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**People's Counsel**

June 29, 2020

**VIA ELECTRONIC FILING**

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street, N.W., Suite 800  
Washington, D.C. 20005

***Re: Formal Case No. 1162, In the Matter of the Application of Washington Gas Light Company for the Authority to Increase Existing Rates and Charges for Gas Service***

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing in the above-referenced proceeding, please find the *Office of the People's Counsel for the District of Columbia's Motion to Withdraw the May 29, 2020 Motion to Compel Washington Gas Light Company to Respond to Data Request No. 11.*

If there are any questions regarding this matter, please contact me at (202) 727-3071.

Sincerely,

/s/ Timothy Oberleiton

Timothy Oberleiton  
Assistant People's Counsel

Enclosure

cc: Parties of record

IN THE MATTER OF )  
THE APPLICATION OF WASHINGTON )  
GAS LIGHT COMPANY'S REQUEST FOR )  
AUTHORITY TO INCREASE EXISTING ) **Formal Case No. 1162**  
RATES AND GAS SERVICE )

## I. INTRODUCTION

## II. BACKGROUND/PROCEDURAL HISTORY

<sup>3</sup> *In the Matter of the Application of Washington Gas Light Company's Request for Authority to Increase Existing Rates and Gas Service*, ("Formal Case No. 1162"), OPC's Data Request No. 11, filed May 15, 2020.

*Objections* to certain data requests of Data Request Set No. 11, including to Data Requests Nos. 11-24(e and g), 11-26(b and e), 11-28(b and e), 11-29(e), 11-30(e), 11-37(a, b, and c), 11-38, 11-39.<sup>4</sup> WGL objected on several grounds, including that certain data requests were irrelevant, outside the scope of the proceeding, required WGL to provide legal conclusions, or otherwise engage in legal research on behalf of OPC.

On May 29, 2020, OPC filed a *Motion to Compel Washington Gas Light Company to Respond to Data Request Set No. 11* (“*Motion to Compel*”),<sup>5</sup> on the grounds that the data requests at issue are directly related to the scope of this case, seek to obtain factual information as opposed to legal conclusions or to have WGL to engage in legal research on OPC’s behalf conclusions, and are reasonably calculated to lead to the discovery of admissible evidence.

On June 4, 2020, WGL responded to OPC’s Data Request Set No. 11,<sup>6</sup> which addressed, *inter alia*, the Data Requests covered by OPC’s *Motion to Compel*.

### **III. ARGUMENT**

Through this pleading, the Office seeks to withdraw the Office’s May 29, 2020 *Motion to Compel*. In that pleading, the Office asked the Commission to (a) overrule Washington Gas Light Company’s (“WGL” or “Company”) May 21, 2020 *Notice of Objections*; (b) grant the Office’s *Motion to Compel*; and (c) issue an order compelling WGL to respond fully to OPC Data Requests Nos. 11-24(e and g), 11-26(b and e), 11-28(b and e), 11-29(e), 11-30(e), 11-37(a, b, and c), 11-38, and 11-39.

As noted above, on June 4, 2020, OPC received WGL’s confidential and public responses

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<sup>4</sup> *Formal Case No. 1162*, WGL’s Notice of Objections, filed May 21, 2020.

<sup>5</sup> *Formal Case No. 1162*, OPC’s Motion to Compel Washington Gas Light Company to Respond to Data Request Set No. 11, filed May 29, 2020.

<sup>6</sup> *Formal Case No. 1162*, WGL’s Confidential and Public Responses to OPC’s Data Request No. 11, June 4, 2020.

to OPC's Data Request Set No. 11. The Office writes to inform the Commission that during the pendency of the *Motion to Compel*, OPC reviewed the June 4, 2020 responses and are satisfied with their contents.

#### IV. CONCLUSION

**WHEREFORE**, the Office requests that the Commission deem OPC's May 29, 2020 *Motion to Compel* withdrawn.

Respectfully submitted,

/s/ Sandra Mattavous-Frye

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**Dated:** June 29, 2020

## **CERTIFICATE OF SERVICE**

### **Formal Case No. 1162, In the Matter of the Application of Washington Gas Light Company for Authority to Increase Existing Rates and Charges for Gas Service**

I certify that on June 29, 2020, a copy of the *Office of the People's Counsel for the District of Columbia's Motion to Withdraw the May 29, 2020 Motion to Compel Washington Gas Light Company to Respond to Data Request No. 11* was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

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