



September 1, 2020

**VIA ELECTRONIC FILING**

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street, NW, Suite 800  
Washington, DC 20005

**Re: Formal Case No. 1142,  
In the Matter of the Merger Application of AltaGas Ltd. and WGL Holdings, Inc.**

Dear Brinda Westbrook-Sedgwick:

Attached please find Sierra Club's Motion for Leave to File a Response and Response of Sierra Club to the August 7, 2020 Correspondence of AltaGas Ltd.

Thank you for your attention to this matter. Should you have any questions, please contact me at [smiller@earthjustice.org](mailto:smiller@earthjustice.org).

Sincerely,

---

Susan Stevens Miller, DC Bar No. 1026066  
Earthjustice  
(443) 534-6401  
[smiller@earthjustice.org](mailto:smiller@earthjustice.org)

*Counsel for Sierra Club*

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF  
THE MERGER APPLICATION OF  
ALTAGAS LTD. AND WGL HOLDINGS,  
INC.**

**Formal Case No. 1142**

---

**MOTION FOR LEAVE TO FILE A RESPONSE AND RESPONSE OF SIERRA CLUB  
TO THE AUGUST 7, 2020 CORRESPONDENCE OF ALTAGAS LTD.**

Pursuant to the Rule 15-105.9 of the Public Service Commission of the District of Columbia’s (“Commission”) Rules of Practice and Procedure,<sup>1</sup> Sierra Club requests leave of the Commission to file a response to the AltaGas Ltd. (“AltaGas” or “Company”) correspondence filed on August 7, 2020.<sup>2</sup> In the August 7<sup>th</sup> letter, the Company disputes Sierra Club’s description of the community public meeting conducted by Washington Gas Light (“WGL”) on July 29, 2020. In support of this Motion, Sierra Club states as follows:

**I. Motion For Leave to Respond**

Consistent with Rule 15-105.9 of the Commission’s Rules of Practice and Procedure, good cause exists to grant Sierra Club leave to submit this Response.<sup>3</sup> On July 31, 2020, AltaGas filed a letter in the above-captioned docket informing the Commission that on June 29, 2020 WGL hosted a public meeting to report on and discuss the Climate Business Plan. On August 4, 2020, Sierra Club filed a reply to the July 31<sup>st</sup> letter.<sup>4</sup> This Reply included an

---

<sup>1</sup> 15 DCMR § 105.9. Pursuant to 15 DCMR § 105.9, no rejoinders or replies to responses shall be accepted without leave of the Commission.

<sup>2</sup> Formal Case No. 1142 (“Formal Case No. 1142”), *In the Matter of the Merger Appl. of AltaGas and WGL*, August 7, 2020 Letter of AltaGas and WGL, at 2 (Aug. 7, 2020) (“August 7<sup>th</sup> Letter”).

<sup>3</sup> *See, e.g.*, Formal Case No. 1017, *In the Matter of the Development and Designation of Standard Offer Service in the District of Columbia*, Order No. 16545, ¶ 5 (Sept. 19, 2011) (granting the Motions for Leave to Respond “in the interest of allowing as much public participation as possible” on the issues in the proceeding).

<sup>4</sup> Formal Case No. 1142, Resp. of Sierra Club to AltaGas Correspondence Regarding the July 29<sup>th</sup> Public Community Meeting on the Climate Business Plan (Aug. 4, 2020) (“Reply”).

affidavit from Mr. Mark Rodeffer, who participated in the virtual meeting. In its Reply, Sierra Club noted that during the public meeting WGL rejected many of the participants questions based on the content of those participants' questions and WGL representatives provided false and misleading information at the meeting. The Sierra Club filed this Reply prior to WGL posting the audio file recording of the public meeting because the Sierra Club could not determine at the time whether WGL intended to make this recording publicly available.

On August 7, 2020, AltaGas filed a letter challenging the veracity of Sierra Club's claims and asserted that "the panel answered all substantive questions about the [Climate Business] Plan" and that "none of the panelists provided the public with any false or misleading information".<sup>5</sup>

On August 12, 2020, WGL posted on YouTube an audio of its July 29, 2020 community public meeting on the company's Climate Business Plan.<sup>6</sup> The audio confirms that Sierra Club's description of the meeting in its Reply with the Commission is accurate. Sierra Club's Reply corrects the misstatements and deficiencies set forth in AltaGas's August 7<sup>th</sup> letter.<sup>7</sup> These misstatements and mischaracterizations cannot remain unaddressed and should not be relied upon by this Commission as a basis for concluding that AltaGas and WGL have met their commitment under the Commission's merger order.<sup>8</sup> Granting Sierra Club's request would ensure that the Commission has all of the accurate information it needs.<sup>9</sup> For these reasons,

---

<sup>5</sup> August 7<sup>th</sup> Letter at n.4, 2.

<sup>6</sup> WGL, *DC Climate Business Plan Public Meeting on July 29, 2020*, Youtube (Aug. 12, 2020), [https://www.youtube.com/watch?v=Ke1kVC\\_WjXw](https://www.youtube.com/watch?v=Ke1kVC_WjXw).

<sup>7</sup> See, e.g., Formal Case No. 766, *In the Matter of the Commission's Fuel Adjustment Clause Audit and Review Program*, Order No. 16427, ¶¶ 35, 52 (July 7, 2011) (granting OPC's Motion for Leave to Respond, which clarified the record and corrected mischaracterizations).

<sup>8</sup> Formal Case No. 1142, Order No. 19396, App. A, Commitment 79 (June 29, 2018).

<sup>9</sup> See, e.g., Formal Case No. 1137, *In the Matter of the Appl. of WGL for Authority to Increase Existing Rates and Charges for Gas Service*, Order No. 19118, at n.7 (Sept. 21, 2017) (granting

Sierra Club respectfully requests that the Commission grant leave to submit this response.

**II. Response to the August 7<sup>th</sup> Letter**

Sierra Club's Response to the August 7<sup>th</sup> letter was originally filed on August 27, 2020 and is included with this motion as Attachment A.

**WHEREFORE**, for the reasons set forth above and in the attached Response, Sierra Club respectfully requests that the Commission grant its Motion for Leave to Respond, accept this Response, and grant Sierra Club the relief set forth in the Response.

Respectfully submitted,



---

Susan Stevens Miller, D.C. Bar No. 1026066  
Staff Attorney, Clean Energy Program  
Earthjustice  
1625 Massachusetts Ave., NW, Ste. 702  
Washington, D.C. 20036  
(202) 667-4500  
smiller@earthjustice.org

---

WGL's Motion for Leave to Respond "[i]n an effort to review a complete record").

## CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> day of September 2020, I caused copies of the foregoing to be electronically delivered to the following:

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street, NW, Suite 800  
Washington, DC 20005  
[bwestbrook@psc.dc.gov](mailto:bwestbrook@psc.dc.gov)

Anjali G. Patel, Esq.  
Office of People's Counsel  
1133 15<sup>th</sup> St. NW, Suite 500  
Washington DC 20005  
[apatel@opc-dc.gov](mailto:apatel@opc-dc.gov)

Christopher Lipscombe  
Lara Walt  
Office of the General Counsel  
Public Service Commission  
of the District of Columbia  
1325 G Street, NW, Suite 800  
Washington, DC 20005  
[CLipscombe@psc.dc.gov](mailto:CLipscombe@psc.dc.gov)  
[lwalt@psc.dc.gov](mailto:lwalt@psc.dc.gov)

Hussain Karim  
Alan J. Barak  
Department of Energy and Environment  
1200 First Street, NE, 5th Floor  
Washington, DC 20002  
[hussain.karim@dc.gov](mailto:hussain.karim@dc.gov)  
[alan.barak@dc.gov](mailto:alan.barak@dc.gov)

Karen Hardwick  
John C. Dodge  
Cathy Thurston-Seignious  
Paul S. Buckley  
Meera Ahamed  
Associate General Counsel  
Washington Gas Light Company  
1000 Maine Ave., S.W.  
Washington, DC 20024  
[cthurston-seignious@washgas.com](mailto:cthurston-seignious@washgas.com)

Brian R. Caldwell  
Assistant Attorney General  
Office of the Attorney General  
441 4th Street, NW  
Washington, DC 20001  
[Brian.caldwell@dc.gov](mailto:Brian.caldwell@dc.gov)

Dennis Jarnouneau  
Andrea Harper  
Kim Hassan  
Pepco  
701 Ninth Street, NW  
Washington, DC 20068  
[djamouneau@pepcoholdings.com](mailto:djamouneau@pepcoholdings.com)

Frann G. Francis, Esq.  
Senior Vice President & General Counsel  
Apartment and Office Building Association  
of Metropolitan Washington  
1025 Connecticut Avenue, NW, Suite 1005  
Washington, DC 20036  
[FFrancis@aoba-rnetro.org](mailto:FFrancis@aoba-rnetro.org)

Emily W. Medlyn  
U.S. Army Legal Services Agency -  
Regulatory Law Office  
927 5 Guns ton Road

Andrew G. Pizor  
National Consumer Law Center  
1001 Connecticut Avenue, NW, Suite 510  
Washington, DC 20036-5528

Fort Belvoir, VA 22060  
[emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

[apizor@nclc.org](mailto:apizor@nclc.org)

Scott H. Strauss, Esq.  
Spiegel & McDiarmid LLP  
1875 I St., NW  
Suite 700  
Washington, DC 20006  
[Scott.strauss@spiegelmcid.com](mailto:Scott.strauss@spiegelmcid.com)

Brian Petruska  
General Counsel  
LiUNA Mid-Atlantic Region  
11951 Freedom Drive, Suite 310  
Reston, VA 20190  
[bpetruska@maliuna.org](mailto:bpetruska@maliuna.org)

Mark Murphy, Esq.  
Mooney, Green, Saindon, Murphy & Welch,  
P.C. on behalf of the International  
Brotherhood of Teamsters Local No. 96  
1920 L Street, NW - Suite 400  
Washington, DC 20036  
[mmurphy@mooneygreen.com](mailto:mmurphy@mooneygreen.com)

J. Joseph Curran, III,  
F. William DuBois,  
Kenneth L. Thompson  
Christopher S. Gunderson  
Venable LLP  
750 East Pratt Street, 7th Floor  
Baltimore, MD 21202  
[JCurran@venable.com](mailto:JCurran@venable.com)

James F. Wallington  
Baptiste & Wilder, P.C.  
1150 Connecticut Avenue, NW, Suite 315  
Washington, DC 20036  
[jwallington@bapwild.com](mailto:jwallington@bapwild.com)

Moxila A. Upadhyaya  
Venable LLP  
600 Massachusetts Avenue, N.W.  
Washington, D.C. 20001  
[MAUpadhyaya@venable.com](mailto:MAUpadhyaya@venable.com)

Bruce Oliver  
Reville Hill Associates, Inc.  
7103 Laketree Drive  
Fairfax Station, VA 22039  
[revilohill@verizon.net](mailto:revilohill@verizon.net)

/s/ Gabriela Rojas-Luna  
Gabriela Rojas-Luna  
Litigation Assistant  
Earthjustice

## **Attachment A**

Formal Case No. 1142, Updated Resp. Regarding The July 29<sup>th</sup> Community Public Meeting on the Climate Business Plan (Aug. 27, 2020).



August 27, 2020

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission of the District of Columbia  
1325 G Street NW, Suite 800  
Washington, DC 20005

**Re: Formal Case No. 1142, In the Matter of the Merger Application of  
AltaGas Ltd. and WGL Holdings, Inc. – Updated Response Regarding  
The July 29<sup>th</sup> Community Public Meeting on the Climate Business Plan**

Dear Ms. Westbrook-Sedgwick:

Sierra Club respectfully files this letter in response to the AltaGas Ltd. (“AltaGas”) and Washington Gas Light Company (“WGL”) (jointly, the “Companies”) letter of August 7, 2020 and to provide updated information to the District of Columbia Commission (“Commission”) regarding the July 29<sup>th</sup> community public meeting on the Climate Business Plan (“public meeting”) hosted by the Companies.

On July 31, 2020, AltaGas filed a letter in the above-captioned docket informing the Commission that the Companies hosted a public meeting to report on and discuss the Climate Business Plan on June 29, 2020. On August 4, 2020, Sierra Club filed a response to this letter (“Response”). This response included an affidavit from Mr. Mark Rodeffer, who participated in the virtual meeting. In its Response, Sierra Club noted that during the public meeting WGL rejected many of the participants questions based on the content of those participants’ questions and WGL representatives provided false and misleading information at the meeting. On August 7, 2020, the Companies filed a letter challenging the veracity of Sierra Club’s claims and asserted that “the panel answered all substantive questions about the [Climate Business] Plan” and that “none of the panelists provided the public with any false or misleading information”.<sup>1</sup>

The audio file recording of the public meeting was not available prior to the filings discussed above. On August 12, 2020, WGL posted on YouTube an audio of its July 29, 2020 community public meeting on the company’s Climate Business Plan.<sup>2</sup> The audio confirms that

---

<sup>1</sup> Formal Case No. 1142, *In the Matter of the Merger Appl. of AltaGas Ltd. and WGL Holdings, Inc.*, August 7, 2020 Letter of AltaGas and WGL, at 2 (Aug. 7, 2020) (“August 7, 2020 Letter”).

<sup>2</sup> WGL, *DC Climate Business Plan Public Meeting on July 29, 2020*, Youtube (Aug. 12, 2020) (“DC Climate Business Plan Public Meeting on July 29, 2020”), [https://www.youtube.com/watch?v=Ke1kVC\\_WjXw](https://www.youtube.com/watch?v=Ke1kVC_WjXw).

Sierra Club’s description of the meeting in its August 4, 2020 filing with the Commission is accurate. The audio demonstrates that WGL refused to ask questions critical of its Climate Business Plan at the meeting and that a senior executive from WGL made false and misleading statements about public health. The audio also demonstrates that WGL’s August 7, 2020 filing before this Commission included a number of falsehoods.

## **SIERRA CLUB VOLUNTEER AND DC RATEPAYER QUESTIONS**

Sierra Club volunteers and other DC ratepayers composed questions about the Climate Business Plan before the meeting. Among the questions from the DC residents and ratepayers were:

- A report from Earthjustice and the Sierra Club<sup>3</sup> found that fossil gas alternatives like manure gas, which your plan calls “low-carbon fuels” are four to 17 times more expensive than fossil gas.<sup>4</sup> How much will you have to increase rates to pay for these expensive gases?
- The Earthjustice/Sierra Club report found that manure gas and other fossil gas alternatives can replace only 13% of current fossil gas consumption.<sup>5</sup> A report from the Natural Resources Defense Council<sup>6</sup> found the alternatives can replace even less - only 3 to 7%.<sup>7</sup> Given the limited supply of these gases, why does your plan rely so heavily on them?
- If the company is unable to reach its target volumes of [Renewable Natural Gas (“RNG”)] at any point, will it make up for the shortfall by using fossil gas, or will it consider the use of non-pipe alternative solutions?

Because WGL imposed a limit on the number of characters that could be used to ask questions through the online forum the company provided, some of the questions had to be slightly altered or broken into two submissions. Despite the barriers that encouraged only brief questions, each of the above questions was submitted by meeting participants. None were asked by the meeting moderator.

## **WGL MODERATOR JOHN FRIEDMAN’S QUESTIONS**

---

<sup>3</sup> Earthjustice and Sierra Club, *Rhetoric vs. Reality: The Myth of Renewable Natural Gas for Building Decarbonization* (July 2020), [https://earthjustice.org/sites/default/files/feature/2020/report-decarb/Report\\_Building-Decarbonization-2020.pdf](https://earthjustice.org/sites/default/files/feature/2020/report-decarb/Report_Building-Decarbonization-2020.pdf).

<sup>4</sup> *Id.* at 2.

<sup>5</sup> *Id.* at 11–12.

<sup>6</sup> Natural Resources Defense Council, *A Pipe Dream Or Climate Solution? The Opportunities And Limits Of Biogas And Synthetic Gas To Replace Fossil Gas* (June 2020), <https://www.nrdc.org/sites/default/files/pipe-dream-climate-solution-bio-synthetic-gas-ib.pdf>.

<sup>7</sup> *Id.* at 5.

As noted above, WGL’s August 7 filing with the Commission states: “Washington Gas and ICF Resources, the independent consultant who assisted in developing the Plan, answered, in substance, every question or topic area that were asked regarding the Plan.” This statement is plainly false, as none of the questions above were asked at the meeting.

Instead, WGL sustainability manager John Friedman, who moderated the meeting, formulated three of his own questions about RNG. Mr. Friedman’s RNG questions, quoted verbatim, were:

1. “We’re getting a number of questions now about renewable natural gas in the chat. And thank you very much for engaging, and engaging right out of the gate, because if you don’t ask questions, then we have to come up with something to answer on our own. So there are questions about renewable natural gas. But in the interest of level setting, can we start out with, what is it, where does it come from? And then we’ll get into some of these other questions about comparative cost and its carbon impact.”<sup>8</sup>
2. “Another follow up question on RNG is, people are questioning and wondering, how much does it cost compared to conventional natural gas and would it be cheaper than renewable electricity. And that’s to anyone on the panel who wants to take it.”<sup>9</sup>
3. “One last question, I think, on renewable natural gas, is, the question has been raised about the volumes of RNG that are available. People are asking about a national study. I know ICF did a regional RNG study, and what did you find? Is there enough of this stuff that we want out there?”<sup>10</sup>

AltaGas’s claim in the August 7<sup>th</sup> filing that at its July 29 meeting WGL “answered, in substance, every question or topic area that were asked” is contradicted by WGL’s audio from the meeting. WGL did not answer, nor even ask, questions from ratepayers regarding how much rates would have to increase to pay for RNG, why WGL chose to rely so heavily on RNG in its plan, and whether WGL would consider non-pipe alternatives if it cannot meet its RNG targets. Instead, Mr. Friedman asked panelists what RNG is, how the cost of RNG compares to electricity from renewable sources, and whether there is “enough of this stuff that we want out there.” These were not the questions posed by Sierra Club volunteers and other DC ratepayers regarding RNG.

AltaGas’s August 7<sup>th</sup> filing states that Mr. Friedman “plainly did not” dismiss a study asked about by meeting participants.<sup>11</sup> In fact, the above verbatim quotes from Mr. Friedman demonstrate that he did not ask questions about how much rates would have to increase to pay for RNG, nor why WGL’s plan relies so heavily on RNG given its limited supply. Both questions cited the “national study” Mr. Friedman dismissed in favor of asking ICF consultant Mike Sloan to opine on his own “regional RNG study.”

---

<sup>8</sup> DC Climate Business Plan Public Meeting on July 29, 2020 at 11:40–12:03 audio mark.

<sup>9</sup> *Id.* at 16:06–16:20 audio mark.

<sup>10</sup> *Id.* at 19:58–20:16 audio mark.

<sup>11</sup> August 7, 2020 Letter at 2.

WGL may disagree with the underlying premises of some of these questions, but WGL made no attempt to explain any differences, nor even ask about them. Instead, Mr. Friedman created his own questions.

## WGL'S FALSE AND MISLEADING PUBLIC HEALTH CLAIMS

Sierra Club's August 4<sup>th</sup> filing accurately notes that WGL assistant vice president and chief social responsibility officer Melissa Adams falsely told meeting participants that:

1. Gas stoves do not emit more chemicals harmful to human health than electric stoves emit; and
2. The health threat from stoves depends not on whether the stoves are gas-fired or use electricity, but instead on the aroma of the food being cooked.

In its August 7<sup>th</sup> response, AltaGas does not address Ms. Adam's statements from the public meeting about gas stoves and public health. However, AltaGas alleges: "[I]mportantly, contrary to Sierra Club's claims, none of the panelists provided the public with any false or misleading information during their presentations or in response to questions from the public."<sup>12</sup> AltaGas further alleges: "[I]n their August 4, 2020 correspondence, Sierra Club materially misrepresents a panelist's response to a question regarding indoor air quality."<sup>13</sup>

The audio of the meeting posted on YouTube contradicts WGL's assertions. At the 55:00 audio mark in the YouTube video, the following exchange occurs:

John Friedman: Another question that has come in has to do with indoor air quality and relating to the differences between electric and gas cooking and some of the studies that have come out recently talking about particulates as well as other irritants that are put into the air when you cook, depending on the fuel source.

Melissa Adams: So, I can start with that. Yes, whenever you cook, in your home, basically, it's a chemical process, and you are essentially, to a certain degree, releasing both particulate matter and emissions and a lot of that is driven by what you're cooking and how you're cooking it. So, high temperature cooking tends to produce more particulates and matter like **things that smell really good tend to actually produce the most emissions. And it doesn't really matter if it's electric or gas.** That's just going to happen. The other point is that you definitely need adequate venting, whether it's electric or gas. Homes are much tighter today and so indoor air quality does become more of an issue. You have off-gassing of many typical residential products. There are many more plastics in our homes today. Carpeting can off-gas. There's all kinds of stuff. And, as the house becomes tighter, venting becomes much more of an issue. We have seen some of these studies. I would say there are, I'm not sure everyone fully agrees with all of the findings of these studies. And we've seen other studies that talk about electric cooking of

---

<sup>12</sup> August 7, 2020 Letter at 2.

<sup>13</sup> *Id.*

certain products and that they create greater emissions. So, you know, you know, we all need to be safe, and I think ventilation is a key factor in any cooking. I know for example, I think it's ovens, when you use your, the oven cleaning function, it's tremendously high temperature and there's all kinds of stuff that's released that can be toxic whether it's gas or electric. So, again, I think venting is extremely important. Mike, do you want to add anything to that?

Mike Sloan: I don't have any particular insights into those issues other than, I do cook with electricity, and my wife will tell you that when I burn dinner, it ruins the air quality in the kitchen. But other than that, I don't have any insights to that question.

John Friedman: That went in a different direction than I was expecting. Let's see if I can get this back on track.

The above transcript of the exchange about the health threat of gas stoves affirms that Ms. Adams did in fact state the aroma of food is the determinant of a stove's health impacts ("...things that smell really good tend to actually produce the most emissions.") and that Ms. Adams said there is no difference in the health impacts of gas and electric stoves ("And it doesn't really matter if it's electric or gas.").

As Sierra Club stated in its August 4<sup>th</sup> filing, Ms. Adams' claims are contrary to research on the topic.<sup>14</sup> Sierra Club is unaware of *any* study or research suggesting that gas-fired stoves do not emit more harmful chemicals than electric stoves and that the aroma of food being cooked is responsible for the stove's adverse health impacts. If WGL is aware of any studies validating Ms. Adams' bizarre claims, Sierra Club requests WGL present these studies.

Sierra Club did not, as AltaGas falsely asserts, "materially misrepresents a panelist's response to a question regarding indoor air quality." In fact, the above transcript shows that Sierra Club's August 4<sup>th</sup> filing accurately described Ms. Adams' outlandish comments on gas stoves and public health. The only material misrepresentations come from Ms. Adams at the public meeting and from AltaGas in its August 7<sup>th</sup> filing with the Commission.

## CONCLUSION

---

<sup>14</sup> Research has shown demonstrated associations between gas stove use and increased respiratory symptoms for household residents, particularly children. UCLA Fielding School of Pub. Health Dep't of Env'tl. Health Sciences, *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California* (Apr. 2020), <https://coeh.ph.ucla.edu/effects-residential-gas-appliances-indoor-and-outdoor-air-quality-and-public-health-california>. Children living in a home with gas cooking have a 42% increased risk of having current asthma, a 24% increased risk of lifetime asthma and an overall 32% increased risk of having current and lifetime asthma. Weiwei Lin, et al., *Meta-analysis of the effects of indoor nitrogen dioxide and gas cooking on asthma and wheeze in children*, 42 Int'l Journal of Epidemiology 1724, 1728–1729 (Dec. 2013), <https://academic.oup.com/ije/article/42/6/1724/737113>.

It is beyond question that WGL rejected questions at the public meeting that WGL believed were critical of its Climate Business Plan, provided false and misleading information to the public at that meeting, and continued its misrepresentations in the AltaGas August 7<sup>th</sup> filing before the Commission. WGL's own audiotape demonstrates that the manner in which WGL conducted the public meeting made a mockery of the public meeting requirement set forth in Commitment Term No. 79. Thus, Sierra Club respectfully reiterates our request that:

1. The Commission find that WGL's public meeting failed to meet the requirement under Commitment Term No. 79 of the AltaGas/Washington Gas merger order to hold bi-annual public meetings;
2. The Commission require WGL to publicly release the video it recorded of its July 29 meeting;
3. The Commission require WGL to record and publicly release the recorded video of all subsequent community public meetings on its Climate Business Plan;
4. The Commission require that in all future community public meetings on its Climate Business Plan, whether held in-person, online or via any other medium or venue, WGL allow meeting participants to ask questions themselves, without prior review by WGL representatives. WGL should be expressly forbidden from censoring questions, refusing to allow certain questions to be asked, and re-wording questions asked by meeting participants; and
5. The Commission should institute an evidentiary proceeding and instruct parties to develop a plan to transition WGL to a business model consistent with DC's climate commitment of carbon neutrality.

Respectfully submitted,



Susan Stevens Miller  
D.C. Bar No. 1026066  
Staff Attorney, Clean Energy  
Program  
Earthjustice  
1001 G St. NW, Ste. 1000  
Washington, D.C. 20001  
(202) 667-4500  
[smiller@earthjustice.org](mailto:smiller@earthjustice.org)

## CERTIFICATE OF SERVICE

I hereby certify that on this 27<sup>th</sup> day of August 2020, a copy of the foregoing was served on the following parties by electronically mail:

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street, NW, Suite 800  
Washington, DC 20005  
[bwestbrook@psc.dc.gov](mailto:bwestbrook@psc.dc.gov)

Anjali G. Patel, Esq.  
Office of People's Counsel  
1133 15<sup>th</sup> St. NW, Suite 500  
Washington DC 20005  
[apatel@opc-dc.gov](mailto:apatel@opc-dc.gov)

Christopher Lipscombe  
Lara Walt  
Office of the General Counsel  
Public Service Commission  
of the District of Columbia  
1325 G Street, NW, Suite 800  
Washington, DC 20005  
[CLipscombe@psc.dc.gov](mailto:CLipscombe@psc.dc.gov)  
[lwalt@psc.dc.gov](mailto:lwalt@psc.dc.gov)

Hussain Karim  
Alan J. Barak  
Department of Energy and Environment  
1200 First Street, NE, 5th Floor  
Washington, DC 20002  
[hussain.karim@dc.gov](mailto:hussain.karim@dc.gov)  
[alan.barak@dc.gov](mailto:alan.barak@dc.gov)

Karen Hardwick  
John C. Dodge  
Cathy Thurston-Seignious  
Paul S. Buckley  
Meera Ahamed  
Associate General Counsel  
Washington Gas Light Company  
1000 Maine Ave., S.W.  
Washington, DC 20024  
[cthurston-seignious@washgas.com](mailto:cthurston-seignious@washgas.com)

Brian R. Caldwell  
Assistant Attorney General  
Office of the Attorney General  
441 4th Street, NW  
Washington, DC 2000 I  
[Brian.caldwell@dc.gov](mailto:Brian.caldwell@dc.gov)

Dennis Jarnouneau  
Andrea Harper  
Kim Hassan  
Pepco  
701 Ninth Street, NW  
Washington, DC 20068  
[djamouneau@pepcoholdings.com](mailto:djamouneau@pepcoholdings.com)

Frann G. Francis, Esq.  
Senior Vice President & General Counsel  
Apartment and Office Building Association  
of Metropolitan Washington  
1025 Connecticut Avenue, NW, Suite 1005  
Washington, DC 20036  
[FFrancis@aoba-metro.org](mailto:FFrancis@aoba-metro.org)

James F. Wallington  
Baptiste & Wilder, P.C.  
1150 Connecticut Avenue, NW, Suite 315  
Washington, DC 20036

Andrew G. Pizor  
National Consumer Law Center  
1001 Connecticut Avenue, NW, Suite 510  
Washington, DC 20036-5528

[jwallington@bapwild.com](mailto:jwallington@bapwild.com)

Scott H. Strauss, Esq.  
Spiegel & McDiarmid LLP  
1875 I St., NW  
Suite 700  
Washington, DC 20006  
[Scott.strauss@spiegelmcid.com](mailto:Scott.strauss@spiegelmcid.com)

Mark Murphy, Esq.  
Mooney, Green, Saindon, Murphy & Welch,  
P.C. on behalf of the International  
Brotherhood of Teamsters Local No. 96  
1920 L Street, NW - Suite 400  
Washington, DC 20036  
[mmurphy@mooneygreen.com](mailto:mmurphy@mooneygreen.com)

Emily W. Medlyn  
U.S. Army Legal Services Agency -  
Regulatory Law Office  
927 5 Guns ton Road  
Fort Belvoir, VA 22060  
[emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

Bruce Oliver  
Reville Hill Associates, Inc.  
7103 Laketree Drive  
Fairfax Station, VA 22039  
[revilohill@verizon.net](mailto:revilohill@verizon.net)

May Va Lor  
Corporate Affairs Department  
LiUNA  
905 16th St., NW, Washington, DC 20006  
[mlor@liuna.org](mailto:mlor@liuna.org)

[apizor@nclc.org](mailto:apizor@nclc.org)

Brian Petruska  
General Counsel  
LiUNA Mid-Atlantic Region  
11951 Freedom Drive, Suite 310  
Reston, VA 20190  
[bpetruska@maliuna.org](mailto:bpetruska@maliuna.org)

J. Joseph Curran, III,  
F. William DuBois,  
Kenneth L. Thompson  
Christopher S. Gunderson  
Venable LLP  
750 East Pratt Street, 7th Floor  
Baltimore, MD 21202  
[JCurran@venable.com](mailto:JCurran@venable.com)

Moxila A. Upadhyaya  
Venable LLP  
600 Massachusetts Avenue, N.W.  
Washington, D.C. 20001  
[MAUpadhyaya@venable.com](mailto:MAUpadhyaya@venable.com)

Dan Dyer  
President, OPEIU Local 2  
AFL-CIO  
8555 16th St., NW, Suite 550  
Silver Spring, MD 20190  
[ddyer@opeiu-local2.org](mailto:ddyer@opeiu-local2.org)

*/s/ Gabriela Rojas-Luna*  
Gabriela Rojas-Luna, Litigation Assistant  
Earthjustice