

September 25, 2020

VIA ELECTRONIC FILING

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 "G" Street, N.W., 8th Floor
Washington, D.C. 20005

Re: FC 1142 - Commitment No. 59 – AltaGas Ltd.’s Request for Commission Determination Regarding Cybersecurity Capability Maturity - PUBLIC

Dear Ms. Westbrook-Sedgwick:

On September 24, 2020, AltaGas Ltd. filed a confidential *Request for the Commission’s Determination that AltaGas Has Achieved an Aggregate Cybersecurity Maturity Comparable to or Greater than Washington Gas*, pursuant to Merger Commitment 59. Attached is the public version of this filing.

Sincerely,



Kate Fischer
Associate General Counsel
AltaGas Ltd.

cc:
Per Certificate of Service

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

**IN THE MATTER OF THE)
MERCER OF ALTAGAS LTD.)
AND WGL HOLDINGS, INC.)**

Formal Case No.: 1142

**ALTAGAS' REQUEST FOR THE COMMISSION'S DETERMINATION
THAT ALTAGAS HAS ACHIEVED AN AGGREGATE CYBERSECURITY
MATURITY COMPARABLE TO OR GREATER THAN WASHINGTON GAS**

I. INTRODUCTION

On June 29, 2018, pursuant to Order No. 19396 issued in the above-captioned proceeding, the Public Service Commission of the District of Columbia ("Commission") approved the merger application of AltaGas Ltd. ("AltaGas"), WGL Holdings, Inc. ("WGL") and Washington Gas Light Company ("Washington Gas") (together, "Companies"), subject to certain conditions set forth in the Order. Merger Condition No. 59 provides, in pertinent part:

1. Washington Gas will continue to operate its existing cybersecurity program on a standalone basis;
2. AltaGas will not reduce the number of staff or capital budget at WGL and Washington Gas dedicated to cybersecurity;
3. AltaGas will continue to invest in its cybersecurity program; and
4. AltaGas will not integrate the information technology ("IT") systems of AltaGas and its pre-Merger affiliates with the IT systems of WGL and its pre-Merger affiliates, including Washington Gas, until the Commission determines that AltaGas has achieved an aggregate cybersecurity

capability maturity comparable to or greater than Washington Gas, as evaluated by a reputable third-party expert.¹

On July 5, 2019 and July 6, 2020, merger compliance notices were filed advising the Commission that AltaGas and Washington Gas have complied with Merger Condition No. 59.

By this filing, and pursuant to Merger Condition No. 59, AltaGas respectfully requests a Commission determination that AltaGas has achieved an aggregate cybersecurity capability maturity comparable to or greater than Washington Gas, as evaluated by a reputable third-party expert. To achieve greater efficiencies and benefit from complementary enhancements to the cybersecurity programs of both AltaGas and Washington Gas, through integration of these respective IT systems, AltaGas respectfully requests that the Commission address this matter without delay.

[REDACTED]

¹ Formal Case No. 1142, Order No. 19396, Appendix A at 21-22 (June 29, 2018).

[Redacted text block]

[Redacted text block]

[Redacted text block]

Respectfully submitted,



Kate Fischer
Associate General Counsel
AltaGas Ltd.

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 25th day of September 2020, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

Christopher Lipscombe, Esq.
Lara Walt, Esq.
Office of General Counsel
Public Service Commission
1325 G St. NW, Suite 800
Washington, DC 20005
clipscombe@psc.dc.gov
lwalt@psc.dc.gov

Frann G. Francis, Esq.
Apartment and Office Building
Association
1025 Connecticut Ave, N.W., Suite
1005
Washington, DC 20036
ffrancis@aoba-metro.org
*Counsel for the Apartment and
Office Building Association*

Anjali G. Patel, Esq.
Office of People's Counsel
1133 15th St. NW, Suite 500
Washington, DC 20005
apatel@opc-dc.gov
*Counsel for the Office of
People's Counsel*

Bruce R. Oliver
Revalo Hill Associates, Inc.
7103 Laketree Drive
Fairfax Station, VA 22039
revilohill@verizon.net

Mark J. Murphey, Esq.
Mooney, Green, Saindon,
Murphy & Welch, PC
1920 L St. NW, Suite 400
Washington, DC 20036
mmurphy@mooneygreen.com
*Counsel for the International
Brotherhood of Teamsters
Local 96*

Brian Caldwell, Esq.
Office of the Attorney General
for the District of Columbia
441 4th St., NW
Washington, DC 20001
brian.caldwell@dc.gov
*Counsel for the District of Columbia
Government*

Andrew G. Pizor, Esq.
National Consumer Law Center
1001 Connecticut Ave, NW
Suite 510
Washington, DC 20036
apizor@nclc.org
*Counsel for the National
Consumer Law Center*

Alan Barak, Esq.
Hussain Karim, Esq.
Department of Energy and
Environment
1200 1st St., NE, 5th Floor
Washington, DC 20002
Alan.barak@dc.gov
Hussain.karim@dc.gov
*Counsel for the District of Columbia
Government*

Emily W. Medlyn, Esq.
U.S. Army Legal Services
Agency Regulatory Law Office
9275 Gunston Rd.
Fort Belvoir, VA 22060
emily.w.medlyn.civ@mail.mil
*Counsel for the Department
of Defense and all other
Federal Executive Agencies*

James F. Wallington, Esq.
Baptiste & Wilder, P.C.
1150 Connecticut Ave., NW
Suite 315
Washington, DC 20036
jwallington@bapwild.com
*Counsel for OPEIU Local 2,
AFL-CIO*

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

May Va Lor
Corporate Affairs Department
LiUNA
905 16th St., NW
Washington, DC 20006
mlor@liuna.org

Scott H. Strauss, Esq.
Spiegel & McDiarmid LLP
1875 I St., NW
Suite 700
Washington, DC 20006
scott.strauss@spiegelmc.com
*Counsel for the District of Columbia
Government*

Kim Hassan, Esq.
Andrea H. Harper, Esq.
Dennis Jamouneau, Esq.
Potomac Electric Power Company
701 9th St. NW, Suite 1100
Washington, DC 20068
djamouneau@pepcoholdings.com
*Counsel for Potomac Electric Power
Company*

Brian Petruska, Esq.
General Counsel, LiUNA Mid-
Atlantic Region
11951 Freedom Dr., Suite 310
Reston, VA 20190
bpetruska@maliuna.org
*Counsel for the Baltimore
Washington Construction & Public
Employees Laborers' District
Council*



KATE FISCHER