

April 26, 2021

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: Formal Case No. 1164
[Washington Gas - Retroactive Expansion of RES Qualifications]**

Dear Ms. Westbrook-Sedgwick:

The Workgroup meetings in Formal Case No. 1164 have been discussing the possibility of expanding the eligibility requirements for a customer's participation in the Washington Gas Light Company's ("Washington Gas" or the "Company") Residential Essential Services ("RES") program on a temporary basis. The Company has been requested to calculate the "estimated" costs that would result from an eligibility expansion. The attached analysis shows different estimated participation rates of newly eligible customers - ranging from 15% to 35%, along with projected cost data. A DOEE submission was made on April 23, 2021 explaining the proposed changes.

Washington Gas would "guesstimate" that a 15% increase in the program enrollment (per DOEE presentation at Workgroup meeting) is the best estimate to use. Based on the 15% enrollment increase, the Company is projecting an additional cost of **\$1.2 million** for the period November 2021 - April 2022 - with all credits at the 100% RES credit level approved in Case No. 1162, the Company's last rate case. If the expanded eligibility would allow newly eligible customers to receive credits for current (November 2020 - April 2021) RES period, that would result in an additional cost of this RES credit to be **\$750,000** to the current RES year, based on the November 2020-March 2021 at a 55% RES credit, and April 2021 at 100% based on the Formal Case No. 1162 approved Settlement Agreement.

If the Commission approves the expanded eligibility for the November 2020 through April 2021 period, the Company would make a filing based on that Order to revise its RES surcharge for the remainder of the current RES surcharge period.

Please feel free to contact me, if you have additional questions.

Sincerely,

Robert C. Cain, II
Robert C. Cain, II
Associate General Counsel

Pc: Per Certificate of Service

Washington Gas Light Company
Residential Essential Service Expansion Surcharge Revision
For the Period June Through November 2021

Line No.	Current Eligibility a/		Forecasted Throughput June-November 2021	77,217,000 therms
	Category	Households		
1	SNAP Eligible	15,119	Forecasted Throughput Nov 2021 - Oct 2022	235,749,000 therms
2	Non-SNAP Eligible	11,444		
3	Total Eligible	26,563		
4	Participants	8,602		
5	% Participation	32.38%		

Line No.	Newly Eligible a/	
	Category	Households
6	60-70% SMI	3,713
7	70-80% SMI	4,570
8	80% SMI - 80% AMI	12,635
9	Total Newly Eligible	20,918

Impact On 2020-2021 RES Season

10	Estimated RES Credits Per Customer 2020-2021 Heating Season		
11	\$1,987,062 2020-2021 Estimated RES Credits including April at 100% Credit		
12	8,602	# participants	
13	\$231.00 Estimated Credit Per RES Customer b/		

14 Estimated Participation Assuming Various Participation Rates @ 80% AMI

Assumed Participation						Current and	+ Additional Surcharge	= Net RES Surcharge
16	Rate a/	Estimated Participants	Estimated RES Surcharge	\$ Increase	% Increase	Reconciliation Factor	Required for Expansion	June-Nov 2021
17	15%	11,740	\$2,711,870.70	\$724,808.70	36%	\$0.0155	\$0.0094	\$0.0249
18	20%	12,786	\$2,953,473.60	\$966,411.60	49%	\$0.0155	\$0.0125	\$0.0280
19	25%	13,832	\$3,195,076.50	\$1,208,014.50	61%	\$0.0155	\$0.0156	\$0.0311
20	30%	14,877	\$3,436,679.40	\$1,449,617.40	73%	\$0.0155	\$0.0188	\$0.0343
21	35%	15,923	\$3,678,282.30	\$1,691,220.30	85%	\$0.0155	\$0.0219	\$0.0374

22 November 2021-October 2022

23	Estimated RES Credits Per Customer 2021-2022 Heating Season		
24	\$3,284,400 2021-2022 Estimated Future RES Credits At Current Eligibility		
25	8,602	# participants	
26	\$381.82 Estimated Credit Per RES Customer		

27 Estimated Participation Assuming Various Participation Rates @ 80% AMI

Participation Rate	Estimated Participants	Estimated RES Surcharge	\$ Increase	% Increase	Required Surcharge at Current Eligibility	Additional Surcharge Required	Net Surcharge Nov-October 2021
15%	11,740	\$4,498,554.98	\$1,202,340.43	36%	\$0.0140	\$0.0051	\$0.0191
20%	12,786	\$4,899,335.12	\$1,603,120.57	49%	\$0.0140	\$0.0068	\$0.0208
25%	13,832	\$5,300,115.26	\$2,003,900.72	61%	\$0.0140	\$0.0085	\$0.0225
30%	14,877	\$5,700,895.41	\$2,404,680.86	73%	\$0.0140	\$0.0102	\$0.0242
35%	15,923	\$6,101,675.55	\$2,805,461.00	85%	\$0.0140	\$0.0119	\$0.0259

a/ Eligibility and participation rate data provided by DOEE

b/ See Page 2

Determination of Average Credit Per Customer

2020-2021 Average RES Credits Per Customer

Line No.		NW therms		Estimated Credits Per Customer		April at 100% RES Credit
1	November	56	\$	20	\$	20
2	December	96	\$	34	\$	34
3	January	128	\$	45	\$	45
4	February	138	\$	48	\$	48
5	March	106	\$	37	\$	37
6	April	74	\$	26	\$	47
7		598	\$	210	\$	231

Determination of Average RES Credit Per Customer for 2021-2022 Heating Season

8	Estimated RES Credits Per Customer 2021-2022 Heating Season		
9	\$	1,806,420	Current RES Credits at 55% Level (= Line 7 * Line 12)
10	\$	3,284,400	Current RES Credits at 100% Level (=Line 9/.55)
12		8,602	# participants
13	\$	381.82	Estimated Credit Per RES Customer (=Line 10/Line 11)

Washington Gas Light Company
District of Columbia
Budgeted Therms Jun-Nov 2021

Line No.	Description	Jun-2021	Jul-2021	Aug-2021	Sep-2021	Oct-2021	Nov-2021	Total						
1	<u>BUDGET THERM SALES - CYCLE</u>													
2	D.C. - Firm Sales - Res	2,238,000	1,601,000	1,461,000	1,456,000	2,291,000	6,388,000	15,435,000						
3	D.C. - Firm Sales - C&I	1,490,000	1,449,000	1,449,000	1,460,000	1,543,000	3,030,000	10,421,000						
4	D.C. - Firm Sales - GMA	506,000	523,000	513,000	518,000	545,000	1,195,000	3,800,000						
5	Total D.C. Firm Sales	4,234,000	3,573,000	3,423,000	3,434,000	4,379,000	10,613,000	29,656,000						
6	<u>BUDGET DELIVERY THERMS - CYCLE</u>													
7	D.C. - Firm Delivery - Res	313,000	223,000	204,000	203,000	320,000	893,000	2,156,000						
8	D.C. - Firm Delivery - C&I	2,695,000	2,615,000	2,642,000	2,655,000	2,725,000	4,765,000	18,097,000						
9	D.C. - Firm Delivery - GMA	813,000	842,000	825,000	833,000	878,000	1,956,000	6,147,000						
10	Total D.C. Firm Delivery	3,821,000	3,680,000	3,671,000	3,691,000	3,923,000	7,614,000	26,400,000						
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11	D.C. - Interruptible Delivery	3,187,000	3,085,000	3,072,000	3,050,000	3,066,000	5,701,000	21,161,000						
12	Total	11,242,000	10,338,000	10,166,000	10,175,000	11,368,000	23,928,000	77,217,000						
13	<u>BUDGET THROUGHPUT THERMS - CYCLE</u>	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-Oct
14	D.C. - Firm Throughput - Res	10,929,000	15,595,000	21,230,000	16,592,000	12,307,000	5,616,000	3,642,000	141,000	1,751,000	1,661,000	4,102,000	4,590,000	98,156,000
15	D.C. - Firm Throughput - C&I	9,846,000	11,998,000	15,592,000	13,101,000	10,761,000	5,678,000	5,112,000	3,997,000	4,283,000	4,276,000	4,522,000	7,045,000	96,211,000
16	D.C. - Firm Throughput - GMA	3,974,000	5,254,000	6,608,000	5,604,000	4,540,000	2,835,000	1,230,000	1,342,000	1,480,000	1,424,000	1,487,000	2,828,000	38,606,000
17	Total D.C. Firm Throughput	24,749,000	32,847,000	43,430,000	35,297,000	27,608,000	14,129,000	9,984,000	5,480,000	7,514,000	7,361,000	10,111,000	14,463,000	232,973,000
18	D.C. - Interruptible Delivery	5,701,000	8,831,000	10,459,000	10,309,000	9,050,000	6,801,000	4,161,000	2,935,000	2,817,000	2,804,000	2,777,000	2,776,000	2,776,000
19	Total	30,450,000	41,678,000	53,889,000	45,606,000	36,658,000	20,930,000	14,145,000	8,415,000	#####	10,165,000	12,888,000	17,239,000	235,749,000

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 26th day of April 2021, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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