



1000 Maine Avenue, SW
Suite 700
Washington, DC 20024
www.washingtongas.com

cthurston-seignious@washgas.com

November 6, 2023

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. 1154
[Washington Gas's Motion for Extension of PIPES 2 Plan]**

Dear Ms. Westbrook-Sedgwick:

Pursuant to 15 DCMR § 105.8, Washington Gas Light Company hereby submits its Motion for Extension of the PROJECT *pipes* 2 Plan.

Sincerely,

Cathy Thurston-Seignious
Supervisor, Administrative and
Associate General Counsel

cc: Per Certificate of Service

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

IN THE MATTER OF)
)
APPLICATION OF WASHINGTON GAS)
LIGHT COMPANY FOR APPROVAL OF) Formal Case No. 1154
PROJECTPIPES 2 PLAN)
)
_____)

**WASHINGTON GAS LIGHT COMPANY’S
MOTION FOR EXTENSION OF THE PROJECTPIPES 2 PLAN**

Pursuant to 15 DCMR § 105.8, Washington Gas Light Company (“Washington Gas” or “Company”) hereby submits this Motion for Extension of the PROJECT*pipes* 2 Plan (“Motion”), in the above-captioned proceeding. In support of this Motion, Washington Gas states as follows:

1. On December 7, 2018, Washington Gas filed with the Public Service Commission of the District of Columbia (“Commission”) an Application for Approval of the PROJECT*pipes* 2 (“PIPES 2”) Plan, to accelerate the replacement of higher risk pipe in the Company’s gas distribution system (“Application”).¹
2. By Order No. 20671, the Commission granted, in part and subject to certain conditions, approval of the Application. The Commission approved a three-year plan (covering the period January 1, 2021 – December 31, 2023), with

¹ Formal Case No. 1115, Washington Gas Light Company’s Application for Approval of PROJECT*pipes* 2 Plan (December 7, 2018).

a \$150 million total spending cap for the term of the plan, as well as a continuation of the PROJECT*pipes* surcharge (“PIPES Surcharge”). Programs 1 (Bare and Unprotected Wrapped Steel Services); 2 (Bare and Unprotected Wrapped Steel Main); 3 (Vintage Mechanically Coupled Main and Services); 4 (Cast Iron Main); 5 (Copper Services); and 10 (Work Compelled by Others) were approved for cost recovery through the PIPES Surcharge. Program 9 (Advanced Leak Detection) was approved by the Commission for implementation but not for cost recovery through the PIPES Surcharge.²

3. The Commission approved Program 10 (Work Compelled by Others) for recovery under the PIPES Surcharge, with annual caps set at \$12.5 million for 2021-2022, \$12.5 million for 2022-2023, and \$17.5 million for 2023-2024, totaling \$42.5 million over the three years of the plan.
4. As directed in Order No. 20671, the Company filed an Application for Approval of the PROJECT*pipes* 3 (“PIPES 3”) Plan, on December 22, 2022, 12 months prior to the conclusion of the PIPES 2 Plan, to continue the PROJECT*pipes* program.³
5. The Commission opened Formal Case No. 1175 to evaluate the PIPES 3 Plan and established a comment period to address issues presented in that

² Formal Case No. 1154, Order No. 20671 (December 11, 2020).

³ Formal Case No. 1175, Washington Gas Light Company’s Application for Approval of PROJECT*pipes* 3 Plan (December 22, 2022).

proceeding.⁴ The Office of the People's Counsel for the District of Columbia filed two (2) requests for additional time to submit comments on the PIPES 3 Plan, which the Commission granted.⁵ These extension requests contributed to the inordinate delay in this proceeding before the end of the PIPES 2 Plan. Nonetheless, comments and reply comments on the PIPES 3 Plan have been filed. The Commission has not issued a procedural schedule for the remainder of the proceeding.

6. In anticipation of the imminent conclusion of the PIPES 2 Plan, on December 31, 2023, and to provide the Commission a reasonable period of time to issue a procedural schedule (including provision for supplemental direct testimony to update the Company's request, given the lengthy passage of time since the Application was filed), evaluate the management audit report of the PIPES 2 Plan and render a decision on the PIPES 3 Plan, Washington Gas hereby seeks a one-year extension of the PIPES 2 Plan, through December 31, 2024.
7. To ensure the continuation of this replacement work, without interruption, and in order to have adequate qualified contractor crews for this extension period, the Company requests that the Commission approve a one-year extension of the PIPES 2 Plan, as well as the PROJECT*pipes* Surcharge, with total expenditures recovered through the PIPES Surcharge not to

⁴ Formal Case No. 1175, Public Notice (January 20, 2023).

⁵ See Formal Case No. 1175, Order No. 21573 (February 17, 2023) and Order No. 21613 (May 10, 2023).

exceed \$57.3 million for the term of the one-year extension period. This proposed spending cap is the same as the spending level approved by the Commission in Order No. 20671, for CY2023.⁶ The Current Factor for the 12-month extension period is attached.

8. Extension of the PIPES 2 Plan will also allow the Company to support an amount of replacement work resulting from the Potomac Electric Power Company's ("Pepco") DC PLUG initiative. This important and necessary work has been discussed in various Company filings, including Washington Gas's Petition for Leave to Intervene Out-of-Time ("Petition"), in Formal Case No. 1168 (DC PLUG), and a Technical Conference convened by Commission Staff in that docket, which was held on May 18, 2023.⁷ In approving the Company's Petition, the Commission stated:

Given: (1) the extent of WGL's cast iron facilities throughout the District that will be impacted by DC PLUG activity; (2) the plans for increased construction activity; (3) the danger involved in undergrounding electric lines near gas lines; and (4) the immediate need for cooperation among the contractors and the utilities, we believe it is in the best interest of all to grant WGL full party status in these proceedings to enable it to have an immediate voice and role in the safe coordination of the undergrounding construction and relocation of its facilities. In light of this and noting that no objections were filed to WGL's Petition, we believe that full intervention as a party in these proceedings is warranted at this time in the interest of

⁶ Formal Case No. 1154, Order No. 20671 at 39. The Company proposes that recovery of funding, through the PIPES Surcharge, for Program 10 for the one-year extension period will remain at \$17.5 million, as approved by the Commission for CY2023. It should be noted, however, that \$17.5 million will not cover all of the Company's anticipated costs for pipe replacements associated with DC PLUG activity in CY2024 while also fulfilling its other public service obligations to maintain a safe and reliable distribution system, and funding for any work beyond the \$17.5 million may be limited based on the scope and scale of the projects.

⁷ Formal Case No. 1168, Washington Gas Light Company's Petition for Leave to Intervene Out-of-Time (May 17, 2023).

safety to the public as well as for the smooth transition from overhead to underground electric lines and the safe relocation of all utility facilities.⁸

9. The Company continues to solicit Commission support in coordinating with Pepco and the District Department of Transportation in managing the DC PLUG work in proximity to Cast Iron main, to ensure the safety of the Company's distribution system, recognizing that resources and available crews are not unlimited.
10. Washington Gas proposes to file a CY2024 Project List, within 30 days of approval of this Motion, if granted.
11. No party will be prejudiced by the requested relief, in that the Company is proposing to work on Commission-approved replacement projects that have not yet been completed or work on replacing eligible pipe material under one of the approved PIPES 2 programs.
12. Any delay in approval of an extension of the PIPES 2 Plan would prohibit the continued replacement of higher risk pipe which enhances the safety of the gas distribution system and reduces greenhouse gas emissions from leaking pipe.

WHEREFORE, for the reasons set forth herein, Washington Gas respectfully requests that the Commission grant this Motion to extend the PIPES 2 Plan and PROJECT*pipes* Surcharge, for one year, until December 31, 2024, at a spending level of

⁸ Formal Case No. 1168, Order No. 21640 at 4 (June 15, 2023).

\$57.3 million. The Company respectfully requests that the Commission render its decision on this Motion before the end of this calendar year.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Cathy Thurston-Seignious", with a stylized flourish at the end.

CATHY THURSTON-SEIGNIOUS
Supervisor, Administrative and
Associate General Counsel

WASHINGTON GAS LIGHT COMPANY
1000 Maine Avenue, SW, 7th Floor
Washington, D.C. 20024

WASHINGTON GAS LIGHT COMPANY - DISTRICT OF COLUMBIA
 CALCULATION OF PIPES SURCHARGE

Formal Case No. 1154
 PROJECT *pipes 2* Extension
 Current Factor 2024
 Page 1 of 9

<u>Line No.</u>	<u>Description</u>		<u>Calendar Year 2024</u>
1	Plant additions (Page 2 of 9)		\$142,944,602
2	Rate of Return on Investment (Page 2 and 3 of 9)		\$10,822,946
3	Revenue Conversion Factor (Page 4 of 9)	Ln 2 * 1.404408	\$15,199,832
4	Depreciation (Pages 5-7 of 9)		\$ 1,730,901
5	Interest Synchronization (Page 7 of 9)		\$ (647,695)
6	Carrying Cost a/		n/a
7	TOTAL COSTS	Lines 3+4+5+6	\$16,283,039

		<u>%</u>	
8	ALLOCATION b/		
9	Residential	50.56%	\$10,132,935
10	Commercial & Industrial	27.67%	\$3,377,102
11	Group-Metered Apartments	12.14%	\$1,353,121
12	Interruptible	9.63%	\$1,419,881
		100.00%	\$16,283,039

<u>January-December 2024</u>			
	<u>Customer Class</u>	<u>Budgeted Therms</u>	<u>Current Factor For 2024</u>
18	Residential	92,550,000	\$ 0.1095
19	Commercial & Industrial	79,497,000	\$ 0.0425
20	Group-Metered Apartments	34,072,000	\$ 0.0397
21	Interruptible	72,554,000	\$ 0.0196

a/ Amount to be determined when annual reconciliation performed
 b/ Based on net rate base in Class Cost of Service Study in Case No. 1162 (Page 9 of 9).
 c/ Based on budgeted normal weather therms for Calendar Year 2024.(Page 8 of 9)

	<u>Distribution</u> <u>Services</u> A	<u>Distribution</u> <u>Mains</u> B	<u>Total</u> D	<u>Cummulative</u> E	<u>Average</u> <u>Rate Base</u> F	<u>Depreciation</u> <u>Reserve</u> G	<u>Accumulated</u> <u>Deferred</u> <u>Income Tax</u> H	<u>Net</u> <u>Rate Base</u> I	<u>Return On Net</u> <u>Rate Base</u> J
Beginning Balance Dec 31, 2023			\$174,013,682			\$7,419,294	\$ (42,304,405)	\$ 124,289,983	
Jan-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$178,788,682	\$ 176,401,182	\$ 7,685,469	\$ (43,550,722)	\$ 125,164,990	\$ 789,731
Feb-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$183,563,682	\$ 181,176,182	\$ 7,958,533	\$ (44,797,040)	\$ 128,420,608	\$ 810,273
Mar-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$188,338,682	\$ 185,951,182	\$ 8,238,486	\$ (46,043,358)	\$ 131,669,338	\$ 830,771
Apr-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$193,113,682	\$ 190,726,182	\$ 8,525,327	\$ (47,289,676)	\$ 134,911,179	\$ 851,225
May-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$197,888,682	\$ 195,501,182	\$ 8,819,056	\$ (48,535,994)	\$ 138,146,132	\$ 871,636
Jun-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$202,663,682	\$ 200,276,182	\$ 9,119,674	\$ (49,782,311)	\$ 141,374,197	\$ 892,004
Jul-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$207,438,682	\$ 205,051,182	\$ 9,427,180	\$ (51,028,629)	\$ 144,595,373	\$ 912,328
Aug-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$212,213,682	\$ 209,826,182	\$ 9,741,574	\$ (52,274,947)	\$ 147,809,660	\$ 932,608
Sep-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$216,988,682	\$ 214,601,182	\$ 10,062,857	\$ (53,521,265)	\$ 151,017,060	\$ 952,846
Oct-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$221,763,682	\$ 219,376,182	\$ 10,391,028	\$ (54,767,583)	\$ 154,217,571	\$ 973,039
Nov-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$226,538,682	\$ 224,151,182	\$ 10,726,088	\$ (56,013,900)	\$ 157,411,193	\$ 993,189
Dec-24	\$ 1,671,250	\$ 3,103,750	\$ 4,775,000	\$231,313,682	\$ 228,926,182	\$ 11,068,036	\$ (57,260,218)	\$ 160,597,927	\$ 1,013,296
	\$ 20,055,000	\$ 37,245,000	\$ 57,300,000		\$ 202,663,682	\$ 9,313,609	\$ (50,405,470)	\$ 142,944,602	\$ 10,822,946

Washington Gas Light Company
Utility Cost of Capital
District of Columbia

Formal Case No. 1154
PROJECT *pipes 2* Extension
Current Factor 2024
Page 3 of 9

Twelve Months Ended September 30, 2015

Formal Case No. 1137

<u>Description</u>	Capital Structure		Return
	<u>Ratio</u>	<u>Cost</u>	
A	B	C	D = B * C
Short Term Debt	3.090%	1.06%	0.033%
Long-Term Debt	39.660%	5.83%	2.312%
Preferred Stock	1.550%	4.79%	0.074%
Common Equity	55.700%	9.25%	5.152%
Total			<u>7.57%</u>

**WASHINGTON GAS LIGHT COMPANY - DISTRICT OF COLUMBIA
REVENUE CONVERSION FACTOR**

**Formal Case No. 1154
PROJECT *pipes 2* Extension
Current Factor 2024
Page 4 of 9**

<u>Ln. No.</u>	<u>Description</u>	<u>Reference</u>	<u>Amount</u>
A	B	C	D
1	State Tax Rate	Statutory	8.250%
2	Federal Tax Rate	Statutory	21.00%
3	Federal Tax Rate Net of State Taxes	=Ln. No. 2*(1-Ln. No.1)	19.27%
4	Composite Tax Rate	=Ln. No.1 + 3	<u>27.518%</u>
5	Compliment of Composite Tax Rate	=1-Ln. No.4	<u>72.483%</u>
6	Revenue Gross Up, Excluding Uncollectible Accounts	=1/Ln. No.5	<u>1.379643</u>
7	Uncollectible Rate	Case No. 1137	<u>1.7950%</u>
8	Uncollectible Conversion Factor	=Ln. No.6 X Ln.No. 7	<u>0.024765</u>
9	Revenue Conversation Factor	=Ln No.6 + 8	<u>1.404408</u>

**WASHINGTON GAS LIGHT COMPANY - DISTRICT OF COLUMBIA
 ANNUAL PLANT BALANCES AND DEPRECIATION EXPENSE**

**Formal Case No. 1154
 PROJECT pipes 2 Extension
 Current Factor 2024
 Page 5 of 9**

	PLANT IN SERVICE			DEPRECIATION EXPENSE					
	<u>Distribution</u>	<u>Distribution</u>	Total	<u>Distribution</u>	<u>Distribution</u>	Total	Monthly	Accumulated	Deferred
	<u>Services</u>	<u>Mains</u>	<u>Plant</u>	<u>Services</u>	<u>Mains</u>	<u>Depr. Exp.</u>	<u>Depreciation</u>	<u>Depreciation</u>	<u>Income tax</u>
	A	B	D	E	F	b/ G	H	I	J
Depreciation Rates a/				2.40%	2.07%				
Oct 15-Dec2023			\$147,113,756				\$259,287	\$ 7,419,294	(\$42,304,405)
Jan-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$266,176	\$ 7,685,469	\$ (43,550,722)
Feb-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$273,064	\$ 7,958,533	\$ (44,797,040)
Mar-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$279,952	\$ 8,238,486	\$ (46,043,358)
Apr-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$286,841	\$ 8,525,327	\$ (47,289,676)
May-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$293,729	\$ 8,819,056	\$ (48,535,994)
Jun-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$300,618	\$ 9,119,674	\$ (49,782,311)
Jul-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$307,506	\$ 9,427,180	\$ (51,028,629)
Aug-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$314,394	\$ 9,741,574	\$ (52,274,947)
Sep-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$321,283	\$ 10,062,857	\$ (53,521,265)
Oct-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$328,171	\$ 10,391,028	\$ (54,767,583)
Nov-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$335,060	\$ 10,726,088	\$ (56,013,900)
Dec-24	\$1,397,873	\$2,596,051	\$3,993,924	\$2,796	\$4,478	\$6,888	\$341,948	\$ 11,068,036	\$ (57,260,218)
	\$8,387,240	\$15,576,303	\$171,077,300			\$41,330	\$1,700,380		

a/ Based on Commission rates approved in Formal Case No. 1137.

b/ Total Depreciation has been reduced by 5.3% to reflect the cost of retired plant

c/ Plant in Service estimated at 83% of total expenditure

E. Annual Depreciation Rates¹⁰¹⁹

FD 1137 Commission on 4-1
 Attachment 4-10
 Page 1 of 2

WASHINGTON GAS LIGHT COMPANY - DISTRICT OF COLUMBIA
 Comparison of Current and SFAS 143 Accrual Rates
 Current: VG Procedure / RL Technique
 Updated: VG Procedure / RL Technique
 Accrual Rate: 3.32 Percent

Statement A

Account Description	Current			SFAS 143		
	Investment D	Net Salvage C	Total D-C	Investment E	Net Salvage F	Total E-F
STORAGE AND PROCESSING PLANT						
Allocated Property						
361.00 Structures and Improvements						
Maryland (Rockville)	2.75%	0.80%	3.64%	2.39%	0.76%	3.15%
Virginia (Ravenworth)	2.63%	0.51%	3.14%	2.47%	0.50%	2.97%
Total Account 361.00	2.69%	0.71%	3.70%	2.43%	0.63%	3.06%
362.00 Gas Holders						
Maryland (Rockville)	1.67%	0.50%	2.23%	1.59%	0.67%	2.26%
Virginia (Ravenworth)	1.75%	0.33%	2.08%	1.78%	0.34%	2.12%
Total Account 362.00	1.70%	0.46%	2.17%	1.78%	0.47%	2.20%
363.00 Other Equipment						
Maryland (Rockville)	2.66%		2.66%	5.30%	0.11%	6.41%
Virginia (Ravenworth)	-0.67%	5.30%	5.63%	1.97%	1.64%	3.51%
Total Account 363.00	2.00%	1.46%	3.53%	4.59%	0.48%	6.00%
Total Allocated Property	1.87%	0.67%	2.44%	2.02%	0.68%	2.62%
Total Storage and Processing Plant	1.87%	0.67%	2.44%	2.02%	0.68%	2.62%
TRANSMISSION PLANT						
Assigned Property						
365.20 Rights of Way						
366.00 Masts and Reg. Station Structures						
367.10 Masts - Steel	1.02%	0.15%	1.17%	0.50%	0.10%	0.60%
369.00 Measuring and Regulating Equipment	1.91%	0.15%	2.12%	1.09%	0.20%	1.29%
Total Assigned Property	1.50%	0.18%	1.63%	0.82%	0.15%	0.97%
Allocated Property						
365.30 Rights of Way						
District	1.76%		1.76%	0.33%		0.33%
Maryland	1.68%		1.68%	1.60%		1.60%
Virginia	1.49%		1.49%	1.10%		1.10%
Total Account 365.30	1.55%		1.55%	1.26%		1.43%
366.00 Masts and Reg. Station Structures						
Maryland	1.98%		1.98%	0.33%	1.04%	1.67%
Virginia	2.04%	0.20%	2.24%	1.38%	0.02%	1.36%
Total Account 366.00	2.01%	0.12%	2.13%	1.00%	0.41%	1.44%
367.10 Masts - Steel						
District	0.88%	0.18%	1.13%	1.00%	0.10%	1.15%
Maryland	1.06%		1.06%	1.44%	-0.03%	1.41%
Virginia	1.54%	0.25%	1.79%	1.47%	0.10%	1.57%
Total Account 367.10	1.50%	0.11%	1.61%	1.42%	0.09%	1.45%
369.00 Measuring and Regulating Equipment						
District	1.67%	0.21%	1.88%	-0.16%	0.20%	0.02%
Maryland	1.82%	0.29%	2.21%	0.29%	2.40%	2.69%
Virginia	1.87%	0.48%	2.60%	0.60%	0.60%	0.60%
Total Account 369.00	1.92%	0.33%	2.17%	0.30%	1.06%	2.02%
Total Allocated Property	1.83%	0.18%	1.81%	1.01%	0.55%	1.59%
Total Transmission Plant	1.61%	0.18%	1.72%	1.03%	0.89%	1.53%
DISTRIBUTION PLANT						
Assigned Property						
376.00 Structures and Improvements						
376.10 Masts - Steel	1.28%	0.37%	1.65%	0.67%	0.39%	1.08%
376.20 Masts - Plastic	1.61%	0.46%	2.07%	1.55%	0.67%	2.10%
376.30 Masts - Cast Iron	0.47%	1.16%	1.63%	-1.78%	1.14%	-0.64%
376.40 Masts - Copper						
377.00 Compressor Station Equipment						
378.00 Measuring and Regulating Equipment	1.19%	0.11%	1.30%	1.08%	0.12%	1.22%
380.10 Services - Steel	1.67%	1.63%	3.30%	1.18%	0.91%	2.09%
380.20 Services - Plastic	1.82%	0.68%	2.49%	1.42%	0.73%	2.19%
380.30 Services - Copper	1.07%	1.40%	2.47%	-1.86%	1.48%	-0.40%

¹⁰¹⁹ The following tables are from Commission Exhibit No. 9 (WGL's Response to Commission Data Requests, Question No. 4-1.)

CALCULATION OF INTEREST SYNCHRONIZATION

2024

1 Rate Base	\$142,944,602
2 Debt Return %	<u>2.34%</u>
3 Line 1 *Line 2*.5	\$1,675,977
4 Tax Rate	<u>27.518%</u>
5 Line 3 * Line 4	\$461,187
6 Revenue Conversion Factor	1.404408
7 Line 5 * Line 6	(\$647,695)

CALCULATION OF DEPRECIATION w/ REVENUE CONVERSION FACTOR

2024

8 Depreciation Amount (Page 5)	\$ 1,700,380
9 Tax Rate Compliment	0.72483
10 Line 8 * Line 9	\$1,232,478
11 Revenue Conversion Factor	1.404408
12 Line 10 * Line 11	\$1,730,901

WASHINGTON GAS LIGHT COMPANY - DISTRICT OF COLUMBIA
 BUDGET THROUGHPUT THERMS
 January-December 2024

Formal Case No. 1154
 PROJECT *pipes 2* Extension
 Current Factor 2024
 Page 8 of 9

Line	Description	January-24	February-24	March-24	April-24	May-24	June-24	July-24	August-24	September-24	October-24	#####	December-24	Total
1	<u>BUDGET THERM SALES - CYCLE</u>													
2	D.C. - Firm Sales - Res	14,849,000	16,430,000	12,104,000	8,210,000	4,146,000	2,067,000	1,533,000	1,386,000	1,461,000	1,606,000	5,616,000	10,793,000	80,201,000
3	D.C. - Firm Sales - C&I	5,197,000	5,541,000	4,455,000	3,325,000	2,201,000	1,496,000	1,458,000	1,448,000	1,462,000	1,543,000	2,722,000	4,033,000	34,881,000
4	D.C. - Firm Sales - GMA	2,140,000	2,298,000	1,835,000	1,409,000	891,000	482,000	480,000	480,000	480,000	499,000	1,108,000	1,672,000	13,774,000
5	Total D.C. Firm Sales	<u>22,186,000</u>	<u>24,269,000</u>	<u>18,394,000</u>	<u>12,944,000</u>	<u>7,238,000</u>	<u>4,045,000</u>	<u>3,471,000</u>	<u>3,314,000</u>	<u>3,403,000</u>	<u>3,648,000</u>	<u>9,446,000</u>	<u>16,498,000</u>	<u>128,856,000</u>
6	<u>BUDGET DELIVERY THERMS - CYCLE</u>													
7	D.C. - Firm Delivery - Res	2,287,000	2,530,000	1,864,000	1,264,000	638,000	318,000	236,000	213,000	225,000	247,000	865,000	1,662,000	12,349,000
8	D.C. - Firm Delivery - C&I	6,647,000	7,086,000	5,697,000	4,253,000	2,816,000	1,914,000	1,865,000	1,853,000	1,871,000	1,974,000	3,482,000	5,158,000	44,616,000
9	D.C. - Firm Delivery - GMA	3,156,000	3,388,000	2,706,000	2,077,000	1,312,000	709,000	707,000	707,000	707,000	733,000	1,632,000	2,464,000	20,298,000
10	Total D.C. Firm Delivery	<u>12,090,000</u>	<u>13,004,000</u>	<u>10,267,000</u>	<u>7,594,000</u>	<u>4,766,000</u>	<u>2,941,000</u>	<u>2,808,000</u>	<u>2,773,000</u>	<u>2,803,000</u>	<u>2,954,000</u>	<u>5,979,000</u>	<u>9,284,000</u>	<u>77,263,000</u>
11	D.C. - Interruptible Delivery	9,472,000	10,100,000	8,381,000	6,834,000	5,220,000	4,189,000	4,002,000	4,002,000	4,002,000	4,098,000	5,095,000	7,159,000	72,554,000
12	<u>BUDGET THERM SALES - CYCLE</u>													
13	D.C. - Firm Total - Res	17,136,000	18,960,000	13,968,000	9,474,000	4,784,000	2,385,000	1,769,000	1,599,000	1,686,000	1,853,000	6,481,000	12,455,000	92,550,000
14	D.C. - Firm Total - C&I	11,844,000	12,627,000	10,152,000	7,578,000	5,017,000	3,410,000	3,323,000	3,301,000	3,333,000	3,517,000	6,204,000	9,191,000	79,497,000
15	D.C. - Firm Total - GMA	5,296,000	5,686,000	4,541,000	3,486,000	2,203,000	1,191,000	1,187,000	1,187,000	1,187,000	1,232,000	2,740,000	4,136,000	34,072,000
16	Total D.C. Firm Total	<u>34,276,000</u>	<u>37,273,000</u>	<u>28,661,000</u>	<u>20,538,000</u>	<u>12,004,000</u>	<u>6,986,000</u>	<u>6,279,000</u>	<u>6,087,000</u>	<u>6,206,000</u>	<u>6,602,000</u>	<u>15,425,000</u>	<u>25,782,000</u>	<u>206,119,000</u>

Washington Gas Light Company
 District of Columbia Jurisdiction Proforma Class Cost of Service Study
 Income Statement Summary
 Twelve Months Ended December 31, 2019 - Average Rate Base

Description A	So. Ppt. Ln B	--- Reference --- Class Allocator C	Cost Category D	District of Columbia Rate Making Total												
				RES-HTG/CLG H	RES-NON HIC-IMA I	RES-NON HIC-OTH J	C&I HIC < 3075 K	C&I HIC > 3075 L	C&I NON HIC M	GMA HIC < 3075 N	GMA HIC > 3075 O	GMA NON HIC P	NON FIRM Q	Special Contract R		
1 Operating Revenues	RV 132			\$ 174,786,823	\$ 74,975,078	\$ 1,878,131	\$ 1,454,551	\$ 4,603,227	\$ 36,586,629	\$ 7,808,055	\$ 684,488	\$ 17,859,177	\$ 2,549,559	\$ 15,029,225	\$ 10,459,823	
2 Operating Expenses	EX 2 45			\$ 90,981,038	\$ 26,118,945	\$ 1,002,196	\$ 655,955	\$ 1,517,753	\$ 8,970,170	\$ 1,744,447	\$ 183,737	\$ 4,403,603	\$ 637,147	\$ 2,733,206	\$ 2,116,571	
Gas Purchased				\$ 24,823,824	\$ 11,336,859	\$ 214,253	\$ 284,593	\$ 810,450	\$ 5,400,277	\$ 995,822	\$ 97,479	\$ 2,646,205	\$ 382,791	\$ 1,433,762	\$ 1,061,535	
Operation - Other than Gas Purchased	EX 4 25			\$ 17,842,538	\$ 8,805,502	\$ 101,248	\$ 232,110	\$ 540,088	\$ 3,712,716	\$ 613,184	\$ 54,611	\$ 1,856,271	\$ 226,794	\$ 859,244	\$ 640,780	
Maintenance	EX 6 20			\$ 3,025,429	\$ 1,510,942	\$ 17,411	\$ 39,881	\$ 92,680	\$ 636,609	\$ 105,295	\$ 9,372	\$ 318,210	\$ 38,939	\$ 146,595	\$ 109,496	
Depreciation	AL 4 30	Tot_Piwt_Ex_Genl	Comp TPE	\$ 4,544,679	\$ 2,269,678	\$ 26,154	\$ 59,908	\$ 139,220	\$ 956,286	\$ 158,170	\$ 14,079	\$ 478,002	\$ 58,493	\$ 220,209	\$ 164,481	
Amortization of General Plant	AL 4 30	Tot_Piwt_Ex_Genl	Comp TPE													
Amortization of Capitalized Software	AL 4 30	Tot_Piwt_Ex_Genl	Comp TPE													
Amortization of Chalk Point / MD Plant 1989 Inter	AL 5 2	Net_Rate_Base	Comp NRB													
Amortization of Unrecovered Plant Loss Ch Num	AL 1 6	Total_Weather_All_NW	Demand	\$ 100,274	\$ 43,748	\$ 210	\$ 755	\$ 2,626	\$ 21,040	\$ 2,020	\$ 250	\$ 11,296	\$ 835	\$ 10,961	\$ 6,526	
Interest on Customer Deposits	RV 1 5	Gas_Sales_Ex_Non_Firm	Comp TCS	\$ 27,118	\$ 13,464	\$ 349	\$ 268	\$ 831	\$ 6,923	\$ 1,286	\$ 109	\$ 3,376	\$ 482	\$ -	\$ -	
Interest on Supplier Refunds	AL 1 4	Annual_Firm_NW	Demand													
General Taxes	EX 8 22			\$ 54,488,831	\$ 17,518,135	\$ 172,150	\$ 337,901	\$ 1,184,819	\$ 11,640,102	\$ 2,135,516	\$ 134,989	\$ 5,170,130	\$ 736,149	\$ 8,739,917	\$ 6,741,022	
Expenses Before Income Taxes	Ln 2 + Ln 13			\$ 154,833,731	\$ 47,813,182	\$ 1,553,391	\$ 1,593,791	\$ 4,268,487	\$ 31,344,133	\$ 5,755,859	\$ 484,827	\$ 14,887,002	\$ 2,061,818	\$ 14,143,912	\$ 10,340,470	
Income Taxes	EX 1 10			\$ 787,138	\$ (198,036)	\$ 55,815	\$ (77,101)	\$ (35,940)	\$ 377,247	\$ 321,736	\$ 30,577	\$ 284,962	\$ 60,316	\$ 202,651	\$ (214,590)	
Total Operating Expenses	Ln 14 + Ln 15			\$ 155,320,869	\$ 47,615,146	\$ 1,609,206	\$ 1,516,690	\$ 4,232,547	\$ 31,721,379	\$ 6,077,595	\$ 515,404	\$ 15,171,964	\$ 2,122,134	\$ 14,346,563	\$ 10,125,820	
Net Operating Income	Ln 1 - Ln 16			\$ 19,465,955	\$ 27,161,936	\$ 324,935	\$ (62,139)	\$ 370,700	\$ 4,864,750	\$ 1,730,760	\$ 169,254	\$ 2,707,124	\$ 427,625	\$ 1,682,662	\$ (166,998)	
18 Net Income Adjustments																
AFUDC	AL 5 2	Net_Rate_Base	Comp NRB	\$ 836,032	\$ 407,796	\$ 4,955	\$ 10,376	\$ 24,965	\$ 176,830	\$ 29,565	\$ 2,562	\$ 88,191	\$ 10,713	\$ 46,968	\$ 33,112	
FCR CWC		Eliminated														
LCP Equity Accrual	AL 4 28	Tot_Cost_Piwt	Comp TDP													
Net Operating Income - Adjusted				\$ 20,301,987	\$ 27,569,732	\$ 291,290	\$ (48,763)	\$ 395,665	\$ 5,042,080	\$ 1,760,345	\$ 161,826	\$ 2,795,315	\$ 438,339	\$ 1,629,630	\$ (132,886)	
23 Net Rate Base	RB 1 25			\$ 643,186,299	\$ 264,692,526	\$ 3,245,644	\$ 6,722,056	\$ 16,212,365	\$ 114,869,517	\$ 19,204,615	\$ 1,668,909	\$ 57,290,725	\$ 6,963,026	\$ 30,692,334	\$ 21,626,583	
24 Return Earned	Ln 22 / Ln 23			3.74%	3.01%	8.98%	-0.73%	2.44%	4.39%	9.17%	0.71%	4.88%	6.30%	5.31%	-0.61%	
25 Uniform Rate of Return Rank				1.00	0.81	2.40	(0.19)	0.65	1.17	2.45	2.60	1.31	1.68	1.42	(0.16)	
					5	3	11	9	7	2	1	6	4	5	10	

WASHINGTON GAS LIGHT COMPANY
PLANT BALANCES, DEPRECIATION & CARRYING COST
OCTOBER 2015 THROUGH DECEMBER 2023

Date	Charges File				Assets File			Deferred Income taxes	
	CAPEX	MC 72 Adj	Adjustment For Cap	COR	Total CAPEX & COR	Net Plant Additions*	Depreciation Expense**		Accumulated Depreciation
	a			b	c=(a+b)	d	e	f=(e cumulative)	g
Sep-15	17,006,637			2,452,450	19,459,087	11,568,637	99,325	99,325	
Oct-15	926,882			133,053	1,059,936	591,548	20,045	119,369	
Nov-15	1,614,831			293,229	1,908,060	2,140,944	21,125	140,495	
Dec-15	1,324,516			172,775	1,497,291	2,523,041	25,019	165,513	
Jan-16	974,443			112,654	1,087,097	1,173,796	29,012	194,526	
Feb-16	1,769,767			314,710	2,084,477	1,312,076	31,051	225,577	
Mar-16	1,419,077			122,367	1,541,443	1,221,588	33,511	259,088	
Apr-16	1,221,355			127,575	1,348,930	1,125,672	35,652	294,740	
May-16	1,798,448			289,996	2,088,444	833,987	37,673	332,413	
Jun-16	1,538,756			150,165	1,688,920	1,365,059	39,235	371,648	
Jul-16	485,702			59,668	545,370	1,533,272	41,777	413,426	
Aug-16	1,536,224			191,890	1,728,115	1,477,947	44,470	457,896	
Sep-16	1,390,544			195,843	1,586,387	34,166	47,148	505,044	
Oct-16	2,169,780			311,584	2,481,364	871,209	47,162	552,206	
Nov-16	913,630			131,131	1,044,761	804,363	48,711	600,917	
Dec-16	951,802			148,942	1,100,745	801,538	50,141	651,057	
Jan-17	1,100,588			199,437	1,300,025	1,077,764	51,555	702,612	
Feb-17	648,386			105,791	754,177	929,190	53,453	756,065	
Mar-17	682,346			99,357	781,703	833,581	55,089	811,155	
Mar-17	(12,096,479)			(2,454,450)	(14,550,929)	(11,568,637)	(99,325)		
Apr-17	558,371			88,756	647,127	1,344,101	36,530	748,360	
May-17	872,597			114,869	987,467	355,154	38,898	787,258	
Jun-17	540,791			84,317	625,108	4,732,423	39,534	826,792	
Jul-17	1,014,796			146,160	1,160,956	258,730	47,309	874,100	
Aug-17	1,740,204			224,275	1,964,479	433,597	47,769	921,869	
Sep-17	3,035,675			528,822	3,564,496	1,110,010	48,538	970,407	
Oct-17	766,620			114,272	880,892	198,801	50,485	1,020,892	
Nov-17	1,540,309			189,152	1,729,461	1,108,619	50,853	1,071,745	
Dec-17	2,400,324			313,654	2,713,978	6,007,781	52,806	1,124,551	
Jan-18	1,460,694			170,994	1,631,688	1,285,203	63,344	1,187,895	
Feb-18	1,535,873			219,279	1,755,151	458,652	65,599	1,253,494	
Mar-18	1,396,915			144,326	1,541,241	1,302,165	66,410	1,319,904	
Apr-18	1,841,119			270,462	2,111,581	2,172,096	68,702	1,388,606	
May-18	1,638,381			185,336	1,823,717	755,285	72,518	1,461,124	
Jun-18	1,954,088			257,255	2,211,343	477,151	73,864	1,534,988	
Jul-18	1,002,395			51,059	1,053,453	715,013	74,799	1,609,786	
Aug-18	1,764,618			351,999	2,116,616	1,066,856	76,061	1,685,848	
Sep-18	3,979,793			498,177	4,477,970	125,314	77,986	1,763,833	
Oct-18	1,767,055			267,947	2,035,002	1,524,191	81,561	1,845,394	
Nov-18	1,072,318			134,974	1,207,292	399,543	84,261	1,929,654	
Dec-18	1,377,393			224,308	1,601,702	7,394,267	84,980	2,014,635	
Jan-19	1,031,761			189,864	1,221,625	4,096,011	97,957	2,112,591	
Feb-19	1,711,066			209,814	1,920,880	1,854,930	104,370	2,216,962	
Mar-19	2,509,445			385,239	2,894,683	999,457	107,617	2,324,579	
Apr-19	1,559,906			223,517	1,783,423	624,957	109,366	2,433,945	
May-19	1,395,164			245,357	1,640,522	2,981,358	110,477	2,544,422	
Jun-19	1,311,728			197,734	1,509,462	1,068,793	115,713	2,660,135	
Jul-19	2,934,963			532,054	3,467,017	2,956,384	117,599	2,777,734	
Aug-19	3,317,265			488,036	3,805,301	3,083,214	122,809	2,900,543	
Sep-19	6,527,723	(93,061)		1,088,050	7,522,712	2,958,447	128,175	3,028,718	
Oct-19	3,462,818			484,518	3,947,336	2,084,781	133,461	3,162,179	
Nov-19	2,579,604			317,863	2,897,468	1,622,896	137,141	3,299,320	
Dec-19	1,882,691			260,406	2,143,097	1,609,331	140,020	3,439,340	
Jan-20	1,576,373			105,030	1,681,403	1,102,375	142,681	3,582,020	
Feb-20	1,584,792			129,916	1,714,708	1,568,441	144,625	3,726,645	
Mar-20	1,513,193			122,066	1,635,259	1,999,885	147,233	3,873,878	
Apr-20	1,851,293			21,915	1,873,209	4,523,641	150,773	4,024,651	
May-20	1,404,418			94,560	1,498,979	1,986,808	157,194	4,181,845	
Jun-20	1,539,487			102,098	1,641,585	1,401,385	160,158	4,342,003	
Jul-20	1,194,265			45,792	1,240,057	997,362	162,475	4,504,478	
Aug-20	3,940,642			235,542	4,176,184	3,429,172	164,858	4,669,337	
Sep-20	3,945,909	(40,320)		246,749	4,152,337	3,333,614	170,699	4,840,036	
Oct-20	2,453,270			163,060	2,616,331	1,126,163	175,942	5,015,978	
Nov-20	2,328,760		(1,133,124)	134,401	1,330,037	452,502	177,882	5,193,860	
Dec-20	3,573,498		(3,792,816)	219,318		1,222,909	180,644	5,374,504	
Jan-21	2,185,016			129,219	2,314,235	1,505,197	184,234	5,558,738	
Feb-21	2,719,742			205,887	2,925,629	960,672	185,946	5,744,684	
Mar-21	3,240,572			271,001	3,511,573	1,140,361	187,961	5,932,644	
Rate Case	(87,158,382)			(12,345,787)	(99,504,169)	(82,265,209)	(140,020)	(3,439,343)	
Apr-21	3,447,272			277,966	3,725,238	1,947,139	51,196	2,544,497	
May-21	3,207,443			306,193	3,513,636	1,293,459	52,856	2,597,354	
Jun-21	2,571,235			259,242	2,830,477	1,448,997	55,247	2,652,600	
Jul-21	2,753,691		(722,313)	216,703	2,248,080	1,958,629	58,658	2,711,258	
Aug-21	1,733,204		(758,612)	133,108	1,107,700	5,693,892	68,615	2,779,873	
Sep-21	2,295,700		(1,705,349)	235,664	826,015	956,369	70,297	2,850,170	
Oct-21	4,256,006		(885,516)	577,391	3,947,880	2,768,906	74,820	2,924,991	
Nov-21	3,093,665		(1,349,786)	445,585	2,189,464	1,370,098	77,182	3,002,172	
Dec-21	5,326,313		(2,114,952)	903,290	4,114,651	3,995,412	84,069	3,086,241	(12,212,352)
Jan-22	3,084,073			333,254	3,417,327	2,563,469	88,598	3,174,839	(12,985,078)
Feb-22	4,563,193			469,292	5,032,485	1,456,847	91,169	3,266,007	(13,490,016)
Mar-22	2,849,685			312,239	3,161,924	7,409,677	103,895	3,369,902	(15,586,305)
Apr-22	2,633,667			295,865	2,929,532	11,437,179	123,249	3,493,151	(18,781,030)
May-22	2,108,384			215,965	2,324,349	1,022,716	125,030	3,618,181	(19,087,479)
Jun-22	2,689,781			474,906	3,164,687	3,477,015	131,017	3,749,198	(20,138,896)
Jul-22	3,251,087			393,940	3,645,027	1,136,033	133,231	3,882,429	(20,523,245)
Aug-22	4,103,766			526,977	4,630,743	7,156,735	145,671	4,028,100	(22,597,525)
Sep-22	4,967,739			642,960	5,610,700	1,681,363	148,662	4,176,762	(23,196,213)
Oct-22	4,346,345			618,027	4,964,373	6,219,747	159,615	4,336,377	(25,033,876)
Nov-22	5,040,470		(85,597)	555,734	5,510,608	8,470,387	174,591	4,510,968	(27,469,595)
Dec-22	7,627,057		(1,708,367)	910,900	6,829,589	5,770,575	184,888	4,695,856	(29,257,293)
Jan-23	4,044,351			501,523	4,545,875	5,133,213	194,054	4,889,910	(30,754,433)
Feb-23	4,387,067			399,754	4,786,822	4,196,154	201,268	5,091,178	(31,963,728)
Mar-23	2,817,536			332,781	3,150,317	3,977,716	208,404	5,299,582	(33,092,522)
Apr-23	5,915,422			695,207	6,610,629	4,117,277	215,557	5,515,139	(34,357,481)
May-23	7,067,624			818,593	7,886,217	3,274,942	221,307	5,736,446	(35,423,022)
Jun-23	3,670,025			346,107	4,016,132	2,804,180	226,227	5,962,674	(36,227,650)
Jul-23	4,488,301			465,136	4,953,437	800,652	227,937	6,190,611	(36,513,241)

Aug-23	6,624,809	827,174	7,451,983	4,488,929	233,784	6,424,395	(37,911,768)
Sep-23	3,798,580	511,115	4,309,696	2,538,370	238,163	6,662,557	(38,685,373)
Estimate Oct-23	4,326,252	554,110	4,880,361	4,082,051	245,204	6,907,761	(39,893,655)
Estimate Nov-23	4,326,252	554,110	4,880,361	4,082,051	252,246	7,160,007	(41,099,998)
Estimate Dec-23	4,326,252	554,110	4,880,361	4,082,051	259,287	7,419,294	(42,304,405)
Total	170,496,792	(133,381)	(14,256,431)	17,906,701	174,013,682	147,113,756	

* Rate Case Adjustments

Total Expenditures w/ Cost removal	146,166,606
Cap	141,250,000
Cap Adjustment	(4,916,606)
Monthly Depreciation Expense Related to MC72 - Jan 2020	(186)
Monthly Depreciation Expense Related to MC72 - Oct 2020	\$ (267)
Projected Spend From 2023 Current Factor	\$ 62,352,191
Spend Through September 2023	47,711,107
Remaining Spend	\$ 14,641,084

% COR	11.35%
% Plant Additions	83.64%

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 6th day of November 2023, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

Kimberly Lincoln-Stewart, Esquire
Public Service Commission
of the District of Columbia
1325 G Street, NW, 8th Floor
Washington, DC 20005
kstewart@psc.dc.gov

Ankush Nayar, Esquire
Office of the People's Counsel
of the District of Columbia
655 15th Street, NW, Suite 200
Washington, DC 20005
anayar@opc-dc.gov

Frann G. Francis, Esquire
Apartment and Office Building
Association of Metro. Washington
Suite 300, 1050 - 17th Street, NW
Washington, DC 20036
ffrancis@aoba-metro.org

Nina Dodge
DC Climate Action
6004 34th Place, NW
Washington, DC 20015
ndodge432@gmail.com

Brian Caldwell, Esquire
Office of the Attorney General
for the District of Columbia
441 4th Street, NW, Suite 600-S
Washington, DC 20001
brian.caldwell@dc.gov

Erin Murphy, Esquire
Environmental Defense Fund
1875 Connecticut Ave., NW, Suite 600
Washington, DC 20009
emurphy@edf.org

Brian J. Petruska, General Counsel
LIUNA Mid-Atlantic Region
11951 Freedom Drive, Suite 310
Reston, VA 20190
bpetruska@maliuna.org

Susan Stevens Miller, Esquire
Earthjustice
1001 G Street, NW, Ste. 1000
Washington, DC 20001
smiller@earthjustice.org

A handwritten signature in blue ink, appearing to read "Cathy Thurston-Seignious". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

CATHY THURSTON-SEIGNIOUS