



**Sandra Mattavous-Frye, Esq.**  
**People's Counsel**

December 21, 2018

**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  
[bwestbrook@psc.dc.gov](mailto:bwestbrook@psc.dc.gov)

**RE: Formal Case No. 1115, In the Matter of Washington Gas Light Company's Request for Approval of a Revised Accelerated Pipeline Replacement Program, and Formal Case No. 1154, Application of Washington Gas Light Company for Approval of PROJECTpipes2 Plan.**

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing in the above-referenced proceeding are an original and three (3) copies of the "Office of the People's Counsel for the District of Columbia Motion for Enlargement."

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

Sincerely,



Thaddeus Johnson

Enclosure  
cc: Parties of record

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

In the Matter of	)	
	)	
Washington Gas Light Company's	)	
Request for Approval of a Revised	)	Formal Case No. 1115
Accelerated Pipeline Replacement Plan	)	
	)	
Application of Washington Gas	)	
Light Company for Approval of	)	Formal Case No. 1154
PROJECTpipes2 Plan	)	

**OFFICE OF THE PEOPLE'S COUNSEL FOR THE  
DISTRICT OF COLUMBIA'S MOTION FOR ENLARGEMENT**

**I. INTRODUCTION**

Pursuant to Rules 105.8 and 117.5 of the Public Service Commission of the District of Columbia's ("PSC" or "Commission") Rules of Practice and Procedure,<sup>1</sup> the Office of the People's Counsel for the District of Columbia ("Office" or "OPC"), the statutory representative of District of Columbia utility ratepayers and consumers,<sup>2</sup> hereby respectfully submits the *Office of the People's Counsel for the District of Columbia's Motion for Enlargement* of Time ("Motion"). OPC respectfully requests the Commission (i) grant this *Motion* and (ii) extend the comment-submission deadlines set forth in the Public Notice issued by the PSC on December 14, 2018. Specifically, OPC requests the PSC change the dates for the submission of Initial Comments and Reply Comments to April 22, 2019, and May 7, 2019, respectively.

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<sup>1</sup> 15 DCMR §§ 105.8 and 117.5 (Lexis 2018).

<sup>2</sup> D. C. Code § 34-804 (Lexis 2018).

## **II. BACKGROUND/PROCEDURAL HISTORY**

On December 7, 2018, Washington Gas Light Company (“WGL” or “Company”) filed a request for approval of a “PROJECTpipes 2 Plan (“PIPES 2 Plan”)” with the Commission. The Commission approved the first five (5) years of WGL’s proposed 40-year Revised Accelerated Pipe Replacement Plan in Order No. 17431.<sup>3</sup> WGL now seeks approval of its PIPES 2 Plan, authorization to recover the costs associated with the PIPES 2 Plan through the approved PROJECTpipes surcharge mechanism, and approval of the PIPES 2 Plan and surcharge mechanism in advance of the expiration of the current PIPES 1 Plan, by September 30, 2019.<sup>4</sup>

On December 14, 2018, the Commission issued a Public Notice<sup>5</sup> wherein it opened a new formal proceeding (i.e., Formal Case No. 1154) to consider WGL’s request. The Commission also established a comment period, which designated January 21 and February 6, 2019 as the submission dates for initial and reply comments, respectively.

## **III. DISCUSSION**

As was the case with the Company’s inaugural PROJECTpipes (formerly known as Accelerated Pipe Replacement Program) filing, WGL’s PIPES 2 Plan presents several highly technical questions and issues, for which the Office must conscript outside consulting services. Pursuant to D.C. law, this can occur only through the procurement process specified therein.

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<sup>3</sup> *Formal Case No. 1093, In the Matter of the Investigation into the Reasonableness of Washington Gas Light Company’s Existing Rates and Charges for Gas Service* (“Formal Case No. 1093”) and Formal Case No. 1115, Order No. 17431, ¶ 32, rel. March 31, 2014.

<sup>4</sup> *Formal Case No. 1115, Application of Washington Gas Light Company for Approval of a Revised Accelerated Pipe Replacement Program; and Formal Case No. 1154, Application of Washington Gas Light Company for Approval of PROJECTpipes2 Plan*, rel. December 14, 2018.

<sup>5</sup> *Formal Case No. 1115, Application of Washington Gas Light Company for Approval of a Revised Accelerated Pipe Replacement Program; and Formal Case No. 1154, Application of Washington Gas Light Company for Approval of PROJECTpipes2 Plan*, rel. December 14, 2018.

OPC has taken the first step to obtain Commission approval for a technical consultant by preparing a Notice of Agency Fund Requirements (“NOAFR”) that will be submitted to the affected utility, WGL, on or before Tuesday, January 8, 2019. Typically, it takes 30 days from the date the affected utility receives OPC’s NOAFR for the Commission to issue an order approving or disapproving OPC’s request. Until that time, and until a contract is executed, by law, the Office is legally prohibited from using consultants for this matter.<sup>6</sup> If the established timeframes are followed, the Office estimates its funding request will be approved approximately one week after the current filing deadline for initial comments and a week before the current due date for reply comments, hence the need for the requested enlargement of time. Given the technical nature of WGL’s PIPES 2 Plan and its substantial cost, the request for additional time will allow the Office to thoroughly evaluate the Company’s proposal and develop probative, insightful record evidence, which, in turn, the Commission can use to inform its merits decision.

Using a conservative estimate, OPC will need more than the currently allocated 15 calendar days to prepare comments for submission. For this reason, the Office requests an enlargement of time of 90 days until April 21, 2018 for initial comments and May 7, 2019 for reply comments. As explained above “good cause” exists to allow the Commission to grant OPC’s request for an extension of time in the instant matter.<sup>7</sup>

OPC contacted WGL regarding the proposed Motion for Enlargement. As of the time of this filing, OPC has not heard from WGL whether it objects to OPC’s request. Given the approach of the holidays, OPC is nonetheless filing its request to avoid the need for a request for

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<sup>6</sup> D. C. Code § 34-912 (Lexis 2018).


<sup>7</sup> *Formal Case No. 1017, Office of the People’s Counsel’s Motion for Enlargement of Time to File Initial and Reply Comments Pursuant to Order No. 19431*, filed August 20, 2018.

a longer extension of time. OPC submits no party will be prejudiced by enlarging the initial and reply comment submission dates to April 22, 2019 and May 7, 2019.

#### IV. CONCLUSION

WHEREFORE, for the reasons stated herein, the Office respectfully requests the Commission (i) grant this *Motion for Enlargement of Time* and (ii) extend the initial and reply comment deadlines to April 26, 2018 and May 14, 2018, respectively.

Respectfully submitted,

  
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Dated: December 21, 2018

## CERTIFICATE OF SERVICE

**Formal Case No. 1115, In the Matter of Washington Gas Light Company's Request for Approval of a Revised Accelerated Pipeline Replacement Program, and Formal Case No. 1154, Application of Washington Gas Light Company for Approval of PROJECTpipes2 Plan**

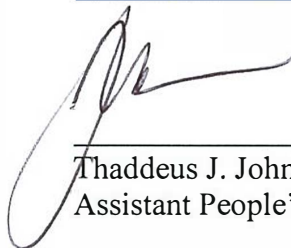
I hereby certify that on this 21<sup>st</sup> Day of December 2018, a copy of the "Office of the People's Counsel for the District of Columbia Motion for Enlargement", was served on the following parties of record by hand delivery, first class mail, postage prepaid, or electronic mail:

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