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February 4, 2019

**VIA ELECTRONIC MAIL AND E-FILING**

Ms. 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 of AltaGas Ltd. and WGL Holdings, Inc.] Applicants' Response to the Joint Response of the District of Columbia Government ("DCG") and the Office of the People's Counsel ("OPC") in Reference to the Applicants' Merger Condition No. 5 Compliance Filing**

Dear Ms. Westbrook-Sedgwick:

Through this letter, pursuant to AltaGas's letter to the District of Columbia Public Service Commission ("the Commission") dated January 28, 2019, AltaGas Ltd. And Washington Gas Light Company (collectively, "the Applicants"), hereby respond to the Joint Response of the District of Columbia Government ("DCG") and the Office of People's Counsel ("OPC") on the Applicants' Compliance Filing with respect to Commitment No. 5.

As contained in the Commission's Order No. 19396, Appendix A, issued in the above-captioned proceeding, Commitment No. 5 requires AltaGas to, "within five (5) years after Merger Close, develop or cause to be developed 10 MW of either electric grid energy storage or Tier one renewable resources in Washington, D.C., [and] ... file its plan for the 10MW project for approval by the Commission within 180 days of Merger Close and an annual progress report following approval of the plan." In the compliance filing submitted on January 2, 2019 in relation to Commitment No. 5 (the "Compliance Filing"), the Applicants set out the steps and activities to be undertaken (the "Plan") to fulfill the commitment to build energy storage or renewable energy in the District of Columbia within five years of Merger Close.

The Applicants are in the early stage of the five-year period to develop the 10MW energy storage or renewable energy in Washington, D.C. Development

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of the project(s) is a lengthy process. The first step in developing the project and determining, *inter alia*, what project(s) to develop, the project location(s), and the choice of technologies to implement, is creating a blueprint of key activities to enable such decisions to be made. The January 2, 2019 Compliance Filing is the Applicants' blueprint to achieve that goal.

The choice of project, technology, and location are important decisions. Collaboration with stakeholders is required stakeholders to advance such decisions. The Applicants understand that OPC and DCG are interested in the project details, however, the Applicants need to first undertake those activities described in the Plan so that careful assessment of the conditions concerning capacity constraints, offtake viability, technical and engineering feasibility, regulatory considerations and local workforce requirements can be made to allow well-informed decisions on project details. The Applicants should be afforded the time provided for in Commitment No. 5 to make sound judgement and deliver the project(s) for the benefit of the District, rather than being rushed into making hasty decisions that are without foundation and inconsistent with the letter and spirit of the Commitment.

It should also be noted that the Applicants have extensive background in the development of renewable energy infrastructure projects throughout the United States and Canada and are eager to pursue this commitment in Washington, D.C. Indeed, it is because of this background that the Applicants know that such a project(s) requires careful planning and collaboration with key stakeholders, including DCG and OPC.

Furthermore, Commitment No. 5 requires the Applicants to file an annual progress report with the Commission following approval of the Plan. Assuming Commission approval is granted, the Applicants will duly submit a progress report on the anniversary of the Commission's approval of the Plan, and annually thereafter, to keep the Commission and other stakeholders informed on progress made in relation to the Plan, including addressing progress on each of the phases and activities set forth therein.

For these reasons, the Applicants respectfully disagree with the view expressed by DCG and OPC regarding the Compliance Filing. The Applicants submit that the Compliance Filing is a legitimate plan to describe how AltaGas intends to satisfy Commitment No. 5, and respectfully request the Commission to approve the Plan as filed as the first step in discharging this Commitment.

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Thank you for your time and attention. Please contact me if you have any questions regarding this matter.

Respectfully submitted,



Moxila A. Upadhyaya  
*Counsel for AltaGas Ltd.*

MAU/srs

Copy to:

Certificate of Service  
Christopher S. Gunderson  
J. Joseph Curran, III

## CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 4th day of February, 2019, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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