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March 28, 2019

**VIA ELECTRONIC FILING**

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

**Re: Formal Case No. 1137  
[Washington Gas's Motion to Extend the Multi-Family Piping  
Program]**

Dear Ms. Westbrook-Sedgwick:

Transmitted for filing is Washington Gas Light Company's Motion to Extend the Multi-Family Piping Program.

Feel free to contact me if you have questions regarding this matter.

Sincerely,

Cathy Thurston-Seignious  
Supervisor, Administrative and  
Associate General Counsel

cc: Per Certificate of Service





2. The Commission later amended the program, such that it would be "split into two parts: 1) enrollment; and 2) data collection. The first two years would be used for enrolling projects into the MPP and the pilot would be extended for two additional years for data collection with no new enrollment in the MPP project during the data collection period."<sup>2</sup>
3. Interest in the MPP is very active in both the large and small project categories. Since the approval of the program, Washington Gas has approved 20 projects, representing 1,521 meters, and an additional 32 projects, representing 7,075 meters, have been under discussion with expressed interest in entering the program. To date, no incentive dollars have been disbursed in the District of Columbia for this program. The Company seeks to extend the enrollment period to include these prospective projects and other future projects in the MPP, thereby allowing both an increase in the pool of available data to be collected and analyzed, as well as offering more customers the opportunity to become gas customers.
4. Washington Gas's experience in implementing the MPP has shown that the project design period can span two to five years, encompassing initial discussions with developers, developing program proposals, influencing design solutions, providing financial data for project budgets, obtaining governing agency approvals, etc.

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<sup>2</sup> Order No. 19236 at 6 (January 17, 2018).

Thereafter, a project Business Case Authorization (“BCA”) is developed and final designs must be obtained from the developer and finalized, which may take up to two years to complete. Washington Gas construction work may not begin until all necessary permits are issued and site readiness is established. Once the meter is installed, the Company can begin collecting data. A minimum of 12 months of data will be analyzed, which must include a full heating season.

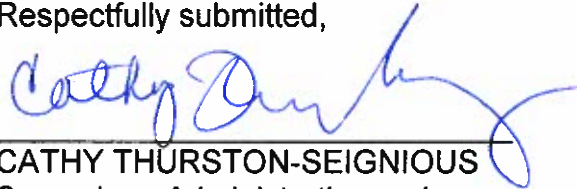
5. Washington Gas proposes to expand the MPP pilot to a five-year program, concluding March 24, 2022, and will present evidence of the success of the program in a subsequent rate case using the evaluation criteria established by the Commission in Order No. 19236. For the five years of the program, the Company proposes to enroll projects while collecting any available data. By extending the MPP enrollment period for an additional three years, the Company will have more time to finalize projects currently enrolled and those expected to be included in the MPP, as well as collect more data on the benefits of the program.
6. The Virginia State Corporation Commission authorized a five-year pilot MPP for Washington Gas, and the Maryland Public Service Commission approved a MPP on a permanent basis. The Company’s request to expand the District of Columbia pilot MPP to five years is consistent with its authorization in neighboring

jurisdictions and would allow the Company to collect, analyze and compare data on a system-wide basis within similar timelines.

7. The additional time requested in this Motion is important for the success of the MPP. For example, the successful programs and additional time period have resulted in 2,408 new meters in Maryland, with an additional 1,567 meters in the construction pipeline, and 934 new meters in Virginia, with an additional 1,200 meters in the construction pipeline. In addition, there are 2,221 meters in Maryland and 1,606 meters in Virginia currently being evaluated for enrollment in the MPP.

WHEREFORE, for the reasons discussed herein, the Commission should extend the MPP to five years and allow the Company to continue enrollments for the duration of the pilot program. This will allow the Company a reasonable period of time to enroll customers while collecting data on the program to report in the Company's rate case following the conclusion of the pilot period.

Respectfully submitted,



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Associate General Counsel

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## CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 28th day of March 2019, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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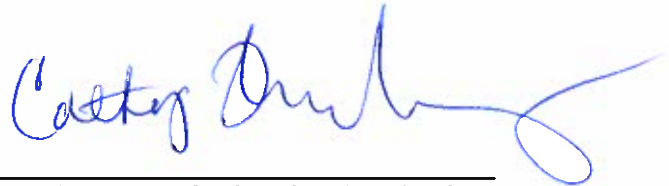
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