



May 10, 2019

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. 1154, In the Matter of the Application of Washington Gas Light  
Company for Approval of PROJECTpipes2 Plan

Dear Ms. Westbrook-Sedgwick:

Enclosed please find the Environmental Defense Fund's Petition to Intervene in Formal  
Case No. 1154 regarding Washington Gas Light Company's PROJECTpipes2 application. If  
there are any questions regarding this matter, please contact me at (202)-572-3389.

Sincerely,

A handwritten signature in black ink that reads "Natalie Karas". The signature is written in a cursive, flowing style.

Natalie Karas  
Lead Counsel, Energy Markets and Utility  
Regulation  
Environmental Defense Fund  
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Enclosures

cc: All parties of record  
Formal Case No. 1154

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

**IN THE MATTER OF WASHINGTON )  
GAS LIGHT COMPANY’S )  
APPLICATION FOR APPROVAL )  
OF PROJECTPIPES 2 PLAN )**

**Formal Case No. 1154**

**PETITION TO INTERVENE  
OF THE ENVIRONMENTAL DEFENSE FUND**

Pursuant to Order No. 19919 of the Public Service Commission of the District of Columbia (“Commission”) and Rule 106.1 of the Commission’s Rules of Practice and Procedure, 15 D.C.M.R. § 106.1, the Environmental Defense Fund (“EDF”) hereby petitions to intervene as a party to the above-captioned case. In support of its Petition, EDF states as follows:

1. On December 7, 2018, Washington Gas Light Company (“WGL” or “Company”) filed with the Commission a request for approval of the Company’s Project Pipes 2 Plan, the second 5-year phase of WGL’s 40-year revised accelerated pipe replacement program. The Commission previously approved the first 5-year phase of the plan in Formal Case No. 1115.
2. On December 14, 2018, the Commission issued a Public Notice opening a new docket, Formal Case No. 1154, to address WGL’s Project Pipes 2 Plan. The Public Notice established an initial and reply comment period, which was ultimately extended to March 22, 2019 and April 8, 2019, at the request of the Office of the People’s Counsel (“OPC”). EDF assisted OPC in preparing the technical affidavit of Virginia Palacios, which was appended to OPC’s initial March 22, 2019 Comments. This affidavit demonstrated the customer, safety, and environmental benefits provided by advanced

leak detection technology and data analytics. On May 3, 2019, the Commission issued Order No. 19919 establishing May 10, 2019 as the date by which petitions to intervene are due. EDF timely submits this Petition to Intervene in accordance with the deadline provided in Order No. 19919.

3. EDF is a membership organization whose mission is to preserve the natural systems on which all life depends. EDF has a substantial presence in the District of Columbia where we maintain a large office housing over 100 employees. In addition, EDF has 7,192 members and activists residing in the District of Columbia. Guided by science and economics, EDF seeks practical solutions to resolve environmental problems. EDF uses the power of markets to speed the transition to clean energy resources, and consistent with its organizational purpose is engaged in activities to facilitate cost-effective and efficient energy market designs that encourage investment to modernize the energy grid so that it can support the ongoing deployment of renewable energy resources and energy efficiency.
4. Over the past three years, EDF has engaged in a focused set of scientific, technical and policy-oriented projects to develop, demonstrate and foster commercialization of advanced leak detection and leak quantification methods<sup>1</sup> for use by local gas distribution utilities. In collaboration with Google Earth Outreach, Colorado State University, and various natural gas utilities, EDF is managing a project that uses

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<sup>1</sup> Advanced leak detection technology refers to high sensitivity (i.e., measuring methane concentrations in parts per billion and collecting data points at a rate of at least twice per second) methane detectors mounted on vehicles equipped with Global Positioning Systems that collect latitude and longitude coordinates at the same time as methane concentration data is being collected. “Leak quantification methods” refers to the advanced analytics or algorithms that utilize data acquired from advanced leak detection technology to estimate the methane flow rate (e.g., in liters per minute) that can be attributed to a leak indication.

Google Street View cars equipped with methane concentration analyzers to quantify methane leaks from distribution pipelines. The goals of this project are to demonstrate the benefits of state-of-the-art technological solutions, create pathways for the integration of leak quantification and advanced leak detection technology into utility operations, and to commercialize tools for use by utilities in planning and implementing leak abatement and leak-prone infrastructure replacement projects.

5. EDF has also been heavily engaged throughout the United States in reducing methane emissions stemming from distribution system pipeline leaks. This engagement includes action in several states, including New York, New Jersey, California, Illinois, and Pennsylvania. For example, in New York, EDF is currently collaborating with KeySpan Gas East Corporation and the Brooklyn Union Gas Company, both subsidiaries of National Grid USA (“National Grid”), on a suite of pilot projects in National Grid’s service territory in Long Island, New York, leveraging new technological capabilities, as envisioned in settlement agreements approved by the New York State Public Service Commission (“NYPSC”) in Cases 16-G-0059 and 16-G-0058. The settlement agreement provides that leak flow rate data gathered as part of these projects will be used by National Grid to enhance leak repair and leak prone pipe (“LPP”) replacement efforts in its Long Island service territory, and that the companies shall develop the means to quantify leak flow rate from their systems in order to better prioritize their leak repair and LPP replacement projects on an ongoing basis.<sup>2</sup>

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<sup>2</sup> *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of KeySpan Gas East Corp. d/b/a National Grid for Gas Service*, NYPSC Case Nos. 16-G-0058 and 16-G-0059, Joint Proposal at Section 5.8 (September 7, 2016).

6. Niagara Mohawk, National Grid’s upstate New York utility, built upon these efforts in a January 19, 2018 Joint Proposal, at the request of EDF. The Joint Proposal in that proceeding, supported by EDF and approved and adopted by NYPSC Order, obligates Niagara Mohawk to continue to “develop a methodology for assessing leak size and volume using leak quantification methods” and consider “best practices for identifying and abating high volume leaks.”<sup>3</sup>

7. In addition, EDF completed a collaborative pilot project to quantify gas leaked from Consolidated Edison Company of New York’s (“Con Edison”) non-hazardous Type 3 leak backlog and develop a prioritization scheme for the repair of those leaks. Under this project, researchers from Colorado State University surveyed hundreds of leaks constituting Con Edison’s Type 3 leak backlog using advanced leak detection technology, and separated these leaks into “small,” “medium,” and “large” categories based on leak flow rate data gathered using leak quantification methods, to allow the company to prioritize the repair of its largest leaks. In order to facilitate this survey, Con Edison provided EDF with information on the location of its Type 3 leaks, including information on underground infrastructure locations, under the terms of a non-disclosure agreement. Con Edison prioritized the repair of Type 3 leaks based on leak flow rate, thereby locking in methane emission reductions earlier than might have been possible under a business as usual scenario.<sup>4</sup>

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<sup>3</sup> *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Gas Service*, NYPSC Case No. 17-G-0239 *et al.*, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans, (March 15, 2018) at 18-19; and Joint Proposal at page 42, Section 7.6 (January 19, 2018).

<sup>4</sup> <https://www.edf.org/media/con-edison-partners-edf-google-map-and-measure-methane-leaks-prioritize-infrastructure>.

8. In New Jersey, the New Jersey Board of Public Utilities (“Board”) approved a settlement agreement among Public Service Electric and Gas Company (“PSE&G”), EDF and other stakeholders relating to PSE&G’s accelerated pipe replacement program. As part of this settlement, PSE&G received Board approval to implement a \$905 million pipe replacement program. Under the terms of this settlement, after taking into account safety considerations, PSE&G is required to consider data gathered by EDF on leak flow rate, *i.e.* the volume of methane emissions leaked from its pipes, in conjunction with other relevant factors, to identify those that are most in need of replacement.<sup>5</sup> The Board has also granted EDF intervention in several other gas utility infrastructure proceedings.<sup>6</sup> In addition, EDF is also active on leak reduction efforts before state public utility commissions in California, Illinois, and Pennsylvania.<sup>7</sup>

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<sup>5</sup> In a press release announcing its approval of the program, the Board acknowledged EDF’s participation and beneficial contribution noting that “data on methane emissions from the Environmental Defense Fund (EDF) will be used” to “ensure that work is prioritized.” BPU News Release, *Board Approves PSE&G’s Natural Gas Main Replacement Program to Improve Reliability and Reduce Methane Emissions*, November 16, 2015.

<sup>6</sup> See, e.g., *In the Matter of The Petition of Pivotal Utility Holdings, Inc. D/B/A Elizabethtown Gas for Approval of a Safety, Modernization and Reliability Program and Associated Cost Recovery Mechanism*, Docket No. GR15091090, Order (February 18, 2016); *In the Matter of the Petition of Public Service Electric and Gas Company for Approval of the Next Phase Of The Gas System Modernization Program And Associated Cost Recovery Mechanism*, Docket No. GR17070776, Decision and Order Approving Stipulation (May 22, 2018) at 2; *In the Matter of the Petition of Elizabethtown Gas Company to Implement an Infrastructure Investment Program (“IIP”) and Associated Recovery Mechanism Pursuant to N.J.S.A. 48:2-21 and N.J.A.C. 14:3-2A*, Docket No. GR18101197, Order (March 18, 2019).

<sup>7</sup> See e.g., *Resolution G-3538, Forecast Requests for Utility Natural Gas Leak Abatement Program*, CA P.U.C. Resolution G-3538 (Oct. 11, 2018) (EDF active in development of gas distribution utility leak abatement programs); *Pennsylvania Public Utility Commission v. Peoples Natural Gas Co., LLC*, PA PUC Case C-2016-2437295 (Jan. 18, 2018) (Commission adopts ALJ recommended decision that, among other things, includes settlement provisions that require Peoples Natural Gas Co to work with EDF on exploring the potential new technologies to measure key environmental data, and to create detailed maps that show the location of natural gas leaks from utility facilities located under city streets); and *Illinois*

9. As demonstrated by these examples, EDF has significant experience in a multitude of proceedings in which local gas distribution utilities seek approval for programs to abate leaks, replace leak-prone infrastructure and modernize gas delivery systems. Our advocacy and deep technical expertise with leak detection and prioritization methods have provided benefits to utilities, their customers, safety and the environment in numerous other states. Before this Commission, EDF has highlighted opportunities for WGL to employ advanced leak detection technology and data analytics to help meet emission reduction targets with more efficiency and also to leverage data to demonstrate successes to key stakeholders and regulators.<sup>8</sup>
10. For these reasons, EDF and its members have a direct and substantial interest in the issues raised in this proceeding and will be directly affected by the outcome. No other party can advance EDF's unique set of interests. Through this Petition, EDF seeks to be fully accorded the rights of a party to this proceeding.

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*Commerce Commission On Its Own Motion vs. Peoples Gas Light and Coke Company*; Ill. Commerce Comm. Case 16-03762018 (Jan. 10, 2018) (The Commission required implementation of a pilot program jointly developed by gas distribution company, the Citizens Utility Board, and EDF).

<sup>8</sup> *In the Matter of the Investigation into Quality of Service of Washington Gas Light Company*, Formal Case No. 977, Testimony of Natalie Karas on behalf of the Environmental Defense Fund (February 6, 2019).

**WHEREFORE**, EDF respectfully requests that the Commission grant this Petition and allow EDF to become a party to this proceeding.

Respectfully,



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**Certificate of Service**  
**Formal Case No. 1154**

I certify that on this 10th day of May, 2019, copies of the foregoing were emailed to the official service list for this proceeding.



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Natalie M. Karas