

Andrew Johnston, Executive Secretary
Maryland Public Service Commission
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202

December 16, 2025

In Re: Case No. 9708, ML# 323889 - Response to Washington Gas Light Company's Annual Strategic Infrastructure Development and Enhancement 3 ("STRIDE-3") Calendar Year ("CY") 2026 Project List and Current Factor.

To the Maryland Public Service Commission (The Commission):

Maryland PIRG Foundation and the Center for Progressive Reform disagree with the Commission Staff's recommendation to approve the WGL 2026 STRIDE project list. As discussed below, WGL failed to follow the Commission's directive that WGL's STRIDE-3 application demonstrate compliance with the newly adopted STRIDE provisions enacted as part of the Next Generation Energy Act ("NGEA").

The Commission should find that staff's analysis on WGL's CY 26 STRIDE-3 application is premature. On October 21, 2025, while considering the removal of certain projects that incurred no charges in 2025, the Commission also issued an order specifically directing WGL to "(1) justify how its current STRIDE-3 plan complies with the NGEA, or (2) submit proposed revisions to its plan that would bring the plan into compliance with the NGEA."¹ The Commission's order gave WGL 60 days to respond—with a response due by December 20, 2025.

WGL, in partial response, filed its CY 2026 STRIDE project list and CY 2026 STRIDE rider and supporting workpapers on October 31, 2025.² In its filing, WGL acknowledges the Commission's order, and indicates that it "intends to respond accordingly."³ However, WGL notes that the Commission, in note 5 of its order, stipulates that the request for justification or revision does not affect work ongoing under the previously applied STRIDE plan, with changes applying only after such time as the Commission may modify the plan.⁴ WGL argues that its CY 26 STRIDE projects are necessary to ensure reliability and safety, and asks the Commission to approve its projects. Presumably, though not directly stated, WGL plans to file another application on December 20th which addresses the Commission's order. Moreover, WGL provides no evidence by which the Commission can determine that the projects submitted actually are part of WGL's ongoing work, or in other words, that construction has already begun on these projects. The Commission should accordingly find that WGL's application is deficient and dismiss the filing.

¹ The Commission - Letter Order to WGL Regarding Revised 2025 STRIDE Project List. Case No. 9708 (M.L. 323749)

² Washington Gas Light Company - 026 STRIDE Current Factor and 2026 STRIDE Project List. Case No. 9708 (ML 323889)

³ *Id.*

⁴ *Id.*, The Commission - Letter Order to WGL Regarding Revised 2025 STRIDE Project List. Case No. 9708 (M.L. 323749), footnote 5.

Given the changes to state law, it is inappropriate to approve the CY 26 project proposal submitted by WGL absent serious evaluation by both the Company, Staff, and interested stakeholders. Staff's evaluation of WGL's CY 26 STRIDE-3 proposal is premature and incomplete since the evaluation is not adequately informed by the NGEA or the Commission's requirement that WGL either justify or modify its plans. As such, Staff's recommendation to approve WGL's application, absent full review of the impact of NGEA on the project list, is inappropriate.

NGEA went into effect on June 1, 2025 and requires that gas pipeline projects meet new requirements, including a demonstration that the gas company has selected and given priority to projects based on their risk to the public and cost effectiveness and has performed an analysis that compares the costs of the proposed replacement projects with alternatives to replacement, including leak detection and repair.

In order to implement the new requirements of NGEA, Maryland PIRG Foundation and the Center for Progressive Reform have the following recommendations, which should be applied to BGE, WGL and Columbia Gas. These are outlined in Maryland PIRG Foundation's "[Fast-Tracked and Flawed: An Analysis of BGE's 2025 Operation Pipeline Work](#)".

1. The Maryland Public Service Commission should order WGL to demonstrate that gas pipeline projects are in compliance with state law. As outlined in the law, the Commission must find that the investments are "required to improve the safety of the gas system after consideration of alternatives to replacement." In order to demonstrate compliance, WGL must present regulators and stakeholders with a valid, transparent risk methodology, formalize and document its project selection decision making process, and demonstrate its chosen mitigations are cost-effective.
2. The Commission should direct WGL to consider, in non-emergency scenarios, alternatives to replacement, including advanced repair, pipe relining, joint encapsulation, and targeted electrification. WGL should document it has considered alternatives before selecting the replacement option.
3. If WGL wishes to pursue a medium pressure conversion, the Commission should direct WGL to separately demonstrate that such investments are prudent and reasonable, particularly in light of overall risk and safety.
4. The Commission should not allow WGL to use accelerated cost recovery for any investments that are not optimized for risk reduction. If WGL fails to present relevant information or follow best practices and the law, the Commission should deny recovery of all associated costs.

For the reasons set forth above, the Commission should reject WGL's STRIDE-3 application. Thank you for taking the time to consider these comments.

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