



APARTMENT AND OFFICE BUILDING
ASSOCIATION OF
METROPOLITAN WASHINGTON

November 19, 2013

Electronic Filing and Federal Express

Brinda Westbrook-Sedgwick
Commission Secretary
D.C. Public Service Commission
1333 H Street, N.W.
Second Floor, West Tower
Washington, DC 20005

Re: Formal Case No. 1106

In the Matter of the Investigation of Washington Gas Light Company's ("WGL")
Interruptible Service Customer Class, The Operation of WGL's Distribution
Charge Adjustment, How WGL's Class Cost of Service Study Accounts for
Revenues From Certain Classes of Customers, the Proper Design of
Interruptible Service Rates, and Related Issues

AOBA Reply Comments

Dear Ms. Westbrook-Sedgwick:

Enclosed please find an original and twenty-five (25) copies of the Reply Comments of the
Apartment and Office Building Association of Metropolitan Washington ("AOBA").

Also enclosed is an additional copy. Please stamp the additional copy and return it to me in
the enclosed envelope. Please call me if you have any questions. Thank you for your attention in
this matter.

Sincerely,

Frann G. Francis
Senior Vice President & General Counsel

cc: all parties of record



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CERTIFICATE OF SERVICE
Formal Case No. 1106

I hereby certify on this 19th day of November, 2013, that the attached **Reply Comments** was filed electronically on behalf of the Apartment and Office Building Association of Metropolitan Washington in Formal Case No. 1106 and an original and twenty-five (25) copies were sent by Federal Express to Brinda Westbrook-Sedgwick, Commission Secretary, District of Columbia Public Service Commission, 1333 H Street, N.W., 2nd Floor, West Tower, Washington, D.C. 20005, and copies were mailed first class, postage prepaid to the service list below.

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Commission Secretary
Public Service Commission
Of the District of Columbia
1333 H Street, NW, 2nd Floor
Washington, DC 20005

Cathy Thurston-Seignious, Esq.
Washington Gas Light Company
101 Constitution Avenue, NW, 3rd Floor
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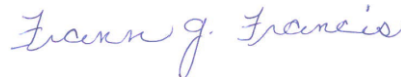
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Frann G. Francis, Esquire

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

In the Matter of the Investigation of)
Washington Gas Light Company (“WGL”))
Interruptible Service Customer Class,)
The Operation of WGL’s Distribution)
Charge Adjustment, How WGL’s Class)
Cost of Service Study Accounts for)
Revenues From Certain Classes of)
Customers, The Proper Design of)
Interruptible Service Rates, and)
Related Issues)

Formal Case No. 1106

**REPLY COMMENTS OF
THE APARTMENT AND OFFICE BUILDING ASSOCIATION
OF METROPOLITAN WASHINGTON**

The Apartment and Office Building Association of Metropolitan Washington (“AOBA”), pursuant to Order No. 17287 (October 31, 2013), hereby files reply comments in response to the Commission’s request for comments to questions raised in Order No. 17208 (July 31, 2013).

On October 15, 2013 AOBA and Washington Gas (“WG” or “Company”) filed comments in response to the Commission’s Order No. 17208. AOBA renews its call for the Commission to conduct evidentiary hearings and require that the Company file testimony in support of its positions. A slightly revised proposed procedural schedule, reflecting the filing of reply comments at this time, is attached.

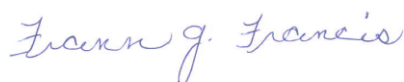
AOBA’s comments recommended that the Commission’s investigation of the WG’s Interruptible Service and rate design result in policy directives and mandates that instruct WG on the proper treatment of Interruptible Service, development of appropriate rates and rate design, and the correct accounting of revenue derived from the Interruptible Service class in order that the Company’s next rate case incorporates the

policy directives and mandates established in this proceeding. A review of WG's proposed tariff and consideration of the Company's positions expressed in WG's October 15, 2013 comments, in response to the Commission's inquiry, are best addressed through the filing of testimony by WG and interested parties and through evidentiary hearings.

The Company's brief comments on the issues embodied in the Commission's request for responses to questions set forth in Order Nos. 17132 and 17208 demonstrate that there is a clear need for the filing of testimony and evidentiary hearings to address these issues. Should the Commission conclude that the filing of testimony and evidentiary hearings are not required, AOBA respectfully requests that the Commission (1) require WG to address the issues identified in Order No. 17132 and 17208 in the Company's next rate case filing, and (2) include AOBA's issues raised in its October 15, 2013 comments in paragraphs 3 through 6 as designated issues in WG's next rate case.

Dated: November 19, 2013

Respectfully submitted,



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Attachment A

Revised Proposed Schedule for Formal Case No. 1106

Commission Publishes Order No. 17208 Opening Investigation of WGL's Interruptible Service Customer Class	July 31, 2013
Initial Comments	October 15, 2013
Reply Comments filed	November 19, 2013
Commission Order	December 19, 2013
Petitions to Intervene	January 6, 2014
WGL Files Direct Testimony and Workpapers	January 8, 2014
Direct Testimony and Workpapers in Response to WGL Filed by OPC and Intervenors	March 5, 2014
Settlement Conference	March 12, 2014
Rebuttal Testimony, Exhibits, and Workpapers by all Parties	April 2, 2014
Public Hearings	TBD
Evidentiary Hearings	Tuesday, April 22, 2014 at 10 am Wed., April 23, 2014 at 10 am Thursday, April 24, 2014 at 10am
All Post-Hearing Briefs	May 15, 2014
PSC Decision	June 26, 2014