



---

APARTMENT AND OFFICE BUILDING  
ASSOCIATION OF  
METROPOLITAN WASHINGTON

---

January 17, 2014

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

Re: Case No. 1110

In the Matter of the Application of Washington Gas Light Company for Approval of a  
Weather Normalization Adjustment

**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's ("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 and General Counsel

cc: All parties of record



---

1050 17th Street, NW, Washington, DC 20036  
Phone: 202-296-3390 • Fax: 202-296-3399 • Email: [webmaster@aoba-metro.org](mailto:webmaster@aoba-metro.org)  
URL: <http://www.aoba-metro.org>



**CERTIFICATE OF SERVICE**  
**Formal Case No. 1093**

I hereby certify on this 17<sup>th</sup> day of January, 2014, that the attached Reply Comments were filed electronically on behalf of the Apartment and Office Building Association of Metropolitan Washington in Formal Case No. 1110 and an original and twenty-five (25) copies of the above Comments 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.

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
Of the District of Columbia  
1333 H Street, NW, 2<sup>nd</sup> Floor  
Washington, DC 20005


Cathy Thurston-Seignious, Esq.  
Washington Gas Light Company  
101 Constitution Avenue, NW, 3<sup>rd</sup> Floor  
Washington, DC 20080

Richard D. Beverly, Esq.  
Office of the General Counsel  
DC Public Service Commission  
1333 H Street, NW, 7<sup>th</sup> Floor East Tower  
Washington, DC 20005

Sandra Mattavous-Frye, Esq.  
Office of the People's Counsel  
1133 15<sup>th</sup> Street, NW, Suite 500  
Washington, DC 20005

Christopher Lipscombe, Esq.  
Kimberly Lincoln-Stewart, Esq.  
DC Public Service Commission  
1333 H Street, NW, 7<sup>th</sup> Floor East Tower  
Washington, DC 20005

Dr. Phylicia Fauntleroy-Bowman  
DC Public Service Commission  
1333 H Street, NW, 7<sup>th</sup> Floor East Tower  
Washington, DC 20005



---

Frann G. Francis, Esquire

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

IN THE MATTER OF THE	)	
	)	
Application of Washington Gas Light Company'	)	Formal Case No. 1110
For Approval of a Weather Normalization Adjustment	)	

**REPLY COMMENTS OF  
THE APARTMENT AND OFFICE BUILDING ASSOCIATION  
OF METROPOLITAN WASHINGTON  
ON THE WASHINGTON GAS LIGHT COMPANY'S  
APPLICATION FOR A WEATHER NORMALIZATION ADJUSTMENT**

The Apartment and Office Building Association of Metropolitan Washington ("AOBA"), hereby files these reply comments in response to comments submitted on the Washington Gas Light Company's ("Washington Gas" or "Company") November 8, 2013 application for a Weather Normalization Adjustment ("WNA").

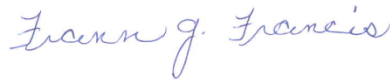
In AOBA's comments, submitted on December 20, 2013, we requested that the Commission deny the Company's WNA proposal because (1) it violates the Commission's policy on regulating distribution rates and ratemaking adjustments, (2) the Company's proposal is inconsistent with the Commission's policy presumption against single-issue ratemaking, and (3) the Commission precedent in Formal Case 1093 requires consideration of any WNA or similar revenue adjustment requested by the Company in WG's next base rate case.

The Office of the People's Counsel ("OPC") filed comments on January 3, 2014. In its comments, OPC also determined that the Company's WNA should be denied for similar reasons. AOBA agrees with the sentiments expressed in OPC's comments.

There is no basis provided by WG that supports Commission consideration at this time, nor approval, of the Company's WNA proposal. AOBA renews its request that the Commission deny the Company's WNA proposal.

Dated: January 17, 2013

Respectfully submitted,



---

Frann G. Francis, Esq.  
Senior Vice President & General Counsel  
Apartment and Office Building  
Association of Metropolitan Washington  
1050 17th Street, N.W., Suite 300  
Washington, DC 20036  
(202) 296-3390  
DC Bar Number # 210385

W. Shaun Pharr, Esq.  
DC Bar Number # 362595  
Nicola Y. Whiteman, Esq.  
DC Bar # 468051