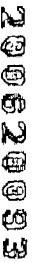


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June 5, 2020

BY ELECTRONIC TRANSMISSION

Joel H. Peck
Clerk
State Corporation Commission
Document Control Center
Tyler Building, First Floor
1300 East Main Street
Richmond, VA 23219

RE: *Temporary Suspension of Tariff Requirements,*
Case No. PUR-2020-00048

Comments of the Apartment and Office
Building Association of Metropolitan Washington

Mr. Peck:

If the current and mandatory moratorium on the suspension of utility service disconnections is extended, the Apartment and Office Building Association of Metropolitan Washington (“AOBA”) respectfully recommends that any costs or expenses incurred as a result of the extension be recovered on a cost-causation basis. Specifically, any costs incurred as result of extending the moratorium to residential customers should be recovered from residential ratepayers. And any costs incurred as a result of extending the moratorium to commercial customers should be recovered from commercial ratepayers.

As you know, AOBA is a non-profit entity chartered to represent the interests of multifamily and commercial building owners in the Virginia, Maryland and the District of Columbia. In Virginia, AOBA members own, manage and/or control over 131,000 apartment units and over 75 million square feet of office building space.

AOBA takes no substantive position on whether the moratorium should be extended or replaced. While the COVID-19 pandemic has extracted an immediate and significant toll on the ability of customers to pay for utility service, AOBA agrees that an

“unlimited” moratorium is “not sustainable. We understand, however, that the havoc wrought on our economy and on millions of Virginia utility customers by the COVID-19 pandemic may dictate further assistance to those in desperate need during this very challenging time.

Any recovery, though, should be in accordance with cost-causation or cost-responsibility principles. Under this long-standing Commission principle, customers who cause the Company to incur additional costs should bear primary responsibility for the costs. The cost-causation principle also prevents cross-subsidization among classes of customers, ensuring that commercial customers do not pay a portion of the additional moratorium costs incurred by residential customers. Sound policy considerations, therefore, support the recovery of additional moratorium costs on a customer class basis.

On behalf of AOBA, I thank you for your time and consideration of these comments and, if you have any questions or need additional information, please do not hesitate to contact me should you have any questions or if I may be able to provide further information to aid in your determination.

Very truly yours,

/s/ Brian Gordon

Brian Gordon
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