

April 16, 2014

HAND DELIVERED VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary Commonwealth of Pennsylvania Pennsylvania Public Utility Commission 400 North Street Keystone Building, 2nd Floor Room N201 Harrisburg, PA 17120

APR 16 2014

RECEIVED

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

RE: AOBA Alliance Comments on Rulemaking to Amend the Provisions of 52 Pa. Code, Section 54.5 Regulations Regarding Disclosure Statement for Residential and Small Business Customers and to Add Section 54.10 Regulations Regarding the Provision of Notices of Contract Renewal or Changes in Terms

Dear Ms. Chiavetta:

AOBA Alliance, Inc., a wholly owned subsidiary of the Apartment and Office Building Association of Metropolitan Washington (AOBA), is one of the largest customer-based energy procurement services groups in the US and offers competitive energy services to commercial real estate and multi-family customers in the District of Columbia, Maryland, Virginia, and Pennsylvania, PA License Number A-2010-2197104. Participation in the AOBA Alliance is open to all non-residential customers in the aforementioned territories.

For more than a decade, the AOBA Alliance has offered customers a unique contract that is tailored to meet the specific needs of the commercial real estate industry. An important aspect of the AOBA Alliance energy contract is the deliberate exclusion of evergreen and auto-renewal clauses. Every AOBA Alliance participant energy contract has a specific start date and end date and the contract is terminated on the specific contract end date. AOBA Alliance energy contracts are never renewed without the written consent of the customer. All AOBA Alliance participants are contacted by phone or email in advance of their contract expiration and presented options for contract extensions. When an AOBA Alliance participant agrees to a renewal term, the participant is then required to sign a renewal Agreement that specifies the renewal contract start and end date.

The AOBA Alliance will continue the practice of the deliberate exclusion of evergreen and auto-renewal clauses from our energy contracts and continue to offer finite contract terms on both the initial contract as well as any subsequent renewal contracts

Please date stamp the extra copy of these comments and return it to the undersigned in the enclosed self-addressed postage-prepaid envelope. Please direct any questions to the undersigned at (202) 296-3390.

Thank you for your attention to this matter.

April Kreller Director of Operations AOBA Alliance, Inc.

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