May 18, 2018

VIA EMAIL

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

RE: Case 15-E-0751 – In the Matter of the Value of Distributed Energy Resources


Dear Secretary Burgess:

The Clean Energy Parties, including the Solar Energy Industries Association, the Alliance for Clean Energy New York, the Coalition for Community Solar Access, Natural Resources Defense Council, New York Solar Industries Association, Pace Energy and Climate Center, and Vote Solar, as well as the Acadia Center, have articulated both by letter and at stakeholder meetings several significant concerns regarding the stakeholder process, methodology and lack of utility information.

Regarding the upcoming deadline for rate design proposals, we respectfully request an extension of time, to June 22, 2018. We note that AEE Institute has asked for the same extension in their letter of May 14, 2018.

There are several reasons for the request:

- We await written clarity in the scope of the classes or group of customers in question posed in our letter of May 4, 2018;
- The inputs to the workbook model are restrictive and will require that we produce an accompanying proposal that accompanies the workbook model;
We await cost of service studies for all utilities as requested in our letter of May 4, 2018. An additional month of time will provide all parties with time to review the information we have requested, and not yet received, so we can prepare quality rate design proposals.

We respectfully disagree with the Joint Utility (JU) letter filed May 18, 2018. And we note, per the Commission Phase One VDER Order, that net metering is intended to continue in its current form until 2020. An additional month to prepare initial proposals does not disrupt the overall case timeline. Furthermore, while the utilities have been working on their handbooks and intake tool for quite some time, other stakeholders in the case have had a little more than a month to digest and respond to this information.

We appreciate your consideration of this request. We look forward to working with the other stakeholders in this proceeding to evaluate potential rate designs that align with the state policy goals of New York. Please direct any questions on this letter to David Gahl at dgahl@seia.org, or at (518) 487-1744.

Respectfully submitted,

/s/
David Gahl
Director of State Affairs, Northeast Solar Energy Industries Association

/s/
Mark LeBel
Staff Attorney
Acadia Center

/s/
Anne Reynolds
Executive Director
Alliance for Clean Energy New York

/s/
Brandon Smithwood
Policy Director
Coalition for Community Solar Access

/s/
Miles Farmer
Staff Attorney
Natural Resources Defense Council
/s/
Rob Garrity
President
New York Solar Energy Industries Association

/s/
Karl Rabago
Executive Director
Pace Energy & Climate Center

/s/
Nathan Phelps
Regulatory Director
Vote Solar