November 8, 2014

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

By Electronic Delivery to: secretary@dps.ny.gov

Re: Case 09-E-0115 - Con Edison Tariff Filing on Riders S and U
– Comment of Energy Spectrum, Inc. – Due date November 8, 2014

Dear Secretary Burgess:

Energy Spectrum, Inc., an aggregator participating in the Company’s Demand Response (“DR”) programs, offers these comments on Con Edison’s recent amended tariff filing on proposed changes to the Company’s Riders S and U. We commend the Company for working to continually improve the program.

The issue of how much demand will be verified for each “completed electric efficiency project” remains open in item (D) 4 first paragraph at the top of tariff leaf 257.1 (Rider S) and in item (F) 4 first paragraph at the top of tariff leaf 282.1 Rev 2.

Energy Spectrum understands that the Company has proposed to develop an undefined “manual/compliance document” (by end of Dec 2014) to determine how much demand will be verified for each “completed electric efficiency project”.

Energy Spectrum believes that this should be spelled out in the tariff. We propose that the following clause “in accordance with a Measurement and Verification manual”, be added after the words “completed electric efficiency project.”

Therefore in both locations the revised item 4 would conclude with:

"Completed electric efficiency project in accordance with a Measurement and Verification manual"

The Commission should direct the Company to confirm that the tariff leaves should reflect this proposal to bring clarity to the DR programs.

Thank you for the opportunity to offer these comments.

Respectfully submitted,

Energy Spectrum, Inc.

Note the M&V manual should be developed by the Company with input from stakeholders.