March 5, 2018

VIA ELECTRONIC FILING

Hon. Kathleen H. Burgess  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Re: Case No. 15-E-0751—In the Matter of the Value of Distributed Energy Resources  
Case No. 17-01277—In the Matter of the Value of Distributed Energy Resources  
Working Group Regarding Rate Design

Dear Secretary Burgess:

Pace Energy and Climate Center (“Pace”) submits this request to the Department of Public Service Staff (“Staff”) in order to obtain clarification on the scope of the above-referenced proceedings.

Pace requests that the Staff indicate whether the following topics can be raised by parties, will be added to the formal agenda for the proceedings, will be addressed in the meetings, and/or will be addressed in recommendations or white papers developed by the Staff in the Value of Distributed Energy Resources (“VDER”) Rate Design Working Group, or elsewhere in the VDER proceeding:

- Policy issues relating to cost of service study methodologies. Pace understands “policy” issues to include regulatory matters of general application and not uniquely limited to the factual characteristics of any single utility.
- The merits of Ramsey-Boiteux pricing and its application to cost of service studies and rate design.
- Customer demographic, usage, and other statistical data; grouped by census tract, zip code, neighborhood, or other basis smaller than utility customer class—often referred to as “mass market customer data.”

Pace further requests that the Staff indicate whether the VDER proceeding will review, evaluate, and make recommendations relating to the following aspects of costs of service studies and the methods used:

- Customer sampling methods
- Cost classification
- Cost functionalization
- Cost allocation

To the extent that the above listed issues will be addressed in the VDER proceeding, Pace requests that the Staff indicate whether parties in the VDER proceeding will have an opportunity to establish a record on the issues, including the presentation of experts and studies, and the submission of questions for response by other parties and their experts.
Pace appreciates Staff’s clarification on the above questions. Clarification would permit parties to the VDER docket and related dockets, many of whom have been participating in the VDER proceeding since its inception and have contributed valuable time and resources for the development of a full record, to better assess and plan their resources and engagement going forward. 

Thank you for your consideration.

Sincerely,

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