

September 12, 2016

Honorable Kathleen Burgess  
Secretary  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, New York 12223

***RE: Dockets 15-E-0302 / 16-E-0270 & other ongoing cases and policies with bill impacts***

Dear Secretary Burgess:

On behalf of our organizations, we request that at your September 13 workshop on implementation of the PSC's August 1 order, in the above mentioned dockets, there will be an in depth discussion on how the clean energy standard implementation will impact residential ratepayers' monthly electric and other energy bills.

AARP and PULP are very concerned that the clean energy standard implementation (particularly the subsidy for power plants) may have costly impacts on New Yorkers already facing among the highest electricity rates in the nation.

The mention of a potential \$2/month residential bill impact from the Tier 3 purchase of Zero Emission Credits in the Order was not accompanied by any details or citation to where such an estimate was derived and fails to provide sufficient cost and bill impact information for each customer class, for each utility, or for the entire 12-year commitment to support these power plants. Indeed, several parties have estimated the cost of up to \$8 billion to comply with this mandate. We believe that it would be in the public interest if the PSC staff could clarify this calculation at the workshop.

Our concern is even more heightened by a number of other dockets which also impose additional costs on New York's electricity customers, such as but not limited to impacts upon:

#### Electric Customers' Bills

- mandates for smart meters (\$1.5 billion for Con Ed ratepayers)
- approval for cost recovery for distributed energy demonstration projects
- approval for the increase to the \$5 billion fund for NYSERDA programs; and

#### Gas Customers' Bills

- rate increase requests including a 26.7% National Grid-NY gas increase, a 15.5% increase for National Grid-LI, including a "ratebasing" of more than \$700 million in superfund cleanup costs by National Grid-NY

These cases and the clean energy standard rate increase simply cannot be viewed separately. They all will result in significant energy utility bills impacts. Looking at these increases together, they threaten the value and impact of the increase in funding for low income assistance programs from Case 14-M-0565, and continue to threaten the affordability of essential electric and gas service for New York's most vulnerable customers.

Accordingly, we urge the PSC to include a discussion of the cost impact on ratepayers (in dollars per month and dollars per household), as well as all filed and approved requests this year listed in this letter.

Sincerely,

Beth Finkel  
State Director for AARP in New York

Richard Berkley, Esq.  
Executive Director  
PULP