SUBJECT: Case 15-E-0751, Case 15-E-0082, & Matter 17-01276

To the Hon. Kathleen H. Burgess, Secretary

Please see our comment below in response to the Notice Soliciting Comments on Staff Proposal and Related Matters issued on May 22nd, 2018.

1. Interzonal Crediting - Should a DER, eligible for and receiving compensation based on the VDER value stack tariff, be permitted to apply the credits it receives to the bills of customers in the same utility territory as the DER but a different New York Independent System Operator (NYISO) load zone, either through CDG or through single customer remote crediting?

We propose that DER be eligible for interzonal crediting within the same utility territory independent of NYISO load zones. There are regions of Upstate New York where the optimal locations for DER are located in low population centers. However, these CDG projects can feed a large scale population, located in the same utility zone. Unfortunately, it falls outside of the NYISO load zone. This is very prevalent in National Grid and NYSEG Western territory where NYISO Zone A and B intertwine on the western edge of the major population areas of Zone A. By allowing interzonal crediting, we would eliminate this issue and allow for construction of DER in the rural, low soft cost geographic territory surrounding population centers that, unfortunately, due to a NYISO load zone demarcation, fall outside the NYISO zone but service the same utility territory.

We STRONGLY support the removal of the interzonal credit barrier for those DER within the same utility territory, despite being in different NYISO load zones.

Respectfully;

Thomas J. Guzek
Managing Partner