

# Consumer Power Advocates

Columbia University Medical Center  
Fordham University  
Memorial Sloan Kettering Cancer Center  
Montefiore Medical Center

Mount Sinai Health System  
New York Presbyterian Hospital  
New York University  
NYU Langone Medical Center

The College of New Rochelle

Filed electronically

June 5, 2015

Honorable Kathleen Burgess  
Secretary to the Commission  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350s

RE: Case 13-E-0030- Con Edison electric rates

Dear Secretary Burgess:

Consumer Power Advocates is an alliance of large not-for-profit institutions in the greater New York region. Our membership is open to hospitals, universities, medical schools, and cultural institutions. CPA members include some of the largest employers and energy users in New York State. Six of our recent member hospitals are among the 15 largest regional health organizations including five of the ten largest. According to *Crain's New York Business*, six current CPA members, among hospitals, universities, and other related institutions, are among New York City's 25 largest employers.

Below is a list of our current members:

Columbia University Medical Center  
The College of New Rochelle  
New York Presbyterian Hospital  
Fordham University  
Memorial Sloan-Kettering Cancer Center  
Montefiore Medical Center  
Mount Sinai Health System New York University  
NYU Langone Medical Center

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CPA is an active party and a signatory to the Joint Proposal filed April 20, 2015 in the above captioned case. We offer this statement in support of the Joint Proposal to extend the current Con Edison electric rates until December 31, 2016.

## STATEMENT IN SUPPORT OF THE JOINT PROPOSAL

CPA believes that the Joint Proposal (JP) is in the best interests of its members, and superior to our expectation of the result of any settlement for case 15-E-0050, filed by Con Edison in January 2015. By extending the current rates, the parties will be spared the costly effort of investigating, analyzing and negotiating or litigating the January case. In that case, Con Edison requested an annual rate increased \$368 million, which did not include an additional \$48 million scheduled to go into effect at the end of the current rate plan. While it is impossible for us to judge what amount of rate relief the Commission may have allowed, we believe that a large increase in base rates may have been required.

The JP also requires an excess earnings sharing mechanism that reduces the sharing thresholds by 20 basis points, relative to the current mechanism.

Of the greatest importance to our members is the immediate implementation of improvements to the standby rate tariff. These improvements include restructuring of the MAC charge applicable to standby customers, the use of net energy purchased in place of gross energy taken from the system and a Contract Demand Credit. The provisions included in the JP are significantly better than those in the original filing. The opportunity to earn a Contract Demand Credit by proven reliable operation of on-site generators is significantly enhanced by the reduction of the number of measured demand hours and by the allowance of up to 3 generator trip events. The JP also allows Con

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Edison to file to make these changes effective June 15<sup>th</sup> of this year, rather than next year as would have occurred had the parties failed to file a JP.

The JP also requires Con Edison to develop a rational and transparent process to implement the Advanced Metering Initiative (AMI). The AMI is an ambitious program, and critical to the success of REV. The process required by the JP will insure that the AMI meets customers' needs and avoids potentially costly missteps.

Finally, while many issues raised by the Company's February filing in case 15-E-0050 remain unresolved, notably depreciation and revenue allocation, CPA believes those issues can be deferred without undue harm to its members or to ratepayers generally.

For all the above reasons, Consumer Power Advocates urges the Commission to accept the Joint Proposal in its entirety.

Respectfully submitted,

*Catherine M. Luthin*

Executive Director  
Consumer Power Advocates

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