

June 15, 2015

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

Re: Case 14-M-0101 – Proceeding on Motion of the Commission in Reforming the Energy Vision – Response to Petition for Rehearing

Dear Secretary Burgess:

Pursuant to Section 22 of the Public Service Law and 16 NYCRR 3.7(c), Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., Central Hudson Gas & Electric Corporation, Niagara Mohawk Power Corporation d/b/a/ National Grid, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation (together, the “Joint Utilities”) file this response to the March 30, 2015 Petition for Rehearing (“Petition”) jointly filed by Alliance for a Green Economy, Binghamton Regional Sustainability Coalition, The Center for Social Inclusion, Citizens’ Environmental Coalition, Citizens for Local Power, and People United for Sustainable Housing (“PUSH”) Buffalo of the Commission’s February 26, 2015 Order Adopting Regulatory Policy Framework and Implementation Plan (“Track One Order”) in the Reforming the Energy Vision (“REV”) Proceeding.¹ By Notice Concerning Petition for Rehearing, the Public Service Commission (the “Commission”) deemed the petition timely and directed that any responses be filed by June 15, 2015.² The Petition requests rehearing and/or clarification of the following: (1) utility ownership of distributed energy

¹ Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy* (“REV Proceeding”), Order Adopting Regulatory Policy Framework and Implementation Plan (issued February 26, 2015) (“Track One Order”).

² REV Proceeding, Notice Concerning Petition for Rehearing (issued April 10, 2015), p. [1].

resources (“DER”) for moderate and low-income customers and (2) opportunities for participation by members of the public and public-interest stakeholders in Track Two.³

With respect to the first issue, the Joint Utilities anticipate working with community groups and third parties to identify opportunities for DER for moderate and low-income customers, consistent with the Commission’s direction. The Joint Utilities believe that different forms of DER ownership may develop to address the particular situations and needs of moderate and low-income customers. The Joint Utilities further believe that appropriate outreach is essential to engagement with moderate and low- income customers. The Track One Order anticipates and provides the needed flexibility to provide opportunities for these customers to access REV benefits, while providing adequate protection for DER markets to develop.

The Joint Utilities also note the Commission’s history of attention to moderate and low income groups and community groups and see nothing in the Track One Order to the contrary. In sum, the Joint Utilities note that the Track One Order provides and should maintain the flexibility sought by consumer advocates and the Petitioners and respectfully urge the Commission to re-affirm the Track One Order on this issue.

**CONSOLIDATED EDISON COMPANY OF
NEW YORK, INC. and ORANGE AND
ROCKLAND UTILITIES, INC.**

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³ Petition at p. [1].

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NEW YORK STATE ELECTRIC AND GAS CORPORATION and ROCHESTER GAS AND ELECTRIC

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