

October 27, 2017

VIA ELECTRONIC MAIL

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

**Re: Case 15-M-0127, In the Matter of Eligibility Criteria for Energy Service Companies
Case 12-M-0476: Proceeding on Motion of the Commission to Assess Certain
Aspects of the Residential and Small Non-Residential Retail Energy Markets in New
York State.**

Case 98-M-1343: In the Matter of Retail Access Business Rules

**RETAIL ENERGY SUPPLY ASSOCIATION REBUTTAL TESTIMONY
AND EXHIBITS**

Dear Secretary Burgess:

The Retail Energy Supply Association respectfully submits the attached Rebuttal Testimony of Jeff Makhholm of NERA Economic Consulting and Frank Lacey of Electric Advisors Consulting, LLC for filing in Cases 15-M-0127, 12-M-0476 and 98-M-1343. Attachments include:

- **Rebuttal Testimony of Jeff D. Makhholm**
- **Rebuttal Testimony of Frank Lacey and the following rebuttal exhibits:**
 - 1) Exhibit__ (FL -1R)
 - 2) Exhibit__ (FL -2R)
 - 3) Exhibit__ (FL -3R)
 - 4) Exhibit__ (FL -4R)
 - 5) Exhibit__ (FL -5R)
 - 6) Exhibit__ (FL -6R)
 - 7) Exhibit__ (FL -7R)
 - 8) Exhibit__ (FL -8R)

BARCLAY DAMON LLP

By: /s/

David G. Burch
Ekin Senlet

*Counsel for Retail Energy
Supply Association*

80 State Street
Albany, New York 12207
Tel.: (518) 429-4321
dburch@barclaydamon.com
esenlet@barclaydamon.com

*cc: Administrative Law Judges Moreno and Bergen
Active Parties in Parties in Cases 15-M-0127, 12-M-0476 and 98-M-1343*