



December 18, 2017

**VIA ELECTRONIC FILING**

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, New York 12223-1350

Re: Case 15-E-0751 – In the Matter of the Value of Distributed Energy Resources

Matter 17-01277 – In the Matter of the Value of Distributed Energy Resources Working Group  
Regarding Rate Design

Matter 17-01276 – In the Matter of the Value of Distributed Energy Resources Working Group  
Regarding Value Stack.

Dear Secretary Burgess:

Advanced Energy Economy Institute (AEEI), Alliance for Clean Energy New York (ACE NY), and the Northeast Clean Energy Council (NECEC) are writing to express our general support for the Clean Energy Parties plan for Phase 2 of the VDER process and the Solar Energy Industries Association's December 14th letter reiterating their proposal and disagreeing with some modifications suggested by the Joint Utilities.

While we are sympathetic with efforts to make sure the process is appropriately streamlined, for the reasons laid out by Clean Energy Parties, it is important to have a clear, methodical, and transparent process that allows for effective participation by all stakeholders, including small organizations with limited resources.

In addition to our support for the Clean Energy Parties' proposal to address rate design for DER customers first, we urge the Staff to ensure that demand side management technologies will also be addressed in this process. We understand that the need to address DER customers is being driven by the Commission's March 9th VDER Order requiring a Phase Two Methodology recommendation by the end of 2018, however, the application of new rate designs for demand side management technologies is an important topic that should not be put off until after 2018.

We also reiterate our request for professional facilitation of this process. While we have full confidence in the professionalism of Staff, the VDER working groups are large, require significant resources to manage, and cover issues where staff simultaneously must manage group discussion and represent their own positions. Staff have done well given the difficulty of the task, but the process and the efficient use of all stakeholders' time and resources would benefit from professional facilitation.

In short, we reiterate our support for the updated process proposal submitted by Clean Energy Parties on November 11th and SEIA's response to the Joint Utilities' proposal. We look forward to reviewing a process plan from DPS staff.

Respectfully Submitted,

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Janet Gail Besser

/s/  
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/s/  
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