May 18, 2018

VIA ELECTRONIC MAIL

Honorable Kathleen H. Burgess
Secretary
New York State Public Service Commission
Three Empire State Plaza
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

Joint Utilities Response to Extension Request

Dear Secretary Burgess:

Please accept this response on behalf of Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the “Joint Utilities”) to the recent request by AEE Institute (“AEE”) to extend the filing date for rate design proposals in these proceedings from May 23 to June 22.

The Joint Utilities are concerned that a month-long delay will prove problematic to meeting the deadline of the Public Service Commission (“Commission”) to complete a Department of Public Service Staff (“Staff”) recommendation on transitioning from traditional net energy metering by the end of this year. As to the basis for a delay, the Joint Utilities disagree with various characterizations in AEE’s request for extension. For example, AEE’s statement that the workbook model is too restrictive for certain types of rate design proposals ignores Staff’s expressed willingness to consider narratives of rate design proposals that do not fit the workbook template. Moreover, while AEE requests the bill impact models that the Joint Utilities used to develop rate design proposals, the Joint Utilities have not conducted a bill impact analysis and Staff’s schedule does not even contemplate use of bill impact models at this stage of the process. Finally, the Joint Utilities have provided a significant amount of information to AEE and other parties in working group meetings, technical workshops, training sessions, and responses to various data requests. Moreover, the Joint Utilities are not aware of any outstanding data requests.

*Admitted only in New Jersey
In sum, within Staff’s schedule, the Joint Utilities and many other parties have been working diligently with Staff in these proceedings to meet the Commission’s expectations. The Joint Utilities urge against the requested delay.

Thank you.

Very truly yours,

Susan Vercheak

cc
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Warren Myers
Marco Padula