STAFF OF THE DEPARTMENT OF PUBLIC SERVICE
RESPONSE TO INTERROGATORY/DOCUMENT REQUEST

Orange & Rockland Utilities, Inc.
Cases 18-E-0067 & 18-G-0068

Requesting Party: Orange & Rockland Utilities, Inc.
Set No.: 3
Request No.: O&R-15
Responding Witness: Staff Gas Programs & Supply Panel
Date of Response: June 12, 2018

Question:

The Staff Gas Programs & Supply Panel states as follows on page 25, lines 14-17: "The Panel also recommends that while focusing on getting customers to convert from less environmentally friendly heating fuels the Company should evaluate the impact on peak day assets to support these gas customers. The Company should not be adding any new gas customers in areas where reliability is threatened by capacity shortages. The addition of any new customers should be stopped if it means pursuing pipeline projects or otherwise adding to peak day assets." Please provide Staff's definition of "peak day assets" and provide a list of the kinds of assets that Staff believes qualify as "peak day assets."

Response:

A "peak day asset" is any asset identified as necessary to meet peak day demand needs. This includes, but is not limited to, any system design day capacity capability used to meet design day or peak day customer demand. These capacity volumes include pipeline capacity assets, any recallable capacity assets, mandatory assignment of capacity assets, capacity assets supporting the transportation of others, peaking assets, and contracts, etc.