March 28, 2018

Kathleen H. Burgess
Secretary
State of New York
Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Matter 17-0277 – In the Matter of the Value of Distributed Energy Resources Working Group Regarding Rate Design – Joint Utilities’ Response to SEIA

Dear Secretary Burgess:

The Solar Energy Industries Association (“SEIA”) submitted initial comments in this matter on March 22, 2018 that presented its preliminary response to a Brattle Group presentation at the March 6, 2018 Value of Distributed Energy Resources Working Group Regarding Rate Design (“Rate Design Working Group”). SEIA’s comments are premised on its erroneous view that 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 (the “Joint Utilities”) have proposed demand charges for all mass market customers. The Joint Utilities provide the following comments to clarify the record.

At the outset, the Joint Utilities emphasize that the primary purpose of the Rate Design Working Group is to develop, by December 31, 2018, a successor rate design to replace net energy metering (“NEM”) for customers installing NEM-eligible technologies, including solar, starting January 1, 2020. Part of the process to develop this rate design

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*Admitted only in New Jersey
involves parties submitting rate design proposals by May 14, 2018. The Joint Utilities have not yet made a proposal but do plan to submit a rate design proposal pursuant to that schedule. Contrary to SEIA’s characterization, the Joint Utilities sponsored The Brattle Group’s presentation as part of the process to educate the Rate Design Working Group members for them to make more informed proposals in May. The presentation also responds to the Public Service Commission’s direction that stakeholders “analyze the potential impacts of a range of mass-market rate reform scenarios, including time-of-use and demand charges, for delivery and/or default commodity service.”

The Joint Utilities are developing their rate design proposal and considering various approaches, including those presented by The Brattle Group. The Joint Utilities look forward to proposing a NEM successor rate for mass-market customers and engaging with the other stakeholders in that step of the process. Thus, because the SEIA Comments attempt to address a proposal that has not in fact been made, they should be accorded no weight.

The Joint Utilities appreciate the opportunity to provide these comments.

Sincerely,

Susan Vercheak

cc
Marco Padula
Warren Myers
Theodore Kelly, Esq.

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