



Sreekanth Venkataraman

Policy Director
Northeast Clean Heat and Power Initiative

PO Box 1000
New York, NY 10001

svenkat@nechpi.org

October 13, 2016

BY E-MAIL

Hon. Ben Wiles

Hon. Dakin Lecakes

Administrative Law Judges

NYS Department of Public Service

Three Empire State Plaza

Albany, NY 12223-1350

**Re: Case 16-E-0060 – Proceeding on Motion of the Commission as to the Rates, Charges,
Rules and Regulations of Consolidated Edison Company of New York, Inc.
for Electric Service.**

**Case 16-G-0061 – Proceeding on Motion of the Commission as to the Rates, Charges,
Rules and Regulations of Consolidated Edison Company of New York, Inc.
for Gas Service.**

Dear Judges Wiles and Lecakes:

Pursuant to your Ruling on Schedule, Issued September 28, 2016, in the above referenced proceedings, please consider this letter as the Statement in Limited Support of the Joint Proposal (“JP”) on behalf of North East Clean Heat & Power Initiative (NECHPI). NECHPI is an active party and I speak for NECHPI.

NECHPI is a 501(c)(6) business league functioning primarily in the eight northeastern states of New York, New Jersey, Connecticut, Rhode Island, Massachusetts, Vermont, New Hampshire, and Maine. We promote policies and practices conducive to the deployment of clean combined heat and power (“CHP”) applications where high overall efficiency and economic and environmental benefits will be achieved.

The goal of facilitating more effective/efficient/flexible utilization of “embedded” resources, includes the promotion of a variety of pilots by the New York Independent System Operator (NYISO) and the Company dealing with distributed energy resources (DER). While Several pilots have been advanced by the JP, which is noteworthy, we believe that the pilots alone do not do enough.

The Standby Reliability Credit proposal is an item on which we have reserved support. We strongly believe that the existing operating parameters for the period of operation and hours in the Con Ed territory should not be tampered with. We do not believe there are sufficient justifiable reasons (through load studies or bill impact analysis) that warrant the need to abandon the current reliability program. In this context, it is important that the same period and hours of RY1 should be kept for RY2 and RY3 instead of undercutting the participating customers. Changing the period and hours will be a serious issue for the residential facilities given that they have other legal obligations to meet.

Thank you for the opportunity to offer these comments.

NECHPI reserves the e right to comment further in reply to initial comments of the undersigned.

Respectfully submitted,

Sreekanth Venkatamaran

Signature:

Policy Director
NECHPI