



THE E CUBED COMPANY, L.L.C.

October 5, 2016

Providers of Strategic
Energy Services At
The Exponential
Interface Among

- Energy
- Economics and
- Environment

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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.

The E Cubed Company, LLC and Joint Supporters Shared Statement in Limited Support of the Joint Proposal

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 The E Cubed Company, LLC (“E Cubed LLC”) and Joint Supporters (“JS”), a voluntary association. Both are Active Parties and I speak for both.

Pursuing a cleaner and more efficient future at the transitional and exponential interface of energy, environment and economics (hence the logo E3 or E Cubed) E Cubed LLC and JS have participated in generic and specific issue cases in New York and other States since 1989. Relevant to the instant case is work on interconnection to and service with distributed energy resources, especially relatively clean natural gas generation and energy efficiency compared to the prior widespread use of fuel oil and coal. Our negotiations of standby service rates in New York and other jurisdictions includes the framework now up for modification in New York in the REV process, including Track Two, and in this Case.

We have been campaigning for twenty years for more effective utilization of “iron in the ground”, i.e. New York and Con Edison’s widespread base of Cogeneration

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facilities, both owned by outside parties/customers and when allowed, owned by Con Edison and the gas companies in southeastern New York, especially earlier the KeySpan affiliates.

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). Several pilots have been advanced by the JP. This is a plus for the JP. However, in our view the pilots do not go far enough.

The JP furthers utilization of existing resources as well as promotes new more efficient and cleaner resources. Procedures have been set in place to advance the potential export from existing resources through a pilot. We negotiated for more opportunity for export and regretfully had to compromise for less.

Most specifically, the Standby Reliability Credit proposal is an item on which we reserved support.

We were parties to the Joint Proposal in Case 15-E-0050 and Case 13-E-0030 which the Commission approved on June 19, 2015. The Commission adopted “the changes to Standby Service as proposed in the Joint Proposal and addendum.” (p 42)

The program came into place in 2015 with a definition of summer period and hours (June 15-September 15 and 10-10 M-F) that was designed to, by the participants in 2015 and 2016.

The Commission declared that:

Standby customers will now have the opportunity to prove the reliability of their generating facilities and to be rewarded for such performance. (p.42)

Because of the Commission and the Company’s commitments to participating Standby Customers, we strongly endorse going forward keeping the existing operating parameters in the Con Ed territory for the period of operation and hours. The Commission should not undercut the participating customers.

Neither Con Edison, the Staff nor any other party indicated through load studies or bill impact analyses that changes were justified other than that the Staff wanted to do it. That is not sufficient cause to abandon this “proven reliability” program.

The same period and hours of RY1 should be kept for RY2 and RY3. Thus five years of continuity is available to prove the reliability of their generating facilities and to be rewarded for their performance beginning in 2015. Changing the period and hours will work a hardship for residential facilities that have other legal obligations to meet. The old adage is appropriate. “If it ain’t broke, don’t fix it!”

Thank you for the opportunity to offer these comments.

E Cubed LLC and the JS reserve the right to comment further in reply to initial comments of

Respectfully submitted

A handwritten signature in cursive script that reads "Ruben S. Brown". The signature is written in black ink on a white background.

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