



VIA EMAIL

October 19, 2018

Theodore Kelly
Assistant Counsel
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12233

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

Dear Mr. Kelly:

The Clean Energy Parties (“CEP”) welcome and appreciate the opportunity to provide additional iterations of rate design options for further evaluation. The additional changes we are suggesting in this letter are aligned with our original rate design proposals filed May 29, 2018 and a subsequent letter filed October 9, 2018.

We are requesting the following rate design iterations be considered for residential and small general service customers for all six utilities:

1. Seasonal 2-part TOU (version 1)

Customer charge	\$7/month
Summer peak to non-summer peak ratio	3:2
Peak to off peak, summer	2.5:1
Peak to off peak, non-summer	2:1
Summer and winter peak period	2 PM to 7 PM, weekdays

2. Seasonal 2-part TOU (version 2)

Customer charge	\$7/month
Summer peak to non-summer peak ratio	2:1
Peak to off peak, summer	2:1
Peak to off peak, non-summer	1.5:1
Summer and winter peak period	3 PM to 8 PM, weekdays



3. Critical Peak Price (CPP)

We request JU and Staff to evaluate a critical peak price on top of the TOU rates above. A CPP with a TOU is a valuable option for DPS to consider. These rates have proven successful in reducing peak consumption while lowering stress on the transmission and distribution system during extreme conditions. We initially proposed a seasonal 2-part CPP rate in our May 29, 2018 proposal, but it was not considered.

The CEP appreciate the opportunity for consideration of additional rate design options for evaluation. We look forward to reviewing the results of the additional analysis.

Sincerely yours,

A handwritten signature in black ink that reads "David Gahl".

David Gahl
*Solar Energy Industries Association (on
behalf of the Clean Energy Parties)*

cc: Theodore Kelly (via email)
Warren Myers (via email)
Marco Padula (via email)