

Consumer Power Advocates

Columbia University Medical Center
Continuum Health Partners
Fordham University
Luthin Associates, Inc.
Memorial Sloan Kettering Cancer Center

Montefiore Medical Center
Mount Sinai Medical Center
New York Presbyterian Hospital
New York University
NYU Hospitals Center

November 26, 2014

Honorable Kathleen Burgess
Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 14-M-0094- Clean Energy Fund
Case 14-M-0101- Reforming the Energy Vision
Consumer Power Advocates comments on the Clean Energy Fund filing

Dear Secretary Burgess:

Consumer Power Advocates' mission is to lower energy costs for our members through representation in energy-related regulatory and legislative proceedings. CPA is an alliance of large not-for-profit institutions in the greater New York region. Our membership is open to hospitals, universities, medical schools, and cultural institutions. CPA members include some of the largest employers and energy users in New York State. Six of our recent member hospitals are among the 15 largest regional health organizations including five of the ten largest. Six current CPA members, among hospitals, universities, and other related institutions are among New York City's 25 largest employers, according to *Crain's New York Business*. All of our members purchase electric service from Con Edison, and some currently operate various distributed energy resources, including on-site generators and campus distribution systems. Our members also participate in various demand response and energy efficiency programs, including those sponsored by NYSEERDA, NYISO and Con Ed.

Our current members are:
Continuum Health Partners
Fordham University
Memorial Sloan-Kettering Cancer Center
Montefiore Medical Center
Mount Sinai Medical Center
New York Presbyterian Hospital
New York University

535 Main Street, Allenhurst, NJ 07711
Tel 732-774-0005 Fax 732-774-0049

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CPA generally supports NYSERDA's September 25, 2014 Clean Energy Fund (CEF) proposal. The proposal describes a workable path to the future electric system without unduly burdening ratepayers. Of particular importance to our members are the cost savings achieved by the reduction of the combined SBC, EEPS and RPS collection cap by \$225 million annually.

Of equal importance is NYSERDA's commitment to used unexpended SBC funds to continue current programs. In contradiction to the DPS Staff Track 1 Straw Proposal, which would have had utilities taking responsibility for current SBC, RPS and EPPS programs by the end of 2016, the CEF proposal would continue NYSERDA administration through the transition period. It is essential that recent successful initiatives continue during the transition. Among the most important of these successes is a growing network of service businesses, aggregators and other contractors in the energy field. These businesses will be key players in implementing the Commission's vision a cleaner and more resilient energy future. By continuing to fund these efforts, the CEF proposal satisfies some of the conditions that CPA attached to its support for the Straw Proposal. These conditions include that current effective energy efficiency and demand management programs are extended until replacement programs can be reasonably transitioned and implemented without eroding the current progress, that customers and their operations are not harmed in the rush to transform the utility future, and that all current contractual obligations are honored. The continuation of current NYSERDA programs is a necessary component of all these conditions.

Energy efficiency and demand response are necessary parts of achieving clean energy goals, and NYSERDA's programs have achieved significant reductions in total energy use and peak system demand. The efficiencies achieved by current NYSERDA programs compliment the more ambitious changes proposed in the REV case, and help insulate customers from possible bill impacts caused by changes in the traditional utility business model.

To summarize, CPA supports CEF as a beneficial, market-driven financing option, which has the capability to support the investments necessary to implement REV, and we believe funding for NYSERDA energy efficiency, demand response and renewable energy programs must be maintained at current levels during the transition to a more market oriented and customer centered energy system.

Consumer Power Advocates looks forward to continuing to work on this important effort.

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Respectfully submitted,

Catherine Luthin

Executive Director, Consumer Power Advocates

Cc: All active parties

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