

Consumer Power Advocates

Columbia University Medical Center
Fordham University
Memorial Sloan Kettering Cancer Center
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Mount Sinai Health System
New York Presbyterian Hospital
New York University
NYU Langone Medical Center

Filed electronically

December 1, 2015

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

RE: c.15-G-0601 – Tariff filings by Con Edison to revise Rider H, Distributed Generation Gas Delivery Service

Dear Secretary Burgess,

Consumer Power Advocates (CPA) supports the revisions to Rider H filed by Con Edison. There revisions will allow the operators of distributed generation (DG) to enjoy the more favorable Rate II delivery rates for all gas used for electric generation, provided that the total aggregated generating plant meets the 5 MW minimum requirement. This removes from the tariff any ambiguity concerning the appropriate rate to be applied to gas used in generating units smaller than the 5 MW threshold. This is the correct result because, regardless of the size of individual units, DG plants are managed as an integrated plant to meet the electric and thermal requirements of the host load. This also corresponds with the current NYISO proposal for the sale of energy and capacity from “behind-the-meter” DG plants, which provides for all units to be aggregated. The use of different and more costly gas rates in smaller units would unnecessarily disadvantage the owners of complex DG plants in the wholesale markets.

The proposed revisions allow that all DG units installed at a Specified Location may be aggregated for the purpose of qualifying for Rate II. A Specified Location is defined as “several buildings within a single parcel of land not intersected by a public highway or a city street, under ownership of a single customer...” Con Edison has provided no justification for this requirement.

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

The Company's campus tariff allows electric loads to be located across city streets, and the Rider H requires should be no different in this regard. The Commission should direct Con Edison to file further revisions allowing the aggregation of DG units across streets, provided that they serve a common campus load.

With that change, the revised Rider H will better serve to encourage the development of efficient DG to meet the City's need for resilient clean energy.

Thank you for the opportunity to comment on these important issues.

Respectfully Submitted,

John J. Dowling

Director- Regulatory Issues, Consumer Power Advocates