

Consumer Power Advocates

Columbia University Medical Center
Fordham University
Memorial Sloan Kettering Cancer Center
The College of New Rochelle

Mount Sinai Health System
New York Presbyterian Hospital
New York University
NYU Langone Medical Center

Electronic filing only

June 13, 2016

Hon. Kathleen Burgess
Secretary
New York State Department of Public Service
3 Empire State Plaza
Albany, NY 12223

Re: Case 16-E-0196, Tariff Filing by Con Edison to revise the offset provisions included in electric Standby Service.

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. According to *Crain's New York Business*, four of CPA's current member hospitals are among the 25 largest hospitals in New York, all of which are also among the five largest hospital systems. In addition, two CPA member hospitals are among New York's five largest employers.

On April 4, 2016, Con Edison (Company) filed proposed amendments to its Electric Tariff to allow the use of a single distributed generator (DG) by multiple customers. These are the comments of Consumer Power Advocates (CPA) on that filing.

The Multi-Party Offset provisions were the subject of a collaborative formed as a result of Case 13-G-0031(Con Edison Gas Rates). Over the course of many months, CPA, New York City and other

participants consistently opposed the new single building limitation. Nevertheless, Con Edison chose to ignore the advice of the parties, and filed amendments which include that new restriction.

DGs are one of the distributed energy resources (DERs) necessary to support the microgrids that are one of the essential features of Reforming the Energy Vision (REV). Without DG or other controllable resources, it will be impossible to balance load and with intermittent renewable supply on any proposed microgrid, and the value of a microgrid will be severely constrained if it is limited to a single customer, and even more constrained if it is limited to a single building. We expect large campuses served by DGs, such as those operated by CPA members, to be among the first and best microgrid opportunities. By restricting these opportunities, Con Edison is directly undermining REV.

In its pending amendments to allow multiple customers to receive energy from a single DG (offset service) receive offset service, the Company added a new definition of which applies only to the new Multi-party Offset service. General Rule 20.2.1(B)(8)(a)(3)(b) states: “Under Multi-party Offset, “premises” means “a single building.” CPA objects to the single building limitation, because in some cases campuses include leased space in which the owner prefers that the lessee maintains the utility accounts, or because a single institution may be organized as multiple corporations. For example, a hospital campus may include a medical school and independently owned businesses in leased spaces, such as gift shops or cafeterias. These leased spaces may be in any building within a campus, including buildings separated by streets. The proposed tariff would not allow the use of a campus DG to serve leased spaces if a single campus owner does not maintain all the accounts.

CPA urges the Commission to reject the current filing in the above captioned case, and to require Con Edison to file further amendments to its electric tariff allowing the use of Multi-party Offset service in multiple buildings.

Thank you for the opportunity to comment on this issue of importance to our members.

Respectfully submitted,

Catherine M. Luthin

Executive Director