

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

Via electronic filing only

June 27, 2016

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

RE: 15-G-0185- Fuel Oil Supply Coordination with Interruptible Gas Service

Dear Secretary Burgess,

These are the comments of Consumer Power Advocates (CPA) regarding in the above captioned proceedings. 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.

CPA supports the recommendations contained in the Staff's Straw Proposal, filed on May 25, 2016, regarding the implementation of new or additional communication protocols. We believe it is necessary to establish clear, continuing and redundant communication channels in order ensure

compliance with service requirements. CPA made improving communication protocols a priority in its advocacy before the Commission. The communication improvements included in the Straw Proposal should be supported by all stakeholders.

The Straw Proposal also would require interruptible customers to file affidavits, signed by their oil suppliers, attesting that oil replenishment contracts are in place. We believe this is an important step that need not be burdensome. The identification of the responsible oil dealer was initially proposed by CPA and we believe that is necessary to hold suppliers accountable. Filing affidavits in lieu of contracts eliminates concerns about the misuse of proprietary business information, while still assuring the utility that interruptible customers are following good operating practices.

Finally, we support requiring pre-winter testing of all interruptible customers. Con Edison has followed this practice, and our members find these tests useful to avoid compliance problems. We do not, however, believe a second test in late January is needed. Such a test would reduce the customer fuel inventories necessary to sustain an interruption, and require replacement fuel at exactly the time oil prices are likely to peak. We urge the Commission to reject this recommendation. If such a test is required, interruptions occurring in the normal course of system operations should satisfy that requirement.

Thank you for the opportunity to offer these comments.

Respectfully Submitted,

Catherine Luthin

Executive Director, Consumer Power Advocates