

Orange and Rockland Utilities, Inc. 4 Irving Place New York NY 10003-0987 www.oru.com

April 30, 2018

Kathleen H. Burgess Secretary New York State Department of Public Service 3 Empire State Plaza, 19<sup>th</sup> Floor Albany, New York 12223

> RE: Case Nos. 14-E-0423 and 15-E-0191, Order Adopting Program Changes with Modification and Making Other Findings

Dear Secretary Burgess:

Orange and Rockland Utilities, Inc. (the "Company" or "O&R") hereby submits for electronic filing with the Public Service Commission (the "Commission") amendments to its Schedule for Electric Service, P.S.C. No. 3 – ELECTRICITY (the "Electric Tariff").

Appendix A identifies the Electric Tariff Leaves and Statement being filed to become effective on May 1, 2018.

### **Reason for Filing**

Ordering Clause 1 of the Commission's <u>Order Adopting Program Changes and Making Other Findings</u>, issued and effective April 23, 2018, in Case Nos. 14-E-0423 and 15-E-0191 (the "April Order"), directed the electric distribution utilities to file, by May 1, 2018, tariff amendments to implement changes to their distribution level demand response programs for the 2018 capability period required in the body of the April Order. The Company hereby files revisions to all of its existing distribution-level demand response programs: the Direct Load Control Program ("DLCP"), the Commercial System Relief Program ("CSRP"), and the Distribution Load Relief Program ("DLRP"). These programs are included in the Electric Tariff under Riders D, E and F, respectively.

#### **Tariff Changes**

The Company has made the following changes to the Tariff in compliance with the April Order.

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<sup>&</sup>lt;sup>1</sup> The Company had submitted draft tariff leaves on December 1, 2017, proposing changes to the distribution level demand response programs for the 2018 capability period. The April Order approved these tariff leaves with modifications. Today's filing incorporates those modifications.

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#### Rider D – DLCP

- "Test Event" was added to the Definitions Section in order to define how the Company
  will test participant responses to the signal sent to a Control Device and define the
  parameters of such an event. Test Event was also added under the description of the
  Bring Your Own Thermostat ("BYOT") Option to assist in calculating customer eligibility
  for the annual incentive.
- Language was added to the Company Provided Thermostat ("CPT") Option to make the CPT Option available to customers in targeted areas that have been defined as having additional load relief needs. Additionally, the Company reserves the right to offer incentives for the CPT Option which may vary by target area.
- Incentive payment rates were removed from the Electric Tariff and were listed on the newly created Statement of Demand Response Incentives ("DRIS").<sup>2</sup>

#### Rider E – CSRP

- Language was included allowing Aggregators to establish up to three sub-aggregations, provided each sub-aggregation meets the existing 50 kW minimum Load Relief requirement for participation.
- The definition of "CBL" has been revised to remove specific CBL options within the Company's methodology; language was added to make the distinction between changes being made to baseline options and new potential baseline options. Additionally, language regarding a timeline to discuss potential additional baselines with stakeholders and concerned parties was added to the CBL definition.
- Language was eliminated from the definition of "CBL Verification Methodology" relating
  to the currently existing options ("weather adjusted CBL" and "average day CBL"). This
  change was made to this definition consistent with the revisions made to the definition of
  CBL.
- Language was eliminated from Section C of the Applications and Terms of Service Section to keep this section consistent with the revised definitions of CBL and CBL Methodology Verification.
- Language was added to Section E of the Reservation Payment Option section to adjust the Performance Factor calculations and add a minimum threshold of 25%.

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<sup>&</sup>lt;sup>2</sup> Ordering Clause 6 of the April Order required the Company to file a new statement with details of DLCP payment rates, eligibility, and other relevant program data. The existing incentive payment rates were moved to the DRIS. With regards to the CPT option within the DLCP, the Company has not yet established specific dollar amounts or target areas and will not be offering this option for the 2018 capability period.

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#### Rider F – DLRP

- Language was included allowing Aggregators to establish up to three sub-aggregations, provided each sub-aggregation meets the existing 50 kW minimum Load Relief requirement for participation.
- The definition of "CBL" has been revised to remove specific CBL options within the Company's methodology; language was added to make the distinction between changes being made to baseline options and new potential baseline options. Additionally, language regarding a timeline to discuss potential additional baselines with stakeholders and concerned parties was added to the CBL definition.
- Language was eliminated from the definition of "CBL Verification Methodology" relating
  to the currently existing options ("weather adjusted CBL" and "average day CBL") to
  maintain consistency with the revised definition of CBL.
- The definition of "Test Event" was revised from one hour to a duration lasting two hours.
- Language was eliminated from the Contracting for Distribution Load Relief Program Section to make this section consistent with the change in the Test Event duration.
- Language was eliminated from Section C of the Applications and Terms of Service to keep this section consistent with the revised definitions of CBL and CBL Methodology Verification.
- Language was added to the Performance Payment Rates Section under Payment Rates to add clarification on how Performance Payments are calculated during a Test Event.
- Language was added to Section E of the Reservation Payment Option section to adjust the Performance Factor calculations and add a minimum threshold of 25%.

#### **Conclusion and Notice**

As directed by the April Order, the Company is filing these tariff amendments with an effective date of May 1, 2018 on not less than one day's notice. Pursuant to Ordering Clause 11 of the April Order, the requirement for newspaper publication is waived.

Any questions regarding this filing can be directed to Cheryl Ruggiero at (212) 460-3189.

Very truly yours,

/s/ William A. Atzl, Jr. Director – Rate Engineering

# Orange and Rockland Utilities, Inc. Distribution Demand Response Programs Proposed Tariff Leaves Effective May 1, 2018

## P.S.C. No. 3 Electricity

2nd	Revised Leaf No.	155.1
3rd	Revised Leaf No.	155.2
4th	Revised Leaf No.	156
3rd	Revised Leaf No.	156.1
3rd	Revised Leaf No.	156.4
2nd	Revised Leaf No.	156.9
3rd	Revised Leaf No.	157
3rd	Revised Leaf No.	157.1
3rd	Revised Leaf No.	157.2
3rd	Revised Leaf No.	157.4
2nd	Revised Leaf No.	157.8
3rd	Revised Leaf No.	157.9

Statement of Demand Response Incentives - DRIS-1