



Orange and Rockland Utilities, Inc.
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May 29, 2020

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

RE: Case No. 14-E-0423, Proceeding on Motion of the
Commission to Develop Dynamic Load Management
Programs.

Dear Secretary Phillips:

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

The revised Tariff leaves set forth in Appendix A to this letter, are filed to become effective on June 1, 2020.

Reason for Filing

The Commission's Order Directing Demand Response Program Modifications on an Expedited Basis, issued and effective on May 14, 2020, in Case 14-E-0423 (the "Order"), directed the Company to make various changes to the Company's Rider E – Commercial System Relief Program ("CSRP") and Rider F – Distribution Load Relief Program ("DLRP") for the 2020 Capability Period to help ease the impacts of the COVID-19 pandemic on Demand Response market participants.

These changes include:

- Extending the program application deadlines for the Reservation Payment Option under the CSRP and the DLRP, as applicable, to allow customers to enroll by June 1, 2020, for a July 1, 2020 start date.
- Delaying Test Events until July 1, 2020, at the earliest.
- Allowing participants that have already enrolled to modify the amount of Load Relief enrolled in the Dynamic Load Management programs if such requests are made by June 1, 2020, with such modified enrollment amount to become effective on July 1, 2020.

Honorable Michelle L. Phillips

May 29, 2020

Page 2

- Approving enrollments in instances where utility-provided interval metering has already been installed, but the participant has been unable to obtain communications service. These participants will be provisionally allowed to participate in events, but incentive payments will be withheld until communication service is established and necessary data can be downloaded. If communication service is not established or data can't be recovered from a meter due to limited memory of the meters, performance during the applicable events shall be set to zero.

Tariff Changes

Pursuant to the Order, the Company is making the following changes to Riders E and F for the 2020 Capability Period.

Changes to extend the program application deadline:

- On Leaves 156.3 and 157.3 under the Applications and Terms of Service Section, the Company added text to specify the application deadline of June 1 for a July 1 commencement date for the Reservation Payment Option for the 2020 Capability Period.

Changes to delay when Test Events can be held:

- On Leaves 156.2 and 157.2 under the Definitions Section, the Company added text to the definition of "Test Event" to specify that "For the 2020 Capability Period only, Test Events may only be called at the Company's discretion starting July 1."

Changes to modify amount of Load Relief starting in July:

- On Leaves 156.4 and 157.4 under the Applications and Terms of Service Section, the Company added text to specify that "For the 2020 Capability Period only, a Direct Participant or Aggregator may change the kW of pledged Load Relief by June 1 for a July 1 effective date for enrollments that commenced participation on May 1 or June 1."

Changes to allow for non-communicating meters to be provisionally allowed to participate:

- On Leaves 156.3 and 157.3 under the Applications and Terms of Service Section, the Company specified that "If the Company does not bill the participant monthly using interval metering at the time of the application, for the 2020 Capability Period only, an interval meter must be installed 30 days prior to the commencement date." The Company specified the existing interval meter installation and communication date rules apply to all other Capability Periods.
- On Leaves 156.6.1 and 157.6 under the Metering Section, the Company added text to specify that "If, at the time of application for service under this Rider for the 2020 Capability Period only, the Company does not bill the customer account monthly using interval metering, the telecommunications must be in place by the time the Company calculates Reservation and Performance Payments. Failure to have communications in place can result in either delayed payments or being assigned 0 kW of Load Relief for purposes of calculating Reservation and Performance Payments." In addition, the Company specified disposition of withheld incentive payments by adding text describing

Honorable Michelle L. Phillips

May 29, 2020

Page 3

when payments are delayed and when Load Relief is assigned 0 kW for purposes of calculating Reservation and Performance Payments by adding the following text: "Payments will be delayed for the customer account or aggregation until communications are established. If communications are not established by the time September Reservation Payments are calculated, then the account will be assigned 0 kW of Load Relief for purposes of calculating Reservation and Performance Payments. If insufficient data are available after communications are established for calculating performance as a result of previously unavailable communications, then 0 kW of Load Relief will be assigned for the purposes of Reservation and Performance Payments."

Conclusion and Notice

Pursuant to Ordering Clause 1 of the Order, the Company is filing these changes to become effective on June 1, 2020 on not less than one day's notice. Pursuant to Ordering Clause 4 of the Order, the Commission waived the requirement for newspaper publication of these changes.

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

Appendix A

**Orange and Rockland Utilities, Inc.
Dynamic Load Management Program
List of Revised Tariff Leaves effective June 1, 2020**

P.S.C. No. 3 - ELECTRICITY

3rd	Revised Leaf No.	156.2
4th	Revised Leaf No.	156.3
4th	Revised Leaf No.	156.4
4th	Revised Leaf No.	156.5
4th	Revised Leaf No.	156.6
1st	Revised Leaf No.	156.6.1
3rd	Revised Leaf No.	156.7
4th	Revised Leaf No.	157.2
4th	Revised Leaf No.	157.3
5th	Revised Leaf No.	157.4
3rd	Revised Leaf No.	157.5
2nd	Revised Leaf No.	157.6
	Original Leaf No.	157.6.1