



Orange and Rockland Utilities, Inc.
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April 19, 2018

Honorable Kathleen H. Burgess
 Secretary
 New York State Public Service Commission
 Three Empire State Plaza, 19th Floor
 Albany, New York 12223-1350

Re: Cases 15-E-0751 and 15-E-0082, *In the Matter of the Value of Distributed Energy Resources*

Dear Secretary Burgess:

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

The revised tariff leaves, which are identified below, make changes to Rider N – Net Metering and Value Stack Tariff for Customer-Generators. The revised tariff leaves have an effective date of April 28, 2018.

<u>Tariff Leaf No.</u>	<u>Revision No.</u>	<u>Superseding Revision No.</u>
185.6	2	1
185.6.1	0	

Tariff Changes

The Commission's Order on Phase One Value of Distributed Energy Resources Implementation Proposals, Cost Mitigation Issues, and Related Matters, issued September 14, 2017 (the "September Order") in the above-referenced proceedings, directed each utility to file tariff amendments implementing the Value Stack and cost recovery for credits paid under the Value Stack. Pursuant to the September Order, the Company made its compliance filing on October 17, 2017 to modify Rider N (the "October 2017 Filing"). The filed tariff changes became effective on November 1, 2017.

The October 2017 Filing included a tariff provision that compensation under the Environmental Component of the Value Stack would be based on a rate equal to the clearing price of the New York State Energy Research and Development Authority's ("NYSERDA") most recent Tier 1 Renewable Energy Credit ("REC") procurement price published by NYSERDA. By letter dated March 28, 2018, in the above-referenced proceeding, Department of Public Service Staff clarified that compensation under the Environmental Component of the Value Stack should be based on a rate equal to the higher of: (1) the clearing price of the NYSERDA's most recent Tier 1 REC procurement price published by NYSERDA; or (2) the Social Cost of Carbon net of

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the expected Regional Greenhouse Gas Initiative allowance values, as calculated by Department of Public Service Staff. The Company is therefore amending Rider N of the Tariff to include this clarification.

In addition, the Company is adding clarifying language related to the ownership of RECs. First, in its March 9, 2017 Order on Net Energy Metering Transition, Phase One of Value of Distributed Energy Resources, and Related Matters (the "March Order") in the above-referenced proceedings, the Commission stated that customers served under the Value Stack would default to receiving compensation under the Environmental Component and would transfer all RECs generated by the generator. The March Order also stated that customers could make a non-revocable election at the time of interconnection to opt-out of compensation under the Environmental Component and retain their RECs. Currently the Tariff states that customers could choose prior to the date of interconnection whether or not they would retain their RECs. Language was added to the Tariff to clarify that the transfer of RECs to the Company would be the default option unless the customer makes a one-time irrevocable election to retain the RECs as described in the March Order. Language was also added to Rider N of the Tariff stating that, upon such transfer of RECs, the Company would then become the responsible party within the New York Generation Attribute Tracking System ("NYGATS") for all Tier 1 eligible Value Stack projects receiving Environmental Component compensation, including Tranche 0 Community Distributed Generation projects, and would receive all associated RECs. A statement was also included to indicate that Tier 1 eligible Value Stack projects making the election to opt out of the Environmental Component compensation and retain their RECs must designate a responsible party with NYGATS.

Conclusion and Notice

The tariff leaves filed today are proposed to become effective April 28, 2018. Pursuant to Ordering Clause 23 of the September Order, the Commission waived the requirement for newspaper publication for the tariff changes filed on October 17, 2017, that became effective November 1, 2017. Since today's filing serves to clarify the provisions filed on October 17, 2017, the Company requests waiver of newspaper publication.

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