



Orange and Rockland Utilities, Inc.
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March 6, 2020

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

RE: Tariff Filing to Implement the Competitive Procurement
Process for Dynamic Load Management Resources and
Premium Auto-DLM Resources

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 "Electric Tariff").

The revised Electric Tariff Leaves, which are identified below, are filed to become effective on August 1, 2020.

5th	Revised Leaf No.	156
4th	Revised Leaf No.	157
1st	Revised Leaf No.	185.6.3
4th	Revised Leaf No.	185.7
4th	Revised Leaf No.	185.8
6th	Revised Leaf No.	249
1st	Revised Leaf No.	249.1

Reason for Filing

On January 29, 2020, the Company filed a Plan¹ to implement a competitive procurement process for Dynamic Load Management ("DLM") participation agreements. In this Plan, the Company stated it would file two tariff amendments addressing (1) cost recovery of costs associated with Day-Ahead-DLM and Auto-DLM programs, and (2) the elimination of double compensation for customers participating in Day-Ahead-DLM and Auto-DLM programs and the Value Stack Tariff. Also, as stated in the Plan, customers participating in either Day-Ahead-DLM or Auto-DLM programs will be excluded from both Rider E – Commercial System

¹ Case 18-E-0130, *In the Matter of Energy Storage Deployment Program, Plan of Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc. to Implement Competitive Procurement Process for Dynamic Load Management Resources and Premium Auto-DLM Resources* (filed January 29, 2020) ("Plan"). Consolidated Edison Company of New York, Inc. is making a similar tariff filing today for recovery of its program costs as described in the Plan.

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Relief Program ("CSRP") and Rider F – Distribution Load Relief Program ("DLRP") to avoid double compensation and overlapping dispatch obligations.

Tariff Changes

Changes were made to effectuate cost recovery in the DLM Surcharge section of the Electric Tariff as follows:

- Day-Ahead-DLM and Auto-DLM programs were added to the list of programs eligible to have program costs recovered through the DLM Surcharge.
- In order to collect the costs of deferring upfront incentives as regulatory assets, including the Company's overall pretax rate of return on such costs, language was added to describe what is considered as annual forecasted program costs for the Day-Ahead-DLM and Auto DLM programs.
- Consistent with the Commercial System Relief Program, all costs of Day-Ahead-DLM and Auto-DLM programs will be allocated based on the transmission demand (D01) allocator.

Changes were made to the Value Stack section of the Electric Tariff to state that customers participating in either the Day-Ahead-DLM or Auto-DLM programs will not be eligible for Demand Reduction Value or Locational System Relief Value compensation for the duration of their participation in the Day-Ahead-DLM or Auto-DLM programs. This change will avoid double compensation for value provided to the distribution system that would otherwise be provided to customers participating in either the Day-Ahead-DLM or Auto-DLM programs and the Value Stack Tariff.

Changes were made to the CSRP and DLRP to restrict availability to CSRP and DLRP from customers who are otherwise contractually precluded from taking service under the CSRP and DLRP, either by their own contract or because they are represented by a third party that is contractually precluded.

Conclusion and Notice

The Company is filing changes to the Electric Tariff to become effective on August 1, 2020. The Company will provide public notice of the tariff changes in this filing by means of newspaper publication once a week for four consecutive weeks prior to the effective date of the proposed tariff changes. Included is a proposed form of Notice of Proposed Rule Making for publication in the State Register pursuant to the State Administrative Procedures Act.

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

Very truly yours,

/s/

William A. Atzl, Jr.
Director – Rate Engineering