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December 4, 2019

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

RE: Case 15-E-0751, Hybrid Energy Storage Tariff

Dear Secretary Phillips:

Orange and Rockland Utilities, Inc. 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 December 9, 2019.

Leaf No.	Revision No.	Superseding No.
177	4	3
180	11	10
180.1	12	11
188.1	2	1
218	6	5

Reason for Filing

This filing is made pursuant to the Commission's <u>Order Implementing Hybrid Energy Storage System Tariff</u>, issued and effective December 13, 2018, (the "Order") in Case No. 15-E-0751, "In the Matter of the Value of Distributed Energy Resources."

Tariff Changes

Pursuant to the Order, the Company has modified the following sections of the Electric Tariff as described below.

• The Applicability Section of Rider N has been amended to clarify that customers with a Hybrid Facility that consists of an Electric Energy Storage System that is paired with a technology that is: (1) biomass or tidal/ocean electric generating equipment rated up to 5 MW as defined in the NYSERDA Clean Energy Standard Tier 1 eligibility criteria; or (2) generating equipment rated up to 5 MW listed in (1) as a resource ineligible for Clean Energy Standard Tier 1 solely by virtue of having

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an in-service date prior to January 1, 2015, will be subject to Standby Service and Standby Service rates.¹

Since the Applicability Section of Rider N has been amended to include Hybrid Facilities in both paragraphs (J) and (K), changes in references are required in Rider M – Voluntary Day-Ahead Hourly Pricing ("Voluntary DAHP") and General Information Section No. 15.3 – Mandatory Day-Ahead Hourly Pricing ("MDAHP") to include the provisions for when a full-service customer with a Hybrid Facility that is compensated under the Value Stack Tariff can opt in to being billed for hourly supply or will be required to be billed for hourly supply.²

Conclusion and Notice

As directed by Ordering Clause 1 of the Order, the tariff amendments are filed, on not less than five days' notice, to become effective on December 9, 2019. As specified in Ordering Clause 2 of the Order, the Commission has waived the requirements for newspaper publication.

Very truly yours,

/s/

William A. Atzl, Jr. Director – Rate Engineering

¹ The current Electric Tariff states that any Hybrid Facility where the customer receives compensation under the Rider N Value Stack Tariff is subject to Standby Service and Standby Service rates.

² Full service customers served under the Value Stack Tariff with a Hybrid Facility where the nameplate rating or inverter capability is more than 115% of the customer's load (excluding loads directly related to or necessary to support the Electric Energy Storage system) are subject to the provisions of MDAHP. Where the rating is less than or equal to 115%, such customer can opt in to Voluntary DAHP.