

JOINT SUPPORTERS

Comments To Case 07-M-0548

Energy Efficiency Portfolio

Standard Symposium

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Who are we and what do we do?

- Joint Supporters (1990)
 - Voluntary Association of users, providers, and mobilizers of demand resources, including EE, DR, DG, CHP (including micro-CHP) active in policy settings on occasion. Facilitated by E3 LLC.
- E3 LLC (1989)
 - Providers of Strategic Services at the Exponential Interface of Energy, Environment and Economics.

Interests In New York's Policy Processes (1)

- The Joint Supporters have participated in most of New York's energy efficiency, distributed generation, combined heat and power, and demand response proceedings since 1990.
- At various times have negotiated and supported role and incentives for utility-run programs that mobilize the marketplace and not just procure on behalf of their own customers. Still support this.
- Negotiated restructuring settlements and supported independent administration of system benefit charge programs run by NYSERDA. Still support this.

Interests In New York's Policy Processes (2)

- Positions have and do advocate deployment and mobilization of technology at or near electric and gas loads, hence continued commitment to Combined Heat and Power and Clean DG.
- Positions have and do advocate innovative and effective opportunities for end-users and third parties to deploy performance contracting, combined heat and power, distributed generation, emergency generators, demand response initiatives, competitive metering and alternatives.
- Negotiated the Standby-by Rate Cases, both generic and specific. Are prepared to consider re-formulation to reduce barriers in line with EEPS objectives.
- Negotiated the DG interconnection proceedings and processes. Remain vigilant to delays in implementation.

Interests In New York's Policy Processes (3)

- Negotiated Design of 300 MW Demand Resource Programs in Con Edison Territory (\$250 M allowed). Prepared to negotiate fresh initiatives in SE New York in conjunction with rate cases and/or EEPS
- Have and do promote net metering for highly efficiency CHP at the smaller sizes.
- Promote the development of energy storage opportunities as part of the EEPS process and otherwise.
- Implement NYSERDA Study with Distributed Utility Associates on Electricity Storage Opportunities in NYS, especially NYC. (pub May 2007).

What's next? (2007-2008 - NY)

- **Negotiate Energy Efficiency Portfolio Standard (EEPS) Proceeding (15% improvement by 2015)** - DG, DR, Storage should not be second order priorities. What about greater recognition for CHP Savings and Peak Shaving Benefits? Interface of DR with EE & DG? Role of residential micro-CHP?
- **Negotiate/litigate New Con Edison Base Rate Case begun May 2007 (for 2008-2011 period - decision by March 2008 - negotiations over next five months while EEPS process is unfolding.)**
 - How does 15% EEPS objective (circa 1600 MW by 2015 compare with Con Ed proposal for 500 MW by 2016?)
 - How does Con Ed Proposal comport with NYISO Planning? Role of load resources? Further transmission and distribution infrastructure improvements (post Long Island City blackout) - How can DG/DR/EE contribute?
 - Advanced Metering Proposed for 2.5 million accounts. Interface with NYISO programs? How can AMI interface with DR?
 - Mandatory Hourly Pricing for additional 2000 accounts (above 500 kW)
 - 500 MW demand resource proposal for EE & DG. What about DR?
 - How does proposed Demand side program interface with NYSERDA responsibilities? Carry over from 2005-2008 rate plan? Going forward?
- **Negotiate other initiatives in regulatory and RTO situations.**

What are New Demand Resource Opportunities for NY?

(2007-2008 - NY) (1)

- **Promote the aggregation of energy efficiency and other benefits.**
 - Generators aggregate multiple benefit streams -
 - So should demand resources be able to aggregate benefit streams.
 - Composite aggregation should be facilitated for capacity, ancillary services and other benefit streams.
 - See NYSERDA Storage Study identifying optional benefit streams for storage systems - would apply to other resources.
- **Allow Clean DG to perform in the economic markets as other DR resources can.**
- **Create Alternate Energy Sector at the NYISO, encompassing Demand Response, DG, EE and other Demand Resources with voting rights, manuals, etc. -- provide value for EEPs achievements in the wholesale market. See ISO-New England models and PJM.**

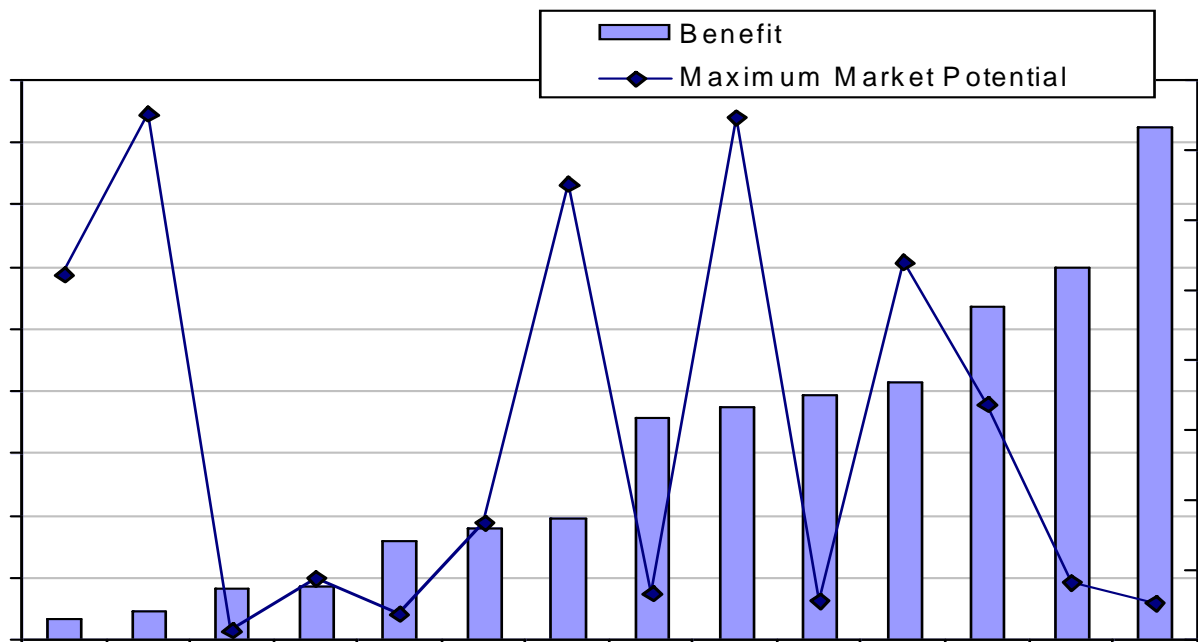
What are New Demand Resource Opportunities for NY?

(2007-2008 - NY) (2)

- **Promote CHP Portfolio Standard And Aggressive Awards Program**
 - Adopt a CHP Portfolio Std approach similar to CT as revised by 2007 Law (6% by 2010).
 - Move to aggressive CT model for Monetary Awards for CHP and EG with differential for SE New York. Open the door for projects of all qualified applicants -- not competitive elimination. Program is much more aggressive than NY.
 - Adopt CHP Savings Policy similar to Senator. Schumer's Senate Amend 1797 (June 19, 2007) deals with combined savings for gas & electricity sides, not either/or.
- **Promote Electricity Storage As EEPS and Grid Resource**
 - Promote consideration of NYSERDA Report 8723 by DUA and The E Cubed Company, LLC, **Guide to Estimating Benefits and Market Potential for Electricity Storage in New York (With Emphasis on New York City)**
 - Promote utilization of storage as resource to integrate intermittent demand resources and wind and solar facilities.

Sample New Demand Resource Opportunities for NY? (2007-2008 - NY)

- **Promote mass market aggregation of residential and other EE/DG/DR/storage/renewable capabilities for capacity, energy, ancillary and other benefits -**
- **Example of plug-in hybrid vehicles**
 - NYISO and NYS should take lead in collaborating with Smart Grid Study called for in Senate Amendment 1797 to the Energy Bill passed on June 21.
- **Example of Storage Facilitating Wind and Solar Installation**



Further Information

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