

12-Oct, 2023

NY Reply to AEY comments on Motions.

In general, AEY's argument against providing proper answers is that the Rebasing proceeding did not require them to implement particular options. However I am asking about options not previously discussed, and of course the GRA is not the Rebasing proceeding.

In the Rebasing proceeding, AEY argued that certain changes were out of scope of that limited proceeding. Now in the GRA, AEY claims that these issues were "thoroughly discussed and evaluated by the Board in the AEY and YEC Rate Rebasing proceeding." No, actually they were out of scope.

AEY should be reminded that the GRA proceeding is not the Rebasing proceeding, and something being out of scope in one proceeding does not mean it is out of scope in another. Particularly given that Board Order 2023-08 from the Rebasing proceeding notes that "None the less, in the Board's view, this is a GRA issue." This is in response to a suggested change to billing display.

With the Board stating that display issues are GRA issues, it is clear that presentation and customer understanding of the results of the GRA are GRA issues.

As for AEY's specific objections:

AEY-NY-004: AEY argues that they have provided a "full and adequate response" when in fact they have provided no response at all, other than pointing out that a different idea was out of scope in a different and much more limited proceeding. Inexplicably, AEY also provided a table of rates and riders from the Rebasing proceeding in their IR response. This filler has nothing to do with the IR or the GRA. I ask that AEY provide a proper and relevant response to my IR and Motion.

AEY-NY-005,006,007,008: AEY once again claims to have provided a "full and adequate response" however rather than addressing the IR, they have basically cut and pasted a reply from the Rebasing proceeding concerning a different idea. They make vague statements about "misled" customers and "confusion" while failing to provide any actual information or explanation of these claims. Are customers better served by not knowing actual rates? How does customers' understanding of rates relate to TOU and DSM? Relevant of course, as AEY mentions TOU rates as a benefit of AMI and grid modernization efforts. I ask that AEY provide the further response requested in my Motion. A general and vague response of questionable relevance does not address these specific and relevant IRs.

AEY-NY-009: AEY's objection to my Motion seems to focus on something about the "Rebasing proceeding was not meant to re-open or re-examine fuel price or Rider F determinations..." This is of course completely irrelevant to my IR, which asks about having more descriptive text for all Riders on billing statements. They cite Board Order 2023-08, para 46, PDF pp. 13-14 (para 46 is actually on page 10) and conveniently ignore para 60 pp13-14 which directly addresses this IR and states that it is a GRA issue. Given that AEY has provided an irrelevant and incoherent objection to my Motion, they are asked to provide a proper response to the IR.

AEY-NY-010: Customer understanding of the Riders is a GRA issue, as confirmed in Board Order 2023-08, para 60, PDF pp. 13-14. The results of the GRA are provided to customers on billing statements, and in greater detail on the Bill Calculator. AEY has previously objected to cost and complication of altering billing statements. This would not be an issue with the Bill Calculator and would serve the goals of showing customers the result the GRA and general energy literacy. AEY is again requested to answer the IR.

AEY-NY-016: AEY's claim that they were unfamiliar with terminology used by YEC cannot be considered a full and adequate response to this IR, now that a Motion has been filed explaining the terminology and asking for further response. Given that YEC has used this terminology, I had reasonably expected that AEY would understand it. My Motion repeats my original IR, with translation from YEC terminology to AEY terminology and asks for very relevant information – the direction AEY plans to take with Grid Modernization and what other technologies will be applied as a part of this. Grid Modernization and AMI are subsets of SSM in YEC terms. I ask AEY to provide a full and adequate response to this IR as requested in my Motion. Now having an understanding of the terminology, if AEY fails to provide an answer, it can be inferred that AEY's Grid Modernization begins and ends with AMI – as this was about all that was mentioned for Grid Modernization in the GRA.