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Consolidated Edison Company of New York, Inc. 4 Irving Place New York NY 10003 www.conEd.com

December 1, 2017

Honorable Kathleen H. Burgess Secretary New York State Public Service Commission 3 Empire State Plaza, 19th Floor Albany, New York 12223

RE: Case 16-E-0060 and Case 16-E-0196 - Con Edison's Electric Rate Case - RY 2, and Case 14-M-0565 - Affordability for Low Income Utility Customers

Dear Secretary Burgess:

Consolidated Edison Company of New York, Inc. ("Con Edison") is filing with the Public Service Commission (the "Commission") amendments to its Schedule for Electricity Service, P.S.C. No. 10 – Electricity (the "Electric Tariff"), applicable to its customers in the City of New York and the County of Westchester. The Company is also filing amendments to its Schedule for PASNY Delivery Service, P.S.C. No. 12 – Electricity (the "PASNY Tariff"), applicable to delivery by the Company of power and associated energy to Authority Public Customers under the PASNY Tariff.

The Company's schedule leaves are issued with an effective date of January 1, 2018. The specific Electric tariff leaves and statement being revised are identified in Appendix A. The specific PASNY tariff leaves and statement being revised are identified in Appendix B.

Reason for Filing

The Commission's <u>Order Approving Electric and Gas Rate Plans</u>, issued and effective January 25, 2017, in Cases 16-E-0060, 16-G-0061, and 16-E-0196 (the "Order"), adopted the Joint Proposal ("JP") as set forth in Attachment A to the Order.

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¹ This schedule is also titled, "Delivery Service Rate Schedule Implementing and Part of the Service Agreement Between the Power Authority of the State of New York ("PASNY" or "NYPA") and Consolidated Edison Company of New York, Inc. (the "Company"), dated March 10, 1989, for the Delivery by the Company of Power and Associated Energy to Authority Public Customers."

The Order provides for a three-year electric rate plan in which Rate Years ("RY") 1, 2, and 3 are the twelve-month periods commencing January 1, 2017, January 1, 2018, and January 1, 2019, respectively. Under the rate plan, the electric delivery service revenue requirement, including the fixed component of the Monthly Adjustment Clause ("MAC"), will be increased on an annual basis, including gross receipts tax, by \$194.554 million starting in RY 1,² an additional \$155.315 million starting in RY 2, and an additional \$155.206 million starting in RY 3. To provide rate stability over the term of the electric rate plan, the revenue requirement increase plus the \$47.776 million increase approved by the 2015 Rate Case Order will be implemented on a levelized basis, which includes interest. The annual levelized revenue changes associated with Transmission and Distribution ("T&D") delivery revenue, the retained generation component of the MAC, and purchased power working capital will be \$199.034 million, or \$193.959 million exclusive of gross receipts tax, in each RY.³

The tariff amendments being filed herewith include the rates for RY 2 of the Electric Rate Plan in compliance with the Order. For RY 2, the increase, after excluding gross receipts tax, results in overall increases of \$170.115 million to customers served under the Electric Tariff and \$23.844 million to customers served under the PASNY Tariff.

Revenue Allocation and Rate Design

Revenue Allocation

The revenue allocation for RY 2 is described in Appendix 19 of the JP. Table 2 of Appendix 19 summarizes the changes in delivery revenues by Service Classification ("SC"), including the components of the revenue changes. Table 2a of Appendix 19 shows the overall impacts (e.g., including additional MAC changes and PASNY surcharges to collect the customers' share of incentives earned by the Company under Earning Adjustment Mechanisms) by SC.

The percentage change in revenues and bill changes for the Con Edison SCs are shown in Appendix C. The percentage change in revenues for NYPA is shown in Appendix D.

Rate Design

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² The electric revenue increase of \$194.554 million in RY 1 is in addition to the \$47.776 million increase in electric delivery service revenues established by the Commission's <u>Order Adopting Terms of Joint Proposal to Extend Electric Rate Plan</u> ("2015 Rate Case Order"), issued June 19, 2015, in Cases 15-E-0050 and 13-E-0030, resulting in a total increase of \$242.330 million.

³ The annual levelized rate changes would result in higher base rates at the end of the three-year term of the Electric Rate Plan than they would otherwise be under a non-levelized approach. Accordingly, if the Company does not file for new rates to be effective January 1, 2020, the Company will make a compliance filing by December 1, 2019 to set rates effective January 1, 2020 at a level that is designed to produce delivery base rate revenues on an annual basis that are lower by \$44.25 million and reduce the Revenue Decoupling Mechanism ("RDM") target by that amount effective January 1, 2020.

Appendix 19 of the JP describes the rate design process, for which major items are summarized below:

- Customer charges were not changed, except as follows: (a) the reduced customer charge for SC 1 Rate I customers enrolled in the low-income program was eliminated; and (b) customer charges for customers served under SCs 5, 8, 9, 12, and 13 Standby Service rates were increased by the non-competitive percentage increase to the overall system on a historic basis.
- Demand charges were redesigned in some SCs, as follows: the high/low tension differential (<u>i.e.</u>, annualized high/low tension rates compared to high/low tension costs based on the 2013 embedded cost-of-service study) was adjusted for Rate I of SCs 5 and 12, Rate II of SCs 8 and 12, and NYPA rates, as shown in Table 3 of Appendix 19. These changes were revenue neutral to the January 1, 2016 rate level and made before adjusting delivery rates to reflect the RY changes.

Other Tariff Changes

Pursuant to Section N of the JP and the Commission's <u>Order Approving Implementation Plans with Modifications</u>, issued and effective February 17, 2017, in Case 14-M-0565 (the "2017 Order")⁴, the Company is implementing tiered discount levels for Customers enrolled in the Company's electric low-income program.⁵ The Company is establishing a new Rider, Rider S – Low Income Program applicable to SC 1 Rate 1 Customers who are enrolled in the Company's electric low income program. In accordance with the JP, the low income discounts will be shown as a credit on customers' bills rather than through reduced base rates. Customers enrolled in this program, except for those in Arrears or in Tier 4, will be notified that they will automatically be enrolled in the Company's Levelized Payment Plan, as described in General Rule 12.3 of the Electric Tariff, unless the Customer contacts the Company and opts out within 30 days of receiving such notice.

The Company is also filing conforming tariff leaves to implement the new Rider S – Low Income Program.

Statements

The Company is filing a Statement of Delivery Revenue Surcharge – SDR Statement No. 5 to the Electric Tariff and Statement of Delivery Revenue Surcharge – SDR Statement No. 4 to the PASNY Tariff. Effective January 1, 2018, these statements will cease recovery or pass back of amounts related to the collection of Allowed Pure Base Revenue shortfalls that resulted from the extension of the Case 16-E-0060 suspension period. Consistent with General Rule 26.7 of the

⁴ On March 31, 2017, the PSC granted the Company's request for an extension to file tariff changes to implement the provisions discussed in the body of the 2017 Order from the directed March 30, 2017 deadline, to December 1, 2017.

⁵ The Company is simultaneously filing its detailed annual report regarding its low income program in Case 14-M-0565.

Electric Tariff (Leaf 358), the Company will file a subsequent statement to reconcile any differences between amounts required to be collected and the actual amounts collected under the Electric Tariff. The Company expects to file this statement (i.e., SDR Statement No. 6) for rates effective March 1, 2018, effective for a one-month period.

Conclusion and Notice

As directed by Ordering Clause 5 of the Order, the Company is filing its tariff amendments to take effect on a temporary basis, on one day's notice, effective January 1, 2018.

As directed by Ordering Clause 4, the Company is serving copies of this filing electronically upon all parties to this proceeding.

Consistent with Ordering Clause 6, the Company will publish notice of the proposed tariff change on December 8, 15, 22, and 29, 2017.

Sincerely,

/s/ William A. Atzl, Jr.
Director
Rate Engineering Department

Appendix A

PSC No. 10 - Electricity: List of Revised Tariff Leaves and Statement

		Superseding			Superseding
Leaf No.	Revision No.	Revision No.	Leaf No.	Revision No.	Revision No.
6	7	6	453	9	8
119	9	8	453.1	6	5
177	12	11	463	9	8
181	9	8	479	9	8
192	9	8	480	9	8
255	8	7	483	9	8
255.1	2	1	485	9	8
351	16	15	486	9	8
363	4	3	487	9	8
388	10	9	488	9	8
389	9	8	495	9	8
389.1	6	5	496	9	8
397	10	9			
398	9	8			
406	9	8			
408	9	8			
409	9	8			
410	9	8			
416	9	8			
432	9	8			
435	9	8			
437	9	8			
438	9	8			
439	9	8			
445	10	9			
449	9	8			
451	9	8			
452	9	8			
452.1	6	5			

<u>Statement</u>	Statement Type	Statement No.
Statement of Delivery Revenue Surcharge	SDR	5

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Appendix B

PSC No. 12 - Electricity: List of Revised Tariff Leaves and Statement

		Superseding	
Leaf No.	Revision No.	Revision No.	
4	9	8	
5	9	8	
6	9	8	
7	9	8	
8	9	8	
9	9	8	
14	11	10	

Statement	Statement Type	Statement No.
Statement of Delivery Revenue Surcharge	SDR	4

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. Estimated Effect on Con Edison Conventional and TOD Customers' Bills and Revenue Resulting from the Application of Proposed Conventional and TOD Rates and Charges Based on Sales and Revenues for the Twelve Months Ended December 31, 2013

Total Revenues* Total Revenues* Con Edison Service Classification -Estimated Change Estimated Number of Customers' Bills *** Percentage Conventional Rates @ January 2017 Rates @ January 2018 Rates @ January 2018 Rates Change Decreased Unchanged 1 - Rate I ** Residential & Religious \$3,526,050,910 \$3,619,210,277 \$93,159,367 2.64% 34,694,419 0 102,608 General - Small 585,766,509 600,896,201 15,129,692 2.58% 4,156,128 0 150,495 5 - Rate I Electric Traction Systems 172,497 178,244 5,747 3.33% 120 0 0 Public & Private Street Lighting 2,838,439 2,808,210 -30,229 -1.06% 27 19,811 21,426 8 - Rate I Multiple Dwellings - Redistribution 334,071,589 340,433,983 6,362,394 1.90% 22,307 0 0 9 - Rate I General - Large 3,294,010,457 3,348,010,213 53,999,756 1.64% 1,561,485 0 0 12 - Rate I Multiple Dwelling - Space Heating 31,014,152 31,672,845 2.12% 658,693 5,239 90 Sub-Total Con Edison's Conventional Rates \$7,773,924,553 \$7,943,209,973 \$169,285,420 2.18% 40,439,725 19,812 274,619 Con Edison Service Classification -Time-of-Day Rates 1 - Rate II Residential & Religious \$15,815,193 \$16,319,139 \$503,946 3.19% 23,230 15 2 - Rate II General - Small 1.601.325 1,643,486 42,161 3,911 12 2.63% 0 5 - Rate II Electric Traction Systems 14,909,168 15,053,872 144,704 0.97% 60 0 8 - Rate II Multiple Dwellings - Redistribution 23,603,868 24,025,200 421,332 1.79% 228 0 8 - Rate III Multiple Dwellings - Redistribution - Voluntary 11,377,773 11,584,792 207,019 1.82% 539 0 0 9 - Rate II General - Large 1,547,377,926 1,555,080,703 7,702,777 0.50% 8.200 0 0 9 - Rate III General - Large - Voluntary 207,343,807 209,969,445 2,625,638 1.27% 26,374 0 3 Multiple Dwelling - Space Heating 12 - Rate II 41,023,613 41,620,959 597,346 1.46% 336 0 Bulk Power - High Tension - Housing Developments 13 - Rate II 4,123,698 4,207,883 84,185 2.04% 12 0 0 Sub-Total Con Edison's Time-of-Day Rates \$1,867,176,371 \$1,879,505,479 \$12,329,108 0.66%62,890 1 30 Con Edison Total Con Edison's Total Excluding Special Contract \$9,641,100,924 \$9,822,715,452 \$181,614,528 1.88% 40,502,615 19,813 274,649

^{*} Total Revenues for all customers include: T&D delivery charge and estimated market supply charge, monthly adjustment clause, system benefits program charges, the surcharge to collect Public Service Law, Section 18-a Assessments, and the associated gross receipts taxes.

The market supply charge revenues for retail access customers are equivalent to what these customers would have paid as full service customers.

^{**} Total Revenues in Service Classification No. 1 include customers currently served under Rider D. Total Revenues in SC 1 at both January 2017 and January 2018 Rates include \$55.247 million of low income program credits (i.e., \$54.7 million of low income and \$547,000 for waived reconnection fees).

^{***} The change in Con Edison P.S.C. No. 10 revenues for the rate year, i.e., the twelve months ending December 31, 2018, equates to \$182.0 million, or an overall increase of 1.9%. Excludes the impact of Tier 3 (Heat and Non Heat) low income credit discounts effective January 1, 2018 in Service Classification No. 1.

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CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

Estimated Effect on NYPA Delivery Service Conventional and TOD Revenue Resulting from the Application of Proposed Conventional and TOD Rates and Charges Based on Sales and Revenues For the 12 Months Ended December 31, 2013

NYPA Delivery Service	Total Revenue @ January 2017 Rates*	Total Revenue @ January 2018 Rates*	Estimated Change @ January 2018 Rates	Percentage Change
	<u> </u>		**	**
NYPA Total	\$1,332,469,714	\$1,356,510,408	\$24,040,693	1.80%

^{*} Total Revenues include delivery service revenues, estimated supply revenues, estimated NYPA portion of the "EAM" incentive costs and the surcharge to collect Public Service Law, Section 18-a Assessments associated with customers billed under the PASNY Delivery Service - P.S.C. No. 12 tariff.

^{**} Based on sales and revenues for the rate year, i.e., the twelve months ending December 31, 2018, such increase in NYPA Delivery Service revenue equates to \$24.8 million or an overall increase of 1.9%.