



Consolidated Edison Company
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February 28, 2018

Honorable Kathleen H. Burgess
Secretary
New York State Public Service Commission
3 Empire State Plaza, 19th Floor
Albany, New York 12223-1350

RE: Case 17-E-0458, Tariff Amendments Related to Electric Energy Storage Systems

Dear Secretary Burgess:

Consolidated Edison Company of New York, Inc. (“Con Edison” or the “Company”) is filing with the Public Service Commission (the “Commission”) amendments to its Schedule for Electricity Service, P.S.C. No. 10 – Electricity (the “Tariff”), applicable to its Customers in the City of New York and the County of Westchester.

The Company’s tariff leaves are issued with an effective date of March 1, 2018. The specific tariff leaves being revised are identified in Appendix A.

Reason for Filing

The Commission’s Order Approving Tariff Changes With Modification, issued and effective on February 22, 2018, in Case 17-E-0458 (the “Order”), approved, with modifications, the Company’s filing made on July 27, 2017, to expand the circumstances under which Electric Energy Storage systems would be able to export to its distribution system.

In this filing, the Company is modifying the July 27, 2017 filing pursuant to the Order.

Tariff Changes

The Order (at pages four and five) directed the Company to provide a more precise definition for the Stand-alone Energy Storage system and further modify tariff leaf 167 to specify that a stand-alone energy storage system is not eligible to earn the Reliability Credit. The Order stated that the Company’s proposed definition may result in disputes between Customers and the Company regarding a Customer’s eligibility for the Standby Reliability Credit because decisions would be based on “the Company’s perception of a Customer’s intentions or purpose.” To respond to the Order’s concern, the Company proposes herein to define “Grid-connected Electric Energy

Storage”¹ to mean an Electric Energy Storage system that supports Customer loads (other than loads directly related to or necessary to support the Electric Energy Storage system) that are less than or equal to 25 percent of the Electric Energy Storage system nameplate capacity rating or inverter capability (i.e., the Electric Energy Storage capability is four times or more than the Customer load, exclusive of loads for the storage system). Loads that are directly related to or necessary to support the Electric Energy Storage system (e.g., system controllers, electronics, pumps, and heating, ventilation, and air conditioning units used to support the system), will be excluded from the 25% threshold because they would not have existed but for the Electric Energy Storage system. The Company also modified Leaf 167 to specify that a Grid-connected Electric Energy Storage system is ineligible for the Standby Reliability Credit.

The Company’s proposed new definition of Grid-connected Electric Energy Storage meets the Order’s requirements. The 25% threshold creates a quantifiable boundary between an Electric Energy Storage system that primarily supports load from one whose primary purpose is to participate in energy markets. The 25% threshold will not affect existing Electric Energy Storage systems in Con Edison’s service territory because these systems are intended to support Customer loads and are sized less than the Customer’s load. The Company believes that the 25% boundary would best mitigate the potential for cost-shifting to other Customers if the Standby Reliability Credit applied.

Pursuant to Ordering Clause 3 of the Order, the Company is incorporating provisions on Leaves 16 and 162 that were previously approved by the Commission since the Company made its July 27, 2017 filing.

Conclusion and Notice

Pursuant to Ordering Clause 2 and 3 of the Order, the Company is filing these changes within seven days of the issuance of the Order to be effective on not less than one day’s notice, and on not less than one days’ notice to become effective on March 1, 2018, respectively. Pursuant to Ordering Clause 4 of the Order, the Commission waived the requirement for newspaper publication of this change.

Sincerely,

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

¹ As described on page 3 of the Order, “Stand-alone Energy Storage” system is synonymous with “Grid-connected Electric Energy Storage” system.

Appendix A

List of Revised Tariff Leaves

P.S.C. No. 10 – Electricity

<u>Leaf No.</u>	<u>Revision No.</u>	<u>Superseding Revision No.</u>
15	3	2
16	7	6
162	6	5
167	7	6