



Consolidated Edison Company  
of New York, Inc.  
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April 3, 2020

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

**Re: Credit for AMI Customer Sided Power Solution**

Dear Secretary Phillips:

Consolidated Edison Company of New York, Inc. (“Con Edison” or the “Company”) is filing with the Public Service Commission (the “Commission”) an amendment 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 revised Electric Tariff leaves are identified below and have a proposed effective date of September 1, 2020:

<u>Leaf No.</u>	<u>Revision No.</u>	<u>Superseding No.</u>
2	3	2
63.2	1	0

**Reason for Filing**

The Company has been installing Advanced Metering Infrastructure (“AMI”) pursuant to the AMI Order.<sup>1</sup> As part of its AMI rollout, the Company must install AMI meters along with the communications network necessary for the meters to communicate information to the Company. Typically, AMI communications equipment, which consists generally of access points or relays, is connected to the Company’s side of metering equipment, thus avoiding the use of customers’ electric supply to power the very small usage associated with the communications equipment. In limited circumstances, however, the Company has had to install meters in certain non-residential buildings that are out of the wireless range of the Company’s AMI network where the meters are not in close proximity to a Company power source. In these limited circumstances, in order to extend

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<sup>1</sup> Case 15-E-0050, Consolidated Edison Company of New York, Inc. – Electric Rates, Order Approving Advanced Metering Infrastructure Business Plan Subject to Conditions, issued and effective March 17, 2016 (“AMI Order”).

the wireless signal to the meters, the Company must install long lengths of conduit to extend its communication network, in some cases throughout a building, in order to achieve operable AMI meter communication. This arrangement is an inconvenience, and can be unsightly for customers, and is also more costly. In lieu of the Company installing lengthy conduit in these limited circumstances, the Company proposes alternatively to connect an access point or relay to customer-sided power, or after the outlet of the meter. This communications arrangement will provide a more convenient and less invasive solution to extend communications to meters in these limited circumstances in non-residential buildings. Since, however, the communications equipment would be connected to the customer's power, the customer's electricity usage for billing purposes would include the small amount communications equipment usage.

Therefore, the Company proposes to provide a credit to non-residential customers that consent to this communications arrangement to compensate the customer for the electric usage, although minimal, of the access points or relays. The electric usage of the access points or relays, based on manufacturing specifications, ranges from approximately 2.5 to 4.8 watts while idle, and from 8.8 to 13.3 watts at the maximum usage. Based on these manufacturing specifications, and assuming the highest maximum usage, the equipment at 13.3 watts would use approximately 10 kWh per month and 115 kWh per year.

The Company used the estimated peak demand identified above to determine an appropriate credit to provide to customers in these limited circumstances. The Company developed the credit based on the estimated consumption multiplied by an annualized average per kWh rate (i.e., \$0.20 per kWh) for 2019 inclusive of supply, delivery and taxes/fees for an SC 9 commercial customer with monthly demands of 50 kW and usage of 12,600 kWh. This calculation produces an annual credit amount of about \$23.00. However, the Company proposes to compensate affected customers for the use of their power, by establishing a credit of \$50.00 per year. This will compensate for any inconvenience and eliminate the need to recalculate the credit annually.

The Company's use of this alternative arrangement will be based on the individual non-residential customer installations and will be determined on a case-by-case basis, and the Company will do this only with the customer's consent. The customers will be required not to interfere with the communications equipment. However, the Company reserves the right to revert to traditional communications equipment on the Company's side of the meter. This would allow the Company to remove the alternate equipment should there be situations where they become inoperable or ineffective.

The Company does not anticipate the need for this alternative arrangement on a wide scale basis, as it will be used in limited circumstances where meters are located in areas within a building that are far out of range of existing communications equipment. The Company believes this will be a necessary alternative for approximately 500 to 2,000 buildings.

### **Proposed Tariff Change**

The Company proposes to expand the Meters section (or General Rule 6) of the Electric Tariff by adding General Rule 6.11, Credit for AMI Non-residential Customer-Sided Communications. This new general rule will establish a credit of \$50.00 per year for non-residential customers that agree to allow the Company to install AMI metering communications equipment on the customer's side of the meter.

### **Conclusion and Notice**

This filing is proposed to become effective on September 1, 2020. The Company requests waiver of newspaper publication, because Con Edison will contact eligible customers directly. Included is a proposed form of Notice of Proposed Rule Making for publication in the State Register pursuant to the State Administrative Procedures Act.

Sincerely,

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