



Consolidated Edison Company
of New York, Inc.
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May 4, 2020

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

RE: Change in Methodology for the Determination of Reactive Power Demand

Dear Secretary Phillips:

Consolidated Edison Company of New York, Inc. (the “Company”) is filing with the Public Service Commission (the “Commission”) proposed 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 revised Electric Tariff Leaf, which is identified below, is filed to become effective on September 1, 2020.

<u>Leaf No.</u>	<u>Revision No.</u>	<u>Superseding No.</u>
95	10	9

Reason for Filing

As part of the Company’s Advanced Metering Infrastructure (“AMI”) program approved in the Commission’s *Order Approving Advanced Metering Infrastructure Business Plan Subject to Conditions* (issued March 17, 2016) in Case 15-E-0050, the Company has integrated a new Meter Data Management System (“MDMS”). The new MDMS is the Company’s repository for data received from meters and it integrates with the Company’s Customer Service Information System used for billing purposes. Starting September 2020, the Company plans on using the new MDMS to bill customers who are billed a Reactive Power Demand Charge pursuant to the Electric Tariff. For the billing of the Reactive Power Demand Charge, the new MDMS is coded such that if the same kW maximum demand occurs two or more times during the billing period, the reactive power demand will be determined at the time of the last kW maximum demand occurrence. The Reactive Power Demand Charge provisions in the existing Electric Tariff, however, require that the reactive power demand be determined at the time of the first kW maximum demand occurrence in the billing period, rather than the last. Modifying the new MDMS logic is complicated and would require custom code to be developed. Such changes are highly undesirable from a software

management prospective and not recommended. In addition, implementing custom code would result in significant cost and schedule impacts. Moreover, the impact of this change to customers will be minimal since the exact same kW maximum demand occurring two or more times during a billing period is extremely rare.

As such, the Company is proposing that the Electric Tariff be modified to specify that reactive power demand be determined at the time of the last kW maximum demand occurrence in a billing period.

Proposed Tariff Changes

The Company proposes to revise the Reactive Power Demand Charge provision in General Rule 10.11 so that, if the same kW maximum demand occurs two or more times during the billing period, the reactive power demand will be determined at the time of the last kW maximum demand occurrence.

Conclusion and Notice

The Company is filing changes to the Electric Tariff to become effective on September 1, 2020. The Company will provide public notice of the tariff changes in this filing by means of newspaper publication once a week for four consecutive weeks prior to the effective date of the proposed tariff changes. 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