



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

February 21, 2017

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

RE: General Rule 8.3, Generating Facilities Used on an Emergency Basis for Export

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 revised Tariff Leaves, which are identified below, are filed to become effective on May 23, 2017:

<u>Leaf No.</u>	<u>Revision No.</u>	<u>Superseding No.</u>
3	5	3
79	4	3

Tariff Change Proposed

General Rule 8.3, “Generating Facilities Used on an Emergency Basis for Export,” of the Company’s Tariff permits export to the Company’s primary distribution feeders on an emergency basis only: (1) when the generating equipment is operated at the direction of the New York Independent System Operator (“NYISO”) under Special Case Resources procedures or Emergency Demand Response Program procedures, or (2) at the direction of the Company under Rider O. The Company proposes to amend General Rule 8.3 to permit the export of electricity discharged by battery storage systems for delivery to the Company’s primary or secondary distribution system, at the direction of the Company, when demand response events are called under the Brooklyn/Queens Demand Management

("BQDM") Program.¹ Because the Company would permit battery storage systems to export electricity into its primary or secondary distribution system, if deemed safe, the Company also proposes to remove the word "primary" from "primary distribution feeders" and change "distribution feeders" to "distribution system" in the context of prohibiting export for operational reasons or while the customer is receiving electric energy delivered by the Company. In addition, because General Rule 8.3 is being expanded to permit the export of electricity discharged by battery storage systems under the BQDM Program, the General Rule has been renamed, "Generating Facilities Used Under Special Circumstances for Export," and a conforming change has been made to the Tariff's Table of Contents.

The proposed change to General Rule 8.3 to permit the export of electricity discharged by battery storage systems when the Company calls demand-response events under the BQDM Program is consistent with General Rule 8.2, "Emergency Generating Facilities Used for Self-Supply," which was modified effective July 18, 2016, to permit the use of emergency generating facilities for self-supply at the direction of the Company when demand response events are called under the BQDM Program.² This change will allow the BQDM Program to be more responsive to developing market needs and meeting customer expectations.

Conclusion and Notice

The Company is filing these Tariff amendments to become effective on May 23, 2017. The Company will publish newspaper publication of this change on March 7, 14, 21, and 27, 2017. Copies of this filing are being served electronically to the active party list in Case 14-E-0302.

Sincerely,

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

¹ Case 14-E-0302, *Petition of Consolidated Edison Company of New York, Inc. for Approval of Brooklyn Queens Demand Management Program*, Order Establishing Brooklyn/Queens Demand management Program (issued December 12, 2014).

² That tariff change was filed pursuant to the Commission's Order Approving Tariff Amendment, issued July 14, 2016, in Case 16-E-0236, "*Tariff filing by Consolidated Edison Company of New York, Inc. to make revisions to Rider T - Commercial Demand Response Programs contained in P.S.C. No. 10 – Electricity.*"