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

October 15, 2019

Hon. Kathleen Burgess Secretary State of New York Public Service Commission Three Empire State Plaza Albany, NY 12223-1350

RE: Case 19-G-0490, Proposed Gas Tariff Revisions to the Company's Daily Delivery Service for Gas Marketers

## Dear Secretary Burgess:

Consolidated Edison Company of New York, Inc. (the "Company") is filing with the Public Service Commission (the "Commission") amendments to its Schedule for Gas Service, P.S.C. No. 9 – Gas (the "Gas Tariff"), applicable to its customers in Manhattan, and the Bronx, the First and Third Wards of Queens and certain municipalities in the County of Westchester.

The revised Tariff Leaf, which is identified below, is filed to become effective on December 1, 2019:

Leaf No.	Revision No.	Superseding No.
386.2.2	3	2

## Reasons for and Summary of Proposed Tariff Modifications

On July 1, 2019, the Company filed proposed modifications to its Gas Tariff in order to institute a voluntary Tier 2(B) Physical Storage Program under the Company's Daily Delivery Service program for Marketers (the "July Filing"). The tariff modifications were proposed to become effective November 1, 2019.

On August 23, 2019, at the request of the Staff of the Department of Public Service ("Staff"), the Company postponed to December 1, 2019 the effective date of the tariff changes

that were included in the July Filing. Accordingly, the Company filed Supplement No. 88 to the Gas Tariff, to postpone the effective date of the tariff changes to December 1, 2019.

Based upon further discussions with Staff, the Company is proposing additional tariff changes to clarify the circumstances under which the Company will purchase the remaining gas that a Marketer has in its allocated storage fields at the end of a program year (March 31). Specifically, if a Marketer who has elected to continue to participate in the voluntary Tier 2(B) program has more commodity left in any of its allocated storage fields on March 31 than what is permitted by its new April 1 capacity release for that storage field minus two dekatherms, then, absent a sale to another buyer, the Company will purchase all of the gas that remains in that field that is above the new April 1 release for that field minus the two dekatherms.

## **Notice and Conclusion**

The Company has completed publication of the notice of the July Filing. Since the changes proposed today are only meant to further clarify the language proposed in the July Filing, the Company respectfully requests waiver from the Commission's notice requirements with respect to the tariff changes filed today.

Sincerely,

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