Received: 01/28/2022



Matthew Ketschke President

January 28, 2022

Hon. Michelle L. Phillips, Secretary New York State Public Service Commission Three Empire State Plaza Albany, New York 12223

Dear Secretary Phillips:

New York State is leading the way to a clean energy future. By taking bold action through the Climate Leadership and Community Protection Act ("CLCPA") to reduce emissions and support disadvantaged communities, the State is building a sustainable energy future for all New Yorkers.

Con Edison shares the State's vision and is committed to making it a reality. To do that, we are proposing new electric and gas rate plans for January 2023 that will help fund investments to bring large-scale clean energy resources to our customers, reduce emissions, and facilitate increased electrification.

Over the next three years, our proposed electric and gas plans will support economic growth and development in New York City and Westchester County by investing more than \$14 billion in the communities we serve, including disadvantaged communities. Our strategy of developing smart, multi-value projects, combined with our 200 years of experience lighting, heating, and powering New York, enables us to deliver cost-effective results.

Among other things, this rate filing includes:

- The Reliable Clean City Projects that will permit older, more polluting generators in New York City to retire and will help bring new, renewable power to our service territory
- 200 MW of new solar generation as part of a 1000 MW project that will reduce bills for low-income customers, on top of our new capital investments to make it easier for our customers to own solar
- Four new storage projects that will enhance reliability, resilience, operational flexibility, and serve disadvantaged communities

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- A portfolio of building electrification programs that will reduce emissions by facilitating the transition away from natural gas and other fossil fuels and reduce the cost to customers to electrify their homes and businesses
- A Selective Undergrounding Program that will enhance reliability and resiliency by undergrounding sections of the overhead electric distribution system that are most vulnerable to storms and that includes consideration of disadvantaged communities
- Electric system investments to prepare for extreme heat from climate change and increased demand from electrification, including the new Gateway Park Area Substation
- Projects to reduce methane emissions from our gas system, including replacing leak prone mains and purchasing renewable and certified gas

As part of our clean energy commitment, we will also continue our unprecedented investments in energy efficiency, electric vehicles, demand response, and heat pumps. These clean energy investments will help the environment and lower customers' bills. For example, we will continue our investments to:

- Add nearly 20,000 new electric vehicle chargers by 2025
- Encourage heat pumps as an alternative to gas and other fossil fuel heating

Over the next three years, we estimate that our clean energy investments will save approximately 2.4 million metric tons of carbon dioxide, equivalent to taking more than 500,000 cars off the road for a year.

As we push towards a clean energy future, we will keep our relentless focus on safety and reliability. The Commission recently emphasized that "failure to maintain safe and adequate electric and gas systems throughout the state would undermine the intent of the CLCPA." We agree. Safety and reliability have been in our DNA since Thomas Edison built the first underground electric grid in 1882. We will keep making the equipment and maintenance investments required to keep our systems safe and reliable into the future. This includes continuing to invest in cybersecurity to stay ahead of current and evolving threats.

We recognize that the future will involve responding to more frequent and severe weather. The six worst storms in the Company's long history, as measured by the number of customer outages, have all occurred since 2010. As Winter Storm Uri in Texas, last year's heat wave in the Northwest, and Tropical Storm Ida here in New York demonstrate, extreme weather makes safe, reliable, and resilient energy systems even more important.

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¹ Case 20-E-0380 et al., *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Electric Service*, Order Adopting Terms of Joint Proposal, Establishing Rate Plans and Reporting Requirements (Jan. 20, 2022) at 80.

Our proposed electric rate plan includes investments to make our infrastructure more resilient, including undergrounding the electric distribution lines that serve customers most affected by storms and increasing our system's ability to withstand the extreme heat that will come from climate change. Our resilience investments mean that fewer customers will lose service when severe weather strikes, and that we can restore service faster to those that do.

As our customers rely more and more on electricity to power their lives, they can count on us to restore service as soon as possible after a storm. Our proposed electric rate plan continues to invest in storm preparation and includes provisions for bringing in the extra crews we need to get the power back on as soon as possible.

Because of our commitment to clean energy, our proposed gas rate plan is not a "business-as-usual" filing. First, our gas investments, such as our significant investments in replacing leak-prone mains, installing remote natural gas detectors, and complying with federally required gas transmission main replacement, are to reduce methane emissions and make our system safer, not expand it.² Over the next three years, approximately 85 percent of our gas system investment will be devoted to making the system safer. Second, we are the first gas utility in New York State to propose eliminating economic assistance not required by law for new gas customers by increasing the amount of new pipe that they would have to pay for directly. Finally, we are increasing our electrification education programs and requiring all prospective gas customers to certify that we have informed them about clean energy alternatives and the State's clean energy policy before we provide them with new gas service.

Our customers can also rely on us to provide excellent customer service and to assist them with their energy choices. Our proposed rate plans keep investing in our customer education and customer service systems. For example, this rate filing includes:

- Completing our new Customer Service System that will improve billing and customer service
- Finishing our Smart Meter installation so that all customers can make informed choices about how and when to use energy and we can see and respond to outages faster
- A new Customer Relationship Management System that will allow us to better tailor solutions to customer needs by gathering interaction data in a single place
- New tools to facilitate customer energy choice, including guidance on clean energy options

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² The gas revenue requirement includes the effect of a proposal to modestly decrease gas service line depreciation lives by five years. While the exact path of decarbonization is uncertain, all forecasted paths show decreased natural gas usage. We believe that it is essential to begin now to manage this transition and the cost for future customers.

• Enhanced communication and education efforts for low-income and at-risk customers, including improvements for non-English speakers

We know our customers trust us to be good stewards of their hard-earned money. We take that responsibility seriously and strive for efficiency in all our operations while providing products and services that our customers value. As part of our ongoing commitment to affordability, our proposed rate plans also include a discount program for small business customers, a solar program for low-income customers, and increased energy efficiency programs for low-and moderate-income customers.

We have been consistently recognized as a leader in clean energy *and* reliability, so we know what it takes to deliver safe, clean, reliable, and resilient energy to our customers. Our proposed rate plans are the path forward.

A. Electric and Gas Increases

Our proposed rate plans are designed to fund the investments necessary for a safe and reliable clean energy future, including the investments summarized earlier, and our operating expenses, like local property taxes.

To meet these funding requirements, our proposed plans request authority to collect approximately \$1.2 billion more in electric revenue and approximately \$500 million more in gas revenue. The electric revenue requirement translates to an overall electric customer bill increase of 11.2 percent.³ The gas revenue requirement translates to an overall gas customer bill increase of 18.2 percent.⁴

More than half of the overall electric bill increase, and more than one-third of the overall gas bill increase, is attributable to three categories: local property taxes, deferred costs, and an updated sales forecast that appears as an increase but in reality does not have a bill impact because these costs have already been incorporated into bills through the existing revenue decoupling mechanism.⁵ In addition, much of the spending in our proposed plans either has been previously authorized by the Commission or is required to comply with gas safety regulations.

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³ The delivery charge increase, which is a component of the overall customer bill, is 17.6 percent. The calculation of the overall customer bill increase percentage includes estimates of electric supply costs for Con Edison retail access customers and New York Power Authority customers.

⁴ The delivery charge increase, which is a component of the overall customer bill, is 28.1 percent. The calculation of the overall customer bill increase percentage includes estimates of gas supply costs for Con Edison retail access customers.

⁵ Less than 40 percent of the increase is attributable to the capital required to fund our \$4.7 billion new capital investment and the Company's proposed increase in its overall equity return to reflect capital market conditions for raising money to fund needed investments.

1. Property Taxes

Property taxes, around 90 percent of which are paid to New York City, will be \$2.5 billion for electric and gas for 2023. They account for approximately \$180 million of our proposed electric increase and \$75 million of our proposed gas increase. Property taxes alone account for an overall electric bill increase of almost two percent and an overall gas bill increase of just under three percent.⁶

We make every effort to reduce the property taxes that our customers bear, including contesting our tax assessments. But final property tax decisions are ultimately made by the municipalities where we provide service.

2. Deferred Costs

As required by the current rate plan, we have deferred charging customers certain costs of providing service, including approximately \$50 million spent preparing for and responding to more frequent and severe storms⁷ and \$20 million spent performing new gas service line inspections in compliance with recent governmental directives. In addition, current electric rates were reduced because of the 2017 federal Tax Cut and Jobs Act. A portion of those tax benefits will have been fully passed to electric customers by 2023, resulting in an approximately \$130 million increase in the electric revenue requirement. In total, these and other items in this category account for an overall electric bill increase of approximately 1.9 percent and an overall gas bill increase of approximately 0.5 percent.

3. <u>Updated Sales Forecasts</u>

Our electric and gas revenue requirements are converted to rates by allocating them across expected sales volumes. Actual electric and gas sales, however, have been lower than the forecasts used to set current rates. This causes revenue shortfalls that customers currently pay through a revenue decoupling mechanism. The Commission has required revenue decoupling since 2007⁸ to encourage utilities to promote energy efficiency and other conservation measures without the disincentive of losing sales.

Our proposed electric and gas revenue requirements use revised sales forecasts that are lower than the sales forecasts underlying current rates. On paper, this has the effect of increasing the electric revenue requirement by approximately \$260 million and the overall electric bill by approximately 2.5 percent and the gas revenue requirement by approximately \$80 million and the overall gas bill by approximately 2.9 percent.

⁶ To avoid situations where the property tax estimates used to set rates fall short of actual property taxes and result in large deferrals to be collected from customers in the future, we are proposing a new rate adjustment mechanism that would recover such incremental property tax costs as incurred.

⁷ As with property taxes, we propose a rate adjustment mechanism to recover during the rate plan period storm preparation and response costs that exceed what is in rates.

⁸ Case 03-E-0640 et al., *Proceeding on Motion of the Commission to Investigate Potential Electric Delivery Rate Disincentives Against the Promotion of Energy Efficiency, Renewable Technologies and Distributed Generation*, Order Requiring Proposals For Revenue Decoupling Mechanisms (Apr. 20, 2007).

From a practical standpoint, however, these updated sales forecasts do not have a bill impact because these costs have already been incorporated into customer bills through the existing revenue decoupling mechanism.

4. Authorized and Required Spending

Our electric and gas revenue requirements include spending that either the Commission has already authorized or that is required to comply with gas safety regulations. For example, our electric revenue requirement includes the costs of the Reliable Clean City Projects and our energy efficiency and electric vehicle charging programs. Our gas revenue requirement includes approximately \$100 million to comply with recent federal gas safety rules and approximately \$36 million in new operations and maintenance costs to comply with recent service line inspection requirements.

B. Mitigation of Requested Increase

To mitigate our requested electric and gas increase, we develop smart, cost effective investments. For example, where possible we design electric system projects to facilitate clean energy while solving reliability needs. Such multi-value projects, which we are in the best position to design, provide our customers with high value. We have also taken a harder look at our gas investments due to potential electrification and are proposing to reduce our annual gas leak prone pipe replacement commitment by a modest amount without affecting safety.

We have also changed the way we work. During our current rate plan, we are engaging in a focused effort to identify opportunities for efficiency that will save customers over \$150 million, including from our significant investment in automated metering infrastructure. These efficiencies are now part of how we do business and these previously achieved ongoing and expected savings helped to reduce our current request.

In addition, we are exploring opportunities to receive funds authorized by the 2021 federal Infrastructure Investment and Jobs Act to help fund our required investments and reduce the costs we need to collect from customers. Finally, we participate in proceedings at the Federal Energy Regulatory Commission and advocate for reasonable market rules at the New York Independent System Operator to reduce supply costs that we are required to pass on to customers.

C. Affordability

We are committed to affordability for our customers who require assistance. We support and provide discounts, which have recently increased significantly, to our low-income customers, and which will mitigate the increase. We are also aggressively implementing our energy efficiency programs for low-and moderate-income customers. In addition, we are assisting residential and small business customers facing financial hardship. Finally, we note that with respect to impact on our residential customers, typical annual residential consumption has fallen by approximately seven percent since 2013.

We are also proposing to procure and own up to 1,000 MW of utility-scale solar generation facilities between 2024 and 2034 and to use the revenues to further increase our low-income bill discount. We forecast that this plan, when fully implemented, could provide an

approximate \$15 per month electric bill credit and connect low-income customers to the benefits of renewable energy.

Finally, we are proposing a discount program for small businesses, which have been particularly hard hit by the COVID-19 economic downturn. While we expect based on current economic forecasts that the economy will have returned to normal by the time our proposed rate plans take effect in January 2023, this program will provide needed assistance to small businesses that may require aid after the recovery begins.

D. Proposed Rate Term

We are proposing one-year electric and gas rate plans but intend to explore multi-year rate plans in settlement discussions with the Department of Public Service and other interested parties. Multi-year rate plans benefit customers by providing rate certainty for the duration of the plan and by facilitating implementation of the Company's investments.

E. Revised Tariff Leaves, Effective Date and Public Notice

Our proposed rate plans require changes to our electric and gas tariffs, including increases to the charges for electric and gas service. Included as appendices to this letter are revised Tariff leaves, descriptions of changes, and revenue impacts as follows:

Appendix A – List of Revised Electric Tariff Leaves

Appendix B – List of Revised PASNY Tariff Leaves

Appendix C – List of Revised Gas Tariff Leaves

Appendix D – Proposed Changes to the Electric and PASNY

Tariffs

Appendix E – Proposed Changes to the Gas Tariff

Appendix F – Electric Revenue Impacts

Appendix G – PASNY Revenue Impacts

Appendix H – Gas Revenue Impacts

Appendix I – Typical Residential Customer Bill Impacts

The revised Tariff leaves are issued as of January 28, 2022, to become effective February 27, 2022. We respectfully request that the Commission suspend the effective date and, unless the Company subsequently requests otherwise, approve and make the proposed Tariff leaves effective on and as of January 1, 2023.

The Company will provide for public notice of the Tariff changes proposed in this filing by means of newspaper publication once a week for four consecutive weeks prior to February 27, 2022. In addition, with this filing we have included draft Notices of Proposed Rulemaking in the form required by the State Administrative Procedure Act and the Commission's form regarding consent to receive electronic-only service of Commission orders.

We know that the transition to a clean energy future is a big job. But we are a Company that gets big jobs done. We are privileged to serve New York City and Westchester County and we look forward to engaging with our stakeholders on our plans to achieve the clean and resilient energy future we all want.

Very truly yours,

CONSOLIDATED EDISON COMPANY OF NEW YORK

Matthew Ketschke

President

PSC No. 10 - Electricity: List of Revised Electric Tariff Leaves

		Superseding			Superseding
Leaf No.	Revision No.	Revision No.	Leaf No.	Revision No.	Revision No.
3	6	5	166.4	0	rectision ive:
6	17	16	166.5	Ö	
7	9	8	166.6	Ö	
17	3	2	166.7	Ö	
33	1	0	166.8	Ö	
36.2	0	v	166.9	Ö	
37	4	1	166.10	Ö	
37.1	0	1	166.11	Ö	
45	1	0	167	10	9
56	4	3	167.1	6	5
61	5	4	170	4	9 5 3 7
63.1	6	5	171	8	7
64	3	2	177	24	23
79.1	0	2	181	15	14
79.2	0		193	6	5
79.3	0		195	6	5
79.4	0		196	6	5 5
79.5	0		197	5	4
79.6	0		198	9	8
79.7	0		199	7	6
95	11	10	200	7	6
97	8	7	201	8	7
119	12	11	213.1	3	
121	8	7	234	4	3
122	8	7	235		2 3 1
124	1	Ó	236	2 3 2	
125	1	0	237	2	2 1
126	8	7	238	3	
129	0 1	$\stackrel{\prime}{0}$	239	8	2 7
146	3	2	240	8	7
153	3 4	3	242	9	8
154	7	6	243	9	8
155	3	2	243.1	6	5
156	2	1	243.2	6	5
157	8	7	243.3	6	5
157.0.1	2	1	243.4	6	5 5 5 5
157.1	6	5	243.5	6	5
157.1.1	4		243.6	6	
157.2	8	3 7	243.7	6	5 5 5 5 5
157.2.1	2	1	243.8	6	5
157.3	6	5	243.9	6	5
157.4	16	15	243.10	6	5
157.5	2	1	253	8	7
157.6	1	0	253.9	2	1
158	3	2	268	13	12
159	3	2	270	10	9
160	5	4	272	11	10
162	12	11	273	7	6
162.2	5	4	274	7	6
164	8	7	281.1	$\overset{\prime}{2}$	1
166.2	$\overset{\circ}{0}$,	292	6	5
166.3	0		293	1	0
100.5	V		273	1	U

PSC No. 10 - Electricity: List of Revised Electric Tariff Leaves

		Superseding
Leaf No.	Revision No.	Revision No.
294	1	0
295		
296	3 3	2 2 3
297	4	3
298	1	0
299	1	0
300	2	1
301	6	5
320	1	$\overset{\circ}{0}$
327.3	7	6
327.4	7	6
327.5	7	6
327.5.1	6	5
327.3.1	7	6
327.10	6	5
327.14	6	5
330.1		5 \$
	7	5 5 5 3
331	4	3
335	5	4
336	9	8
337	12	11
339	4	3 2 4
340	3	2
341	5	
342	1	0
343	15	14
343.1	12	11
344	9	8
346	4	2
347	3	1
351	19	18
352	10	9
359.1	1	0
360	5	4
384.1	6	5
385	11	10
385.0.1	6	5
387	4	3
388	16	15
389	16	15
389.1	14	13
389.2	3	2
396	2	1
397	16	15
398	15	14
399	3	2
406	15	14
408	15	14
409	15	14
410	15	14
411	4	3
111	₹	J

Leaf No. 416 432 434 435 437 438 439 440 444 445 448 449 451 452 453 453.1 454 458 459 459.0.2 459.3 463 465	Revision No. 15 15 2 15 15 15 15 15 15 15 15 15 16 2 16 2	Superseding Revision No. 14 14 14 14 14 14 14 14 14 14 14 14 14
466 467 468 469 470 472 476 477 479 480 482 483 485 486 487 488 490 492 495 496 497	4 4 4 2 3 4 4 4 5 15 15 15 15 15 15 15 2 2 15 15 15 15 15 15 15 15 15 15 15 15 15	1 3 1 2 3 3 3 4 14 14 14 14 14 14 14 14 15 3

PSC No. 12 - Electricity: List of Revised PASNY Tariff Leaves

		Superseding
Leaf No.	Revision No.	Revision No.
4	15	14
5	15	14
6	15	14
7	16	15
8	16	15
9	15	14
10	13	12
11	3	2
13	11	10
17	4	3
17.1	6	5
19	3	2
20	2	1
22	13	12
24	3	1
25	6	5
26	10	9
26.1	8	7
26.2	3	2
26.4	6	5
26.5	1	0
26.6	0	

PSC No. 9 - Gas: List of Revised Tariff Leaves

Leaf	Revision	Superseding	Leaf	Revision	Superseding	Leaf	Revision	Superseding
No.	No.	Revision No.	<u>No.</u>	No.	Revision No.	<u>No.</u>	No.	Revision No.
4	16	15	154.13	3	2	235.1	0	
5	22	21	154.14	4	3	240	34	33
6	15	14	154.15	4	3	241	7	6
12	7	6	154.16	3	2	243	26	25
13	5	4	154.17	7	6	251	11	10
30	3	2	154.18	28	27	255	26	25
31	4	3	154.19	4	3	259	13	12
33	1	0	154.24	28	27	261	5	4
34	2	1	154.25	25	24	264	14	13
35	2	1	155	20	19	269	28	27
44	3	2	156	21	20	274	17	16
48	3	2	157.1	16	15	275	12	11
76.1	12	11	158	17	16	279	10	9
77	4	3	166.2	16	15	300.3	13	12
78	1	0	166.3	2	1	303.3	2	1
85	3	2	167.1	8	7	316	11	10
87	7	6	171	10	9	316.1	10	9
89	5	4	173	9	8	317	10	9
117	10	9	176	6	5	318	6	5
127	7	6	177	14	13	326	10	9
128	14	13	178	19	18	326.1	8	7
129	7	6	178.1	15	14	327	10	9
130	7	6	178.2	6	5	329	8	7
148	3	2	180	18	17	330	10	9
149	3	2	181	22	21	331	12	11
150	1	0	181.1	9	8	332	19	18
151	1	0	181.2	10	9	333	6	5
152	27	26	183	22	21	334	6	5
153	1	0	183.1	23	22	341.1	10	9
154	2	1	183.2	16	15	342	10	9
154.6	24	23	183.6	4	3	349	33	32
154.7	11	10	183.7	0		378	6	5
154.8	24	23	228	35	34	385	6	5
154.9	30	29	230	28	27	389.3	7	6
154.10	7	6	232	3	2	397.1	7	6
154.11	8	7	234	22	21	397.2	10	9
154.12	3	2	235	13	12	397.3	11	10

Section	Leaf #s	Description of Tariff Change	Testimony Panel
PSC No. 10 - Electricity			
SC Rate Changes SC 1 Rate I	388	Undeted rete	ERP
	389	Updated rates	ERP
SC 1 Rate II-VTOD rates and Spec Prov D rates		Updated rates.	
SC 1 Rate III - VTOD (also applicable to Spec Prov F customers)	389.1	Updated rates.	ERP
SC 1 Rate IV - Optional Demand Based Rate	389.2	Updated rates.	ERP
SC 2 Rates I and II	397, 398	Updated rates.	ERP
SC 5 Rates I, II, III, and IV	406, 408, 409, 410	Updated rates.	ERP
SC 6	416	Updated rates.	ERP
SC 8 Rates I, II, III, IV and V	432, 435, 437, 438, 439	Updated rates.	ERP
SC 9 Rates I, II and III	445, 449, 451	Updated rates.	ERP
SC 9 Rates IV and V, incl. station use	452, 453, 453.1	Updated rates.	ERP
SC 11	463	Updated rates.	ERP
SC 12 Rates I and II (incl Rt I energy only)	479, 480, 483	Updated rates.	ERP
SC 12 Rates III, IV and V (incl III energy only)	485, 486, 487, 488	Updated rates.	ERP
SC 13 Rates I and II	495, 496	Updated rates.	ERP
Other Data Channe			
Other Rate Changes	0.5	Undeted rete	ERP
GR 10.11 - Reactive Power Demand Charge	95	Updated rates.	
Rider D Rider Q - Option B CRSP and DLRP rates	181 242- 243.10	Updated rates. Updated rates.	ERP ERP
Riders Z and AA - IPP rates	327.3, 327.4, 327.5,	Updated rates.	ERP
	327.5.1, 327.10	openios alos.	
Rider AB - Smart Home Rate	327.14	Updated rates.	ERP
GR 25.3 - MFC	335	Updated rates.	ERP
SC 9 Spec Prov G (RNY)	459.0.2	Updated rate.	ERP
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GR 21.1 - Continuity of Supply	171	Updated spoilage compensation amounts.	ERP
GR 26.2(3) - RDM targets	351	Indicated that RDM targets are "to be determined."	ERP
GR 28 - Transition Adjustment for Competitive Services	360	Updated targets.	ERP

Section	<u>Leaf #s</u>	Description of Tariff Change	Testimony Panel
Uncollectible	146, 336, 344	Uncollectibles experience to be based on the 12-months ended September (instead of November).	ERP
GR 25.1- MSC factor of adjustment	329	Updated Factor of Adjustment for Losses.	ERP
SC 1 Rate IV	389 .2	Eliminated eligibility requirements making SC 1 Rate IV an optional rate available to all SC 1 customers.	ERP
SCs 1, 2, and 9	387, 396, 444	Clarified that SC 2 and SC 9 are SCs intended for which no other service classifications are specifically provided.	ERP
	n/a	Include Standby rates in RDM effective January 1, 2024.	ERP
<u>Tariff Changes</u> <u>Rider J - BIR Changes</u>			
Rider J - Business Incentive Rates ("BIR")	193, 195, 196, 197, 198, 199, 200, 201	Added a new COVID-19 BIR component and MAC recovery.	ERP
GR 26.1 - MAC	343	Added new component 36 to recover amounts associated with COVID-19 BIR rate reductions.	
Rider J - Business Incentive Rates ("BIR")	193	SCs 2 and 9 Special Provision (C) is not applicable to customers served under Rider J.	ERP
AMI Tariff Changes			
Standby and SC 11 - Buy Back provisions	162.2, 166.5, 167, 240, 477	Eliminated requirement for customer to provide communications for Output Meters.	ERP
General Rule 20.4 - Billing under Standby Service Rates		Deleted requirement for customer to provide and maintain communication services and deleted monthly communications service credit.	ERP
General Rule 20.4 - Billing under Standby Service Rates	166.8, 166.9	Modified Standby Offset interval meter readings to be based on 15-minute interval to each metered interval.	ERP
Rider R - Net Metering and Value Stack Tariff for Customer-Generators	253	Added an option for Rider R customers to close an account on the date of request for customers with communicating AMI meters.	ERP
SCs 2 and 12	399, 490	Deleted the provision that a demand meter will be installed if customer uses over 10 kW or 6,000 kWh over two months	ERP
SCs 5, 8, 9, 11, and 13	411, 440, 454, 472, 497	Deleted the installation of demand meter provisions.	ERP
SC 12 - Multiple Dwelling Space Heating	492	Established SC 12 energy only/demand thresholds.	ERP
GR 6.10 - AMR/AMI Meter Opt-out	63.1	Residential customers who are required to have an Interval Meter cannot opt-out of AMI.	ERP

Distributed Generation Changes

Section	<u>Leaf #s</u>	Description of Tariff Change	<u>Testimony Panel</u>
General Rule 8.4	79.1-79.7, 153-160, 465-470	Combined Standby and SC 11 interconnection rules and moved to new General Rule 8.4.	ERP
General Rule 20.4	157-157.6, 166.2- 166.11, 164, 167.1, 170, 239, 384.1, 385, 385.0.1	Moved Standby Offset and export to another service connection provisions to Billing under Standby Service Rates section, and updated all references.	ERP
General Rule 20.3	162	Deleted the 30-day requirement for customers with Designated Technologies electing to be billed under Standby Service rates.	ERP
SC 11	476, 477	Deleted the option to export to NYISO under SC 11.	ERP
Standby provisions	79.1, 166.2, 166.4, 384.1	Removed the 20 MW upper limit for generating facility interconnections	ERP
Housekeeping Changes			
Update table of contents to include EV Make-Ready Surcharge	7, 337	Updated table of contents and list of delivery surcharges to include EV Make-Ready Surcharge	ERP
General Rule 2 - Definitions	17	Clarified the definition for Pure Base Revenue.	ERP
General Rule 5.5 - Underground Facilities	45	Added an option for the Company to elect to provide underground facilities.	ERP
General Rule 5.6 - Transformers and Associated Equipment	56	Deleted specific language related to flood protection requirements that are included in Company specifications.	ERP
General Rule 17.6 - Meter Upgrades and Purchases	129	Deleted the obsolete provision related to customer-owned meters.	ERP
Rider T	268	Delete obsolete provisions that were only applicable for 2017 and 2018.	ERP
Rider T	270, 272, 273	Deleted obsolete provisions that were applicable only during the 2020 capability period.	ERP
Rider T	274	Deleted "/or" from the sentence "DRV and and/or LSRV value compensation."	ERP
GR 26.1 - MAC	339, 342, 343, 343.1, 346, 347, 459	Deleted or revised certain MAC components.	ERP
26.10 EV Make-Ready Surcharge	359.1	Added time periods to clarify the EV Make-Ready Surcharge applicable to Rate II of SC 5 and Rate II and Rate III of SCs $8, 9$, and 12 .	ERP
SCs 8, 9, and 12	434, 448, 482	Removed obsolete provision for thermal storage customers.	ERP
SC 9 Special Provision D	97, 200, 320, 330.1, 458, 459.3	Removed the expired SC 9 Special Provision D heating discounts.	ERP
GR 5.2.4 - Excess Distribution Facilities	36.2	Added General Rule - 5.2.5 Permits that was erroneously deleted.	
Changes Described in Other Testimonies			
Rule 17.3 - Special Services Performed by the Company at a Charge	126	Updated percentages for handling costs and corporate overheads for costs associated with Special Services.	Accounting

Section	Leaf #s	Description of Tariff Change	Testimony Panel
GR 26.1 - MAC	339	Added new component 10 to reconcile carrying charges associated with interference costs.	Accounting & MISP
GR 26.1 - MAC	339	Added new component 11 to reconcile storm costs.	Accounting & SRR
GR 26.1 - MAC	341	Added new component 20 to reconcile costs related to deferred late payment fees and other fees originally associated with customer non-payment.	Accounting
GR 26.1 - MAC	341	Added new component 21 to reconcile uncollectible bill expenses and non-Credit and Collections portion of the POR Discount reconciliation.	Accounting
GR 26.1 - MAC	341	Added new component 23 to reconcile property taxes.	Accounting
GR 16.1 - Charge for Replacing a Damaged Meter	121	Updated the Damaged AMI meter fee.	EIOP
GR 16 - Other Charges	121	Updated the charge for re-inspection.	EIOP
GR 17.1 - Special Services at Stipulated Rates	122	Updated charges for hi-pot test, Megger test, dielectric fluid testing.	EIOP
General Rule 7.1 – Customer Wiring and Equipment	64	Established a Company requirement to furnish and install wiring and equipment for customers in the Selective Undergrounding Program.	EIOP
GR 5.2.8 - Street or Sidewalk Service	33, 37, 37.1, 124, 125	Added new Street or Sidewalk Services provision and conforming changes.	EIOP
GR 15.2 - Reconnection Charge	119	Continued waiver of the Reconnection Charge for Low Income Customers. Changed per rate- year cap on waiver amount.	Customer Ops
GR 26.2(4) - Low Income Program Costs	352	Changed Low Income Program Fund for the rate year and indicated that the low-income program will continue beyond December 31, 2023 contingent on the continuation of full cost recovery.	Customer Ops
Riders P, V, and W	6, 177, 213.1, 234, 235, 236, 237, 238, 253.9, 281.1, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 331, 340, 341	Deleted Riders P, V, and W and all references.	CES
GR 5.2.4 - Excess Distribution Facilities	36.2	Added a new provision, Distributed Energy Resources Make Ready Program for Disadvantaged Communities and Low-Income Customers.	CES
n/a	n/a	Cost recovery associated with Renewable Low Income Bill Credit in 2024	CES
PSC No. 12 - Electricity (PASNY)			
SC Rate Changes			
Rate I	4	Updated rates.	ERP

Section	<u>Leaf #s</u>	Description of Tariff Change	Testimony Panel
Street lights and FA	5	Updated rates.	ERP
Rate II	6	Updated rates.	ERP
Rate III, inc station use rate	7	Updated rates.	ERP
Rate IV, inc station use rate	8, 9	Updated rates.	ERP
Other Rate Changes			
Reactive Power Charge	10	Updated rate.	ERP
<u>Tariff changes:</u>			
Rate I	4, 11	Clarified rules for transferring customers between energy only rates and both energy and demand rates.	ERP
Determination of Billable Demand	11	Deleted requirement that a demand meter will be installed if customer uses over 10 kW or 6,000 kWh over two months.	ERP
Communication metering credit	13	Deleted the requirement for the customer to provide and maintain communication service and deleted monthly communications service credit.	ERP
Standby Service and Standby Service Rates	17, 17.1	Updated references for Standby Offset and export to another service connection.	
Standby Service and Standby Service Rates	17.1	Corrected indentation in last paragraph.	ERP
Standby and Buy Back provisions	17.1	Eliminated requirement for customer to provide communications for Output Meters	ERP
Transition Adjustment for Metering Services	20	Removed the obsolete Transition Adjustment for Metering Services	
Additional Delivery Charges and Adjustments	22	Indicated that RDM targets are "to be determined."	ERP
Additional Delivery Charges and Adjustments	22	Changed Low Income Program Fund for the rate-year and indicated that the low-income program will continue beyond December 31, 2023 contingent on the continuation of full cost recovery.	Customer Ops
Additional Delivery Charges and Adjustments	19, 24, 25, 26, 26.1, 26.2, 26.5	Deleted or revised certain adjustments.	ERP
Other Charges and Adjustments	26.1	Earning Adjustment Mechanisms to be determined based on the PASNY Allocation.	CES
Other Charges and Adjustments	26.4, 26.5	Revised component 17 to include late payment fee recovery starting in 2023.	Accounting
Other Charges and Adjustments	26.5	Added new component 18 to reconcile storm costs.	Accounting & SRR
Other Charges and Adjustments	26.5	Added new component 19 to reconcile carrying charges associated with interference costs.	Accounting & MISP
Other Charges and Adjustments	26.5	Added new component 20 to reconcile property taxes.	Accounting
Other Charges and Adjustments	26.6	Added new component 21 to reconcile uncollectible bill expenses and non-Credit and Collections of the POR Discount reconciliation.	Accounting
Other Charges and Adjustments	26.6	Added new component 22 to recover amounts associated with COVID-19 BIR rate reductions.	ERP

Section Leaf #s Description of Tariff Change Testimony Panel

Legend

ERP - Electric Rate Panel

EIOP - Electric Infrastructure & Operations Panel

CES - Customer Energy Solutions

MISP - Municipal Infrastructure Support Panel

GR - General Rule

SRR - Storm Response and Resilience Panel

Proposed Changes to the Gas Tariff

PSC No. 9 - Gas			
Section	Leaf #s	Description of Tariff Change	Testimony Panel
SC Rate Changes			
SC 1	228	Updated rates.	GRP
SC 2	230, 234	Updated rates.	GRP
SC 3	240, 243	Updated rates.	GRP
SC 9	269	Updated rates.	GRP
SC 12	331	Updated rates.	GRP
SC 13	349	Updated rates.	GRP
Other Rate Changes:			
GI VI. (E) - Rider D - Excelsior Jobs Program	128	Updated discounts	GRP
Rider H - Distributed Generation Rates	154.6, 154.8, 154.9	Updated rates.	GRP
Rider J - Residential Distributed Generation	154.24, 154.25	Updated rates.	GRP
GHX.8 - Merchant Function Charge (MFC)	178.2	Updated the per therm supply-related charge and credit and collection-related rates that will be in effect	GRP
Tariff Changes:			
General Changes			
GI II., GI III.14 (B) & (E), SC 9, SC20	12, 13, 85, 89, 259, 261, 316, 385, 389.3	Added language throughout the tariff to include Local RNG Production	GIOSP
GI III.3 B	30	Modified the main and service allotment for residential heating customers	GIOSP
GI III.3(B)(3)(b)	30, 31	Removed the 100' main entitlement aggregation language	GIOSP
GI III.3.(C).(1) &(2)	33, 34, 35	Removed the revenue test	GIOSP
GI III.5(C) 3 ii (a) & (b)	44	Updated the Inside Piping Survey/Inspection Fees	GIOSP
GI III.8(C)(2)	48	Modified no access costs	GIOSP
GI III.8	77, 78	Added Damaged Meter Fee	GIOSP
GI III(14)(E)	89	Added additional pipelines to the weighted market price of gas calculation	GRP
GI IV.2 (B) & (F)	117	Updated percentages for handling costs and corporate overheads for costs associated with special services	Accounting
VI (D) Rate II (3), VI (E); SC 2; SC 3	129, 154.25, 235, 243	Added the WNA to list of charges applicable to various rates	GRP
GI VI (D) Rate II (3), VI (E); SC 2; SC 3	129, 235, 243	Added WNA to rates under Rider J	GRP

Proposed Changes to the Gas Tariff

Section	Leaf #s	Description of Tariff Change	Testimony Panel
GI VI (H) (1), SC 9, SC 12, SC 20	154.10	Removed requirement for Rider H customers to have Interval Metering	GRP
GI VI (H) (1), SC 9, SC 12, SC 20	154.10, 154.11, 317, 318, 326.1, 342, 397.1	Removed references to phone lines	GRP
GI VI (H) (1) SC9, SC 12	154.11, 326.1, 342	Added exemption language from fee for customers with AMI	GRP
GI VII.(B)(2), GI IX.4	176	Added Reconciliation of Interference Costs adjustment	Accounting
GI VII.(B)(2), GI IX.6	177	Added Unbilled Fees Adjustment	Accounting
GI IX.7	178.1	Removed reference to Transition Adjustment for Competitive Services	GRP
GI IX.10	180	Updated the new low income funding level in rates	GRP
GI IX.14	181.1	Changed method for calculating interest on the RDM Adjustment	GRP
GI IX.14	181.2	Changed RDM Targets to TBD	GRP
GI IX.19	183.1	Update the Other Non-Recurring Adjustments to remove the reference to prior case	GRP
GI VII.(B)(2), GI IX.28	183.6	Removed the Pipeline Safety Acts Surcharge and added Surcharge for Gas Safety Compliance Adjustment	GIOSP
GI VII.(B)(2), GI IX.31	183.6	Added Reconciliation of Property Taxes adjustment	Accounting
GI VII.(B)(2), GI IX.32	183.7	Added Uncollectible Bill Expense Adjustment	Accounting
SC 2 (2), SC 3 (2)	232, 241	Added language to the reconciliation of the minimum charge	GRP
SC 12	342	Added exemption language for customers with AMI	GRP
SC 20	397.2	Modified timeline for UB recovery	GRP
Housekeeping			
Table of Contents	4, 5, 6	Added new Special Adjustments and eliminated obsolete Special Adjustments	GRP
GI III.8 V	76.1	Modified notification language regarding reconnection charges	GRP
GI III (14)(C)&(D)(a), SC9(B)(2)&(D), SC 12		Eliminated references to SC 12 Interruptible Temperature Control Option customers	GRP
Table of Contents & SC 12 (A)	341.1		
GI VI Rider G		Removed Rider G and references	GRP
	153, 154, 166.3, 171,173,178,		
	251, 269, 300.3, 326		
GI VI - Rider I	107 154 10 154 11 154 10	Removed Rider I and references	GRP
GI VI - Ridel I	154.14, 154.15, 154.16,	Removed Rider Fand Telefences	GRP
	154.17, 154.18, 154.19,		
	166.3, 171,173,178, 251, 269,		
	300.3, 326		
Q1.4 (E) (E)(a) (B)(B)(a) (B)(B)(a) Q1.4 (I) (O)	•		000
GI VI (E), (F)(3), (D)RI(3), (D)RII(3); GI VIII (C)		Eliminated references to the Tax Sur-Credit	GRP
GI IX (17), SC1, SC2, SC3, SC9 TOC, SC9	167.1, 183, 228, 235, 243,		
(J)(12), SC13	255, 300.3, 303.3, 349		
GI VI (A), (D) Rate I (5), (D) Rate II (5)	130, 154.24, 154.25	Clarified eligibility of Rider J customers under Rider E	GRP
GI VII.(B) and GI VII.(b)(2) MRA	155, 166.2, 166.3	Added new components to the list of MRA items and eliminated obsolete components	GRP
GI VII.(B)(2), GI IX.4	158, 176	Removed Transition Surcharge for Capacity Costs	GRP
GI VII.(B)(2), GI IX.6	158, 177, 178, 255, 279	Removed Load Following Charge and associated references in the tariff	GRP
GI IX.14	181.2	Changed RDM Targets to TBD	GRP
GI VII.(B)(2), GI IX.31	183.6	Removed Manhattan Transmission Project Surcharge	GRP
Or VII.(D)(Z), Or IX.Or	100.0	Nomovod Marmadan Transmission Floject Sulcharge	GINI

Proposed Changes to the Gas Tariff

<u>Section</u>	<u>Leaf #s</u>	Description of Tariff Change	Testimony Panel
SC 2, SC 2 (D) (1)-(5)	230, 235, 235.1	Added exemptions to the SC2 ratio calculation	GRP
SC9(B), SC 12 (A)(1)	274, 332	Eliminated references to the annual interruptible reconciliation of SC12, Interruptible Rate	GRP
		1	
SC9(C), SC12(B)	275, 333, 334	Eliminated rates no longer being offered SC12 Rate 2	GRP
SC12	332, 333	Modified language to the off-peak firm commodity rate	GRP
SC 13	349	Added language to penalty rate	GRP
SC 20 (D)(2)(a)	378	Clarified the exclusion days for cost of gas for the cashout charge	GRP
SC 20 (P)	397.3	Removed obsolete language related the Credit and Collections component of the POR	GRP
		Discount Percentage	

<u>Legend:</u> GRP Gas Rate Panel

GIOSP Gas Infrastructure, Operations, and Supply Panel

Accounting Accounting Panel GI General Information

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

Estimated Effect on Con Edison Conventional and TOD Customers' Bills and Revenue Resulting from the Application of Proposed Conventional and TOD Rates and Charges Based on Sales and Revenues for the Twelve Months Ended December 31, 2019

Con Edison Service Classification -		Total Annual Revenues	Total Annual Revenues	Estimated Change	<u>Percentage</u>	Estimated Number of Customer		mers' Bills
Conventional Rates		@January 2022 Rates ^(a)	@January 2023 Rates ^(a)	@January 2023 Rates ^(d)	<u>Change</u>	Increased	Decreased	<u>Unchanged^(e)</u>
1 - Rate I ^(b)	Residential & Religious	\$3,852,100,470	\$4,320,317,680	\$468,217,210	12.15%	35,812,027	-	32
2	General - Small	698,754,644	798,245,364	99,490,720	14.24%	4,937,300	-	-
5 - Rate I	Electric Traction Systems	163,464	184,604	21,140	12.93%	110	-	-
6	Public & Private Street Lighting	3,392,221	4,179,717	787,496	23.21%	40,858	-	-
8 - Rate I	Multiple Dwellings - Redistribution	295,954,879	328,189,607	32,234,728	10.89%	20,747	-	-
9 - Rate I	General - Large	3,295,873,998	3,666,478,927	370,604,929	11.24%	1,544,897	59	2
12 - Rate I	Multiple Dwelling - Space Heating	27,172,096	30,293,017	3,120,921	11.49%	5,292	-	-
Sub-Total	Con Edison's Conventional Rates	\$8,173,411,772	\$9,147,888,916	\$974,477,144	11.92%	42,361,231	59	34
Con Edison Servi Time-of-Day Rate								
1 - Rate II	Residential & Religious	\$14,155,707	\$16,808,606	\$2,652,899	18.74%	17,793	-	-
1 - Rate III	Residential & Religious - Voluntary	793,379	907,233	113,854	14.35%	4,056	-	16
2 - Rate II	General - Small	26,707,040	31,684,558	4,977,518	18.64%	36,456	-	-
5 - Rate II	Electric Traction Systems	14,470,284	15,395,279	924,995	6.39%	60	-	-
8 - Rate II	Multiple Dwellings - Redistribution	23,021,044	25,337,168	2,316,124	10.06%	227	-	-
8 - Rate III	Multiple Dwellings - Redistribution - Voluntary	20,611,990	22,729,488	2,117,498	10.27%	924	-	-
9 - Rate II	General - Large	1,418,125,622	1,535,573,118	117,447,496	8.28%	9,533	-	-
9 - Rate III	General - Large - Voluntary	344,194,570	372,010,865	27,816,295	8.08%	59,284	-	-
12 - Rate II	Multiple Dwelling - Space Heating	31,579,053	35,425,676	3,846,623	12.18%	321	-	-
12 - Rate III	Multiple Dwelling - Space Heating - Voluntary	-	-	-		-	-	-
13 - Rate I	Bulk Power - High Tension - Housing Developments	3,867,999	4,386,723	518,724	13.41%	12	-	-
Sub-Total	Con Edison's Time-of-Day Rates	\$1,897,526,688	\$2,060,258,714	\$162,732,026	8.58%	128,666	-	16
Con Edison Total	Con Edison's Total Excluding Special Contract	\$10,070,938,460	\$11,208,147,630	\$1,137,209,170 ^(c)	11.29% ^(c)	42,489,897	59	50

⁽a) Total Annual Revenues for all customers include: T&D delivery charge and estimated market supply charge, monthly adjustment clause, system benefits charge, dynamic load management, EV Make-Ready Surcharge, and the associated gross receipts taxes. The market supply charge revenues for retail access customers are equivalent to what these customers would have paid as full service customers.

⁽b) Total Annual Revenues in Service Classification No. 1 include customers currently served under Rider D.

⁽c) The change in Con Edison P.S.C. No. 10 revenues for the rate year, i.e., the twelve months ending December 31, 2023, equates to \$1,057.6 million, or an overall increase of 11.3%.

⁽d) Reflects the overall impacts by class, including the net effect of the increase in low income funding and low income discounts.

⁽e) Number of customer bills unchanged have bill impacts ranging from -0.01% to 0.01%.

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

Estimated Effect on NYPA Delivery Service Conventional and TOD Revenue Resulting from the Application of Proposed Conventional and TOD Rates and Charges Based on Sales and Revenues For the 12 Months Ended December 31, 2019

NYPA Delivery Service	<u>Total Annual Revenues</u> <u>@January 2022 Rates^(a)</u>	Total Annual Revenues @January 2023 Rates ^(a)	Estimated Change @January 2023 Rates	<u>Percentage</u> <u>Change</u>
NYPA Total	\$1,464,818,149	\$1,612,085,837	\$147,267,688 ^(b)	10.05% ^(b)

⁽a) Total Annual Revenues include delivery service revenues, DLM, EV Make-Ready Surcharge, and estimated supply revenues associated with customers billed under the PASNY No. 12 tariff.

⁽b) Based on sales and revenues for the rate year, i.e., the twelve months ending December 31, 2023 such increase in NYPA Delivery Service revenue equates to \$141.2 million or an overall increase of 10.1%.

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
Estimated Effect on Gas Customers' Bills and Company Revenues Resulting from Proposed Gas Rates
Based on Forecasted Sales and Revenues for the Twelve Months Ending December 31, 2023 for Service Classification Nos. 1, 2, 3, 13 and 14
and the Corresponding SC 9 Firm Transportation Sub-classes

Firm Service Classification (Sales and Transportation)	Annual Therms	Total Annual renues at Current /01/22 Rates (b)	Pro	Total Annual Revenues at oposed 01/01/23 Rates (b)	An	stimated Total nnual Revenues ease/(Decrease)	Percent Change	Number of Customers' Bills Increased	Number of Customers' Bills Decreased	Number of Customers' Bills Not Changed (c)
1 - Residential & Religious	38,160,000	\$ 286,004,700	\$	349,123,925	\$	63,119,225	22.1%	6,333,450	0	0
2 - General - Rate I (a)	254,300,000	\$ 307,888,432	\$	350,792,968	\$	42,904,536	13.9%	801,562	0	0
2 - Rider H - Distribution Generation	75,430,000	\$ 61,162,935	\$	65,966,276	\$	4,803,341	7.9%	2,469	0	0
2 - General - Rate II - (a)	341,670,000	\$ 469,866,983	\$	552,417,340	\$	82,550,356	17.6%	734,048	0	0
2 - Total Commercial	671,400,000	\$ 838,918,350	\$	969,176,584	\$	130,258,234	15.5%	1,538,079	0	0
3 - Residential & Religious - Heating (a)	1,004,980,000	\$ 1,638,980,433	\$	1,948,105,441	\$	309,125,008	18.9%	3,565,477	0	0
3 - Rider J - Distribution Generation	20,000	\$ 26,031	\$	30,412	\$	4,382	16.8%	84	0	0
13 - Seasonal Off Peak Firm Service	540,000	\$ 805,870	\$	948,972	\$	143,102	17.8%	3,519	0	0
14 - Natural Gas Vehicles	120,000	\$ 284,264	\$	284,264						
Total Firm Sales & Firm Transportation	1,715,220,000	2,765,019,648		3,267,669,598		502,649,950	18.2%	11,440,610	0	0

⁽a) Gas air-conditioning is included in SC 2 and SC 3.

include gas cost factor, monthly rate adjustment, merchant function charges and various other charges used in calculating Rate Year Revenues; include gas supply costs for transportation customers equivalent to what these customers would have paid as full service customers; and

⁽b) Annual Revenues:

⁽c) Number of customers' bills not changed have bill impacts ranging from -0.01% to 0.01%.

Consolidated Edison Company of New York, Inc.

Typical Residential Customer Bill Impacts

	Bills	at	Percent C	Percent Change		
<u>Electric</u>	Current <u>Rates</u>	Proposed <u>Rates</u>	<u>Change</u>	<u>Delivery</u>	<u>Total Bill</u>	
SC 1 New York City 280 kWh	\$82.90	\$94.11	\$11.21	18.4%	13.5%	
SC 1 Westchester 425 kWh	\$116.90	\$132.50	\$15.60	18.6%	13.3%	
SC 1 600 kWh	\$157.97	\$178.87	\$20.90	18.8%	13.2%	
Gas SC 3 Heating Custome 100 Therms		\$236.42	\$37.88	26.8%	19.1%	