

EXHIBIT ____ (IIP-20)

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C.)	Docket Nos. ER08-858-000
New York Independent System Operator, Inc.))	ER08-867-000
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Consolidated Edison Company of New York, Inc.))	
v.)	
Public Service Electric and Gas Company, PJM Interconnection, L.L.C., and New York Independent System Operator, Inc.)))))	EL02-23-000

**AFFIDAVIT OF MICHAEL FORTE
IN SUPPORT OF REPLY COMMENTS BY
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.**

State of New York)
) ss.
County of New York)

I, Michael Forte, being duly sworn, depose and say:

I. INTRODUCTION

1. My name is Michael Forte and my business address is 4 Irving Place, New York, New York 10003. I am the Chief Engineer in the Transmission Planning Department for the Consolidated Edison Company of New York, Inc. ("Con Edison"). My office is located at 4 Irving Place, New York, New York 10003.

2. My responsibilities include supervising the planning and overall development of the electric bulk power transmission system, coordinating with the Northeast Power Coordinating Council ("NPCC"), the New York State Reliability Council ("NYSRC"), PJM, the New York State Independent Operator ("NYISO"), and neighboring utilities, and ensuring the reliable and timely interconnection of merchant generation and transmission projects to Con Edison's electric bulk power transmission system. I am also responsible for the development of strategic policies as they relate to the electric bulk power transmission system, and conduct on-going assessments of the performance and design of the electric bulk power transmission system on a probabilistic basis through various technical studies, including the development of analytical models and reviewing and updating Company specifications pertaining to voltage control, station start-up, and system restoration. I also supervise Con Edison's compliance with North American Electric Reliability Council ("NERC") electric reliability standards.

3. I received a Bachelor of Electrical Engineering degree from Manhattan College in 1972. In addition, I received a Masters in Engineering from Rensselaer Polytechnic Institute in 1973, and a Masters in Business Administration from Iona College in 1980. I am a senior member of the Institute of Electrical and Electronics Engineers, and a member of the Tau Beta Pi and Eta Kappa Nu engineering associations. I am also the co-author of several technical articles

on system voltage. I have spent my entire professional career at Con Edison. Prior to my current assignment, I was Chief Engineer of Energy Management, where my responsibilities included electric power purchasing and development of electric forecasts and peak demand. Before that, I was Director of Inter-Utility Affairs, focusing on inter-utility contract negotiation and strategic issues, including competition, transmission access and pricing.

4. I have previously testified before the Federal Energy Regulatory Commission New York Public Service Commission, the New Jersey Board of Public Utilities, and the Pennsylvania Public Utility Commission.

5. I am filing this affidavit in support of Con Edison's comments in support of the Settlement Agreement that was filed on February 23, 2009 in FERC Docket No. ER08-858. The purpose of this affidavit is to provide certain factual information as a basis for approval of the Settlement Agreement.

II. SUMMARY

I will address why the wheeling service from PSEG is necessary to maintain system reliability for New York City.

III PHYSICAL FLOWS ENHANCE RELIABILITY FOR NEW YORK CITY

On July 13 and 14, 1977, Con Edison experienced a system-wide blackout. In response to the blackout, Con Edison established a Company Board of Review to investigate the system outage. One of the goals of the review process was to make recommendations that would enhance system reliability and reduce the potential for a repeat of the events leading to the blackout. In the Second Phase Report issued by the Board, the first recommendation was to

accelerate the strengthening of the Con Edison transmission system. The first area identified by the Report was to re-initiate discussions with PSE&G regarding the strengthening of the transmission interconnections between PSE&G and Con Edison.

Pursuant to the Report's recommendation, in 1978 Con Edison entered into an agreement with PSE&G to expand the transmission interconnections between the two companies. Specifically, Con Edison and PSE&G jointly constructed a second Farragut-Hudson interconnection or "C Line" and a phase angle regulator at the Farragut substation. The companies also jointly constructed a second Ramapo-South Mahwah-Waldwick interconnection (Feeder 70 and "K Line" and a phase angle regulator at the Waldwick substation.

The agreement between Con Edison and PSE&G also established the firm delivery of an additional 600 MW of power from Ramapo to New York City. This physical delivery of a total of 1,000 MW of power over the PSE&G system enhances the system reliability of the New York City electric supply. The increases in physical delivery rights from PSEG was a significant reliability measure undertaken by Con Edison. Other steps taken by Con Edison included the Company's Thunderstorm/Storm Procedure (SO-5-2) which permits Con Edison to reduce energy flows into New York City from upstate during times of impending thunderstorms. These measures taken to diversify the physical flow of energy into the City are essential to mitigate the potential of a system-wide blackout in the New York City metropolitan area.

The expansion of the wheeling facilities between Con Edison and PSE&G following the system-wide outage of July 1977 demonstrated Con Edison's commitment to geographically diversify the transmission facilities into New York City. This expansion reduced reliance on the Dunwoodie interface and provided geographically diverse transmission paths into New York City.

The locations of Con Edison's system and of the sources of the power to be transmitted, relative to the PJM transmission system, dictate that the transmitted power be re-delivered over the A, B, and C Feeders. Approximately 1/3 of the peak power demand consumed in the City can be imported over facilities that Con Edison owns between Buchanan and Dunwoodie ("Dunwoodie Facilities"). The balance of imports would be delivered from Ramapo into the City via the PJM system pursuant to the existing 1,000 MW service. Any power that Con Edison acquires from sources in upstate New York that is not delivered over the Dunwoodie Facilities must be scheduled and delivered over the A, B, and C Feeders. There is no other means of delivering power to New York City.

IV. CONCLUSION

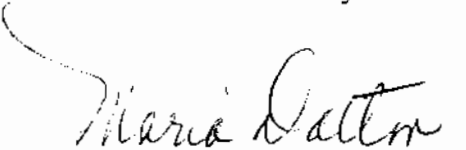
This concludes my testimony.

DATED: March 25, 2009



Michael Forte

SUBSCRIBED AND SWORN to
before me this 25th day of March, 2009



Notary Public
My commission expires: _____

MARIA DALTON
Notary Public, State of New York
No. 01DA5010017
Qualified in Nassau County
Commission Expires March 22, 2011