



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

April 16, 2012

VIA ELECTRONIC DELIVERY

Honorable Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

**Re: Case 03-E-0188 – Proceeding on Renewable Portfolio Standard
Proposed Rulemaking**

Dear Secretary Brillling:

Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc. hereby file their comments in response to a petition filed by the New York State Energy Research and Development Authority proposing a restructuring of solar photovoltaic programs to implement the NY Sun Initiative as part of New York State's Renewable Portfolio Standard program.

Very truly yours,

/s/ Stuart Nachmias

Stuart Nachmias
Vice President
Energy Policy and Regulatory Affairs

Attachment