

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

IVAN KIMBALL - ELECTRICITY SUPPLY

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1 Q. Please state your name, title, employer, and business  
2 address.

3 A. My name is Ivan Kimball. I am Vice President, Energy  
4 Management for Consolidated Edison Company of New York,  
5 Inc. ("Con Edison" or the "Company"). My office is  
6 located at 4 Irving Place, New York, New York 10003.

7 Q. Please describe your responsibilities in that position.

8 A. I am responsible for providing the overall strategic  
9 planning and direction for forecasting service area  
10 demand, evaluating electric, natural gas, and steam  
11 resource options, and procuring electricity and natural  
12 gas. I perform these functions for the customers of Con  
13 Edison, Orange and Rockland Utilities, Inc. ("O&R"),  
14 Rockland Electric Company ("RECO"), and Pike County Light  
15 & Power Company ("Pike").

16 Q. Please describe your professional background.

17 A. I have been in my current position since July 2012. From  
18 August 2008 to June 2012 I was Director, Electricity  
19 Supply for Con Edison. In that position I was  
20 responsible for day-to-day electricity supply operations,  
21 including the scheduling of generation and load bids with  
22 the New York Independent System Operator ("NYISO") and  
23 neighboring control areas; developing the overall

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1 electric power procurement plans for full service  
2 customers; developing and implementing Con Edison's  
3 electric hedging program; strategically evaluating and  
4 participating in capacity and transmission congestion  
5 contract ("TCC") auctions; managing contractual rights  
6 with various non-utility generators; and processing  
7 monthly invoices for wholesale purchases and sales of  
8 capacity, energy, and TCCs for Con Edison and its  
9 affiliates, O&R, RECO, and Pike. From December 1998 to  
10 August 2008, I was employed by Consolidated Edison  
11 Energy, Inc. ("Con Edison Energy") where I was most  
12 recently the Director of Asset Management. My  
13 responsibilities included management of the business  
14 aspects of the generating facilities owned by  
15 Consolidated Edison Development, Inc. ("Con Edison  
16 Development") in New England and other generating  
17 facilities with whom Con Edison Energy had contracts.  
18 This included day-to-day scheduling, fuel procurement,  
19 electricity market sales and planning, and associated  
20 regulatory and accounting matters. From September 1987  
21 to December 1998, I was employed by Con Edison in various  
22 positions of increasing responsibility.

23 Q. Briefly state your educational background.

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1 A. I received a Bachelor of Science degree and a Master of  
2 Science degree in Nuclear Engineering from Rensselaer  
3 Polytechnic Institute in May 1986 and September 1987,  
4 respectively.

5 Q. Have you previously testified before the New York Public  
6 Service Commission ("Commission")?

7 A. Yes. I have testified before the Commission in Cases 09-  
8 E-0428 and 13-E-0030.

9 PURPOSE OF TESTIMONY

10 Q. What is the purpose of your testimony in this proceeding?

11 A. The purpose of my testimony is twofold. First, I  
12 describe Con Edison's historical and projected wholesale  
13 electric supply purchases for the Company's full service  
14 customers. Historical supply purchases cover the period  
15 from January 2010 through December 2014 and projected  
16 supply purchases cover the period from January 2016  
17 through December 2020, which includes the rate year.

18 This section of the testimony also describes the  
19 Company's efforts to minimize supply costs to customers.

20 Second, I discuss incremental capital and O&M costs  
21 that the Company expects to incur for system enhancements  
22 relating to the implementation of the Data Analysis and  
23 Reporting Tool, the nMarket Upgrade/Replacement Project,

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1 Transmission Owners Data Reporting System Next  
2 Generation, and Metrix IDR Upgrade.

3 HISTORICAL SUPPLY COSTS

4 Q. What are the Company's objectives when purchasing  
5 electric supply for its full service customers?

6 A. The Company seeks the lowest reasonable electric purchase  
7 costs for its customers, subject to reliability and  
8 contractual constraints. As part of this objective, the  
9 Company also seeks to mitigate price volatility.

10 Q. In what ways does the Company accomplish these  
11 objectives?

12 A. The Company pursues commercial opportunities, such as  
13 favorable contract restructurings or extensions. The  
14 Company also pursues structural and tariff changes in the  
15 NYISO's wholesale electric markets that are beneficial to  
16 the Company's customers through active participation in  
17 the NYISO governance process and through filings with the  
18 Federal Energy Regulatory Commission ("FERC"). Where  
19 appropriate, the Company pursues certain matters before  
20 FERC through litigation, settlement and mediation  
21 conferences, and the filing of comments and petitions in  
22 an effort to obtain just and reasonable wholesale

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1 electric prices for its customers. I discuss these  
2 efforts later in my testimony.

3 Q. Please describe, in general terms, how Con Edison  
4 procures electric supply for its full service customers.

5 A. Electric energy and capacity are obtained from three main  
6 sources: contract supplies with non-utility generators  
7 ("NUG"), Entergy Nuclear Power Marketing, LLC  
8 ("Entergy"), and Astoria Energy, LLC ("Astoria Energy");  
9 Con Edison's own steam-electric generation; and purchases  
10 made primarily from the NYISO's energy, capacity, and  
11 ancillary services markets. The Company also uses  
12 financial hedges to mitigate price volatility for its  
13 customers.

14 Q. I show you a one-page document entitled, "CONSOLIDATED  
15 EDISON COMPANY OF NEW YORK, INC. - WHOLESALE ELECTRICITY  
16 SUPPLY COSTS - CALENDAR YEARS 2010 THROUGH 2014," and ask  
17 whether it was prepared under your supervision and  
18 direction?

19 A. Yes.

20 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-1)

21 Q. What does Exhibit \_\_\_\_ (ES-1) show?

22 A. Exhibit \_\_\_\_ (ES-1) illustrates the costs from January 1,  
23 2010 through December 31, 2014 for energy, capacity, and

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1 other services acquired on behalf of the Company's full  
2 service customers. This exhibit shows a material decline  
3 in the volume of the Company's total energy supplied,  
4 which is primarily due to customers migrating from full  
5 service to retail access.

6 Q. Please describe the Company's firm supply contracts.

7 A. As noted in Exhibit \_\_\_\_ (ES-1), about 2,700 MW  
8 (approximately 42% of the Company's capacity supply) and  
9 almost 14 million MWh (approximately 65% of the Company's  
10 energy supply) were provided by the Company's seven firm  
11 contracts in 2014. Five of these are mandated NUG  
12 contracts with Public Utilities Regulatory Policy Act  
13 ("PURPA") units, one is with Entergy, and one is with  
14 Astoria Energy.

15 Q. I show you a one-page document entitled, "CONSOLIDATED  
16 EDISON COMPANY OF NEW YORK, INC. - FIRM CONTRACTS AS OF  
17 DECEMBER 31, 2015," and ask whether it was prepared under  
18 your supervision and direction?

19 A. Yes.

20 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-2)

21 Q. What does Exhibit \_\_\_\_ (ES-2) show?

22 A. Exhibit \_\_\_\_ (ES-2) sets forth the term and capacity of  
23 each of the firm supply sources noted above, except for

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1 the Selkirk, Sithe, and Indeck contracts, which expired  
2 in August 2014, October 2014, and June 2015,  
3 respectively.

4 Q. Please describe the Company's steam-electric generation.

5 A. As noted in Exhibit \_\_\_ (ES-1), 711 MW (approximately 11%  
6 of the Company's capacity supply) and over 2.7 million  
7 MWh (approximately 13% of the Company's energy supply)  
8 were provided by the Company's steam-electric generation  
9 facilities in 2014. Fuel costs for this generation are  
10 allocated between the steam and electric services in a  
11 manner established by the Commission.

12 Q. Please describe the Company's spot purchases.

13 A. The vast majority of spot energy purchases are made from  
14 the NYISO, primarily in its day-ahead market, but also  
15 from its real-time market. The NYISO prices energy in  
16 both of those markets at eleven different load zones.  
17 About 85% of Con Edison's customers' consumption is in  
18 NYISO's Zone J, the New York City ("NYC") load zone. The  
19 remainder is located in NYISO Zones H (Millwood) and I  
20 (Dunwoodie). The Company also purchases excess energy  
21 from non-PURPA NUGs located in its territory. Such  
22 energy is typically purchased at the NYISO spot price.



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1           Spot capacity purchases are made from the NYISO's  
2           capacity markets. The NYISO administers four capacity  
3           market areas: one for NYC, one for Long Island, one for  
4           Lower Hudson Valley ("LHV"), and one for rest-of-state  
5           ("ROS"). The majority of Con Edison's capacity  
6           obligation is in NYISO's NYC market; the remainder is in  
7           the NYISO's LHV and ROS markets. The NYISO conducts  
8           auctions that allow load serving entities ("LSEs"), like  
9           Con Edison, to purchase capacity for a one-month period  
10          or for periods of up to six months. Any LSE with  
11          capacity obligations not met by the sum of contract  
12          purchases and purchases made in these "strip" or monthly  
13          auctions is provided capacity by the NYISO from spot  
14          auctions the NYISO conducts monthly. Prices in each spot  
15          auction are set at the intersection of a demand curve,  
16          which is administratively established through the NYISO's  
17          governance processes and approved by FERC, and the supply  
18          offer curve. One aspect of the spot auction is that it  
19          is a single clearing price auction, which means that all  
20          supply offers in NYISO's spot auction that are below the  
21          intersection of the administrative demand curve and the  
22          supply offer curve receive the spot market clearing  
23          price. It is typical for more capacity to be available

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1 for sale than is required to be purchased. Such excess  
2 capacity is purchased by NYISO on behalf of the LSEs,  
3 which are obligated by the NYISO tariff to purchase such  
4 "excess capacity."

5 Q. Please describe the Company's financial hedging  
6 practices.

7 A. The Company uses financial hedge products to mitigate the  
8 volatility of its spot purchases. Products include  
9 fixed-for-floating price swaps, also known as contracts  
10 for differences ("CFDs"), options, and TCCs. CFDs are  
11 typically traded on a "5x16" basis, meaning their value  
12 is computed over the 16 peak hours (7 AM to 11 PM,  
13 prevailing time) on non-NERC-holiday weekdays. CFDs may  
14 also be traded on an "around the clock" basis, priced at  
15 the arithmetic average of all 24 hours in a day, or on a  
16 "load shaped" basis, where hourly spot prices are  
17 weighted by an agreed upon set of weighting factors for  
18 each hour in a day to determine the CFD's settlement  
19 price. These "load shaped" CFDs may be settled against a  
20 fixed proportion of the LSE's hourly actual demand and  
21 may also be known as "slice of system" hedges.

22 Options typically provide a financial benefit to the  
23 option holder when the contracted parameters, such as

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1 spot price, temperature, or both, exceed prior agreed-  
2 upon thresholds. The premiums or purchase costs of such  
3 options are related to the volatility of the underlying  
4 product, the length of time prior to delivery, and the  
5 agreed-upon strike price and/or temperature threshold.

6 TCCs are essentially fixed-for-floating price swaps  
7 that provide a hedge against fluctuations in the  
8 transmission costs associated with moving energy from its  
9 point of injection to its point of withdrawal.

10 Q. What has been the impact of the Company's hedging  
11 program?

12 A. Exhibit \_\_\_ (ES-1) identifies the net impact of the  
13 Company's financial hedging from 2010 through 2014,  
14 including the cost of those hedges. The exhibit shows  
15 that the Company's hedging practices stabilized wholesale  
16 supply prices for customers, which is the objective of  
17 the program. In accordance with the PSC's August 28,  
18 2006 Order Instituting Proceeding and Soliciting Comments  
19 and its April 19, 2007 Order Requiring Development of  
20 Utility Specific Guidelines for Electric Commodity Supply  
21 Portfolios and Instituting a Phase II to Address Longer-  
22 Term Issues in Case 06-M-1017, the Company maintains a  
23 supply portfolio that is hedged but not 100% hedged for

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1 its residential and small commercial customers, and meets  
2 with Commission Staff at least once a year to review its  
3 hedging performance and plans.

4

5 PROJECTED SUPPLY COSTS

6 Q. Have you prepared a projection of generation capacity for  
7 the Company's steam-electric plants?

8 A. Yes.

9 Q. I show you a one-page document entitled, "CONSOLIDATED  
10 EDISON COMPANY OF NEW YORK, INC. - STEAM-ELECTRIC  
11 GENERATION CAPACITY (MW) PROJECTED FOR 2016 AND 2017,"  
12 and ask whether it was prepared under your supervision  
13 and direction?

14 A. Yes.

15 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-3)

16 Q. What does Exhibit \_\_\_\_ (ES-3) show?

17 A. Exhibit \_\_\_\_ (ES-3) shows the capacity from the Company's  
18 retained generation located at its steam-electric plants  
19 (collectively referred to as "steam-electric  
20 generation").

21 Q. Have you also prepared a projection of wholesale energy  
22 costs?

23 A. Yes.

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1 Q. I show you a one-page document entitled "CONSOLIDATED  
2 EDISON COMPANY OF NEW YORK, INC. - PROJECTION OF  
3 WHOLESALE ELECTRICITY SUPPLY COSTS - RATE YEARS ENDING  
4 DECEMBER 2016 through DECEMBER 2020" and ask whether it  
5 was prepared under your supervision and direction?

6 A. Yes.

7 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-4)

8 Q. What does Exhibit \_\_\_\_ (ES-4) show?

9 A. Exhibit \_\_\_\_ (ES-4) sets forth my projections of  
10 electricity supply costs from January 2016 through  
11 December 2020, based upon the forecast of full service  
12 sendout provided to me by the Company's Electric  
13 Forecasting Panel.

14 Q. Please describe the methodology used to develop these  
15 projections.

16 A. As noted earlier, capacity and energy are supplied from  
17 three major categories: firm contracts, steam-electric  
18 generation, and spot purchases.

19 Firm contract capacity and energy costs were  
20 projected based on existing contract terms and reflect  
21 the historical dispatch of the units. In cases where  
22 firm contract terms rely on a projection of the change in  
23 the Consumer Price Index ("CPI") for this region, I used

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1 the CPI forecast based on the October 10, 2015  
2 publication of the "Blue Chip Economic Indicators," for  
3 2015 and 2016, which showed an annual CPI growth of  
4 0.1% and 1.9%, respectively. For years 2017 through  
5 2020, I used the CPI forecast based on the October 10,  
6 2015 Long Range Forecast publication of the "Blue Chip  
7 Economic Indicators," which shows growth in 2017, 2018,  
8 2019, and 2020 as 2.2%, 2.3%, 2.3%, and 2.2%,  
9 respectively. Most firm contract energy costs are  
10 indexed to some fuel supply such as the delivered cost of  
11 natural gas or fuel oil. Natural gas price projections  
12 were based on November 2015 forecasts published by Wood-  
13 Mackenzie, a research and consulting firm that provides  
14 commercial analysis and strategic advice for the global  
15 energy, metals, and mining industries, for commodity  
16 delivered to the Henry Hub, Louisiana.

17 Fuel oil forecasts were determined based on the  
18 relationship of fuel oil costs and crude oil prices over  
19 the period from January 2017 to December 2019 in the  
20 Wood-Mackenzie forecasts, the relationship of the NYMEX  
21 crude oil and natural gas futures prices as of November  
22 25, 2015, and the Wood-Mackenzie natural gas price  
23 forecasts described above.

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1           Steam-electric generation costs were projected using  
2           the PROMOD cost optimization model. Steam sendout  
3           projections and fuel price forecasts were input into  
4           PROMOD, which models the operating characteristics of the  
5           Company's steam-electric units. The natural gas prices  
6           were based on the Wood-Mackenzie forecasts described  
7           above. Natural gas "basis differentials," reflecting the  
8           cost of interstate transportation from Henry Hub to  
9           Transco Zone 6 (NYC), were then applied to the natural  
10          gas prices. This delivered cost of natural gas was then  
11          increased to reflect the cost of taxes on generation  
12          fuel, yielding the natural gas price forecast. These  
13          forecasted natural gas basis differentials were provided  
14          by Wood-Mackenzie. The fuel oil forecasts were based on  
15          the Wood-Mackenzie forecasts and NYMEX futures prices as  
16          described above. This delivered cost of fuel oil was  
17          then increased to reflect the cost of taxes, shipping and  
18          handling, yielding the fuel oil price forecast. Based on  
19          the modeled dispatch of the steam-electric units and a  
20          projected allocation of costs from Steam Operations for  
21          "processing charges," such as water, chemicals, and  
22          labor, the costs and volumes of energy available for

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1 electric supply were determined, as summarized on Exhibit  
2 \_\_\_\_ (ES-4).

3 Q. Please explain why external services are used to develop  
4 natural gas and fuel oil price projections.

5 A. Natural gas and fuel oil prices are subject to  
6 significant period to period variations due to supply  
7 interruptions, economic and regulatory changes, and  
8 general market forces. An external consulting firm like  
9 Wood-Mackenzie can leverage its industry experience and  
10 market intelligence in producing commodity price  
11 projections.

12 Q. Please continue with your description of Exhibit \_\_\_\_ (ES-  
13 4).

14 A. Spot capacity purchase costs are based on a projection of  
15 capacity supply margins in the NYC, LHV, and ROS regions  
16 as provided by the NYISO; the application of these  
17 margins to expected demand curve parameters to project  
18 prices; and then the application of these prices to the  
19 Company's expected spot capacity requirements in the NYC,  
20 LHV, and ROS regions. Excess capacity costs purchased by  
21 the NYISO and allocated to LSEs, as described earlier,  
22 are also included in these cost projections.



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1           Spot energy costs are based on market values as of  
2           December 3, 2015. These price projections were then  
3           applied to the forecast of full service volumetric  
4           requirements as provided to me by the Company's Electric  
5           Forecasting Panel, after deducting energy projected to be  
6           supplied from firm contracts and steam-electric  
7           generation.

8    Q.    Please continue with your description of spot energy  
9           costs in Exhibit \_\_ (ES-4).

10   A.    I note that this exhibit shows a material change in the  
11           volume of the Company's spot purchases, which is  
12           primarily due to the expiration of the NUG contracts as  
13           follows: Astoria in April 2016, Linden in April 2017,  
14           and Entergy in December 2017.

15           To mitigate some of the need for additional spot  
16           purchases and the associated price volatility of spot  
17           purchases, the Company recently implemented a request for  
18           proposal ("RFP") for physical and financial supply.

19           Through the RFP process, the Company purchased from  
20           multiple counterparties 500 MW of around-the-clock NYISO  
21           Zone J (New York City) financial energy consisting of  
22           both fixed priced and natural gas price-indexed products,  
23           and 1,000 MW of New York City unforced capacity ("UCAP")

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1 consisting of both financial and physical fixed priced  
2 capacity. Energy products were purchased for one-year  
3 terms for each of the three calendar years 2016 through  
4 2018. Capacity products were purchased for one-year  
5 terms for each of the three capability years commencing  
6 May 2016, May 2017, and May 2018.

7 Q. Has the net impact of the RFP been included in these  
8 projections?

9 A. Yes, they are included in the costs of the firm contracts  
10 on the exhibit.

11 Q. Does the Company plan to utilize the RFP process going  
12 forward rather than procure any more financial hedges?

13 A. The Company plans to conduct annual RFPs for both energy  
14 and capacity up to three years out in the future.  
15 However, the RFPs will complement, rather than replace,  
16 the financial hedges in the Company's hedge plan. This  
17 will allow the Company to further diversify its portfolio  
18 to mitigate wholesale supply price volatility to our  
19 customers. In addition, by staggering purchases up to  
20 three years out, the annual RFPs over time should reduce  
21 the need for spot purchases to volumes comparable to  
22 historical levels before the expirations of the NUG  
23 contracts.

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1 Q. Has the net impact of financial hedges been included in  
2 these projections?

3 A. Hedges have been assumed to be "at the money," thereby  
4 not affecting customers' prices for the purposes of these  
5 cost projections. However, financial hedges command  
6 premiums for reducing buyers' risks and so would be  
7 expected to increase costs marginally over the long term.

8 Q. Are you aware of the Commission's proceeding relating to  
9 New York State's Clean Energy Standard (Case 15-E-0302)  
10 and the whitepaper issued on January 25, 2016?

11 A. Yes.

12 Q. What impact on the Company will the Commission's  
13 proposals have?

14 A. We have not been able to fully assess the Commission's  
15 proposals. We are following the proceeding and evaluating  
16 its impact. We will address any expected impacts on  
17 Update.

18 COST SAVING INITIATIVES

19 Q. What efforts does the Company undertake to minimize  
20 supply costs to customers?

21 A. A primary objective of the Company is to actively promote  
22 customers' interests by advocating for the adoption of  
23 wholesale market rules that maintain reliability and

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1 create fair and competitive market prices for all  
2 customers, including the Company's full service  
3 customers. Moreover, the Company has consistently  
4 advocated for the implementation and maintenance of  
5 market mitigation measures necessary to prevent the  
6 influence of market power on electric prices. The  
7 Company aggressively pursues NYISO market structure and  
8 tariff changes that are beneficial to its customers  
9 through active participation in the NYISO's governance  
10 process and in FERC proceedings.

11 Q. Please give some examples of the Company's efforts in  
12 these NYISO processes and FERC proceedings.

13 A. Con Edison has been active in promoting rules that allow  
14 new resources fair access to the wholesale markets. For  
15 example, the Company led the push for an exemption to  
16 NYISO's buyer-side mitigation rules for unsubsidized  
17 merchant resources that have no incentive to exercise  
18 buyer-side market power ("competitive entry exemption").  
19 After meeting resistance in the NYISO stakeholder  
20 process, the Company filed a complaint at FERC. FERC  
21 agreed with the Company and ordered NYISO to adopt a  
22 competitive entry exemption. A competitive entry  
23 exemption will benefit customers by permitting

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1 competitive generators to enter the capacity market and  
2 offer to sell at a lower cost than if they were mitigated  
3 and made subject to an offer floor.

4 Con Edison is also advocating for fair demand response  
5 participation in the NYISO capacity market. For example,  
6 in 2015 the Company challenged two FERC orders that  
7 address demand response. In the first order, FERC  
8 reversed a five-year old ruling that made payments from  
9 the Company's Distribution Load Relief Program to Special  
10 Case Resources exempt from the applicable offer floor.  
11 In the second order, FERC denied the Public Service  
12 Commission's request for an exemption from mitigation for  
13 certain resources, including demand response resources.  
14 The Company sought rehearing at FERC on both issues.

15 Con Edison also participates actively in most NYISO  
16 projects and proceedings and secures changes that benefit  
17 customers. For example, in the recent process to review  
18 NYISO's 2016 Annual Project List, the Company advocated  
19 successfully for a project that would define the rules  
20 for eliminating NYISO's LHV capacity zone after new  
21 transmission is built that would eliminate the zone's  
22 transmission constraint. The Company is concerned that

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1 without such rules elevated capacity prices in the LHV  
2 zone will persist unnecessarily.

3 The Company also persuaded NYISO to improve its  
4 Consumer Impact Process, which is intended to consider  
5 how proposed market design changes impact customers.  
6 Under the new rules, NYISO will analyze customer impact  
7 earlier in the process and indicate at the start of a  
8 market design initiative whether it is expected to  
9 increase customer costs by \$50 million or more annually.  
10 In addition, NYISO will provide its cost estimate as a  
11 range, and include all of its underlying assumptions for  
12 stakeholder review. Finally, as requested by Con Edison,  
13 NYISO will provide stakeholders with alternative market  
14 design changes and their cost impacts. Consequently, all  
15 stakeholders will have the information they need to  
16 consider the impact of proposed changes on customers, and  
17 react accordingly.

18 As another example, the Company argued successfully  
19 that NYISO's comprehensive reliability report should  
20 assume that a number of generators would return to  
21 service, which had the effect of saving customers money  
22 by removing the need for alternative projects. The  
23 Company also advocated successfully for more balanced

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1 language with respect to reliability risks over the  
2 planning period than appeared in the initial report. As  
3 a result, the base case in the report showed no  
4 reliability issues during the 10 year term, other than  
5 local transmission security issues upstate.

6 Similarly, the Company successfully persuaded NYISO  
7 to delay implementing changes to its Shortage Pricing  
8 rules after concerns arose about their impact on  
9 customers statewide. Rather than implement the new rules  
10 in June 2015, NYISO implemented them in Novemember 2015,  
11 as the most significant benefits should occur over the  
12 winter period.

13 The Company was also successful in altering a NYISO  
14 proposal to revise its current practice of establishing  
15 the price paid to demand response resources and  
16 generators, in real-time, during reliability-based demand  
17 response activations - Special Case Resources and  
18 Economic Demand Response Program (Scarcity Pricing).  
19 Consistent with the Company's long-held preference, the  
20 NYISO will be improving upon the current after-the-fact  
21 price correction by including pricing and dispatch  
22 decisions in the real-time software. NYISO's consumer  
23 impact assessment demonstrates that when reliability-

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1 based demand response programs are activated, as they  
2 were six times in 2013, the resulting efficiencies could  
3 reduce customer costs up to \$46 million annually  
4 statewide. Implementation is expected summer 2016.

5 The Company has also continued its leadership in  
6 support of market structures designed to improve  
7 efficiency between regional markets, such as the Market  
8 to Market and Coordinated Transaction Scheduling (CTS)  
9 initiatives. In 2015, Con Edison participated actively  
10 in finalizing CTS with ISO-New England, Inc. ("ISO-NE")  
11 (CTS with PJM was put in place the year prior). New York  
12 imports substantial amounts of power annually, and CTS  
13 should enable more frequent and flexible scheduling with  
14 ISO-NE. This should translate into cost savings for the  
15 Company's customers by facilitating access to external  
16 resources that are lower-cost than available native  
17 resources. CTS with ISO-NE was approved by FERC and  
18 became effective December 15, 2015. CTS is expected to  
19 reduce wholesale power costs for electric consumers in  
20 New York by approximately \$3 million dollars between  
21 2016-2020.

22 Finally, the Company assumes leadership roles within  
23 NYISO stakeholder groups and industry-wide organizations.



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1 Q. Are there any Company programs or projects that will  
2 reduce supply costs to customers?

3 A. Yes, the Company has recently installed General Electric  
4 ("GE") Advanced Hot Gas-Path (AGP) hardware on the East  
5 River Generating Station Units 1 and 2 Combustion Turbine  
6 Generators, which increased the total output of the two  
7 units by up to 24 MW. The Company is following the NYISO  
8 Large Facility Interconnection Procedures to be approved  
9 for a total increase of 24 MW in capacity resource  
10 interconnection service ("CRIS") and energy resource  
11 interconnection service ("ERIS"). Once the full 24 MW of  
12 CRIS and ERIS is approved by the NYISO, the annual supply  
13 cost savings of this initiative from avoided capacity and  
14 energy purchases for Con Edison's full service customers  
15 net of the fuel consumption of the additional output is  
16 estimated to be about \$7 million.

17 Q. Any prospective programs that would reduce supply costs  
18 to customers?

19 A. Yes. As the Company has explained in comments to the  
20 Commission regarding new initiatives to help meet the  
21 State's Renewable Portfolio Standards (RPS) goals, Con  
22 Edison supports utility ownership of renewable facilities  
23 over any power purchase agreement (PPA) arrangements.

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1 Utility ownership will result in lower costs to our  
2 customers than PPAs would, while capturing the continued  
3 benefits of the renewable facilities for our customers  
4 over the life of the facilities instead ending at the  
5 expiration of the PPAs.

6 SYSTEM ENHANCEMENTS

7 Q. I show you a one-page document entitled, "CONSOLIDATED  
8 EDISON COMPANY OF NEW YORK, INC. - ELECTRICITY SUPPLY  
9 SYSTEM ENHANCEMENTS - CAPITAL (\$000)" and ask whether it  
10 was prepared under your supervision and direction?

11 A. Yes.

12 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-5)

13 Q. Please explain Exhibit \_\_\_\_ (ES-5).

14 A. This exhibit lists the four system enhancements I will be  
15 speaking to and shows their associated capital costs. For  
16 these four system enhancements in total, it is estimated  
17 that the Company will incur system installation costs  
18 totaling an estimated \$1.92 million in Rate Year 1  
19 (calendar year 2017), \$2.34 million in Rate Year 2  
20 (calendar year 2018,) and \$5.34 million in Rate Year 3  
21 (calendar year 2019).

22 Q. Are there projected additional O&M expenses associated  
23 with these System Enhancements?

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1 A. Yes, there are.

2 Q. I show you a one-page document entitled, "CONSOLIDATED  
3 EDISON COMPANY OF NEW YORK, INC. - ELECTRICITY SUPPLY  
4 SYSTEM ENHANCEMENTS - O&M (\$000)" and ask whether it was  
5 prepared under your supervision and direction?

6 A. Yes.

7 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-6)

8 Q. Please explain Exhibit \_\_\_\_ (ES-6).

9 A. This exhibit lists the four system enhancements I will be  
10 speaking to and shows their associated O&M expenses. For  
11 these four system enhancements in total, it is estimated  
12 that the Company will incur additional O&M expenses  
13 totaling an estimated \$340,000 in Rate Year 1, \$455,000  
14 in Rate Year 2 and \$1,032,000 in Rate Year 3.

15 Q. Starting with the first System Enhancement, what is the  
16 Data Analysis and Reporting Tool?

17 A. The Data Analysis and Reporting Tool is a new system that  
18 will aggregate and standardize market data from various  
19 systems within and external to the Company to enhance the  
20 Company's analytical and reporting capability and support  
21 its ability to function as a market participant in the  
22 wholesale energy markets.

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1 Q. Please describe why the Data Analysis and Reporting Tool  
2 is necessary.

3 A. Dynamic changes in the wholesale energy marketplace,  
4 which include regulatory changes that could impact  
5 pricing, regulatory reporting requirements such as Dodd-  
6 Frank, and new pipeline projects and supply sources that  
7 could also impact energy pricing, warrant a Data Analysis  
8 and Reporting Tool that will help the Company: (1) keep  
9 up with any regulatory changes that could impact energy  
10 costs to its customers, (2) increase efficiency by making  
11 data and results available in a standardized format that  
12 can be used to generate reports automatically for  
13 internal use, settlements, and regulatory reporting, (3)  
14 decrease the possibility for errors by automating  
15 processes as appropriate, and (4) maintain Sarbanes-Oxley  
16 ("SOX") controls and audit capabilities.

17 Q. I show you a three-page document entitled, "CONSOLIDATED  
18 EDISON COMPANY OF NEW YORK, INC. - DATA ANALYSIS AND  
19 REPORTING TOOL - CAPITAL" and ask whether it was prepared  
20 under your supervision and direction?

21 A. Yes.

22 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-7)

23 Q. Please explain Exhibit \_\_\_\_ (ES-7).

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1 A. This exhibit describes the Data Analysis and Reporting  
2 Tool Project and shows the associated capital costs that  
3 are planned to be incurred in 2017 and 2018. It is  
4 estimated that the Company will incur system installation  
5 costs totaling an estimated \$1.5 million in calendar year  
6 2017 and an estimated \$1.1 million in calendar year 2018  
7 for a total of \$2.6 million.

8 Q. I show you a three-page document entitled, "CONSOLIDATED  
9 EDISON COMPANY OF NEW YORK, INC. - DATA ANALYSIS AND  
10 REPORTING TOOL - O&M" and ask whether it was prepared  
11 under your supervision and direction?

12 A. Yes.

13 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-8)

14 Q. Please explain Exhibit \_\_\_\_ (ES-8).

15 A. This exhibit describes the Data Analysis and Reporting  
16 Tool Project and the associated O&M costs that are  
17 planned to be incurred each year starting in 2018. The  
18 \$75,000 per year is based on hiring a 0.5 full time  
19 equivalent ("FTE") of Information Technology ("IT") labor  
20 support. In comparison to the Company's wholesale energy  
21 transactions, which the Data Analysis and Reporting Tool  
22 will support, the revenue requirement of the \$2.6 million

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1 project cost plus the \$75,000 in annual O&M is about  
2 0.01% of the annual wholesale supply costs.

3 Q. What is the nMarket Upgrade/Replacement Project?

4 A. The nMarket Upgrade/Replacement Project will upgrade or  
5 replace the existing nMarket System in order to support  
6 Electricity Supply's Physical Wholesale business  
7 requirements in implementing New York State's Reforming  
8 the Energy Vision ("REV") Initiative. These business  
9 requirements consist of the following:

- 10 • Electric supply and distributed energy resource  
11 ("DER") purchase, scheduling, and invoicing
- 12 • Regulatory and Sarbanes-Oxley (SOX) compliance
- 13 • Interfacing with other internal systems

14 Q. Please describe why the nMarket Upgrade/Replacement  
15 Project is necessary.

16 A. The implementation of the REV Initiative will expand the  
17 participation of DERs in the wholesale energy markets as  
18 well as extend the electricity markets down to the  
19 network and distribution levels. This will add complexity  
20 to Electricity Supply's Physical Wholesale business  
21 requirements, creating the need to upgrade or replace the  
22 existing nMarket System.

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IVAN KIMBALL - ELECTRICITY SUPPLY

1 Q. I show you a three-page document entitled, "CONSOLIDATED  
2 EDISON COMPANY OF NEW YORK, INC. - nMARKET  
3 UPGRADE/REPLACEMENT PROJECT (DESIGN & IMPLEMENTATION) -  
4 CAPITAL" and ask whether it was prepared under your  
5 supervision and direction?

6 A. Yes.

7 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-9)

8 Q. Please explain Exhibit \_\_\_\_ (ES-9).

9 A. This exhibit describes the nMarket Upgrade/Replacement  
10 Project and shows the associated capital costs that are  
11 planned to be incurred in 2019 and 2020. It is estimated  
12 that the Company will incur system installation costs  
13 totaling an estimated \$4.1 million in calendar year 2019  
14 and an estimated \$6.4 million in calendar year 2020 for a  
15 total of \$10.5 million.

16 Q. I show you a three-page document entitled, "CONSOLIDATED  
17 EDISON COMPANY OF NEW YORK, INC. - nMARKET  
18 UPGRADE/REPLACEMENT PROJECT (DESIGN & IMPLEMENTATION) -  
19 O&M" and ask whether it was prepared under your  
20 supervision and direction?

21 A. Yes.

22 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-10)

23 Q. Please explain Exhibit \_\_\_\_ (ES-10).

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1 A. This exhibit describes the nMarket Upgrade/Replacement  
2 Project and the associated O&M costs that are planned to  
3 be incurred each year starting in 2017. Starting in  
4 2017, additional Energy Management labor will be  
5 required, ramping up to 4.5 FTEs by 2019 to provide  
6 transactional support for the additional DERs that are  
7 expected to become available and participate in the  
8 markets, both existing and new ones, as result of REV. In  
9 comparison to the wholesale electricity supply costs to  
10 all customers in the Company's service area, revenue  
11 requirement of the \$10.5 million project cost plus the  
12 \$650,000 in annual O&M by 2019 is about 0.05% of the  
13 annual wholesale electricity supply costs.

14 Q. What are the other two planned capital projects?

15 A. The first is the Transmission Owners Data Reporting  
16 System ("TODRS") Next Generation project. TODRS is a  
17 program that reconciles certain costs between the NYISO  
18 and Energy Service Companies ("ESCOs"). The second  
19 project is the MetrixIDR Upgrade. MetrixIDR is a  
20 calculation engine that forecasts the daily electric and  
21 steam hourly load for the Company.

22 Q. Regarding TODRS Next Generation, please describe the  
23 existing TODRS and its function.



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1 A. TODRS performs the Transmission Owner Energy  
2 Reconciliation and Load Forecast Tag reporting ("ICAP  
3 Tag") functions required by the NYISO. Energy  
4 Reconciliation is the process whereby the Transmission  
5 Owner determines the hourly contribution of each customer  
6 to actual metered zonal load recorded by the NYISO. ICAP  
7 Tag reporting determines the contribution of each  
8 customer to the forecasted annual electric peak. TODRS  
9 retrieves customer energy consumption data and supporting  
10 information from a number of sources, such as NYISO  
11 posted zonal load, the Customer Information System, the  
12 Retail Access database, the Recharge New York database,  
13 the Load Profile Display Program, and Meter Data  
14 Management database. TODRS then distributes consumption  
15 data through each hour during a month based on the  
16 customer's meter type, service class, and consumption  
17 patterns. The hourly data is then used to calculate  
18 monthly reconciled energy consumption and ICAP tags that  
19 are reported to the NYISO.

20 Q. Please describe the proposed upgrade to TODRS.

21 A. "TODRS Next Generation" will include a web interface  
22 where ESCOs and customers can view and download their  
23 hourly energy usage and capacity tag information online.

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1 This upgrade will enhance the users experience by helping  
2 them find data quickly and effectively. It will also  
3 create an automated interface reporting process for other  
4 systems, such as MetrixIDR (described further below), to  
5 extract daily data. Finally, the proposed upgrade will  
6 assist the Company in implementing expected business  
7 requirements resulting from REV and Advanced Metering  
8 Infrastructure ("AMI") implementation projects. For  
9 example, one of the expected benefits from TODRS  
10 interfacing with MetrixIDR is the ability to reconcile  
11 and forecast energy consumption/generation data for  
12 electric networks/radial feeders and distributed energy  
13 resources ("DER"), which will be a key component to  
14 further REV goals.

15 Q. What will be resulting features of the TODRS Next  
16 Generation project?

17 A. TODRS Next Generation is expected to:

- 18 • Connect TODRS to MetrixIDR, as described above.
- 19 • Enhance customer service to ESCOs by allowing the  
20 Company's Customer Service Representatives to  
21 trouble shoot billing errors and visualize customer  
22 data.

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IVAN KIMBALL - ELECTRICITY SUPPLY

- 1           • Provide individual customers secure access to their
- 2           ICAP and energy consumption information via existing
- 3           web services.
- 4           • Provide a User Interface for ESCOs to aggregate
- 5           data.
- 6           • Allow the Company to reconcile energy consumption
- 7           data for 82 electric networks and 12 radial feeders.
- 8           • Implement REV program mechanisms so market
- 9           participants can view and retrieve distributed
- 10          resources data and ICAP Tag benefits.
- 11          • Provide data and analysis for distributed resources
- 12          at electric network level.
- 13          • Enhance capability to process and store hourly
- 14          billing data from AMI meters for energy consumption
- 15          and ICAP Tag calculation.
- 16          • Provide access to Distribution Control Centers and
- 17          Substation Operators.

18 Q.    What are the other benefits and justification for this  
19        project?

20 A.    Online access for ESCOs and customers to energy usage  
21        data, capacity requirements, and basic information about  
22        customers' consumption, will assist ESCOs in analyzing  
23        and targeting specific groups of customers. In addition,

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1 the new User Interface will provide ESCOs a more accurate  
2 and effective system since transactions can be viewed  
3 online, and the system allows for Company personnel to  
4 readily troubleshoot and resolve reporting problems due  
5 to customer billing or metering issues. As NYISO  
6 regulatory and reporting requirements change, it is  
7 essential to upgrade the system.

8 Moreover, as the internal and external data systems  
9 that TODRS is connected to change or are modified,  
10 interfaces between TODRS and these systems will need to  
11 be updated accordingly. The existing TODRS will not be  
12 able to support new programs such as REV and AMI, nor  
13 will it be able to handle additional requests from market  
14 participants. Should a distribution network market  
15 materialize and TODRS is not upgraded, the Company will  
16 not be able to manage its ESCOs at the distribution level  
17 without significant increase in manpower and resources to  
18 meet the new requirements manually. Without the upgrade,  
19 the Company projects that one staff employee would need  
20 to be added to compile and manage customer consumption  
21 data and to communicate with local control centers and  
22 two additional staff employees would be necessary to  
23 create and manage Excel-based tools for electric

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1 networks, radial feeders, DERs, and large customers, and  
2 to answer a large influx of customer inquiries on  
3 distributed resources data and ICAP tag information.

4 In addition, the upgrade will assist the Company in  
5 meeting evolving regulatory reporting requirements and  
6 improve forecasting abilities.

7 Q. I show you a four-page document entitled, "CONSOLIDATED  
8 EDISON COMPANY OF NEW YORK, INC. - NYISO Transmission  
9 Owner Data Reporting System - Next Generation - CAPITAL"  
10 and ask whether it was prepared under your supervision  
11 and direction?

12 A. Yes.

13 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-11)

14 Q. Please explain Exhibit \_\_\_\_ (ES-11).

15 A. This exhibit describes the NYISO Transmission Owner Data  
16 Reporting System - Next Generation and shows the  
17 associated capital costs that are planned to be incurred  
18 between 2017 and 2020. The Company projects to spend  
19 approximately \$1.8 million on this capital project, of  
20 which \$200,000 will be spent in 2017, \$600,000 in 2018,  
21 \$600,000 in 2019, and \$400,000 in 2020.

22 Additional details associated with this capital  
23 project are shown in Exhibit (ES-11).

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1 Q. Are their additional O&M expenses associated with the  
2 TODRS Next Generation project?

3 A. Yes. There are additional staffing requirements.

4 Q. Please explain the additional staffing needed for this  
5 project.

6 A. As the Company, ESCOs, and customers become familiar with  
7 TODRS, one staff employee will be added starting in 2017  
8 to handle customer inquiries, manage and analyze customer  
9 consumption data, and provide necessary reporting  
10 services to the Company, ESCOs and regulators. This  
11 employee will also be responsible to collect, verify, and  
12 manage data that will enable load forecasts for full  
13 service customers and service classes. To meet the needs  
14 of the AMI effort, a second full time staff employee will  
15 be added starting in 2019 to compile and manage the  
16 exponential growth of hourly consumption data collected  
17 into the TODRS database. Without proper data  
18 verification, compilation, and management, TODRS will  
19 fail to utilize the hourly consumption data properly due  
20 to system limitation and potential data issues. As part  
21 of REV, a third staff employee is expected to be added in  
22 2020 to compile CECONY distribution areas/networks load  
23 and DER data. Combining with the staff supporting

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1 MetrixIDR as described below, the team will provide  
2 hourly load forecast for CECONY distribution  
3 areas/networks, forecast DERs' contribution to the  
4 Weather Adjusted Peaks (WAPs) on a system wide basis and  
5 by network, and coordinate with the Company's  
6 Distribution Operations office on forecasted DER  
7 requirements for reliability.

8 Q. I show you a four-page document entitled, "CONSOLIDATED  
9 EDISON COMPANY OF NEW YORK, INC. - NYISO Transmission  
10 Owner Data Reporting System - Next Generation - O&M" and  
11 ask whether it was prepared under your supervision and  
12 direction?

13 A. Yes.

14 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-12)

15 Q. Please explain Exhibit \_\_\_\_ (ES-12).

16 A. This exhibit describes the NYISO Transmission Owner Data  
17 Reporting System - Next Generation and shows the  
18 associated O&M expenses that are planned to be incurred  
19 between 2017 and 2020. The Company projects to spend  
20 approximately \$140,000 in 2017, \$80,000 in 2018, \$182,000  
21 in 2019, and by 2020 the ongoing O&M cost will be  
22 \$284,000 per year. This is primarily for the three

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1 additional full time employees and incremental IT  
2 support.

3 Additional details associated with this O&M expense is  
4 shown in Exhibit (ES-12).

5 Q. Regarding the MetrixIDR Upgrade, please describe the  
6 existing MetrixIDR System.

7 A. MetrixIDR performs the daily electric and steam hourly  
8 load forecasting that the Company's System Operation  
9 Department relies on to plan daily operation and that the  
10 Company's Electricity Supply Department uses to plan  
11 short term electric purchasing and generation scheduling.

12 Q. Please describe the upgrades proposed and why an upgrade  
13 needs to be made.

14 A. The Company proposes to upgrade MetrixIDR to the latest  
15 version supported by the vendor (ITRON). Without this  
16 upgrade, the vendor will no longer support the existing  
17 system as it becomes outdated by 2018. A fully-  
18 functioning MetrixIDR is important to the Company's daily  
19 forecasting. If the system ceases to work or fails to  
20 meet the Company's stringent forecasting accuracy  
21 standard, there can be increased challenges to daily  
22 operations.



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1 In addition, the upgraded system will further REV goals  
2 by implementing forecasting models and installing the  
3 systems necessary to provide hourly load forecasts for  
4 the Company's distribution areas/networks and radial  
5 feeders. This will also enable the Company to forecast by  
6 network/load area on a daily basis. Should a  
7 distribution network market materialize and the MetrixIDR  
8 forecast calculation engine is not upgraded, the Company  
9 will need two additional staff employees to compile and  
10 manage network data, coordinate with Distribution  
11 Operations, and interface with other REV supporting  
12 staff. In addition, another three employees will be  
13 needed to create and manage network level and DER  
14 forecasting models, and to help manage the database, as  
15 much of the data verification and compilation will be  
16 performed manually. This would be five additional  
17 employees if MetrixIDR was not upgraded. With the upgrade  
18 and development of REV and AMI, we are already looking at  
19 increasing our staff by two additional full time  
20 employees.

21 Q. What will be the resulting benefits and features of  
22 upgrading MetrixIDR?

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1 A. The Company expects that the upgrade will improve  
2 forecast reliability and accuracy, improve system  
3 reliability, enable distribution area and network hourly  
4 forecasting, and further REV goals. Forecasting accuracy  
5 leads to improved system operation efficiencies and lower  
6 energy supply costs. If a forecast is too high, more  
7 energy will be procured than needed. If a forecast is too  
8 low, energy will be procured at a premium, and there may  
9 be increased challenges to system operations. In  
10 addition, an upgraded MetrixIDR Load Forecasting System  
11 is expected to add the following new and enhanced  
12 features:

- 13 • Build 82 electric network hourly forecasts and 12  
14 radial feeder hourly forecasts.
- 15 • Provide a mechanism to forecast DERs' contribution  
16 to the WAPs on a system wide basis and by electric  
17 networks, and to provide forecasts for future DERs.
- 18 • Provide access to Distribution Control Centers and  
19 Substation Operators to the MetrixIDR Load  
20 Forecasting System.
- 21 • Additional functionalities to improve forecasting  
22 accuracy, such as enabling statistical analysis on

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1           daily data, and more control on how holidays can  
2           impact daily electric consumption.

3           • Add the capability of forecasting in five minutes  
4           intervals.

5           • Allow direct access to the database for custom  
6           reports, thus increasing our ability to analyze  
7           hourly consumption data by different categories  
8           (such as by area, network, total consumption level).

9           • Improve functionality to organize meter data within  
10          a particular area and to filter data by time period  
11          and other parameters.

12 Q.    I show you a four-page document entitled, "CONSOLIDATED  
13        EDISON COMPANY OF NEW YORK, INC. - Metrix IDR Load  
14        Forecasting Upgrade - CAPITAL" and ask whether it was  
15        prepared under your supervision and direction?

16 A.    Yes.

17                MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-13)

18 Q.    Please explain Exhibit \_\_\_\_ (ES-13).

19 A.    This exhibit describes the Metrix IDR Load Forecasting  
20        Upgrade and shows the associated capital costs that are  
21        planned to be incurred between 2017 and 2019. The Company  
22        projects to spend approximately \$1.5 million on this

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1 capital project, of which \$220,000 is planned to be spent  
2 in 2017, \$640,000 in 2018, and \$640,000 in 2019.

3 Additional details associated with this capital  
4 project are shown in Exhibit (ES-13).

5 Q. Are there additional O&M expenses associated with the  
6 MetrixIDR Upgrade project?

7 A. Yes. There are staffing requirements.

8 Q. Please explain the additional staffing needed for this  
9 project.

10 A. One staff employee will be added starting in 2017 to  
11 compile, analyze, and manage consumption data at the  
12 distribution areas/network level and for DERs. This work  
13 is critical to lay the groundwork for developing hourly  
14 forecast models for REV implementation. By 2020, a second  
15 staff employee (total two FTEs) will be added. The REV  
16 related tasks will include maintaining and updating the  
17 distribution areas/network and DER forecasting models,  
18 coordinating with other REV supporting staffs, and  
19 monitoring the system performance. Some incremental IT  
20 support will be added in 2019 to support the increased  
21 criticality of quick response times and to support the  
22 additional functionality.

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1 Q. I show you a four-page document entitled, "CONSOLIDATED  
2 EDISON COMPANY OF NEW YORK, INC. - Metrix IDR Load  
3 Forecasting Upgrade - O&M" and ask whether it was  
4 prepared under your supervision and direction?

5 A. Yes.

6 MARK FOR IDENTIFICATION AS EXHIBIT \_\_\_\_ (ES-14)

7 Q. Please explain Exhibit \_\_\_\_ (ES-14).

8 A. This exhibit describes the Metrix IDR Load Forecasting  
9 Upgrade and shows the associated O&M expenses that are  
10 planned to be incurred between 2017 and 2020. The Company  
11 projects to spend approximately \$100,000 per year  
12 starting in 2017, increasing to \$125,000 per year in  
13 2019, and increasing to \$275,000 per year by 2020. Of  
14 this \$275,000, \$75,000 is for incremental Information  
15 Technology support.

16 Additional details associated with this O&M expense  
17 is shown in Exhibit \_\_\_\_ (ES-14).

18 TARIFF CHANGES

19 Q. Is the Company proposing any tariff changes?

20 A. Yes. With respect to the MSC II Adjustment Factor in the  
21 Market Supply Charge, the costs/benefits of hedges are  
22 defined in the current tariff to be "all costs incurred  
23 and benefits received from financial hedging instruments

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1 associated with transactions intended to reduce price  
2 volatility to customers." The Company proposes to change  
3 the tariff to specifically provide for recovery of costs  
4 and benefits associated with physical hedges such as that  
5 the same language above in quotes would read, "all costs  
6 incurred and benefits received from hedging instruments  
7 associated with transactions intended to reduce price  
8 volatility to customers."

9 Q. Why is there a need to change the tariff to capture the  
10 costs and benefits of physical hedges?

11 A. As discussed earlier in the testimony, the Company plans  
12 to conduct annual RFPs for short-term energy and capacity  
13 that are either physical or financial hedges to mitigate  
14 the price volatility impact that may otherwise occur  
15 following the expiration of our NUG contracts. The  
16 proposed tariff change will cover transaction costs  
17 associated with physical hedges just as the current  
18 tariff covers transaction costs associated with financial  
19 hedges. These transaction costs are incurred for the  
20 benefit of customers in connection with the Company's  
21 diligent efforts to implement Commission policy to  
22 mitigate price volatility for customers and should be  
23 recoverable as a reasonable cost of doing business.

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

IVAN KIMBALL - ELECTRICITY SUPPLY

1 Q. Do you know of any other New York utility tariff that  
2 provides for recovery of physical hedge transaction  
3 costs?

4 A. Yes. The proposed tariff change herein will make the  
5 treatment of transaction costs associated with physical  
6 hedges the same as in O&R's tariff.

7 Q. Does this conclude your testimony?

8 A. Yes.