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October 19, 2017

VIA EMAIL

Ms. Alicia Sullivan
Appeals Unit, Supervisor
Office of Consumer Services
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case No. 16-E-0124 (440805), 170 Broadway, New York,
New York 10038

Dear Ms. Sullivan:

Consolidated Edison Company of New York, Inc. (“Con Edison” or the Company”) submits this letter in order to clarify certain of the issues raised in the letter dated March 28, 2016 (“March 28 Filing”), submitted on behalf of 170 Broadway NYC, LP, the complainant (“Complainant”) in the above-referenced proceeding. This proceeding involves a billing dispute relating to 166-170 Broadway, New York, New York, a 21-story building located in lower Manhattan, New York (“Premises”). For the sake of convenience, the Company will address these issues in the order in which they appear in the March 28 Filing.

As demonstrated below, the March 28 Filing does not identify mistakes of fact or law, or present new facts or evidence, sufficient to justify modifying or reversing the Informal Hearing Decision dated January 26, 2016 in this proceeding (“Informal Hearing Decision”). Accordingly, the Public Service Commission (“Commission”) should deny Complainant’s request for appeal of the Informal Hearing Decision.

Matters Not At Issue

In light of the extensive material comprising the March 28 Filing, the relevance of which varies wildly, as a preliminary matter it is worthwhile considering what is not at issue in this proceeding.

Complainant has not contested that the electric meter removed from the Premises on November 10, 2014, and tested according to the Commission’s procedures on

November 14, 2014, was found to be recording at 99.8 percent accuracy, which was within the Commission's established accuracy limits.

Complainant has not contested that the new electric meter installed at the Premises on November 10, 2014, and tested according to the Commission's procedures on May 27, 2015, was found to be recording at 101 percent accuracy, which was within the Commission's established accuracy limits.

Complainant has not contested that the Company properly billed Complainant for the electric consumption (kWh) at the Premises during the period in question (*i.e.*, March 2013 – May 2014) ("Period in Question"). Rather, Complainant claims that the billed demands (kW) used by the Company were improper.

Complainant has not contested that the new current transformers ("CTs") installed at the Premises and inspected by the Company on May 27, 2015, were found to be working properly (*i.e.*, within the specified tolerance of +/- 2% of the nominal CT ratio).

Complainant has not contended that there were any electric service outages at the Premises during the Period in Question.

Issues Raised By Complainant In The March 28 Filing

1. The timing of energizing and de-energizing of the 1200 ampere switch and associated CTs installed for use during construction for the period of renovation of the building.

Complainant argues that the dates of the energizing and de-energizing of the 1200 ampere switch and associated CTs support its contention that it was improperly billed during the Period in Question. The Company would note that Complainant has produced no evidence that the ampere switch and associated CTs caused the electric demand meter at the Premises to function improperly. Rather, Complainant's argument consists solely of the naked assertion that because the period when the ampere switch and associated CTs were operational occurred contemporaneously with the period of the alleged improper billing, the former must have caused the latter. As noted in the Company's response to Issue 4 below, the electrical demand at the Premises during the Period in Question was due to the electrical use of the equipment (*e.g.*, heaters) operating during the renovation of the Premises. Complainant's unsubstantiated, speculative, temporal based argument certainly does not constitute "new facts or evidence" sufficient to overturn the Informal Hearing Decision.

2. Explanation of Cause of Excessive Recorded Demands

In this section of the March 28 Filing, Complainant advances several separate arguments to support its contention that it was improperly billed during the Period in Question. As discussed below, none of them is persuasive.

Complainant first argues that the demand readings for the network transformers for the network that included the Premises were frequently lower than the demands recorded by the meter at the Premises. As noted in the attached affidavit of Costas Magoulas (“Magoulas Affidavit”), a copy of which is attached as Exhibit A to this letter, Complainant fails to substantiate that the data communicated from these network transformers are equivalent to the demands recorded by the meter at the Premises. The fact that they are not equivalent betrays a fundamental misunderstanding on the part of Complainant.

Con Edison monitors approximately 25,500 underground network transformers using the Remote Monitoring System (“RMS”). The RMS reports instantaneous data such as transformer secondary voltage, percentage load, tank pressure, oil temperature, oil level, and network protector status. The RMS communicates the information from underground network transformers to the head office approximately once every 3 to 15 minutes. The RMS, however, does not capture the demand from underground transformers or from individual customers. Customer usage (kWh) and demand (kW) is captured only by a customer’s billing accuracy meter(s). Tellingly, neither of the consultant reports submitted by Complainant as part of the March 28 Filing and discussed below, demonstrate otherwise. Therefore, Complainant’s attempt to use the instantaneous data reported for the network transformers to impugn the accuracy of the demands recorded by the meter at the Premises should be rejected.

Complainant also produced a report (“Lane Coburn Report”) prepared by its consultant, Lane Coburn & Associates (“Lane Coburn”). The Lane Coburn Report is included as Exhibit 4 to the March 28 Filing. The Lane Coburn Report (p. 6) states that “There is no safe manner in which the electrical service from the 1200 ampere switch at 208 volts 3-phase could have drawn 4.208 MW of power from Con Edison.” As noted in the Magoulas Affidavit, this statement is incorrect and displays a marked misunderstanding of electric demand meters. Electric demand meters, like the one installed at the Premises, record electrical demand in five minute increments over rolling 30 minute periods. To register a Billed KW reading of 4.208 MW of power, therefore, this amount of power need only have been drawn through the meter for a five minute average over six consecutive five minute intervals. As noted in the Magoulas Affidavit, the meter and CT manufacturer confirmed that the meter can record the demand captured and the CTs can withstand this overload over the half hour interval, with the only real effect being the reduction of the transformer life span.

Lane Coburn also speculates that, “the most likely cause of the overbilling was incorrectly coordinating the actual meter CT ratio utilized in converting measured amperes to determine the amount of power used by the customer.” (March 28 Filing, p. 4) A similar claim was made by the other consultant retained by Complainant, Cosentini Associates (“Cosentini”). In its report included as Exhibit 5 (“Cosentini Report”) to the March 28 Filing, (p. 2), Cosentini contends that the Company overbilled the Complainant “due to incorrect installation of metering equipment and the use of an incorrect multiplier for converting the current transformer (CT) values for calculating power demand and

energy consumption.” According to the Cosentini Report (p. 4), “It appears that Con Edison utilized the same multiplier of 800 throughout 2013 and 2014.”

The conclusions of both Lane Coburn and Cosentini are not supported by the facts. As noted in the Magoulas Affidavit, the CT that captured the demand spike at the Premises had a ratio of 4000:5.¹ Con Edison calculates the multiplier value as the product of the CT and voltage transformer ratios, which is $4000:5 \times 1 = 800$. Accordingly, Con Edison used the correct multiplier of 800 during the Period in Question.

3. Con Edison's CT Test Was Performed on the Wrong CTs

Complainant argues that the Company did not test the CTs that were in place at the Premises during the Period in Question. This statement, however, is at odds with the facts. As noted in the Magoulas Affidavit, the new CTs were installed on March 5, 2014. The Complainant has not contested that these new CTs were operating correctly (and certainly has not introduced evidence to show otherwise).² As noted in the Magoulas Affidavit, the new CTs were installed and operational when the meter at the Premises recorded Billed KW of 4,208.0 for the period March 5 through March 20, 2014 (*see*, Lane Coburn Report, p.6).

More important, as further noted in the Magoulas Affidavit, Complainant’s electrical contractor, Pinnacle Electric, removed and disposed of the old CTs at the Premises without first notifying the Company. Such disposal violated the Company’s policy, which policy Pinnacle Electric was, or should have been, aware. In light of these circumstances, it is more than a little disingenuous for Complainant to criticize the Company for failing to test the old CTs.

4. Bills for Full Building Service Support a Finding that the Billed Demand was Excessive During the Period Complained Of

In the March 28 Filing (pp. 5-6), Complainant contends that the billed demands for the periods after May 2014 (*i.e.*, the period after the renovation of the Premises was complete) supports Complainant’s position that the billed demand was excessive during the Period in Question. As set forth in the Magoulas Affidavit, the comparison of the electric usage and demand during these two periods is wholly improper. As noted in the Informal Hearing Decision (pp. 6-7), Complainant has admitted to using a large quantity of heaters at the Premises during the Period in Question. Moreover, it is far from certain that the survey of electrical equipment prepared by Complainant’s consultant, EnergyWatch, accurately and completely lists all the equipment in use at the Premises during the Period in Question. Given that Complainant was renovating a 21 story office

¹ Please see the Investigation Report (p. 6) of these CTs, a copy of which is attached as Exhibit B to this letter.

² The Company investigated and tested the CTs at the Premises on May 27, 2015. As set forth in Exhibit B to this letter (p. 6), the investigation determined that the “CTs were tested and found to be within the specified tolerance of +/- 2% of the nominal CT ratio.”

building during the winter months, it is certainly possible that its contractors were using additional electric appliances, including construction elevators. In any event, as acknowledged by the Informal Hearing Decision (p. 8), the Company had no obligation to monitor the equipment operating at the Premises during the Period in Question.

Complainant's after the fact complaints regarding the billed demands at the Premises during the Period in Question are undercut by its actions in May 2014. As noted in the email attached as Exhibit F to the Cosentini Report, the Company contacted the Complainant on May 9, 2014 and inquired regarding the usage spike at the Premises during the Period in Question. Complainant did not respond to this inquiry.

5. The Overcharge Totals in Excess of \$500,000 Before Interest is Applied

The Company's position remains that it correctly billed Complainant for its electric usage at the Premises during the Period in Question. Accordingly, there is no overcharge to calculate.

6. Con Edison Failed to Prove that a Theft of Service Occurred

As correctly determined by the Informal Hearing Decision (pp. 2, 5), Complainant's contractor, Pinnacle Electric ("Pinnacle"), improperly entered the Company's CT cabinet located at the Premises in order to install an open core CT. As the Informal Hearing Decision concluded, the contractor had no authority to take such action. Complainant has not alleged, let alone proven, that its contractor requested and received the Company's permission to enter the Company's CT cabinet located at the Premises. The Company's Commission-approved electric tariff is very clear on this point. Specifically, Section 13.1 Access to Premises, of the General Rules of the Company's Electric Tariff (Leaf 107) provides: "Except as provided in General Rule 6.7, [which does not apply in this instance] the Customer shall not permit access by anyone, except authorized employees of the Company, to the meters (regardless of ownership), equipment or any other property of the Company, and shall not interfere with the same."

As an experienced electrical contractor, Pinnacle knew, or certainly should have known, that its actions were improper. Pinnacle's willful disregard of the Company's requirements serves to undercut its credibility, as well as Complainant's credibility in this matter. For example, Complainant's apparent willingness to tolerate Pinnacle's behavior leads one to seriously question its diligence in requiring EnergyWatch to provide an accurate list of electrical equipment operating at the Premises during the Period in Question.

Finally, as noted in the Magoulas Affidavit, the Company removed the electric demand meter from the Premises on November 10, 2014. The security report downloaded from this meter indicates the number of power interruptions at the Premises recorded by the meter. This security report indicates that the meter was off and not

recording on 399 separate occasions. Usually, this number of power interruptions at a single location is no more than five. This history indicates that the meter was off and not recording while the Premises continued to receive power. Excessive power interruptions of this sort are customary in situations involving meter tampering. This security report furnishes further evidence that the Complainant, or its agents, were improperly interfering with the Company's electric facilities at the Premises.

Conclusion

For the reasons stated herein, the Commission should deny Complainant's request for appeal of the Informal Hearing Decision.

Please contact me if you have any questions regarding this matter.

Very truly yours,

/s/ John L. Carley

John L. Carley
Assistant General Counsel

Enclosures

c: Phyllis J. Kessler, Esq. (via email)

EXHIBIT A

3,640.0 for the period February 20 through March 5, 2014 (*see*, the Lane Coburn Report) (p. 6).

6. Complainant's electrical contractor, Pinnacle Electric, removed and disposed of the old CTs at the Premises without first notifying the Company. Such disposal violated the Company's policy, which policy Pinnacle Electric was, or should have been, aware. In light of these circumstances, it is improper for Complainant to criticize the Company for failing to test the old CTs (March 28 Filing, p. 3).

7. Complainant argues in the March 28 Filing (p. 3) that the demand readings for the network transformers for the network that included 170 Broadway were frequently lower than the demands recorded by the meter at the Premises. Complainant fails to substantiate that the data communicated from these network transformers are equivalent to the demands recorded by the meter at the Premises. The fact that they are not equivalent betrays a fundamental misunderstanding on the part of Complainant. Con Edison monitors approximately 25,500 underground network transformers using the Remote Monitoring System ("RMS"). The RMS reports instantaneous data such as transformer secondary voltage, percentage load, tank pressure, oil temperature, oil level, and network protector status. The RMS communicates the information from underground network transformers to the head office approximately once every 3 to 15 minutes. The RMS, however, does not capture the demand from underground transformers or from individual customers. Neither the Lane Coburn Report nor the Cosentini Report, sponsored by Complainant, demonstrates otherwise. Customer usage (kWh) and demand (kW) is captured only by a customer's billing accuracy meter(s).

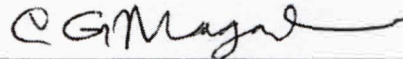
8. In the March 28 Filing (pp. 5-6), Complainant contends that the billed demands for the periods after May 2014 (*i.e.*, the period after the renovation of the Premises was complete) support Complainant's position that the billed demand was excessive during the period in question (*i.e.*, March 2013 – May 2014). The comparison of the electric usage and demand during these two periods is wholly improper. As noted in the Informal Hearing Decision (pp. 6-7), Complainant has admitted to using a large quantity of heaters at the Premises during the period in question. Moreover, it is far from certain that the survey of electrical equipment prepared by Complainant's consultant, EnergyWatch, is complete. Given that Complainant was renovating a 21 story office building during the winter months, it is certainly possible that its contractors were using additional electric appliances (*e.g.*, construction elevators).

9. The Lane Coburn Report (p. 5) states that Complainant "was overcharged probably due to the CT utilized in the calculation by Con Edison using the initial set of Ct's." Similarly, Complainant's consultant, Cosentini Associates, in its report included as Exhibit 5 ("Cosentini Report") to the March 28 Filing, contends (p. 2) that the Company overbilled the Complainant "due to incorrect installation of metering equipment and the use of an incorrect multiplier for converting the current transformer (CT) values for calculating power demand and energy consumption." According to the Cosentini Report (p. 4), "It appears that Con Edison utilized the same multiplier of 800 throughout 2013 and 2014." These conclusions are not supported by the facts. The CT

that captured the demand spike at the Premises had a ratio of 4000:5. Con Edison calculates the multiplier value as the product of the CT and voltage transformer ratios, which is $4000:5 \times 1 = 800$. Accordingly, Con Edison used the correct multiplier of 800 during the period in question.

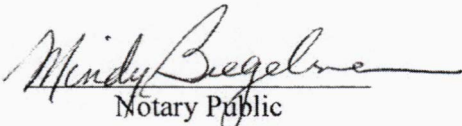
10. The Lane Coburn Report (p. 6) states that "There is no safe manner in which the electrical service from the 1200 ampere switch at 208 volts 3-phase could have drawn 4.208 MW of power from Con Edison." This statement is incorrect and displays a fundamental misunderstanding of demand meters. Demand meters, like the one installed at the Premises, record electrical demand in five minute increments over rolling 30 minute periods. To register a Billed KW reading of 4.208 MW of power, therefore, this amount of power need only have been drawn through the meter for a five minute average over six consecutive five minute intervals. As noted in the email attached as Exhibit A to this Affidavit, the meter and CT manufacturer confirmed that the meter can record the demand captured and the CTs can withstand this overload over the half hour interval, with the only real affect being the reduction of the transformer life span.

11. The Company removed the electric demand meter from the Premises on November 10, 2014. The security report downloaded from this meter and included as Exhibit B to this Affidavit, indicates the number of power interruptions at the Premises recorded by the meter. This security report indicates that the meter was off and not recording on 399 separate occasions. Usually, this number of power interruptions at a single location is no more than five. This history of power interruptions indicates that the meter was off and not recording while the Premises continued to receive power. Excessive power interruptions of this sort are customary in situations involving meter tampering. This security report furnishes further evidence that the Complainant, or its agents, were improperly interfering with the Company's electric facilities at the Premises.



COSTAS MAGOULAS

Sworn to before me this
20 day of October, 2017


Notary Public

MINDY BIEGELMAN
Notary Public, State of New York
No. 01B16036806
Qualified in Westchester County
Commission Expires Feb. 07, 2018

EXHIBIT A

Carley, John L. - Regulatory

From: Magoulas, Costas
Sent: Tuesday, October 17, 2017 11:02 AM
To: Carley, John L. - Regulatory
Cc: Beale, Richard J.; Castro, Doris; Espino, Janette; Princiotta, Joseph
Subject: 170 (166) Broadway TOS

Jack,

Attached, please find email communication regarding the meter and the current transformers (CTs) being capable of registering the demand of 4,208 kW from General Electric (GE) who is the manufacturer of both equipment.

GE (now ACLARA) Meter expert – Carl Chermak.

From phone discussion I had with Carl in September 2016, a class 20 meter, just like the one used at 170 (166) Broadway can, by design operate and measure up to 20 Amperes of secondary current and possibly more. The demand of 4,208 kW translates to approximately 11,700 Amps on the primary or 14.6 Amps through the meter.

From: Chermak, Carl [<mailto:cchermak@aclara.com>]
Sent: Monday, October 09, 2017 11:52 AM
To: Magoulas, Costas
Subject: RE: Demand calculation in GE kV meter with 6 5min subintervals <External Sender>

Costas:

14.6 amps is an average value or the value if you had a constant load. In reality, demand is an average during the 30 minute period and at any given time the instantaneous would be more or less. To get that demand only requires that you consume 2104 kwh over the ½ hour period. This is no different than when you go on a car trip to Albany and it takes you 2 hours to drive the 100 mile distance, so your average mph is 50, but you may go faster or slower during that time.

Carl Chermak
Senior Application Engineer


Aclara

EXHIBIT B

Meter Identification	
Meter Type	kV
Meter Mode	DEMAND
Register Function	DEMAND
Meter ID	6498333
Meter Serial Number	97280045
Program ID	3
Hardware Version	2
Firmware Version	3.0
Meter Cautions	
	None
Meter Errors	
	None
Security Data	
Security Log # Communications	353
Security Log # Bad Passwords	3
Security Log # Demand Resets	206
Security Log Date Last Programming	12-12-97
Security Log Time Last Programming	09:46
Id of Last Programmer	SENSIT
Security Log # Times Programmed	4
Security Log # Power Outages	399
Security Log # Times RTP Entries	0
Security Log Date Last Calibration	06-12-97
Security Log Time Last Calibration	16:22
Id of Last Calibrator	GE
Security Log # EEPROM Writes	404

EXHIBIT B

CT INVESTIGATION REPORT

FIELD INSPECTION REPORT CASE: Radio 8/12/14

DATE OF INVESTIGATION: May 27, 2015

NAME & ADDRESS: 6 Astir Prop Holding, 166 Broadway, New York

METER TYPE: GEkV2c ACT1CX 8075332 K=800 120V 3-stator transformer-rated form 9S IP 10.224.11.39

OLD METER: GEkV CT1HM 6498333 120V 2^{1/2} stators (Z-coil) Form 36A

CT TYPE: GE JAD-OC 2000/4000:5 (connected to 4000A)

Left A-phase S/N 0160277

Middle B-phase S/N 0160276

Right C-phase S/N 0160275

SERVICE TYPE: 120/208V 4-Wire Y Service

RPU FIELD REPORT FINDINGS:

Suspected TOS

Load @ call test with shunts installed calculated at 84%

Load @ call test with shunts removed calculated at 93%

METER ENGINEERING FINDINGS:

CT enclosure:

MES-377 cabinet made by Electrotech.

CT tests:

Three (3) window-type 2000/4000:5 GE JAD-OC CTs connected to the 4000 tap.

Field measurements taken around 9:44 AM using Birddog:

A-phase current = $0.8 \times 800 = 640$ Amps

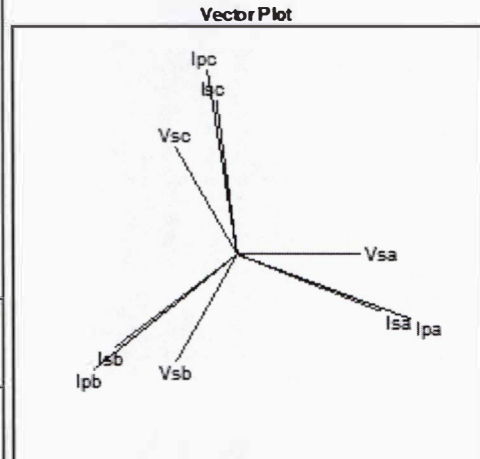
B-phase current = $0.7 \times 800 = 560$ Amps

C-phase current = $0.7 \times 800 = 560$ Amps

System (Meter Circuit) 166 Broadway CT test report

Location: 166 Broadway Meter Type: Form 9, 4 Wire Wye (3S-3IC)
 Date: 5/27/2015 Rotation: ABC
 Comment: Screen: Global Save

Phase	A	B	C	System
Time	09:06:00	09:11:55	09:15:30	
General				
Vs	122.5	123.1	123.2	
Is	0.9491	0.8401	0.8889	
Ip	750.9	664.8	687.5	
φ Vs-Is	21.5	23.0	22.4	
φ Ip-Is	1.2	1.5	1.6	
φ Vsan-Is	21.5	143.0	262.4	
φ Vsan-Ip	20.3	141.6	260.9	
Wire Verify	Correct	Correct	Correct	
Harmonics				
THD Voltage%	1.8	1.7	1.7	
THD Current%	6.7	7.5	9.6	
Power				
kW	0.111248	0.098127	0.101689	0.311084
kVAR	0.033728	0.032664	0.032561	0.098953
kVA	0.116248	0.10342	0.106775	0.326423
True PF	0.957 lg	0.949 lg	0.952 lg	0.953 lg
Disp PF	0.931 lg	0.919 lg	0.924 lg	0.925 lg



Ratio/Burden Summary

Ohm	Phase A		Phase B		Phase C		System
	Ratio	%Change	Ratio	%Change	Ratio	%Change	
0.0	3955.9	0.0	3956.7	0.0	3965.1	0.0	
0.1	3956.7	0.0	3958.0	0.0	3967.2	0.1	
0.2	3952.1	-0.1	3958.7	0.0	3966.3	0.0	
0.5	3957.4	0.0	3960.7	0.1	3968.1	0.1	
1.0							
2.0							
4.0							
Ratio No Burden	3955.9		3956.7		3965.1		
Rated Burden	1.0		1.0		1.0		
Burden Result	As Rated		As Rated		As Rated		
% Accuracy	101.1		101.1		100.9		101%
Favors	Utility		Utility		Utility		Utility
Rated Ratio	4000:5						

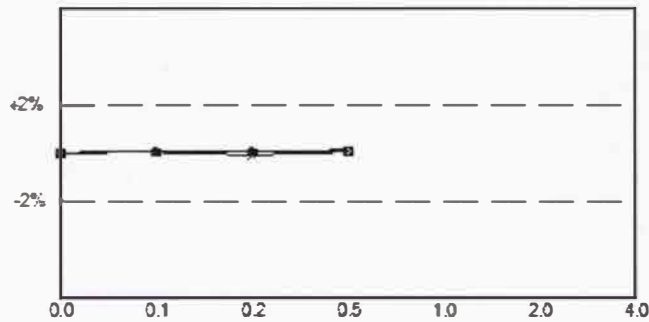


Fig. 1
CT burden/ratio and vector plot summary

Fig.1 above shows a vector plot of all the 3-phase voltages and currents in the customer CTs. All vectors are normal. Wiring is also correct. The ratio/burden summary plot in fig.1 shows all three (3) CTs well within the +/- 2% range of the nominal CT ratio.

CT	Accuracy %		
	Phase A	Phase B	Phase C
Value	101.1	101.1	100.9

Fig. 2
Accuracy table

Meter:

The new meter 8075332 has a normal phasor diagram with normal diagnostic codes as seen in fig. 1 below.

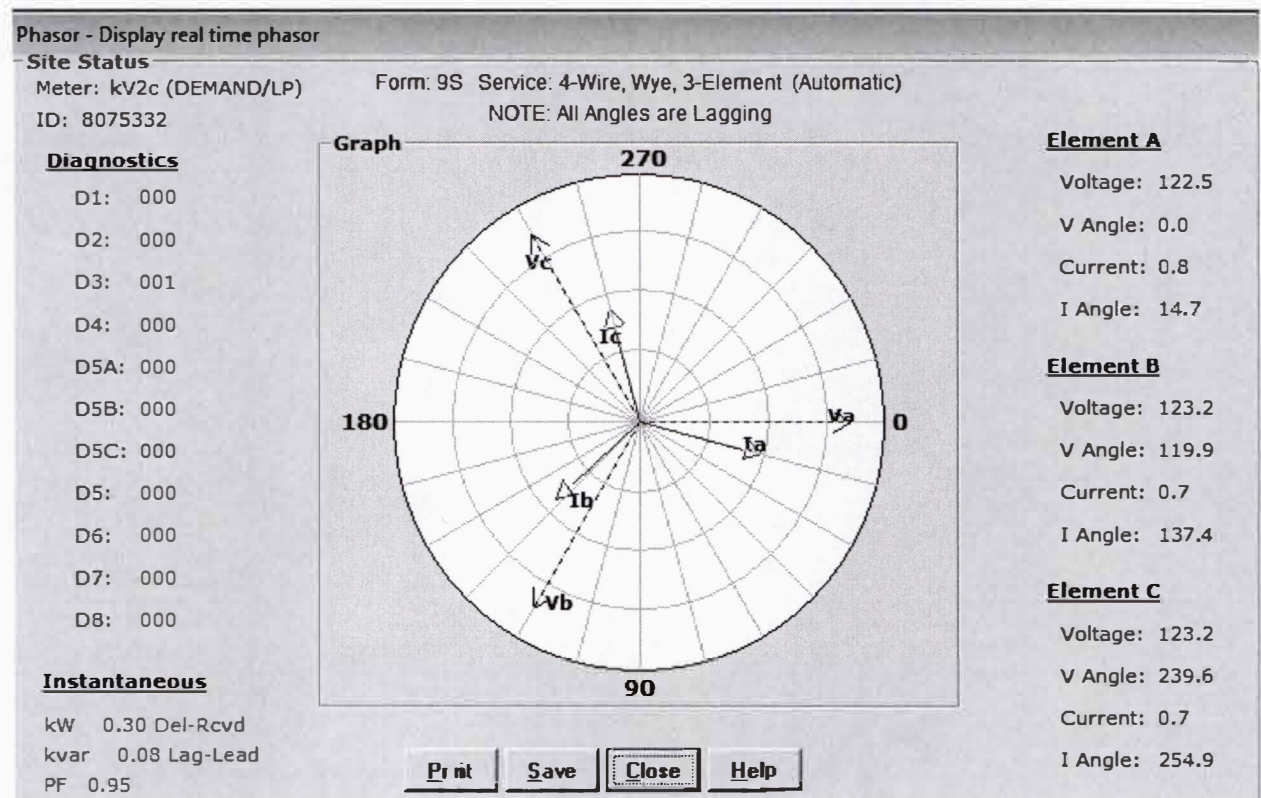


Fig. 3
Meter Vector graph

Billing Report

Name	ConEd
Company1	
Company2	
Company3	

Meter Identification

Meter Type	kV2c
Meter Mode	DEMAND/LP
Register Function	DEMAND/LP
Meter ID	8075332
Meter Serial Number	36341669
Program ID	1
Hardware Version	6
Firmware Version	4.0.0.0
Current Date	05-27-15
Current Day of Week	Wednesday
Current Season	N/A
Current Time	09:44
GMT Setting	Disabled
Time Zone Offset	0 Hours

Meter Cautions

	None
--	------

Meter Errors

	None
--	------

Revenue Data

Average Power Factor	0.960
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Total**Energy**

kWh Total Del Only F+H	210
kvarh Total Lag Only F+H IEEE	53
Summation 3	N/A
Summation 4	N/A
Summation 5	N/A
Maximum Demand	

kW Total Del Only F+H	0.35
kvar Total Lag Only F+H IEEE	0.10
Max Demand 3	N/A
Max Demand 4	N/A
Max Demand 5	N/A
Coincident Demand	
Demand 1 CD 1-None	0
Demand 1 CD 2-None	0
Demand 2 CD 1-None	0
Demand 2 CD 2-None	0
Demand 3 CD 1-None	0
Demand 3 CD 2-None	0
Demand 4 CD 1-None	0
Demand 4 CD 2-None	0
Demand 5 CD 1-None	0
Demand 5 CD 2-None	0
Cumulative Demand	
kW Total Del Only F+H	0
kvar Total Lag Only F+H IEEE	0
Cum Demand 3	N/A
Cum Demand 4	N/A
Cum Demand 5	N/A
Continuous Cumulative Demand	
kW Total Del Only F+H	0.35
kvar Total Lag Only F+H IEEE	0.10
Cont Cum Demand 3	N/A
Cont Cum Demand 4	N/A
Cont Cum Demand 5	N/A

Real time Pricing	
Energy	
kWh Total Del Only F+H - RTP	0
kvarh Total Lag Only F+H IEEE - RTP	0
Summation 3 - RTP	N/A
Summation 4 - RTP	N/A
Summation 5 - RTP	N/A
Maximum Demand	
kW Total Del Only F+H - RTP	0
kvar Total Lag Only F+H IEEE - RTP	0
Max Demand 3 - RTP	N/A
Max Demand 4 - RTP	N/A
Max Demand 5 - RTP	N/A

Coincident Demand	
Demand 1 CD 1-None - RTP	0
Demand 1 CD 2-None - RTP	0
Demand 2 CD 1-None - RTP	0
Demand 2 CD 2-None - RTP	0
Demand 3 CD 1-None - RTP	0
Demand 3 CD 2-None - RTP	0
Demand 4 CD 1-None - RTP	0
Demand 4 CD 2-None - RTP	0
Demand 5 CD 1-None - RTP	0
Demand 5 CD 2-None - RTP	0
Cumulative Demand	
kW Total Del Only F+H - RTP	0
kvar Total Lag Only F+H IEEE - RTP	0
Cum Demand 3 - RTP	N/A
Cum Demand 4 - RTP	N/A
Cum Demand 5 - RTP	N/A
Continuous Cumulative Demand	
kW Total Del Only F+H - RTP	0
kvar Total Lag Only F+H IEEE - RTP	0
Cont Cum Demand 3 - RTP	N/A
Cont Cum Demand 4 - RTP	N/A
Cont Cum Demand 5 - RTP	N/A
Self Read Data	
No Self Read Data Available	
End of Report	

Fig. 4
Meter billing report

CONCLUSION:

CTs were tested and found to be within the specified tolerance of +/- 2% of the nominal CT ratio (see fig.2). The new meter is wired properly and shows no diagnostic codes (fig.3)

ATTACHMENTS

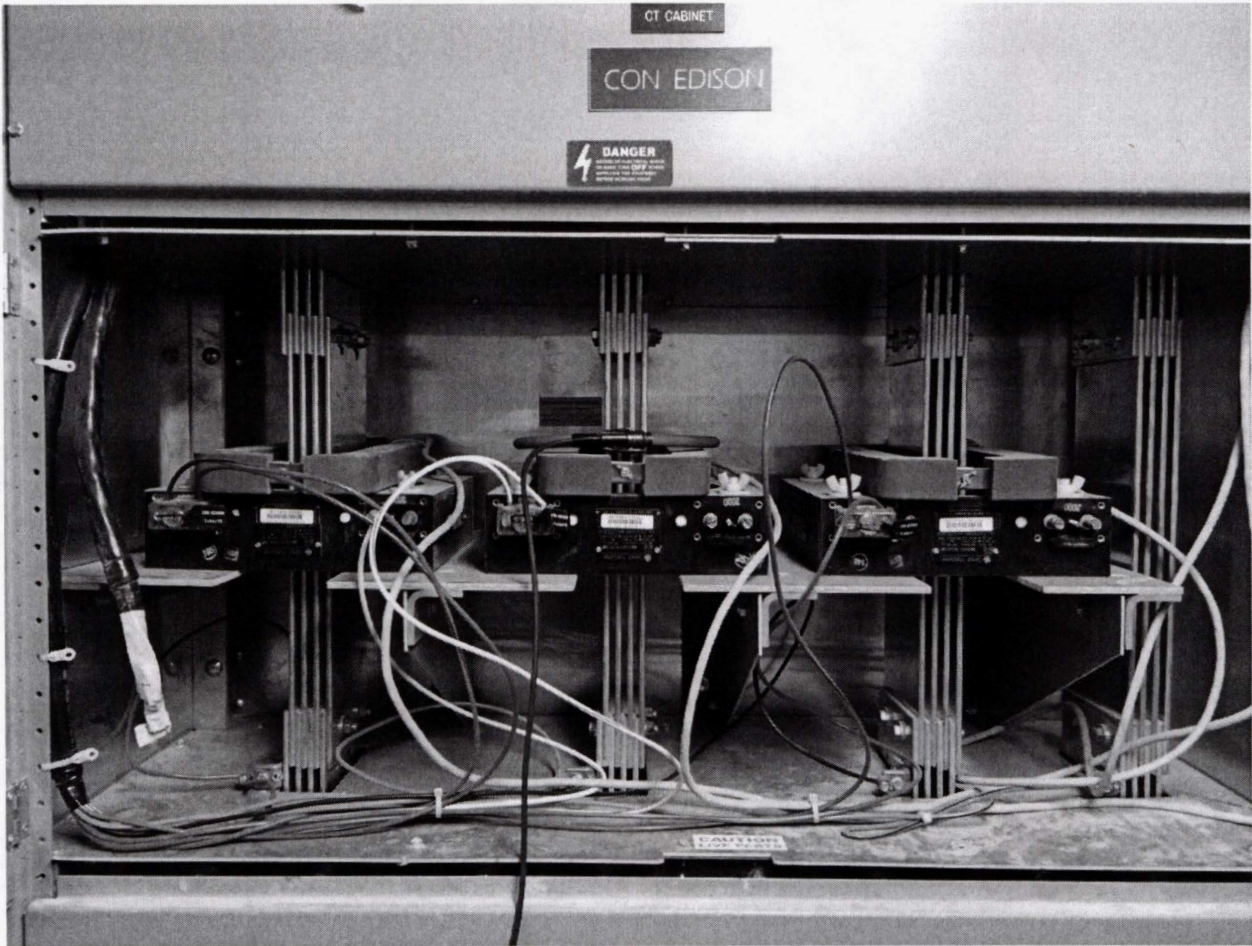


Photo 1

CT cabinet with Birdog primary flex CT on B-phase

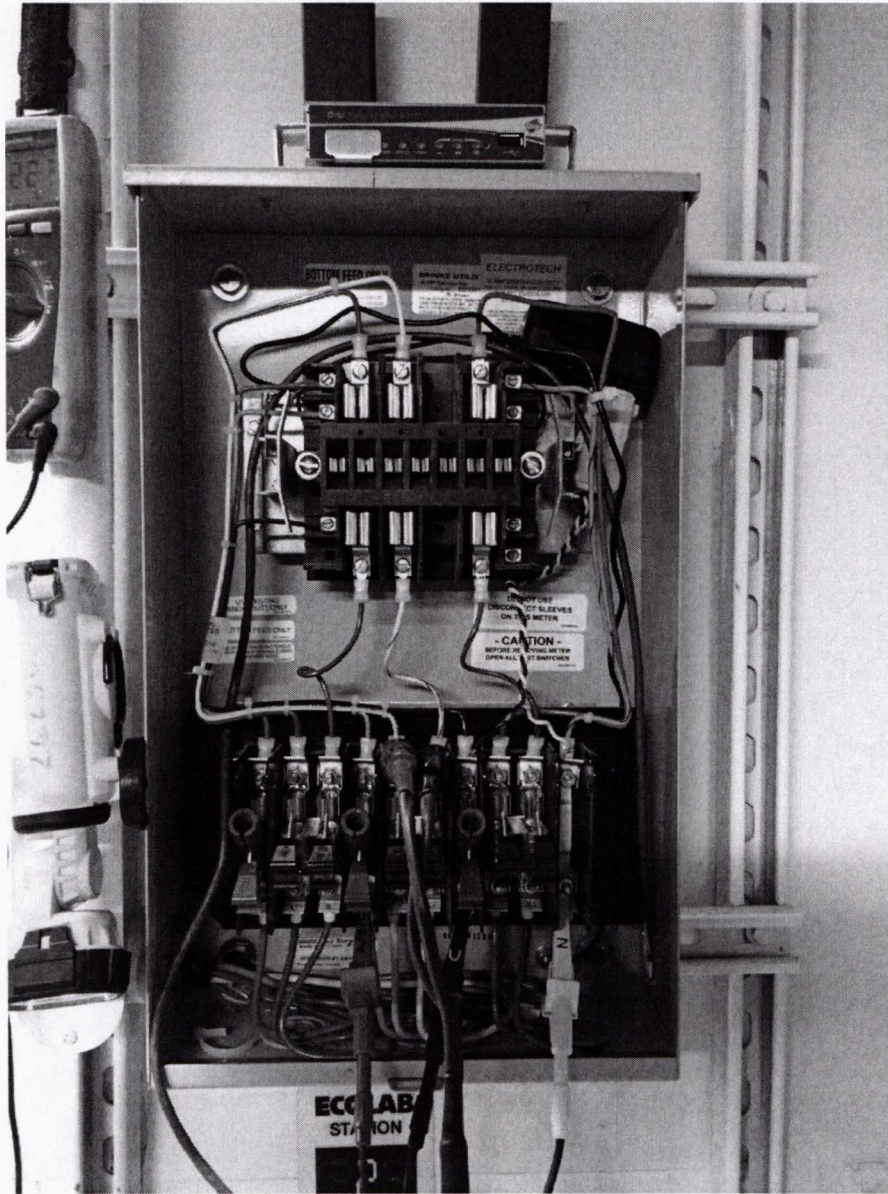


Photo 2

Meter enclosure with meter removed and Birddog secondary cables wired to B-phase on the 10-point test switch.

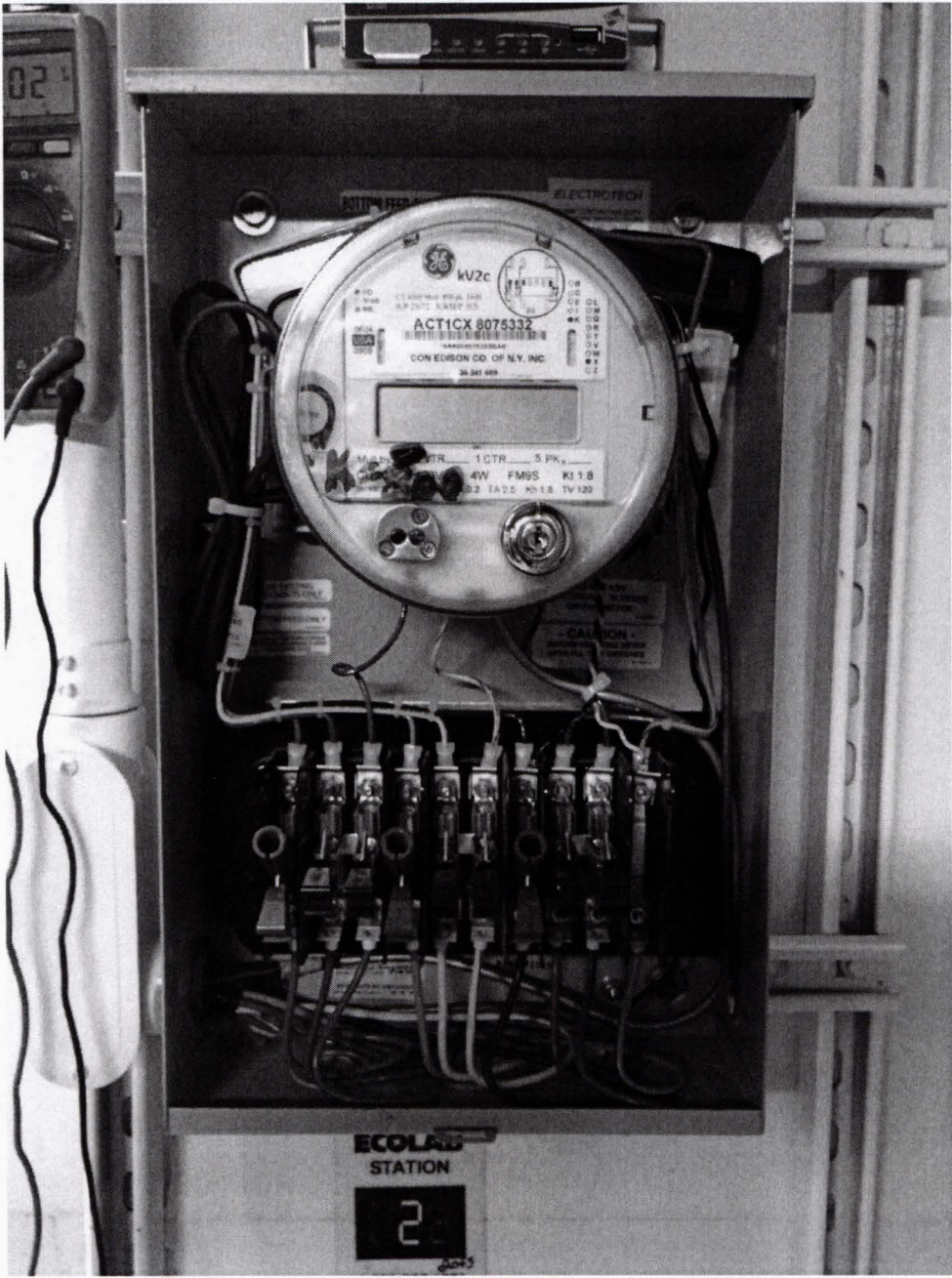


Photo 3
Meter enclosure with meter installed.