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Andrea J. Schmitz
Vice President
Environment, Health & Safety

February 27, 2014

CERTIFIED MAIL-RETURN RECEIPT REQUESTED
Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: PCB Equipment Inventory Report
PSC Case 29211

Dear Secretary Burgess:

Pursuant to the New York State Public Service Commission (PSC) regulation 16 NYCRR Part 730, PSC Case 29211, Con Edison hereby submits three (3) copies of its PCB Equipment Inventory Report for the period July 1, 2013 through December 31, 2013. A copy of this report has been sent to the chief executive of each county or city located within Con Edison's service territory in which the Company operated, stored, or transported electrical equipment containing oil or other fluid with a concentration of 500 parts-per-million or more of Polychlorinated Biphenyls (PCBs). Copies of the cover letters transmitting the report to local officials are attached.

Please contact Craig Little (212) 460-2278 if you have any questions regarding this report.

Very truly yours,

Andrea Schmitz

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Vice President
Environmental, Health & Safety

Attachments

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

REPORT TO THE PUBLIC SERVICE COMMISSION
PCB EQUIPMENT INVENTORY
PSC CASE 29211
JULY 1, 2013 THROUGH DECEMBER 31, 2013

FEBRUARY 2014

INTRODUCTION

This report constitutes Con Edison's semi-annual electric equipment and gas compressor PCB inventory filing under Section 66(23) of the New York Public Service Law ("PSL"), PSC Case 29211, for the period ending December 31, 2013. As specified in the Public Service Commission's regulations (16 NYCRR Part 730) implementing PSL§ 66(23), this report is also being submitted to the chief executive officer of each county and city located within Con Edison's service territory in which the Company operated, stored, or transported equipment containing 500 parts per million (ppm) or more of PCBs and is organized as follows:

- Part 1 of the report addresses equipment that contains or is assumed to contain PCBs in concentrations of 500 ppm or more ("PCB Equipment") and that was in-service as of December 31, 2013

- Part 2 of the report addresses PCB Equipment that was retired or disposed of during the period July 1, 2013 through December 31, 2013 or that was being stored for disposal as of December 31, 2013.

It should be noted that this report's inventory listings include only equipment, as defined in 6 NYCRR § 730.1, that contains or is assumed to contain oil or fluids with PCB concentrations of 500 ppm or greater. Con Edison owns and operates oil and fluid-filled equipment and equipment components that are known or assumed to contain PCBs in concentrations of less than 500 ppm. However, the Public Service Law does not require that lists of such equipment be included in semi-annual PCB inventory reports. In addition, this report does not address PCB liquids (gas condensate) discovered in Con Edison's gas distribution system. Under PSL § 66(23) and 6 NYCRR Part 730, these PCB liquids are addressed in a separate report to the Public Service Commission.

USEPA POLICIES

In determining which of its equipment should be included in this report, Con Edison adhered to the regulations (40 CFR 761), policies, and guidance of the U.S. Environmental Protection Agency ("USEPA") pertaining to PCB-containing equipment. These include:

1. Transformer PCB classification status is based on the PCB concentration of the dielectric fluid in the main body of a transformer while the unit is in use or in storage for reuse. Transformer component parts, such as bushings, tap changers, external vacuum braces, and attached bushing potential devices, are considered to have the same PCB concentration as the in-service transformer of which they are component parts unless and until the components are tested separately for PCB. The same considerations and policies apply when determining the PCB classification status of other types of electric equipment, such as switches, circuit breakers, reclosers, voltage regulators, and rectifiers. While the equipment is in service or being stored for reuse, its

PCB classification depends on the use assumptions given in the following paragraphs. All attached components of the equipment are considered to have the same PCB concentration as the dielectric fluid in the equipment's main body.

2. Unless the PCB concentration of the following types of oil-filled electric equipment has been established through oil analysis, wipe sampling, manufacturer's documentation, or service records, they can be assumed to contain less than 50 ppm PCBs and be categorized as non-PCB electrical equipment under EPA's regulations while in use or in storage for reuse: transformers containing less than three (3) pounds of fluid; circuit breakers; reclosers; rectifiers; oil-filled cable; capacitors that were either manufactured after July 2, 1979, or marked with a "No PCBs" label by their manufacturer; and other electrical equipment manufactured after July 2, 1979.

3. Unless the PCB concentration of the following types of oil-filled electric equipment has been established through oil analysis, wipe sampling, manufacturer's documents, or service records, they can be assumed to contain 50 ppm or more but less than 500 ppm of PCBs and be categorized as PCB-Contaminated Electrical Equipment under EPA's regulations while in use or in storage for re-use: mineral oil-filled electric equipment (other than the equipment discussed in item 2) that was manufactured before July 2, 1979, or for which there is no information establishing when the equipment was manufactured; and pole-top or pad-mounted transformers that were manufactured before July 2, 1979, or for which there is no information indicating when they were manufactured.

4. Unless the PCB concentration of the following types of oil-filled electric equipment has been established through oil analysis, wipe sampling, manufacturer's documentation, or service records, they are assumed to contain 500 ppm or more of PCBs and are categorized as PCB Electrical Equipment under EPA's regulations while they are in use or in storage for re-use: capacitors manufactured before July 2, 1979, or with an unknown date of manufacture if they do not have a "NO PCB" label; *small* transformers containing three (3) pounds or more of fluid other than mineral oil (or with an unknown fluid) if manufactured before July 2, 1979 (unless Best Engineering Judgment determines otherwise: see #5 following), or if the date of manufacture is unknown; and equipment known to contain concentrated formulations of PCBs, such as the trade name Askarel or brand names Pyranol and Inerteen.

5. **Best Engineering Judgment (BEJ)** may be used to categorize *small* transformers. *Small* transformers include (but are not limited to) current, potential, ignition, and instrument transformers. The size of these types of transformers and type of insulating material they contain vary. Their size ranges from several inches to several feet in height. They can be filled with liquid, with a non-liquid compound, or they can be "dry". Unlike most power transformers, *small* transformers are often hermetically sealed at the factory to prevent breathing and leakage (sealed units generally cannot be tested for PCBs without puncturing or cutting them open to obtain samples of their dielectric fluid). They are often found in confined energized locations, such as cabinets, vaults, and switchgear assemblies. Consequently, they can be difficult to access to read nameplate information regarding date of manufacture or type and amount of fluid.

USEPA recognized that in many cases it is not possible to test or inspect *small* transformers without compromising their integrity or creating safety hazards. Therefore, USEPA provided the following guidance with respect to such transformers:

> "....For any period during which it is not possible to physically inspect or test a small transformer (as described at 63 FR 35388) without compromising the integrity of the equipment or where such inspection or testing would pose a safety hazard to personnel without an electrical shutdown of the transformer, the owner or operator of the equipment may rely upon the exercise of best engineering judgment to evaluate the regulatory status of the equipment under the criteria set out in § 761.2 (a) (3) (e.g., whether the equipment is dry, non-liquid, contains less than 3 pound of fluid, or contains mineral oil)." (September 2, 1998 letter from Lynn Goldman, USEPA, to Toni Allen, Piper & Marbury, counsel to Utility Solid Waste Activities Group).

Con Edison's Best Engineering Judgment for *small* transformers located in Con Edison's electric substations is based on information from equipment manufacturers, technical and contract specifications, and the experience of Con Edison's substation engineers and operators. This BEJ is that the small transformers at its substations are either dry type transformers or are likely to contain mineral oil rather than concentrated PCB dielectric fluid. Con Edison assumes that small transformers manufactured before July 2, 1979, which have not been tested for PCB content and for which it has no information indicating that the small transformers are filled with concentrated PCB dielectric fluid, are mineral oil-filled units that contain more than 50 ppm but less than 500 ppm of PCBs. In keeping with USEPA's guidance, if Con Edison discovers that a small transformer at its substations (or any other facility) contains Askarel or other concentrated PCB dielectric fluid, it will treat other units of the same style, class, or model number as PCB Transformers.

EXPLANATION OF THE INFORMATION

1. **Capacitors.** Pursuant to PSC Staff guidance, any capacitor inventory listings contained in this report would include only *Large* Capacitors as defined by USEPA regulations (40 CFR 761.3). Under those regulations, a *Large* Capacitor is one that contains, or is assumed to contain 3 pounds or more of dielectric fluid.

Con Edison generally does not inventory separate component parts of its electric equipment because, as noted above, the PCB classification of electric equipment under the USEPA regulations is based on the PCB concentration of the dielectric fluid in the main tank or body of a piece of electric equipment, rather than the PCB concentration of the equipment's various individual component parts. However, Con Edison does maintain on its electric system equipment that contains *Small* Capacitors as defined by the USEPA regulations (capacitors containing less than three pounds of dielectric fluid). Some of these small capacitors are known to contain concentrated PCB dielectric fluid formulations, such as Pyranol and Inerteen. Others are assumed to contain such formulations because they were manufactured before July 2, 1979 and were not marked

with "No PCB" labels by their manufacturers. The Con Edison electric equipment that contains or is suspected to contain Small PCB Capacitors included oil-filled rectifiers located in New York County. There is only one such rectifier remaining, identified in Exhibit 1. This rectifier, which has been de-energized and drained of fluid, was scheduled to be removed in 2008, but has not been removed because of sidewalk obstructions built over the vaults by the building owners that remain to be resolved. Rectifiers are discussed further following.

2. **Rectifiers.** USEPA regulations do not currently apply PCB reclassification procedures to rectifiers. While the USEPA regulations do not prohibit the retrofilling of rectifiers to reduce their PCB content, the reductions in PCB concentration achieved through those measures do not change the original PCB classification of the rectifiers under the USEPA regulations. Consequently, a rectifier whose main tank was once filled with dielectric fluid that contained over 500 ppm PCBs remains classified as PCB Electric Equipment under the USEPA regulations, even if the rectifier's main tank is drained, flushed, and refilled with non-PCB dielectric fluid.

Con Edison continues to include in this report's PCB inventory a rectifier that formerly contained dielectric fluid with PCB concentrations of 500 ppm or greater. The listed rectifier was retrofilled with non-PCB oil to reduce the PCB concentration of the dielectric oil in the main tank. This unit was subsequently de-energized and drained of oil, and is still located in the same underground vault as the rectifier with small PCB capacitors discussed above. Its removal also depends on resolution of the sidewalk obstruction with the building owner.

3. The PCB equipment inventory listings presented in this report are based in part on the information contained in various internal databases. While Con Edison strives to maintain high quality PCB information for the equipment used on its electric system, it cannot guarantee that its databases are 100% complete or accurate or that they address all electrical components and devices. Con Edison corrects any errors that are identified. With some exceptions, such as the external vacuum braces on large transformers at electric substations, the databases are generally limited to inventorying the PCB concentrations of the dielectric fluid contained in the main tank or main body of oil or fluid-filled electric equipment. There are electrical equipment and components of electrical equipment, such as bushings, on the system which are not included in our databases. Bushings are often sealed units that cannot be sampled without puncturing them. Under USEPA regulations, while the equipment is in service or being stored for re-use, attached components of the equipment are considered to have the same PCB concentration as the dielectric fluid in the equipment's main body.

In addition, PCBs were commonly used in many applications (including non-liquid, solid applications) that are not unique to Con Edison specifically or to utility operations in general. These applications include ballasts in lighting fixtures, motor starting capacitors, pipe wraps, small transformers that are components of electrical devices such as public address and telephone communication systems, and solid plasticizer in relay wires. These PCB applications are not inventoried by Con Edison.

4. It is possible for PCBs to leach from the core of a piece of equipment over time to increase the concentration in the dielectric fluid. Consequently, equipment on record to contain less than 500 ppm PCBs could, when re-tested during maintenance or repair, be found to contain more than 500 ppm PCBs and be added to PCB inventories and reports.

5. The retired PCB Equipment presented in this report is based on hazardous waste manifests and other records at Con Edison's Astoria Hazardous Waste Storage Facility. This report does not include electrical equipment where the PCB contamination is incidentally present, such as in paint, residuals from manufacturing process, caulking, etc., and not present in the oil or other fluids necessary for their operation.

6. As previously agreed with the New York State Department of Public Service in March 18, 1999, Con Edison is permitted to report any newly identified PCB equipment in its next semi-annual submission to PSC and is not required to modify this or any other previously-submitted PCB equipment inventory report that it filed with the PSC each time equipment that was assumed to contain less than 500 ppm PCBs is tested and found to contain 500 ppm or more of PCBs. However, Con Edison must file modifications to its inventory reports to correct any mistakes that were made in a previously submitted report and to include any PCB equipment that was identified by Con Edison prior to the filing of a report but not listed in the report.

CHANGES / CORRECTIONS SINCE LAST REPORT

New York County:

A rectifier from our Electric Distribution System located on the intersection of East 47th Street and Third Ave, New York, New York was removed from service on April 28, 2013 and brought to Con Edison's TSDF located in Astoria. The oil from the main body of this rectifier was sampled and showed a concentration of 540 ppm of PCBs. This unit was deemed a waste and sent to Clean Harbors PPM, LLC for final disposition on August 8, 2013.

Westchester County:

A pole type transformer from our Electric Distribution System located at 315 Saw Mill River Road, Greenburgh, New York was removed from service on July 16, 2013 and brought to Con Edison's TSDF located in Astoria. The oil from the main body of this transformer was sampled and showed a concentration of 554 ppm of PCBs. This unit was deemed a waste and sent to Clean Harbors PPM, LLC for final disposition on August 8, 2013.

PART 1

PCB EQUIPMENT IN SERVICE ON December 31, 2013

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

BRONX COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

DUTCHESS COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

KINGS COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

NEW YORK COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

QUEENS COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

RICHMOND COUNTY, NEW YORK

1. TRANSFORMERS: None Reported

2. LARGE CAPACITORS: None Reported

3. COMPRESSORS: None Reported

4. OTHER EQUIPMENT: None Reported

5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2013

WESTCHESTER COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS:

PART 2

RETIRED PCB EQUIPMENT FOR THE PERIOD:

JULY 1- DECEMBER 31, 2013

BRONX COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Compressors: None

Other Equipment: None

Electrical Equipment Components: None

DUTCHESS COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Compressors: None

Other Equipment: None

Electrical Equipment Components: None

KINGS COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Compressors: None

Other Equipment: None

Electrical Equipment Components: None

NEW YORK COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Compressors: None

Other Equipment: One (1)

Last In -Service Location	Category	Equipment Type and I.D.	No.	Approx. Gross Weight[1] (kg)	Coolant Type	PCB Conc. (ppm)	Retire Date	Ship Date to Astoria
Manhole #6249 E47th & 3rd Ave New York, NY	Electric Operations	Rectifier	1	4000	Oil	540ppm	4/28/2013	6/13/2013

Electrical Equipment Components: None

[1] Weight is given in kilograms (kg) to be consistent with manifest information. For a particular piece of equipment, the weight reported herein is the weight specified on the manifest to the final (non-Con Edison) treatment/storage/disposal facility

QUEENS COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Compressors: None

Other Equipment: None

Electrical Equipment Components: None

RETIRED PCB EQUIPMENT (JULY 1 TO DECEMBER 31, 2013)

RICHMOND COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Compressors: None

Other Equipment: None

Electrical Equipment Components: None

WESTCHESTER COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE AND SHIPPED TO CON EDISON'S ASTORIA PCB STORAGE FACILITY

Transformers: One (1)

Last In - Service Location	Category	Equipment Type and I.D.	No.	Approx. Gross Weight[2] (kg)	Coolant Type	PCB Conc. (ppm)	Retire Date	Ship Date to Astoria
315 Sawmill River Road, Greenburgh NY 10595	Electric Operations	Overhead Transformer	1	700	Oil	554	7/15/13	7/15/13

Large Capacitors: None

Compressors: None

Other Equipment: None

Electrical Equipment Components: None

[2] Weight is given in kilograms (kg) to be consistent with manifest information. For a particular piece of equipment, the weight reported herein is the weight specified on the manifest to the final (non-Con Edison) treatment/storage/disposal facility

QUEENS COUNTY

PCB EQUIPMENT DISPOSED OF

PCB Equipment disposed of by Clean Harbors PPM, LLC

DISPOSAL FACILITY Clean Harbors PPM LLC-1672 E. Highland Road, Twinsburg, OHIO 44087

NEW YORK PORTION OF SHIPPING ROUTE (From Astoria to Clean Harbors PPM, LLC): Astoria (Queens, NYC) - 20th Ave (Queens)--> 42nd St (Queens) --> 19th Ave (Queens)→31st St (Queens)→278E (Queens) →87N

Transformers: One
Other Equipment: One

Last In - Service Location	Category	Equipment Type and I.D.	No.	Approx. Gross Weight[3] (kg)	Coolant Type	PCB Conc. (ppm)	Retire Date	Ship Date to Astoria	Ship Date to Clean Harbors PPM, LLC
315 Sawmill River Road, Greenburgh NY 10595	Electric Operations	Pole Type Transformer	1	700	Oil	554ppm	7/15/2013	7/15/2013	8/08/2013
Manhole# 6249 E47th St and 3rd Ave, NY, NY 10017	Electric Operations	Rectifier	1	4000	Oil	540ppm	4/28/2013	6/13/2013	8/08/2013

[3] Weight is given in kilograms (kg) to be consistent with manifest information. For a particular piece of equipment, the weight reported herein is the weight specified on the manifest to the final (non-Con Edison) treatment/storage/disposal facility