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Via Electronic Filing

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 14-M-0196 – Tariff filing by Central Hudson Gas & Electric Corporation to establish fees for residential customers who choose to opt out of using Automated Meter Reading devices

Dear Secretary Burgess:

Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc. (the “Companies”) submit this letter in response to the *Notice Regarding Submission of Comments*¹ concerning the *Resolution of the Town of Woodstock and Petition in Support of the Resolution*² (the “Petition”). This letter is intended to provide the Commission insight from the Companies with respect to the important issues raised in the Petition.

The Woodstock Town Board and certain Woodstock residents (“Petitioners”) request that the Commission allow customers to opt-out of receiving metering services via automated metering technologies and be provided manual meter reading service at no charge.³ The

¹ Case 14-M-0196. *Tariff filing by Central Hudson Gas & Electric Corporation to establish fees for residential customers who choose to opt out of using Automated Meter Reading devices* (“AMR Opt-Out Proceeding”), Notice Regarding Submission of Comments (issued April 26, 2016).

² AMR Opt-Out Proceeding, *Resolution of the Town of Woodstock and Petition in Support of the Resolution*, (the “Petition”) (filed June 29, 2015).

³ AMR Opt-Out Proceeding, *Petition*, p. 2.

Petitioners further argue that customers should be permitted to choose an analog meter instead of a digital meter.⁴

This request comes at a time when the Commission and many other parties have recognized the benefits of enhancing New York’s metering infrastructure and adopting advanced technologies in the State.⁵ Advanced smart metering has many customer benefits. It improves bill accuracy, reduces estimated bills, enhances the overall customer experience by removing the need to routinely physically access meters on customer premises, and reduces overall utility costs. The Companies’ upcoming Advanced Metering Infrastructure (“AMI”) investments will also improve outage management and storm restoration, among other services. AMI will also advance the Commission’s Reforming the Energy Vision (“REV”) efforts by providing customers with more detailed information to help them make informed decisions about products and services and better manage their energy usage.

The Companies appreciate, however, that certain customers may prefer to opt-out of receiving some of these benefits. The Companies currently allow customers to opt-out of being metered using existing Automated Meter Reading (“AMR”) meters, and will continue to offer this option as AMI is implemented.⁶ The Companies support advanced metering opt-out provisions that appropriately allocate the costs of accommodating customers’ alternative metering requests.

⁴ *Id.*

⁵ Case 15-E-0050, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service*, Order Approving Advanced Metering Infrastructure Business Plan Subject to Conditions (Issued March 17, 2016); ; Case 14-E-0493, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Orange and Rockland Utilities, Inc. for Electric Service*, Order Adopting Terms of Joint Proposal and Establishing Electric Rate Plan (issued October 16, 2015).

⁶ The Companies will provide additional information on AMI opt-out policies in their AMI Customer Engagement Plan filings on July 29, 2016.

In this case, however, the Petitioners request that utilities provide customers with analog meters, and then provide manual meter reading service, at no additional charge. This is not a reasonable approach. First, analog meters are no longer manufactured. Parts are increasingly challenging to procure, and as a result utilities across the country have stopped offering these meters to customers.⁷ Moreover, just like an analog meter, non-communicating digital meters are simply not capable of the data transmissions that the Petitioners are seeking to avoid.

Petitioners' also request that non-communicating meters and manual meter readings be provided to opt-out customers at no charge. This should also be rejected, as it contravenes long-standing Commission precedent to allocate costs for specialized utility services to those customers requesting such services. This is important as it avoids shifting additional costs to customers who are satisfied with the cost-effective and convenient metering options offered by the utility, in this case automated and advanced metering. Customers who request a special meter and ongoing in-person meter reading, once automated systems are in place, should be responsible for the additional costs associated with providing this service. As such, a meter change fee and a recurring meter reading fee are appropriate mechanisms to recover these costs and should be retained. This is consistent with the Commission's recent Orders approving opt-out provisions in all of the utilities' service territories and there is no justification to warrant a reconsideration of this sound policy.

The Companies respectfully submit this letter for the Commission's consideration.

Respectfully submitted,

/s/

Kerri Kirschbaum
Senior Attorney

⁷ Based upon Central Hudson's direct contact with the utilities cited at page 4 of the April 16, 2016 letter from Kenneth S. Panza.