

Company Name: Con Edison
Case Description: 2022 Con Ed Electric & Gas Rate Cases
Cases: 22-E-0064 & 22-G-0065

Response to PULP Interrogatories – Set PULP-2 Settlement
Date of Response: April 04, 2023
Responding Witness: N/A

Question No. :144

In determining its proposed 9.25% authorized return on equity for the rate years in these proceedings, did the settling parties consider the expected future dividends required by investors in the proxy group used by Staff in its direct testimony (Exhibit (FP-19) at 1- 2)? If so, please describe such considerations in detail, and provide any workpapers supporting the conclusions that resulted. If not, please explain why not.

Response

The Settling Parties object to this interrogatory as settlement discussions and offers on ROE are confidential under 16 NYCRR § 3.9(d).

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Date of Response: April 04, 2023
Responding Witness: N/A

Question No. :145

In determining its proposed 9.25% authorized return on equity for the rate years in these proceedings, did the settling parties consider the expected future growth in the overall economy, as measure by growth in nominal Gross Domestic Product, or GDP? If so, please describe such considerations in detail, and provide any workpapers supporting the conclusions that resulted. If not, please explain why not.

Response

The Settling Parties object to this interrogatory as settlement discussions and offers on ROE are confidential under 16 NYCRR § 3.9(d).

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Responding Witness: N/A

Question No. :146

In determining its proposed 9.25% authorized return on equity for the rate years in these proceedings, did the settling parties consider the reasonableness of its determination with any macroeconomic indicators such as the Blue Chip Economic Indicators report published by Wolters Kluwer N.V.? If so, please describe such considerations in detail, and provide any workpapers supporting the conclusions that resulted. If not, please explain why not.

Response

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Responding Witness: N/A

Question No. :147

In determining its proposed 9.25% authorized return on equity for the rate years in these proceedings, did the settling parties consider systematic risks such as changes in interest rates, recessions, wars and pandemics? If so, please describe such considerations in detail, and provide any workpapers supporting the conclusions that resulted. If not, please explain why not.

Response

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Question No. :148

In determining its proposed 9.25% authorized return on equity for the rate years in these proceedings, did the settling parties consider risk-free rates of return such as those published by the Federal Reserve and as used by Staff in its direct testimony (Exhibit FP-19) at 3)? If so, please describe such considerations in detail, and provide any workpapers supporting the conclusions that resulted. If not, please explain why not.

Response

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Question No. :149

In determining its proposed 9.25% authorized return on equity for the rate years in these proceedings, did the settling parties consider market estimates for the S&P 500, as published by Bank of America in its Quantitative Profile reports and as used by Staff in its direct testimony (Exhibit (FP-19) at 3)? If so, please describe such considerations in detail, and provide any workpapers supporting the conclusions that resulted. If not, please explain why not.

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Question No. :150

Please provide a comparison of present (2022) and proposed (RY 1) Con Edison rates and charges for the SC 1 - Rate I - Residential & Religious electric class, including winter and summer billing periods for:

- a. Energy delivery charge – first energy block (currently 250 kWhr)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block
- c. Customer charge

Response

The Settling Parties object to this interrogatory as the information requested was filed in DMM in these proceedings on March 1, 2023 and is thus public and “readily available.” 16 NYCRR § 5.8(a)(2).

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Response to PULP Interrogatories – Set PULP-2 Settlement
Date of Response: April 04, 2023
Responding Witness: N/A

Question No. :151

Please provide a comparison of proposed RY 1 and proposed RY 2 Con Edison rates and charges for the SC 1 Residential & Religious electric class, including winter and summer billing periods for:

- a. Energy delivery charge – first energy block (currently 250 kWhr)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block
- c. Customer charge

Response

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Date of Response: April 04, 2023
Responding Witness: N/A

Question No. :152

Please provide a comparison of proposed RY 2 and proposed RY 3 Con Edison rates and charges for the SC 1 Residential & Religious electric class, including winter and summer billing periods for:

- a. Energy delivery charge – first energy block (currently 250 kWhr)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block
- c. Customer charge

Response

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Responding Witness: N/A

Question No. :153

Please provide a comparison of current (2022) and proposed RY 1 Con Edison rates and charges for the SC 1 gas class for:

- a. Energy delivery charge - first energy block (currently 3 Therms or less)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block

Response

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Question No. :154

Please provide a comparison of proposed RY 1 and RY 2 Con Edison rates and charges for the SC 1 gas class for:

- a. Energy delivery charge - first energy block (currently 3 Therms or less)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block

Response

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Question No. :155

Please provide a comparison of proposed RY 2 and RY 3 Con Edison rates and charges for the SC 1 gas class for:

- a. Energy delivery charge - first energy block (currently 3 Therms or less)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block

Response

The Settling Parties object to this interrogatory as the information requested was filed in DMM in these proceedings on March 1, 2023 and is thus public and “readily available.” 16 NYCRR § 5.8(a)(2).

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Responding Witness: N/A

Question No. :156

Please provide a comparison of current (2022) and proposed RY 1 Con Edison rates and charges for the SC 3 gas class for:

- a. Energy delivery charge - first energy block (currently 3 Therms or less)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block

Response

The Settling Parties object to this interrogatory as the information requested was filed in DMM in these proceedings on March 1, 2023 and is thus public and “readily available.” 16 NYCRR § 5.8(a)(2).

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Responding Witness: N/A

Question No. :157

Please provide a comparison of proposed RY 1 and RY 2 Con Edison rates and charges for the SC 3 gas class for:

- a. Energy delivery charge - first energy block (currently 3 Therms or less)
- b. Energy delivery charge for any other blocks, indicating the lower and upper bound for each block

Response

The Settling Parties object to this interrogatory as the information requested was filed in DMM in these proceedings on March 1, 2023 and is thus public and “readily available.” 16 NYCRR § 5.8(a)(2).

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Question No. :158

Please provide a comparison of proposed RY 2 and RY 3 Con Edison rates and charges for the SC 3 gas class for:

- a. energy delivery charge - first energy block (currently 3 Therms or less)
- b. energy delivery charge for any other blocks, indicating the lower and upper bound for each block

Response

The Settling Parties object to this interrogatory as the information requested was filed in DMM in these proceedings on March 1, 2023 and is thus public and “readily available.” 16 NYCRR § 5.8(a)(2).