STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 25-E-0072 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison of New York, Inc, for Electric Service.

CASE 25-G-0073 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison of New York, Inc. for Gas Service.

HEARING EXHIBIT 1237a

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :48
Subject: Network and Radial Service
How many distinct electric distribution load areas does the Company have in its system? How many of these are entirely in Westchester County? How many are entirely in New York City? How many are partly in Westchester County and partly in New York City?

Response

The Company has 18 non-network load areas:

- 5 in Staten Island (New York City)
- 13 in Westchester
- None of the load areas are partially in Westchester County and New York City

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :49
How many individual electric networks does the Company have in its system? How many are entirely in Westchester County? How many are entirely in New York City? How many are partly in Westchester County and partly in New York City?

Response

- Con Edison has 65 N-2 networks and 20 N-1 networks between New York City and Westchester.
- Con Edison has 17 N-1 networks in Westchester.
- Con Edison has 65 N-2 networks and 3 N-1 networks in New York City.
- None are partially in Westchester County and New York City.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :50
Please provide a list of the electric networks that are located entirely in Westchester County.

Response

- Peekskill
- New Rochelle
- Hartsdale
- Tarrytown
- Greenburgh
- Saw Mill River
- Bronxville-Tuckahoe
- Yonkers
- Rye
- Mount Kisco
- Ossining
- Central Ave
- Fort Hill
- Mount Vernon
- Chatsworth
- Garth Road
- White Plains

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :51
Please provide a list of the electric networks that are located entirely in New York City.

Response

- Bay Ridge
- Borough Hall
- Brighton Beach
- Crown Heights
- Flatbush
- Ocean Parkway
- Park Slope
- Prospect Park
- Ridgewood
- Sheepshead Bay
- Williamsburg
- Battery Park City
- Beekman
- Bowling Green
- Canal
- Central Park
- Chelsea
- City Hall
- Columbus Circle
- Cooper Square
- Cortlandt
- Empire
- Fashion
- Freedom
- Fulton
- Grand Central
- Greeley Square

- Greenwich
- Harlem
- Herald Square
- Hudson
- Hunter
- Kips Bay
- Lenox Hill
- Lincoln Square
- Madison Square
- Midtown West
- Morgan
- Park Place
- Pennsylvania
- Plaza
- Rockefeller Center
- Roosevelt
- Sheridan Square
- Sutton
- Times Square
- Triboro
- Turtle Bay
- Washington Heights
- Yorkville
- Borden
- Flushing
- Jackson Heights
- Jamaica
- Long Island City
- Maspeth
- Rego Park
- Richmond Hill
- Sunnyside
- Central Bronx
- Fordham
- Northeast Bronx
- Riverdale
- Southeast Bronx
- West Bronx

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :52
Please provide a list of the electric networks that are partly in Westchester County and partly in New York City.

Response

Con Edison does not have any electric Networks that are partly in Westchester County and partly in New York City.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :53
How many individual non-network (E.g., radial) systems does the Company have? How many are entirely in Westchester County? How many are entirely in New York City? How many are partly in Westchester County and partly in New York City?

Response

- The Company's Distribution System has 193 autoloops, 14 miniloops and 20 4kV grids
- Con Edison has 76 autoloops, 14 miniloops, and 12 4kV grids in New York City.
- Con Edison has 117 autoloops and 8 4kV grids in Westchester
- There are no non-network systems partly in Westchester and partly in New York City.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :54
Please provide a list of the non-network (E.g., radial) systems that are located entirely in Westchester County.

Response

- Airport
- Aqueduct
- Ardsley
- Armonk
- Baldwin
- Banksville
- Battle Hill
- Bedford Road
- Benedict
- Bonwit
- Bowman
- Briarcliff
- Business Park
- Byram
- Carpenter Avenue
- Central Avenue
- Chapel Hill
- Clovebrook
- Columbus
- Cortlandt
- Croton
- Crowhill
- Davenport
- Division Street
- Donbosco
- Eastchester

- Elmsford
- Fenimore
- Ferncliff
- Fleetwood
- Foxisland
- Franklin
- Fulton
- Furnace Dock
- Garden
- Glenwood
- Grasslands-Knollwood
- Greenville
- Greystone
- Griffen
- Hamilton
- Harbor Island
- Hardscrabble
- Harrison
- Hastings
- Heathcote
- Highland
- Irvington
- Johnwalsh
- Kingstreet
- Kitchawan
- Lafayette
- Lakestreet
- Larchmont
- Lexington
- Lincoln
- Longhill Road
- Ludlow
- Macquesten
- Manville
- Maple Street
- Maryknoll
- Mclean
- Meetinghouse
- Millroad
- Milton Point
- Mount Hope
- Mount Kisco
- Mount Vernon
- Newcastle

- Newrochelle
- Orchard
- Orienta
- Ossining
- Panas
- Parkview
- Paulding
- Peekskill
- Philipse Manor
- Pines Bridge
- Pleasantville
- Pocantico
- Portchester
- Premium Point
- Quaker Bridge
- Regent
- Ridge Street
- Rye
- Saint Johns
- Sargent Place
- Scarborough
- Shrub Oak
- Singsing
- Sleepy Hollow
- Southside
- Sprout Brook
- Station
- Sunnyside
- Tarrytown
- Teatown
- Terrace
- Thornwood
- Tibbets
- Tuckahoe
- Union Ave
- Villard
- Wampus Lake
- Warburton
- Washington Street
- Whippoorwill
- White Plains
- Wilmot
- Winans
- Windmill Farms

- Winged Foot
- Wolden
- Yonkers
- Buchanan 4kV Grid
- Elmsford 4kV Grid
- Granite Hill 4kV Grid
- Grasslands/Ossining
- West/Pleasantville
- Harrison 4kV Grid
- Rockview 4kV Grid
- Washington St and Cedar St 4kV Grid
- White Plains 4kV Grid
- Parkchester No 1 4kV Grid

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :55
Please provide a list of the non-network (E.g., radial) systems that are located entirely in New York City.

Response

- 1R81 - 4R76M Loop
- 2R91 - 4R86L Loop
- 2R92 - 4R96L Loop
- 3R30L - 3R34 Loop
- 3R30M - 5R20 Loop
- 3R31L - 3R35L Loop
- 3R31M - 5R11 Loop
- 3R32L - 3R36L Loop
- 3R32M - 5R22 Loop
- 3R33L - 3R37L Loop
- 3R33M - 5R23 Loop
- 3R35M - 5R15 Loop
- 3R36M - 5R16 Loop
- 3R37M - 5R17 Loop
- 4R54L - 4R56L Loop
- 4R54M - 4R56M Loop
- 4R64 - 4R66 Loop
- 4R74L - 4R76L Loop
- 4R86M - 4R96M Loop
- 5R10 - 5R18 Loop
- 5R13 - 5R26 Loop
- 5R14 - 5R24 Loop
- 5R19 - 5R29 Loop
- 5R27 - 5R28 Loop
- Broad Channel
- Centerville

- City Island East
- City Island West
- City Line
- Clason Point
- Coney Island
- Corona Heights
- Cropsey
- Cypress Hills
- Douglaston
- Dyker
- Fort Hamilton
- Fresh Ponds
- Gerritsen Beach
- Gravesend
- Greenpoint
- Gun Hill Loop
- Haberman
- Juniper Valley
- Laconia East
- Laconia West
- Laurel Hill
- Liberty Park
- Lombardy
- Madison
- Marine Park
- Metropolitan
- Middle Village
- Midwood
- Neill
- Palisade
- Parsons
- Red Hook
- Rhinelander
- Riverdale
- Shell Road
- Sommer
- Spring Creek
- Springfield Gardens
- St. Peters
- Stadium
- Starr
- Tilden
- Van Nest
- Vandervoort

- Varick
- Voorhies
- West Farms
- Whitestone
- Whitestone West
- Woodlawn
- 1R16 - 1R28 Mini-Loop
- 1R26 - 1R38 Mini-loop
- 1R27 - 1R32 Mini-loop
- 2R13 - 2R19 Mini-loop
- 2R24 - 2R30 Mini-loop
- 2R28 - 2R94 Mini-loop
- 2R34 - 2R68 Mini-loop
- 2R39 - 2R44 Mini-loop
- 2R49 - 2R54 Mini-loop
- 412 - 413 Mini-Loop
- 422 - 428 Mini-Loop
- 424 - 259 Mini-Loop
- 434 - 367 Mini-Loop
- 438 - 250 Mini-Loop
- Flatbush 4kV Grid
- Flushing 4kV Grid
- Flushing MB
- Glen Oaks 4kV Grid
- Hollis MB
- Jamaica 4kV Grid
- Livonia MB
- Rego Park 4kV Grid
- Richmond Hill 4kV Grid
- Fox Hills 4kV Grid
- Fresh Kills 4kV Grid

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :56
Please provide a list of the non-network (E.g., radial) systems that are located partly in Westchester County and partly in New York City.

Response

- 1031 grid and 1032 grid

- Washington Street and Granite Hill supply a section of Northeast Bronx; Rockview supplies a section in Fordham and some feeders from Granite Hill supply Riverdale.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :57
Does the Company have customer-facing portions of its non-network systems that are not configured as a radial system?

Response

No. Distribution customers are classified as either Radial or Network.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :58
If your answer to WMC-57 is at least partly affirmative, please describe these situations and explain how these particular non-network systems are configured, with an emphasis on clarifying how these systems differ from a typical radial system.

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :59
Does the Company have data that indicates or records the peak load on individual networks?

Response

Yes. The Company calculates summer and winter peak loads for networks and non-networks.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :60
If your answer to WMC-59 is at least partly affirmative, please describe how this information is developed and maintained, what database(s) contain this data, and how this data is used by the Company's employees.

Response

The Company's engineering and planning team's reviews the most recent summer peak 24-hour profiles for network and non-networks. Con Edison maintains the data on the Company's System Operation Energy Control Center XA/21 PI server for extraction for analysis. For actual peak loading experience, PI Historian is the Company's go-to database. Con Edison compares these actual summer values with previous peak summer data to ensure that significant design changes are avoided, and outlier actions are used for next year's summer peak planning case building. Con Edison can also use weekday, Saturday, Sunday profiles derived from the database for operational purposes. Con Edison is evaluating Winter Peak data and Spring/Fall for long range planning and system impacts.

Con Edison's Commodity Forecasting group also uses this information but takes it a step further by creating the Weather Adjusted Peaks (WAPs), which represent what the load would have been under design conditions. Commodity Forecasting uses all summer loading data, adjusted to account for demand reducing actions taken, such as activation of demand response programs as the source data for regression analyses used to determine WAPs for each network and the system. Con Edison then uses the WAPs as the starting point for the updated 20-year peak demand forecasts. These forecasts are used by the various Con Edison Planning and Engineering teams as an input to studies which inform future needs.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :61
If your answer to WMC-59 is negative, please explain why you do not have this type of peak load data, and explain the actual level of granularity the Company maintains for its use in planning, engineering, and managing its distribution system.

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :62
Does the Company have data that indicates or records the peak load on individual radial systems?

Response

See response to WMC-4-59.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :63
If your answer to WMC-62 is at least partly affirmative, please describe how this information is developed and maintained, what database(s) contain this data, and how this data is used by the Company's employees.

Response

See response to WMC-4-60.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :64
If your answer to WMC-62 is negative, please explain why you do not have this type of peak load data, and explain the actual level of granularity the Company maintains for its use in planning, engineering, and managing its distribution system.

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :65
Is the Company developing or working towards having the ability to develop peak load forecasts for individual networks?

Response

The Company does develop peak load forecasts for individual networks and non-networks.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :66
If your answer to WMC-65 is at least partly affirmative, please describe this effort, what information is being used in this effort, what database(s) contain data that is useful for this effort, and how this data is or will be used in this effort.

Response

The Company's response to DPS-1-127 describes the effort of producing the System Coincident Peak Demand Forecast. The approach to producing the Network Peak Forecast is similar but is done by individual network instead of the system.

The general information being used in the Network Peak Forecast is the same as that included in the Company's response to DPS-1-127.

The primary internal databases used in the peak forecasts include PI for historical load data and CPMS and PowerClerk for interconnection applications. Numerous other internal and external databases are used as complimentary resources in producing the peak forecasts.

Data from these sources are used as inputs to produce the forecast.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :67
If your answer to WMC-65 is negative, please explain the level of granularity the Company is using to develop localized peak forecasts for the network portion of its distribution system.

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :68
Is the Company developing or working towards having the ability to develop peak load forecasts for individual radial systems?

Response

See response to WMC-4-65.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :69
If your answer to WMC-68 is at least partly affirmative, please describe this effort, what information is being used in this effort, what database(s) contain the underlying data that is useful for this effort, and how this data is or will be used in this effort.

Response

See response to WMC-4-66.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :70
If your answer to WMC-68 is negative, please explain the level of granularity the Company is using to develop localized peak forecasts for the radial portion of its distribution system.

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :71
As a general rule, does the Company know whether a customer is connected to a network or whether the customer is connected to a radial system? Are there exceptions? Please explain your response.

Response

Yes. The connectivity information resides in Network Management System (NMS 2.6). There are no exceptions.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :72
To the extent your response to WMC-71 is at least partly affirmative, please describe how this information is developed and maintained, and what database(s) contain this data. Please also explain whether, and how, this information is used by the Company's employees.

Response

The customer data is maintained in the Company's Customer Information System (CIS) and married with the electric distribution system model in the Outage Management System (OMS). This information is used by Company employees who have access to the Company's OMS system. CIS data is used for billing and to provide customer service to the customer, and OMS data is used to manage and report on customer outages.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
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Responding Witness: Electric Infrastructure & Operations Panel

Question No. :73
If your answer to WMC-71 indicates this information is not currently available for some customers, please explain which types of customers are not associated with a specific network or radial system in your databases, and explain what steps would need to be taken in order to obtain that information if it were needed. For example, does the Company have each street address where the customer receives service? Could the street address be analyzed with a Geographic Information System (GIS) in order to identify the network or radial system that provides them with service at that location?

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
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Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :74
According to footnote 226 on page 164 of the June 30, 2025 Distribution System Implementation Plan, "The Company's network system (i.e., underground) serves 86 percent of Con Edison's electric customers via 99,300 miles of underground transmission and distribution lines, over 268,000 underground vaults, and 43,000 underground transformers. While the non-network system (i.e., overhead) supplies the remaining 14 percent of customers via 36,500 miles of overhead lines, 270,000 utility poles, and 53,000 overhead transformers." Please identify and describe each database that you relied upon to develop the numbers that are summarized in this footnote. Please explain the data source that was relied upon in developing each of these numbers. As part of your response, please clarify which numbers were extracted from your continuing property records, which numbers were extracted from your customer accounting data, and which numbers were obtained from other data sources.

Response

The customer counts are obtained from the General Accounting as described in Public Service Law §66[1],(g) as follows:

(*g) Average Number of customers served. The average number of customers served shall be the number of active metered customer accounts as of the last day of the prior year […] recorded under Uniform System of Accounts 440, 442, 445, 446 and 448.*

The number of assets is obtained from Property Record ledgers.

Company Name: Con Edison
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Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
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Question No. :75
Referring again to footnote 226, please explain how the ratio of 86% network customers to 14% radial customers was developed. Within your response, please identify the database(s) that were relied upon and the methodology that was used in determining what percentage of its customers are receiving network service, and what percentage are receiving non-network (radial) service.

Response

The number of network and non-network customers are obtained from NMS 2.6.

Company Name: Con Edison
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Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :76
Referring again to the percentage of customers disclosed in footnote 226, can you develop and provide analogous ratios for individual customer classes?

Response

Based on current customer class information and data structure, the Company does not have the means to provide this information.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
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Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
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Responding Witness: Electric Infrastructure & Operations Panel

Question No. :77
If your answer to WMC-76 is at least partly affirmative, please explain how difficult and time-consuming this effort would be. Please identify the databases that you would rely upon for developing these ratios, and provide an estimate of how many hours it would take to develop the necessary queries.

Response

Not Applicable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
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Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :78
If your answer to WMC-76 is not affirmative, please explain why this data cannot be extracted from one of your databases.

Response

The Company's existing rate design reflects the integrated nature of our system. This concept applies to tariffed service classes, such that delivery rates for any service class cannot be distinguished between network and radial.

Company Name: Con Edison
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Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :79
Does the Company have non-network (E.g., radial) systems where some distribution lines are underground?

Response

Yes.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :80
If your answer to WMC-79 is at least partly affirmative, please describe how these situations arise.

Response

The Company has locations where developers decided to underground a development or simply paid extra for not having overhead wires on their property.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :81
If your answer to WMC-79 is at least partly affirmative, please explain how common this is.

Response

This is not common in the service territory. Areas that commonly leverage this design are in large residential subdivisions and commercial/industrial complexes.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
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Question No. :82
Do real estate developers or customers sometimes ask the Company to extend lines underground that would otherwise be installed overhead?

Response

Yes.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :83
If your answer to WMC-82 is at least partly affirmative, please explain how the added cost of underground placement is handled. Is the Company reimbursed for the incremental costs associated with installing cables in conduits instead of on poles?

Response

The customer will be charged the cost differential for the underground service. It must be paid for in order for Con Edison Engineering to begin drawing layouts for the underground design.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :84
If your answer to WMC-82 is at least partly affirmative, do real estate developers or customers sometimes install distribution lines underground that become the Company's property? In those situations, is the cost of installing the lines in conduits borne by the developer (or customer), or is the cost shared between the Company and the developer (or customer)? Please explain how this is handled.

Response

Real estate developers do not install distribution lines. However, they are afforded an opportunity to install civil related work (vaults, conduits) via a developer agreement where they are reimbursed at pre-determined rates. It affords them more flexibility and control. This is not an option for underground cable.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Electric Infrastructure & Operations Panel

Question No. :85
Please more fully explain the Company's current and historical policies and practices with regard to the situations referenced in WMC-82, WMC-83, and WMC-84, clarifying and extending beyond the information that is provided in your tariff, so that we can more fully understand how your line extension policies and practices are reflected in the continuing property records and other accounting data that is relied upon in developing your Embedded Cost of Service (ECOS) studies.

Response

Various characteristics of service types and service rulings are outlined in the Company's tariff. Customer Engineering is best suited to discuss this item. The Company will accommodate, upon customer request, a radial underground service in lieu of an overhead interconnection. Costs between the utility and customer will be determined based on the provisions in the tariff (leaf 45). Any underground installation must comply with all Company specifications and design requirements to ensure safe and reliable service. The customers will be charged for electric usage based on their service classifications as defined in the electric tariff (e.g., residential, commercial).

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :86
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated S03 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

The Company does not anticipate difficulties beyond the typical level of effort to develop disaggregated S03 allocation factors that distinguish between the customers connected via underground (UG) and overhead (OH) services within each class.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :87
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated S03A allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

Please see response to IR WMC 4-86.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :88
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated S04 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

There will be difficulties in developing a disaggregated S04 allocation factor that distinguishes between network and non-network (radial) customers within each class as the S04 allocation factor (metering) is classified by meter type and does not distinguish between whether a service class is network or non-network (radial).

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :89
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated S05 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

The Company does not anticipate difficulties beyond the typical level of effort to develop disaggregated S05 allocation factors that distinguish between the customers connected via underground (UG) and overhead (OH) services within each class.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :90
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated S06 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

The Company does not anticipate difficulties beyond the typical level of effort to develop disaggregated S06 allocation factors (services) that distinguish between the customers connected via underground (UG) and overhead (OH) services within each class.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :91
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated C01 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

The Company does not anticipate difficulties beyond the typical level of effort to develop disaggregated C01 allocation factors that distinguish between the customers connected via underground (UG) and overhead (OH) services within each class.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :92
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated C02 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

The Company does not anticipate difficulties beyond the typical level of effort to develop disaggregated C02 allocation factors that distinguish between the customers connected via underground (UG) and overhead (OH) services within each class.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :93
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated C03 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What sampling techniques or other options could be pursued in order to overcome the problem?

Response

The Company does not anticipate difficulties beyond the typical level of effort to develop disaggregated C03 allocation factors that distinguish between the customers connected via underground (UG) and overhead (OH) services within each class.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :94
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated R01 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What are some options that could be pursued in order to overcome the problem?

Response

There will be difficulties in developing a disaggregated R01 allocation factor that distinguishes between network and non-network (radial) customers within each class as the R01 allocation factor (revenues) does not distinguish between whether a service class is network or non-network (radial).

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :95
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated K01 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What are some options that could be pursued in order to overcome the problem?

Response

There will be difficulties in developing a disaggregated K01 allocation factor that distinguishes between network and non-network (radial) customers within each class as the K01 allocation factor (annual kWh sales) does not distinguish between whether a service class is network or non-network (radial).

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :96
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated K02 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are these difficulties? What are some options that could be pursued in order to overcome the problem?

Response

Please see the difficulties explained in the response to IR WMC 4-95.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :97
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated K03 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What are some options that could be pursued in order to overcome the problem?

Response

There will be difficulties in developing a disaggregated K03 allocation factor that distinguishes between network and non-network (radial) customers within each class as the K03 allocation factor (billing demands) does not distinguish between whether a service class is network or non-network (radial).

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :98
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated K04 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What are some options that could be pursued in order to overcome the problem?

Response

Please see the difficulties explained in the response to IR WMC 4-97.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :99
Referring to the Demand Analysis and COS Panel's exhibit DAC-1 and pages 118-125 of 130 of its exhibit DAC-2 as an example for reference, are there any gaps in your data or other difficulties you anticipate would need to be overcome in order to develop disaggregated K05 allocation factors that distinguish between the network and non-network (radial) customers within each class? What are the difficulties you can anticipate encountering? What are some options that could be pursued in order to overcome the problem?

Response

There will be difficulties in developing a disaggregated K05 allocation factor that distinguishes between network and non-network (radial) customers within each class as the K05 allocation factor does not distinguish between whether a service class is network or non-network (radial).

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :100
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain the source of the dollar amounts provided in column C. Please include in your response an explanation of whether the data originates from your continuing property records or from another data source. Is the underlying data source the same as the one you rely upon in developing your ECOS studies? If not, what is the difference?

Response

The dollar amounts provided in column C originate from Power Plan software, which is the Company's system of record for property accounting and asset-related data. This is the same source relied upon in developing ECOS studies.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :101
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain the source of the Quantity data provided in column D. Please include in your response an explanation of whether the data originates from your continuing property records or from another data source. Is the underlying data source the same as the one you rely upon in developing your ECOS studies? If not, what is the difference?

Response

The quantities provided in column D originate from Power Plan, which is the Company's system of record for property accounting and asset-related data. This is the same source relied upon in developing ECOS studies.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :102
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D7, D8, and D9. For example, is this the number of poles? If this includes both poles and other miscellaneous items, please explain what other items are included (in addition to poles), and whether it would be feasible to further disaggregate this data in order to provide more homogenous quantities.

Response

Cells D7, D8, and D9 reflect the physical pole units sorted by Westchester and non-Westchester areas.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :103
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D12, D13, and D14. For example, is this the number of linear feet of overhead cable? If this includes both cable quantities and other items, please explain what other items are included (in addition to cable), and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D12, D13, and D14 reflect the linear feet of overhead cable by Westchester and non-Westchester areas, along with minor relatable recloser quantities that can be separately identified.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :104
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D17, D18, and D19. For example, is this the number of linear feet of conduit? If this includes both conduit quantities and other items, please explain what other items are included (in addition to conduit), and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D17, D18, and D19 show the linear feet of conduit by Westchester and non-Westchester areas, along with minor manhole and vault quantities that can be separately identified.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :105
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D22, D23, and D24. For example, is this the number of linear feet of underground cable? If this includes both cable quantities and other items, please explain what other items are included (in addition to cable), and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D22, D23, and D24 reflect the linear feet of underground cable sorted by Westchester and non-Westchester areas.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :106
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D27, D28, and D29. For example, is this the number of overhead transformers? If this includes both transformer quantities and other items, please explain what other items are included (in addition to the number of transformers), and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D27, D28, and D29 reflect the quantities of overhead transformers sorted by Westchester and non-Westchester areas.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :107
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D32, D33, and D34. For example, is this the number of underground transformers? If this includes both transformer quantities and other items (in addition to the number of transformers), please explain what other items are included, and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D32, D33, and D34 reflect the quantities of underground transformers sorted by Westchester and non-Westchester areas.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :108
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D37, D38, and D39. For example, is this the number of overhead services? If this includes both the number of services and some other items, please explain what other items are included, and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D37, D38, and D39 reflect the quantities of overhead services sorted by Westchester and non-Westchester areas.

Company Name: Con Edison
Case Description: 2025 CECONY Electric and Gas Rate Cases
Case: 25-E-0072, 25-G-0073

Response to Westchester Municipal Consortium Interrogatories – Set WMC-4
Date of Response: August 25, 2025
Responding Witness: Demand Analysis & Cost of Service Panel

Question No. :109
Referring to the spreadsheet that was provided as a supplemental response to WMC-21 through WMC-33, please explain what quantities have been provided in cells D42, D43, and D44. For example, is this the number of underground services? If this includes both the number of services and some other items, please explain what other items are included, and whether it would be feasible to further disaggregate this data to provide more homogenous quantities.

Response

Cells D42, D43, and D44 reflect footage of underground services sorted by Westchester and non-Westchester areas.