

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**In the Matter of a Status Report on the Demand/Supply
Component of the Department's Electric Price and
Reliability Task Force Including Recommendations
For Specific Utility Actions on the Demand-Side**

Case 00-E-2054

**PETITION OF CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.,
ORANGE AND ROCKLAND UTILITIES, INC., AND NIAGARA MOHAWK
POWER CORPORATION d/b/a NATIONAL GRID TO RESCIND MONTHLY
DEMAND RESPONSE REPORTING REQUIREMENT**

Introduction

In 2002, the Public Service Commission (Commission) required each of the six major electric utilities¹ to file monthly demand response reports.² Since then, the Commission has gained more experience with demand response³ and has instituted annual reporting requirements that render the monthly reports duplicative and unnecessary.⁴ Accordingly, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., and Niagara Mohawk Power Corporation d/b/a National Grid (together, the Named Utilities)

¹ The six major electric utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation.

² Case 00-E-2054, *In the Matter of a Status Report on the Demand/Supply Component of the Department's Electric Price and Reliability Task Force Including Recommendations for Specific Utility Actions on the Demand-Side* (DR Status Report Proceeding), Order Regarding Major Electric Utilities (issued March 22, 2002) (2002 Reporting Order). The major electric utilities' most recent iteration of this report was filed with the Commission in May 2025. *See, e.g.*, National Grid Demand Response Program Data Reporting – May 2025 (filed July 9, 2025). Con Edison and O&R have been sending these reports directly to Department of Public Service Staff monthly.

³ *See, e.g.*, Case 14-E-0423, *Proceeding on Motion of the Commission to Develop Dynamic Load Management Programs* (DLM Programs Proceeding), Order Instituting Proceedings Regarding Dynamic Load Management and Directing Tariff Filings (issued December 15, 2014), p. 6; *see also*, Case 09-E-0115, *Proceeding on Motion of the Commission to Consider Demand Response Initiatives*, Order Instituting Proceeding (issued February 17, 2009), p. 2.

⁴ *See* DLM Programs Proceeding, Order Adopting Dynamic Load Management Filings with Modifications (issued June 18, 2015) (DLM Filings Order), p. 19.

request that the Commission rescind the monthly reporting requirements. Doing so will enable the Named Utilities to simplify their reporting and to focus on program enrollments and operations.

The Monthly Reporting Requirements Are Duplicative and Obsolete

Demand response was relatively new at the time of the 2002 Reporting Order.⁵ Consequently, the Commission enacted the monthly reporting requirement as a way to monitor demand response programs.⁶ Since then, however, the Commission's expertise has evolved significantly, as demand response is an essential part of New York's clean energy transition.

The Commission's reporting requirements have evolved too. In 2015, the Commission ordered utilities to submit annual reports covering targeted demand side management efforts.⁷ These reports have evolved over time with the introduction of new programs and technologies and now include many of the metrics covered by the monthly reporting requirement. For example, the Named Utilities' annual reports include data regarding the total number of registered customers and the total available load relief by program. Further, the reports have been expanded in recent years to include other reporting, for example, for Con Edison, New York Power Authority (NYPA) customer performance. The annual reports are thus sufficient to provide the Commission with the information it requires to effectively regulate demand response.

⁵ See DR Status Report Proceeding, 2002 Reporting Order, p. 3, where the Commission noted that based on the 2001 experience, a "formalized reporting system is needed to facilitate the collection of accurate and timely demand response program data."

⁶ *Id.*

⁷ DLM Programs Proceeding, DLM Filings Order, p. 19. The Named Companies submitted their latest filings in November 2024. See, e.g., DLM Programs Proceeding, Con Edison 2024 DR Annual Report (filed November 15, 2024).

Rescinding the monthly reporting requirement is also the most efficient use of customer resources and will aid in making the Named Companies' demand response programs more effective; the Named Companies will be able to allocate resources away from duplicative reporting to operational improvements, program load relief capabilities, and the customer experience.

Conclusion

For the reasons discussed herein, the Named Companies respectfully request that the Commission rescind the monthly demand response reporting requirements initiated in the 2002 Reporting Order of the DR Status Report Proceeding.

Dated: August 6, 2025

Respectfully submitted,

**CONSOLIDATED EDISON COMPANY OF
NEW YORK, INC. and ORANGE AND
ROCKLAND UTILITIES, INC.**

By: /s/ *Mary L. Krayeske*

Mary L. Krayeske
Assistant General Counsel
Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, New York 10003
Tel.: 212-460-1340
Email: krayeskem@coned.com

**NIAGARA MOHAWK POWER
CORPORATION d/b/a NATIONAL GRID**

By: /s/ *Janet M. Audunson*

Janet M. Audunson
Assistant General Counsel
National Grid
300 Erie Boulevard West
Syracuse, New York 13202

Tel.: (315) 428-3411

Email: janet.audunson@nationalgrid.com