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

Response to ALJ Interrogatories – Set ALJ-1
Date of Response: December 10, 2025
Responding Witness: Electric / Gas Rate Panels

Question No. :1
We request Con Edison to file Electric and Gas Bill Impacts and Rate Summaries for Rate Years 1 through 3 in the same or substantially similar form as those filed on March 1, 2023 in Cases 22-E-0064 (DMM No. 148) and 22-G-0065 (DMM No. 134).

Response

Please refer to attachments "Electric Rate Summary and Bill Impacts - 25-E-0072 - 2025 1210.pdf" and "Gas Rate Summary and Bill Impacts - 25-G-0073 - 2025 1210.pdf" for the requested Con Edison Electric and Gas Bill Impacts and Rate Summaries for Rate Years 1 through 3.

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

Response to ALJ Interrogatories – Set ALJ-1
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Responding Witness: Electric / Gas Rate Panels

Question No. :2
JP, pp. 4-6 provides information on Electric Revenue Increases and Impacts and JP, pp. 10-11 provides information on Gas Revenue Increases and Impacts.

Do the figures for each year take into account the increasing monthly minimum charges?

Identify in narrative form the major rate drivers for the Electric and Gas Revenue Requirements in the JP, including costs and expenses in dollar and percentage amounts.

Specify the electric and gas monthly bill impact percentages that would have occurred under Con Edison's initial rate requests (including average percentage incremental monthly increases for typical residential electric customers using 600 kWh per month and gas heating customers using 100 therms per month).

Response

The delivery rates derived from the shaped electric and gas revenue increases include increases to the monthly minimum charges. Based on the revenue increases, monthly minimum charges can increase or remain the same.

Note that in gas, there was no increase to the monthly minimum charge for the SC1 residential non-heating customer class (and corresponding distributed generation Rider J) in the first and third rate years. Similarly, the commercial distributed generation Rider H monthly minimum charges remained at current levels in the first rate year.

The major rate drivers for the RY1 electric rate increase of $222 million are the Company's investment in infrastructure ($300 million / 135%), higher property taxes ($147 million / 66%), and higher pension and OPEB costs ($142 million / 64%). The major offset to the RY1 electric rate increase of $222 million is the amortization of regulatory assets and liabilities ($311 million / 140%). The major rate drivers for the RY2 electric rate increase of $473 million are the Company's investment in infrastructure ($191 million / 40%), higher pension and OPEB costs ($125 million / 26%), and higher property taxes ($88 million / 19%). The major rate drivers for the RY3 electric rate increase of $329 million are the Company's investment in infrastructure

($350 million / 106%) and higher property taxes ($79 million / 24%) and the major offset is lower pension and OPEB costs ($83 million / 25%).

The major rate driver for the RY1 gas rate decrease of $46 million is the amortization of regulatory assets and liabilities ($72 million / 155%) and the major offset is the Company's increased operating expenses ($51 million / 109%). The major rate drivers for the RY2 gas rate increase of $170 million are the Company's investment in infrastructure ($48 million / 28%), lower sales ($41 million / 24%), and higher pension and OPEB costs ($37 million / 22%). The major rate drivers for the RY3 gas rate increase of $93 million are the Company's investment in infrastructure ($49 million / 53%) and lower sales ($32 million / 34%). The major offset to the RY3 gas rate increase of $93 million is the lower pension and OPEB costs ($25 million / 27%).

The bill impacts of typical electric residential customers using 600 kWh per month and using 280 kWh per month, and a typical gas residential heating customer using 100 therms per month as proposed by the Company in its initial filing compared to the Joint Proposal are as follows:

Electric SC 1 Rate I Residential Monthly Usage of 600 kWh	Initial Filing	Joint Proposal
Rate Year 1 - 2026	13.4%	3.5%
Rate Year 2 - 2027	7.4%	3.2%
Rate Year 3 - 2028	6.2%	3.1%

Electric SC 1 Rate I Residential Monthly Usage of 280 kWh	Initial Filing	Joint Proposal
Rate Year 1 - 2026	13.7%	3.9%
Rate Year 2 - 2027	8.1%	3.3%
Rate Year 3 - 2028	5.8%	3.2%

Gas SC 3 Rate I Residential Heating 1-4 Dwelling Units Monthly Usage of 100 therms	Initial Filing	Joint Proposal
Rate Year 1 - 2026	19.1%	4.4%
Rate Year 2 - 2027	8.2%	5.7%
Rate Year 3 - 2028	4.8%	5.6%

Company Name: Con Edison
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Responding Witness: N/A

Question No. :3
The Summary of the JP includes unshaped annual delivery revenue increases including incremental property tax impacts. Is the property tax information provided in the Summary contained in the JP and/or Appendices? If so, identify where the information is located. If not, explain how the incremental property tax amounts were determined.

Response

The Company calculated the RY1 electric property tax increase by subtracting the Case 22-E-0064 RY3 electric property taxes of $2,249.5M shown on Case 22-E-0064 JP Appendix 1, Page 6 from the RY1 electric property taxes of $2,391.9M shown on JP Appendix 1, Page 6 in this case. Property taxes in RY1 in this case are $142.4M higher than in RY3 in the current rate plan. The $146.8M shown in the JP Summary reflects the $142.4M increase plus the gross-up for gross receipts taxes and other costs.

The RY2 and RY3 incremental electric property tax impacts of $82.9M and $75.9M, respectively, shown in the JP Summary are the RY2 and RY3 electric property tax increases of $80.4M and $73.6M respectively, after gross-up, shown in JP Appendix 1, Page 6.

The Company calculated the RY1 gas property tax decrease by subtracting the Case 22-G-0065 RY3 gas property taxes of $553.8M shown on Case 22-G-0065 JP Appendix 2, Page 6 from the RY1 gas property taxes of $552.4M shown on JP Appendix 2, Page 6 in this case. Property taxes in RY1 in this case are $1.4M lower than in RY3 in the current rate plan. The decrease in RY1 remains at $1.4M after gross-up, as shown in the JP Summary.

The RY2 and RY3 incremental gas property tax impacts of $19.0M and $17.5M, respectively, shown in the JP Summary are the RY2 and RY3 gas property tax increases of $18.4M and $17.0M, respectively, after gross-up, shown in JP Appendix 2, Page 6.

Company Name: Con Edison
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Response to ALJ Interrogatories – Set ALJ-1
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Question No. :4
Does the JP provide for any economic development programs? If so, describe the programs, including funding levels, whether shareholders or ratepayers are responsible for such funding, and how the programs benefit ratepayers.

Response

The Company has a Business Incentive Rate program that was not modified by this Joint Proposal.

The Joint Proposal does provide updates to the Excelsior Jobs Program Discount under Rider D in the Company's gas tariff. The existing discounts of 53% and 40% for the Company's SC2 Rate I and SC2 Rate II customers, respectively, remain at 53% for SC2 Rate I and decreases to 33% for SC2 Rate II. The Company would note, however, that there are currently no customers receiving these discounted rates.

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

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Responding Witness: N/A

Question No. :5
List the projects and costs of capital projects initially proposed by Con Edison that are not included in the JP.

Response

Please see the attached file "Attachment ALJ_1_5.pdf" which lists the projects initially proposed by the Company in this proceeding that have no funding included in the Joint Proposal. The Company would note that there are projects with reduced funding/scope from the Company's initial filing that were not listed in this attachment.

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

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Responding Witness: N/A

Question No. :6
Are all of the capital programs and projects proposed in the JP necessary for Con Edison to provide safe and reliable service? If not, explain why those programs and projects are included in the JP.

Response

The electric and gas infrastructure programs and projects are to provide safe and reliable service; many are also expected to have attendant benefits (e.g., preparing the Company's infrastructure to address the impacts of climate change; supporting the clean energy transition because customers requesting electric service may be electrifying their homes/buildings or choosing electric vehicles). There are other programs and projects that are not directly related to safe and reliable service, but are related to a core utility function (e.g., billing, call centers, back-office IT).

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

Response to ALJ Interrogatories – Set ALJ-1
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Responding Witness: N/A

Question No. :7
List the major electric, gas, and common and capital programs and projects contained in the JP and describe the benefits they provide to ratepayers and to Con Edison's electric and gas systems.

Response

Below are some of the major capital programs and projects contained in the Joint Proposal. A detailed list of all programs and projects can be found in Appendix 11 of the Joint Proposal.

Electric Infrastructure and Operations

- **Eastern Queens and Idlewild Projects** - Previously authorized by the Commission, these projects will address growing demand, improve reliability and enable customer electrification efforts. The new transmission substation will be in service by April 2028, will alleviate transmission constraints, and add resiliency to the transmission system in the eastern part of Queens. In addition, splitting the Jamaica network into to networks (Jamaica and Springfield networks) will improve reliability for customers in these networks.

- **Primary Feeder Reliability Program** – This Program is aimed at maintaining and improving the reliability and resiliency of Con Edison's networks and non-network load areas. The program relies on the Network Reliability Index ("NRI"), a measure used to gauge the reliability and resiliency of all 65 second contingency networks on the Con Edison distribution system. The lower the index, the less likely for that network to experience cascading feeder outages.

- **Brooklyn Clean Energy Hub** - Previously authorized by the Commission, this project will establish the Brooklyn Clean Energy Hub, a new 345kV transmission substation needed for reliability and to facilitate the interconnection of clean energy to Con Edison's system. The Brooklyn Clean Energy Hub will create Points of Interconnection ("POI") for large scale renewable resources, such as off-shore wind and, potentially, other clean resources. The transmission station will also include five 345/138kV transformer banks that will provide supply to existing substations (Trade Center and Seaport Nos. 1 and 2)

and future area substations like the new area substation (Gateway Park No. 1) proposed as part of the long-term solution for the feeder constraints in the Brownsville area of Brooklyn. Initial engineering design and construction work began on this project in 2022, as did demolition and site preparation work on the Company-owned property where the station is being constructed. The station is expected to be in service in the second quarter of 2028.

- **New Business** - New Business is the Company's projects and programs that connect new customers to the Company's electric system. When the Company connects new load, it often finds that its distribution system is at or beyond its capability and that it cannot serve the new load by simply extending a service lateral from its existing distribution system. Many new residential and commercial projects require the Company to make extensive infrastructure investments such as reinforcing secondary mains, extending primary feeders, and installing transformer vaults. The New Business Capital Program is the vehicle for making these investments. With these investments, the Company will be prepared to provide reliable service to the new customer loads. The Company saw significant increases in new business in the last rate plan and the JP provides funding, as well as a reconciliation mechanism, to address customer needs.

- **Transformer Purchases** - This program funds distribution system equipment purchases under the capital budget used to purchase new and reconditioned capital electrical distribution equipment. This equipment includes underground network transformers, overhead transformers, pad-mount transformers, capacitor banks, emergency generators, and network protectors to support distribution system relief, reliability, emergency, and load growth programs. This funding is needed to provide Electric Operations Construction and Energy Services with electrical distribution equipment in order to complete active and planned burnout, new business, and system relief and reinforcement projects.

- **Brownsville Area Load Relief - Establish Gateway Park No. 1** - This project is part of a Company program designed to alleviate forecasted overloads on the 138kV feeders supplying the Brownsville Area Substations. The Company first identified the need for a new substation to provide relief for the Brownsville substation in 2014, but prior load forecasts showed the Brooklyn Queens Demand Management program deferring the need for the new station until 2032. More recent forecasts, however, show significant, near-term load growth in the area (including adoption of electric vehicles and electric heating) indicate that a new station is needed by 2028.

- **Gas Infrastructure Replacement or Reduction Program (GIRRP)**: The GIRRP focuses on replacing or abandoning leak-prone gas mains, specifically targeting small diameter mains (12 inches or smaller) made of cast iron, wrought iron, and unprotected steel (pre-1972).

  Under the JP, the Company will replace or abandon 80 miles of main in each of the three rate years. These goals are in line with the Company's strategy to eliminate or abandon leak-prone pipe in its service territory by 2040.

The GIRRP will address several critical needs, including:

(1) Safety: The program mitigates the risk of a Gas Distribution System Event by replacing or abandoning leak-prone gas mains. This is crucial for protecting both life and property.

(2) Decarbonization: By targeting the replacement or abandonment of pipes with higher fugitive emissions, the program supports the Company's methane emissions reduction efforts and decarbonization strategy. This aligns with broader climate goals, including those set by the NYS Climate Leadership and Community Protection Act.

(3) Climate Adaptation and Resilience: By focusing on replacing or abandoning low-pressure gas mains in flood-prone areas, the program enhances the resilience of the gas distribution system against climate-related events.

(4) Operational Efficiency: Replacing or abandoning leak-prone pipes reduces the need for frequent repairs and maintenance. This proactive approach helps in managing the Company's leak backlog more effectively.

- **AMI-Enabled Natural Gas Detectors (NGDs)**: This program includes the installation of new NGD devices at locations that currently do not have an NGD, replacement of existing NGDs as needed, and expansion of the AMI network coverage that enables NGD communication.

  The NGD project enhances public and employee safety by enabling early detection of gas leaks, allowing for quicker response and risk mitigation. The accumulation of natural gas in a building can occur from a leak on the buried gas distribution infrastructure located outside of the building. Gas can migrate through the soil or through a utility service point of entry ("POE") and into the building. Buildings are typically constructed where the majority of utility POEs (water service, sewer pipe, buried electric service) are in close proximity to the gas POE. Locating the NGD on service line pipe near POEs provides detection capability for this type of occurrence. It will also detect leaks on nearby customer piping or equipment. Using NGD technology will improve pubic and employee safety by identifying potential leaks much earlier than relying on odor calls, allowing Company crews more time to identify potential gas leaks, make the location safe and evacuate the public if necessary. The Joint Proposal includes tariff modifications that will make installation of these devices mandatory for all existing customers as well as for new customers with installed AMI meters.

- **REV-Grid Modernization (DSP)**. The purpose of this program is to enhance the Distributed System Platform (DSP) to integrate Distributed Energy Resources (DERs) into the grid, improve hosting capacity, and enable advanced market services. The benefits are it optimizes grid-edge operations, reduces curtailments, and supports New York's clean energy goals under the CLCPA. It also improves interconnection processes and customer engagement through tools like Hosting Capacity Maps and Demand Response Management Systems.

- **Integration Technical Obsolescence**. The purpose of this program is to replace aging, unsupported technology to maintain system reliability and compliance with evolving standards. The benefits are it supports reliability and fosters efficiency by reducing operational risk and downtime, improving performance and security, and ensuring compatibility with modern platforms. Upgrades also enable better data integration and support future automation initiatives.

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Responding Witness: N/A

Question No. :8
Page 19 of the JP refers to the Infrastructure Investment and Jobs Act. Does Con Edison have any applications pending for funding under the Infrastructure Investment Jobs Act? If so, identify the proposed projects and funding amounts requested.

Response

Con Edison currently has two applications pending for funding under the Infrastructure Investment and Jobs Act. The proposed projects and funding amounts are as follows:

- Battery Energy Storage System Fire Plume Assessment - $1 million grant sought (this project is not funded in the Joint Proposal).
- Living Shorelines - $900,000 grant sought (this project is funded in the Joint Proposal; see Appendix 11, page 10, line 65).

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Responding Witness: Electric / Gas Rate Panels

Question No. :9
Explain how the revenue allocation and rate design proposed in the JP differ from what Con Edison initially proposed and how ratepayers benefit from any such changes.

Response

The electric and gas revenue allocation proposed in the JP differs from the initial filing due to the updated rate year sales and revenue forecasts, the energy efficiency transferred from base rates to a surcharge per the Commission's 5/15/2025 Order in 14-M-0094 et al., and the lower revenue requirements and resulting rates per the JP. The electric revenue allocation and rate design proposed in the JP incorporates a change in the criteria for seasonal delivery revenue adjustments to be more in line with cost indications. Additionally in gas, the ECOS study revenue allocation was phased in over 9 years compared with 6 years as proposed in the Company's initial filing. The phase in over 9 years mitigates customer bill impacts due to the separation of the SC3 residential heating class into SC 3 Rate I for customers residing in 1-4 dwelling units and SC 3 Rate II for customers residing in greater than 4 dwelling units.

Company Name: Con Edison
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Case: 25-E-0072, 25-G-0073

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Date of Response: December 10, 2025
Responding Witness: N/A

Question No. :10
Identify programs and projects that are required or mandatory to comply with federal or state statutory or regulatory authorities and any programs and projects that are discretionary.

Response

The Company's gas and electric infrastructure projects are required for safe and reliable service, which is a standard required by NY state statute and PSC regulation. Many other programs and projects are required to meet regulatory obligations (e.g., DEC, PHMSA, EPA). Still other projects could be considered independent from a discreet regulatory obligation, but are necessary to run a functioning utility (e.g., back-office IT, billing).

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Case Description: 2025 CECONY Electric and Gas Rate Cases
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Responding Witness: N/A

Question No. :11
Explain Con Edison's ongoing efforts to pursue non-pipeline alternative projects (NPAs) and identify any NPAs that have been implemented during Con Edison's last rate plan.

Response

Program	Program Description	Program Efforts	NPA Implementation Achievements
Electric Advantage (EA)	Incentivize customers to perform building electrification and avoid gas main replacements	The Company has identified and analyzed 436 gas mains for the EA program, 158 of which were cost-effective. Outreach, engagement, and enrollment to eligible customers has been conducted and is continuously ongoing. The Company plans to continue identifying and pursuing new Electric Advantage NPAs.	26 electrified buildings & 2,795' of gas main installation avoided
Energy Exchange (EX)	Incentivize customers to perform building electrification and avoid gas service replacements	The Company has identified approximately 39,600 eligible buildings for the EX program. Outreach has been conducted to customers in approximately 10,000 eligible buildings. Additional customer outreach, engagement, and enrollment is continuously being conducted.	37 electrified buildings and gas service replacements avoided
Area Load Relief	Incentivize customers to reduce peak gas demand reduction through energy efficiency or electrification and avoid gas	The Soundview Portfolio of the Area Load Relief Program, (launched 2023), completed ten peak load reduction projects in a	106 peak day dth reduced

	system reinforcements	disadvantaged community (“DAC”). The portfolio was closed in 2024 because of updated engineering analyses concluding that the original load growth necessitating infrastructure upgrades is no longer projected to materialize.	

More information on the Company’s NPA programs can be found below:

Con Edison 2025 NPA Implementation Plan:
https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={8074939A-0000-CA29-BA0B-F034F943FA44}

Con Edison 2025 NPA Annual Report:
https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={6074939A-0000-C317-8FFC-360C86522958}

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Question No. :12
Compare the proposed rates and bill impacts in the JP and JP Summary to projected inflation rates for Rate Years 1, 2 and 3.

Response

Please refer to the attached file named "Attachment ALJ-1-12.pdf" for the requested information.

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

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Date of Response: December 10, 2025
Responding Witness: N/A

Question No. :13
What are the different tiered discounts under the Electric and Gas Energy Affordability Programs that will be in effect until Con Edison updates its EAP discounts following issuance of a rate order in these cases?

Response

The EAP discounts that will be in effect until the Company updates them following issuance of a rate order in these cases are:

Con Edison Discounts - Eff. 12/1/25				
	Electric Heat	**Electric Non-Heat**	**Gas Heat**	**Gas Non-Heat**
Tier 1	$27.89	$27.89	$118.31	$3.00
Tier 2	$72.05	$45.08	$150.09	$3.00
Tier 3	$117.69	$67.90	$172.90	$3.00
Tier 4	$113.32	$65.71	$170.72	$3.00

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Responding Witness: N/A

Question No. :14
What percentage of Con Edison's electric customers are enrolled in the Electric Energy Affordability Program?

Response

As of December 1, 2025, 10.9% of total electric customers and 13.1% of residential electric customers were enrolled in the EAP.

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Responding Witness: N/A

Question No. :15
What percentage of Con Edison's gas customers are enrolled in the Gas Energy Affordability Program?

Response

As of December 1, 2025, 10.6% of total gas customers and 12.4% of residential gas customers were enrolled in the EAP.

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Responding Witness: N/A

Question No. :16
Has the EAP participation rate been increasing or decreasing since January 1, 2023?

Response

While the EAP participation rate has increased in some periods and decreased in others since January 1, 2023, overall the EAP participation rate has decreased from January 1, 2023, to the present.

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Responding Witness: N/A

Question No. :17
We request Con Edison to provide copies of leaf 396, revision 3 and leaf 457 and address the issues raised in Passive House Center, Inc.'s comment letter filed in Case 25-E-0072 on November 19, 2025.

Response

Please see "Attachment ALJ_1_17.pdf for the currently effective tariff leaf nos. 396, 401, 444, and 457.

There is no contradiction between Tariff Leaf 396 and Tariff Leaf 457 of the Company's Commission-approved electric tariff, as Passive House Center, Inc. suggests. In short, Leaf 396 sets forth the rules for service under Service Classification (SC) 2 and Leaf 457 sets forth the rules for service under SC 9, including how a customer may be transferred between those rates based on its actual metered demand.

Leaf 396 provides that SC 2 applies to service for "[l]ight, heat, and power for general uses for which no other service classification specifically applies and where the Customer's requirements do not exceed 10 kilowatts subject to the Common Provisions and Special Provisions of this Service Classification. Those "Common Provisions and Special Provisions" are set forth on Leaves 399-402. The relevant Special Provision on Leaf 401, Special Provision (C) states that "[w]henever a Customer's metered use under this Service Classification exceeds 10 kilowatts of maximum demand in two consecutive months, the Customer's use thereafter will be billed under the appropriate Service Classification for the Customer's use of service."

In other words, when a non-demand-billed customer in SC 2 has two consecutive months with metered demand greater than 10kW, Leaf 401 provides that the customer will move to a demand-based rate, typically SC 9.

Leaf 444 provides that SC 9 applies to service "[l]ight, heat, and power for general uses for which no other service classification specifically applies and where the Customer's initial requirements are expected to be in excess of 10 kilowatts subject to the Common Provisions and Special Provisions of this Service Classification." This is consistent with the provisions

governing SC 2, as when a customer in SC 2 has 10 kW of metered demand for two consecutive months, the expectation is that its demand will continue to be in excess of 10 kW, such that the customer should be served under SC 9.

Moreover, Leaf 444, like Leaf 396, includes the key phrase "subject to the Common Provisions and Special Provisions of this Service Classification." Leaf 457 contains Special Provision C to SC 9, which states that "[w]henever a Customer's maximum demand for a period of 12 consecutive months shall not have exceeded 5 kilowatts, the Customer will thereafter be billed under SC 2."

In other words, when a demand-billed customer in SC 9 has 12 consecutive months with maximum demand of 5 kW or less, Leaf 457 provides that the customer will move to a non-demand-billed rate under SC 2.

Finally, in response to Passive House Center Inc.'s suggestion that customers should be billed under SC 2 instead of SC 9 in any month when the customer's metered demand is less than 10 kW, the Company disagrees. By exceeding the 10 kW threshold in two consecutive months, an SC 2 customer has demonstrated that its loads support demand billing. But to avoid having customers switching service classes on a monthly basis, the 12-month requirement to revert back to SC 2 is appropriate.