

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

MEETING OF THE PUBLIC SERVICE COMMISSION

Thursday, February 5, 2015
10:30 a.m.
Three Empire State Plaza
Agency Building 3, 19th Floor
Albany, New York

COMMISSIONERS

AUDREY ZIBELMAN, Chair
DIANE X. BURMAN
GREGG C. SAYRE
PATRICIA L. ACAMPORA

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2 (The meeting commenced at 10:32

3 a.m.)

4 CHAIR ZIBELMAN: Good morning.

5 We're going to call the Public Service Commission

6 to order.

7 Good morning, Commissioner

8 Acampora.

9 COMMISSIONER ACAMPORA: Good
10 morning.

11 CHAIR ZIBELMAN: We are -- I'd
12 like to start today with a couple -- couple of
13 announcements. First one is we're going to
14 change -- change the process a little bit, in that
15 you will see now that the Commission will post a
16 preliminary agenda when we send out notices for the
17 meetings, like we've always had, but will be
18 preliminary. And then we will be posting a final
19 agenda the day prior to the meeting.

20 This is to allow for -- that
21 folks can actually review the final agenda and make
22 sure that the items that they're interested in are
23 still on and don't have to make the trips and only
24 find out the day of.

25 So we're hoping to make this a

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2 He, in a very quiet, but very
3 gentle way, and often with a lot of humor, would
4 advise us when he thought we were really going off
5 the rails. And I think that one thing that New
6 York can be proud of is that everyday and every
7 decision Garry made, he made with a great deal of
8 deliberation of what was the best for the people he
9 was serving.

10 And with that, I felt very
11 honored to have been able to serve with him. And I
12 think everyone -- I can speak for everyone in the
13 agency that it was -- he's a great person. And
14 we're going to miss him a lot, but we know that
15 he's going to be hugely successful in whatever else
16 he decides to do.

17 I'll be happy if anyone else
18 wants to say anything, but I did want to take that
19 moment.

20 COMMISSIONER SAYRE: I'll just
21 say briefly that Garry was a terrific mentor and
22 leader for me from the very minute I set foot in
23 this building as a wet-behind-the-ears
24 commissioner.

25 I appreciated his guidance, his

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2 humor, his -- his deep, deep understanding of the
3 issues. And I'll miss him very much.

4 COMMISSIONER BURMAN: Thank you.

5 I just want to take the
6 opportunity to say farewell to a man whose word I
7 trusted more than any regulation. His knowledge
8 and experience was really beyond par, and he was
9 someone who actually was my boss before I came to
10 the Commission when I was at the Commission.

11 So, for me, Garry was a true
12 mentor and a calming influence and was very helpful
13 to me behind the scenes in talking to me and
14 working through positions and issues and giving me
15 his insights. And I thank him really for his
16 service to the people of New York. And he will be
17 personally missed.

18 CHAIR ZIBELMAN: Thanks.

19 Commissioner Acampora, did
20 you --?

21 COMMISSIONER ACAMPORA: I would
22 love to chime in. I'm sorry I wasn't there for a
23 Garry sendoff yesterday, but I would like it noted
24 and happy that we've had something to say that goes
25 on the record. It was my pleasure to work with

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2 Garry. When he came on the Commission, he greatly
3 relieved me of the task of heading up the agency,
4 which was something he wanted to do, but something
5 I didn't sign up for.

6 But I always appreciated the way
7 Garry handled himself, even not in Albany. When we
8 were at MACRUC conferences and NARUC conferences,
9 he was very well-respected by the regulators
10 throughout our country. And it really was a
11 pleasure to work with him. He had a nice, easy,
12 steady way of handling some of the things that, as
13 we all know, get thrown out at us at the last
14 minute.

15 And he was able to balance that
16 and also balance the needs of the commissioners.

17 His door was always open. You
18 could always speak to him, and it really was a
19 pleasure to work with him. And I wish that he gets
20 to collect a lot of checks from the State and he
21 stays healthy and enjoys, with his wife, a very
22 long and healthy, successful retirement.

23 CHAIR ZIBELMAN: Thank you.

24 So, we are going to now move on
25 to the -- the topics, but thanks. And I'm sure all

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2 of you, if you have a chance and see Garry, I'm
3 sure you'll want to do the same thing. He is -- he
4 was a great jewel for us.

5 So we have three items on the
6 regular agenda today. The first item is 201, and
7 that's with respect to our Reforming the Energy
8 Vision and Clean Energy Fund, our final
9 environmental impact statement. And Paul Agresta
10 will be presenting that.

11 MR. AGRESTA: Thank you.

12 The State Environmental Quality
13 Review Act, or SEQRA, requires the Commission to
14 incorporate a consideration of environmental
15 impacts into its decision-making process. Pursuant
16 to SEQRA, the Commission is the lead agency for the
17 environmental review of the REV and the Clean
18 Energy programs.

19 In that regard, the Commission
20 previously determined that an environmental impact
21 statement, or EIS, should be prepared to assist in
22 that environmental review.

23 In October, we presented a draft
24 generic EIS to you, which the Commission accepted
25 as complete, and issued for public comment. The

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2 minimum thirty-day public comment period expired in
3 December, and fifteen comments were received.

4 Today, we are presenting for your
5 approval and acceptance a final generic EIS. The
6 final EIS contains an analysis in response to all
7 of the comments that were received, and revisions
8 to the text of the draft EIS made as a result of
9 considering the comments.

10 As you know, the final EIS is a
11 voluminous and exhaustive document. Many revisions
12 were made, and the final document is stronger and
13 more comprehensive as a result of the comment
14 process. So we thank the parties that took the
15 time to participate.

16 Jim Austin and Tina Palmero, of
17 the Office of Energy Efficiency and Environment,
18 managed the project of drafting the document. The
19 final EIS, itself, was prepared by a contractor,
20 Industrial Economics Incorporated, under the
21 direction of DPS Staff, with assistance from
22 NYSERDA and the Department of Environmental
23 Conservation.

24 Staff recommends that you adopt
25 the memorandum and resolution in the manner

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2 proposed, and that the final EIS be accepted and
3 filed, as required by SEQRA. Filing of the final
4 EIS commences a minimum, ten-day waiting period
5 that must occur before the Commission will be in a
6 position to actually begin taking action in these
7 proceedings.

8 When the Commission does take
9 action, SEQRA further requires that, in conjunction
10 with any future decisions, the Commission make
11 SEQRA findings that will articulate in writing how
12 the Commission has considered the information
13 compiled in the EIS and a statement of the facts
14 and conclusions supporting the particular future
15 decisions.

16 In addition, when the Commission
17 does take those further actions, as it does so the
18 Commission will need to consider whether mitigation
19 measures are necessary to minimize adverse impacts
20 to the environment. So, while this is a big step
21 forward today in the Environmental Review process,
22 you will be making -- as you make further decisions
23 in these proceedings, you will be considering the
24 environment with each decision in deciding whether
25 or not you need to do any mitigation measures as

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2 part of those decisions.

3 And this concludes my

4 presentation.

5 CHAIR ZIBELMAN: Great. Thank

6 you.

7 So first of all, I'm pleased
8 we're here, and I do appreciate the -- the
9 comments, and I know it was a tremendous amount of
10 work. This is -- was an unusual way -- EIS and the
11 context is that it's not a specific project or
12 projects, but a policy proceeding.

13 But without, you know, question,
14 it seems to me then, as EIS indicates or shows,
15 that the intent of REV, of course, is to think
16 about how we can integrate distributed clean
17 energy, including energy efficiency, much better in
18 the operation of the grid, so that, by consequence,
19 the -- the intended outcome of all of this will be
20 to improve the environment and to -- and to reduce
21 environmental impacts from the consumption and
22 production of energy. So I appreciate that and
23 certainly intend to vote in favor of it.

24 Any further comments?

25 COMMISSIONER BURMAN: I just want

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2 to thank Staff for the diligent work that they did
3 on this. I have, up here, the draft and also the
4 final. And my same comments on the draft are
5 appropriate for the final.

6 I found this to be a very
7 well-written document that adds a lot of
8 information and helps in looking at the historical
9 perspective so that I really do want people to
10 focus in, even though today we'll be voting on
11 whether to approve it or not, it is something that
12 people should keep handy and go back to.

13 And this is just one process in
14 going forward. So adopting this today is not
15 locking us in specifically to any one outcome or --
16 or any outcome, going forward. It's just the
17 process. But I do want people to understand the
18 importance of this and that I do see it as a very
19 valuable document to review and get an
20 understanding.

21 So thank you.

22 CHAIR ZIBELMAN: Thank you.

23 Commissioner Acampora, any
24 comments?

25 COMMISSIONER ACAMPORA: No

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2 comments.

3 CHAIR ZIBELMAN: Okay. Yes.

4 I'll let you shout, and I'll hear you all the way
5 from New York City.

6 COMMISSIONER ACAMPORA: You will
7 hear me.

8 CHAIR ZIBELMAN: Yes. Okay.
9 With that then, all those in favor of the
10 recommendation to adopt a resolution accepting the
11 final generic Environmental Impact Statement as
12 complete pursuant to SEQRA, please indicate by
13 saying aye.

14 COMMISSIONERS: Aye.

15 CHAIR ZIBELMAN: Opposed?

16 Hearing no opposition and there
17 being none, the recommendation is adopted.

18 Our second item today is a
19 proceeding to assess residential and
20 non-residential retail energy markets in New York
21 State. It's Item 202. And Luann Scherer, who's
22 Chief of Consumer Advocacy, and Brandon Goodrich,
23 who's Assistant Counsel, will be here. Brandon
24 will be available for questions, and I believe
25 Luann will be doing the presentation.

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2 Welcome.

3 MS. SCHERER: Good morning. In
4 its February 2014 order regarding residential and
5 small non-residential retail energy markets, the
6 Commission took several actions intended to enhance
7 protections for customers obtaining electricity
8 and/or natural gas from ESCOs. Four parties filed
9 petitions for re-hearing clarification or
10 reconsideration.

11 In April 2014, the Commission
12 signaled its intention to address the merits of
13 each of the claims raised in the petitions, granted
14 the procedural requests for re-hearing, and stayed
15 certain requirements of the February order for
16 future consideration.

17 The most significant issues
18 addressed in the draft order before you include
19 consumer protections that should be applicable to
20 ESCO customers who receive the utility low-income
21 discount benefit and/or HEAP benefit, and we're
22 referring to these customers as assistance program
23 participants, and the requirements for independent
24 third-party verification, TPV, of enrollments with
25 ESCOs.

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2 for low-income ESCO customers. The Commission
3 postponed the effective date of the low-income
4 protections until the concerns and questions raised
5 by ESCOs were thoroughly reviewed.

6 After two stakeholder meetings,
7 Staff recommends that the Commission substantially
8 reaffirm its February policy. Our recommendation
9 is designed to ensure that all customers, including
10 assistance program participants, can take advantage
11 of opportunities to be created through the REV
12 initiative, including advanced energy management
13 products and renewable energy resources.

14 Similarly, assistance program
15 participants should have the same opportunity as
16 other customers to purchase fixed-rate products at
17 reasonable prices. At the same time, these options
18 must not dilute the effectiveness of the financial
19 assistance programs these customers receive.

20 Regarding energy-related
21 value-added services, including fixed-rate
22 products, we are recommending that we convene a
23 collaborative of interested parties to develop
24 proposed requirements for ESCO provision of
25 energy-related, value-added, including fixed-price

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2 offerings, to low-income customers which do not
3 dilute the effectiveness of the low-income
4 benefits. We expect to report back to the
5 Commission within six months.

6 Similarly, after discussions with
7 industry experts, we believe a point-of-sale
8 approach confirming a low-income customer's
9 participation in a low-income discount program is
10 necessary. We are recommending that the
11 collaborative we just identified also consider
12 technological approaches to implementing the
13 Commission's low-income policies.

14 The collaborative should also
15 consider how to protect existing low-income ESCO
16 customers and customers who become low-income after
17 taking service from an ESCO. We recommend that
18 these issues also be resolved in a six-month
19 timeframe.

20 Regarding third-party
21 verification of enrollments, the Commission's
22 February 2014 order requires that sales resulting
23 from door-to-door or telephonic marketing be
24 subject to independent third-party verification
25 after the sales agent leaves the customer's premise

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2 or the marketing call ends. RESA and NEMA
3 requested re-hearing or re-clarification on several
4 aspects of that requirement.

5 The draft order would uphold the
6 February order except that it would grant several
7 of RESA's requests to provide flexibility in the
8 way that the TPV requirement is implemented, such
9 as permitting telemarketers to set up the TP call
10 with -- TPV call with consumers, allowing TPV to be
11 conducted by automated integrated voice response
12 systems and streamlining the TPV script.

13 Just one other point I want to
14 make. The TPV script changes were -- came about
15 through a collaborative process, as well.

16 This ends my presentation.
17 Brandon and I are available for questions. Thank
18 you.

19 CHAIR ZIBELMAN: Thank you.

20 Just in terms of, you know, the
21 balance here, and I -- and I appreciate where Staff
22 has ended up in this position and support it.
23 We -- we're trying to do two things. One is we --
24 we obviously do not want people who are already on
25 a form of assistance to be paying more for energy

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2 than they would have if they just took energy --
3 took power from the utility. And so to be in a
4 situation where essentially you're getting a
5 discount and then end up paying more, and that
6 creates more problems around arrearages, et cetera,
7 is -- is we exactly need to address that problem.

8 At the same time, we recognize
9 that part of the issues that people have is
10 variability of price volatility, particularly
11 people on a fixed budget. And the fact is that as
12 we proceed with REV, et cetera, we would like the
13 market to provide more services, energy
14 efficiency-type services, which will have the
15 mitigating effect on total energy bill.

16 So, you know, it -- and the
17 recognition of course that, you know, which is you
18 can't -- is that if you're on a fixed price, you
19 can't necessarily guarantee that it's going to be
20 less than the utility because you're offering a
21 fixed price, and you're taking some risk.

22 So, I believe this strikes the
23 appropriate balance in terms of making sure, if
24 it's a variable price, there is a guarantee for low
25 income but give us ability to take a look at if we

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2 offer value-added services, including a fixed-price
3 option that looks like it could provide benefits as
4 the collaborative may identify that we do not
5 deprive low-income customers of these market
6 opportunities, and give -- and -- and give them
7 further opportunities to help mitigate and/or
8 reduce their energy bills.

9 So, I think this is the right
10 balance. I hope that the collaborative can work
11 very quickly in coming forward with some ideas on
12 how to proceed with this.

13 I also really like the idea of
14 using technology. It just seems to me, you know,
15 any -- we all are consumers and that a
16 point-of-sale approach where you can validate, at
17 that time, whether someone is entitled to low -- or
18 is on a low-income program or not, it seems to me
19 the way to go because it makes the transaction that
20 much easier. And we really should be able to get
21 the technology there.

22 So, I -- I -- very much think
23 that these parts of the order really address some
24 of the harder issues that we -- we dealt with in
25 this docket.

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2 The -- the second point about
3 the -- working with the TPV, I think that works
4 well. I know that and expect that this script will
5 continue to evolve as we get more experience, but
6 you know, certainly the -- the complaints we heard
7 about people who felt that they got enrolled in
8 programs that they weren't really agreeable to,
9 this should help both the consumer, as well as the
10 industry, to build market confidence. And that's
11 something that I think is going to be very integral
12 to our -- our success in REV is that people --
13 people develop the confidence around working with
14 retailers and start to see the -- the value to them
15 of getting different product offerings.

16 I think that this order goes a
17 long way of addressing some of the major concerns
18 that we had with the retail market, and I intend to
19 support it.

20 Are there any questions,
21 comments? Commissioner Sayre?

22 COMMISSIONER SAYRE: I also --
23 excuse me -- I also support this item.

24 CHAIR ZIBELMAN: I guess we all
25 have the same thing.

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2 COMMISSIONER SAYRE: I don't

3 know. It's the Commission flu or something.

4 But I'd like to get a little bit
5 into the weeds in the -- what's going to be
6 considered in the upcoming collaborative that we're
7 directing. I -- I have a couple of requests for
8 that collaborative process that we're setting up in
9 the order. I -- I'd like the collaborative to
10 consider what, if anything, should be asked in the
11 third-party verification about possible eligibility
12 for a low-income program.

13 I'd also like the collaborative
14 to explore the possibility of some EDI-type data
15 flowing from ESCOs on whether a customer has been
16 identified as -- as low-income and what kind of
17 program they're being put on. And it would be
18 really good to find out if it can be done in a
19 low-cost economical way.

20 Overall, how many energy-related,
21 value-added services are being provided to all
22 customers? Because that will help give us an idea
23 of how well we're animating the markets in
24 connection, as the Chair said, with the REV
25 proceeding.

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2 CHAIR ZIBELMAN: Thank you.

3 Commissioner Acampora?

4 COMMISSIONER ACAMPORA: Let me

5 chime in.

6 CHAIR ZIBELMAN: Okay.

7 COMMISSIONER ACAMPORA: I also
8 would request that we look carefully into the
9 third-party verification to make sure that our
10 policies are consistent. And I'm talking about our
11 telecom policies and how they mesh with the
12 policies that will move forward on this.

13 As the Chair said, there's a word
14 that she used that really is important that when we
15 move forward and do something, it's creating that
16 balance. And REV cannot be successful unless we're
17 making sure that everyone is included and has an
18 opportunity to move forward with everyone else.

19 So I think that the collaborative
20 is extremely important. I know that you've all
21 done a lot of work on this and will continue to do
22 a lot of work on it. And there again, you know, we
23 always have to leave ourselves the ability to be
24 flexible as things change. But this is a really
25 important step forward in making sure that there is

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2 opportunity for low-income people who are assisted.

3 So thank you for your work.

4 Appreciate it.

5 CHAIR ZIBELMAN: Commissioner

6 Burman?

7 COMMISSIONER BURMAN: Thank you.

8 First of all, I will be voting
9 yes for this item. In the -- at the February
10 session, I did vote for the item. And at that
11 time, I said that I implored folks, if they had
12 concerns with the order and if we were getting
13 things wrong, to let us know. And then folks did.

14 And the April order, which I
15 voted in concurrence in part and dissent in part,
16 was really a exploration of, you know -- we took a
17 pause in what was happening and really delved down
18 into listening to the stakeholders. The
19 stakeholders were not just the retail access market
20 sector, but also the consumer advocates.

21 And today, what we're doing is
22 taking into account a lot of what had been missing
23 before, which was a clear record and delving into
24 the specific issues that were important to the
25 parties.

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2 But rather than rushing forward,
3 we are still staying a number of items and looking
4 at those in the future so that what we're really
5 doing is trying to work -- continue to work in a
6 collaborative effort with folks and to also -- for
7 me, it's very important that we keep in mind that
8 we need to listen to all sides, rather than
9 dictating what we feel is important for decision
10 making in the collaborative. So that the table is
11 set by the folks who are, you know, really living
12 and breathing it on both sides, rather than by us,
13 and that we don't operate in a silo. But as these
14 issues affect other proceedings, in particular the
15 REV proceeding, that we make sure that we are
16 communicating effectively to all interested
17 parties, internally as well as externally.

18 And I think that this is really
19 kudos to Chair Zibelman for recognizing the need to
20 move fast, but to slow down when appropriate. And
21 I really am very happy with the way this is moving
22 forward and applaud the Chair and the Staff and
23 look forward to a really comprehensive
24 collaborative that's inclusive and really tries not
25 to dictate, but to come up with real-life solutions

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2 from the folks in the collaborative.

3 So thank you.

4 CHAIR ZIBELMAN: Thank you.

5 Although, I have to say that the
6 brains in this outfit is the woman in the blue
7 scarf at the table. So -- but, well, thank you
8 very much.

9 I -- you know, I do -- I do want
10 to note there are a number of issues that continue
11 to be pending in this docket. And this docket
12 actually preceded the REV docket. And so what
13 we're looking to do, and I think staff is doing a
14 very good job, is bringing issues forward that need
15 to be resolved.

16 And certainly, we have a
17 significant concern that the protections against
18 consumer fraud and also protections necessary to
19 protect low-income were addressed early and -- and
20 in a way that could be executed easily and, I
21 think, make the market better and, as I said, build
22 confidence in this market, which we need to have
23 happen.

24 So with that, I'm going to ask
25 for a vote. And so all those in favor of the

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2 recommendation to grant and deny petitions for
3 re-hearing in part as described with respect to
4 Item 202, please indicate by saying aye.

5 COMMISSIONERS: Aye.

6 CHAIR ZIBELMAN: Opposed?

7 Hearing no opposition, there
8 being none, the recommendation's adopted. Thank
9 you very much. And Brandon and Doug, as well as
10 Luann.

11 So the third item is -- today, is
12 Item 302, which is Con Edison Storm Hardening and
13 Resiliency Collaborative, Phase Two report.

14 You know, people accuse us of
15 jargon all the time. I don't see any jargon in
16 that.

17 So Tammy Mitchell is going to be
18 presenting that today.

19 MS. MITCHELL: Good morning,
20 Chair Zibelman and Commissioners.

21 Item 302 is a draft order that
22 would adopt Con Edison's electric gas and steam
23 systems storm hardening and resiliency plans for
24 2015 as presented in the Company's Storm Hardening
25 and Resiliency Collaborative Phase Two report.

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2 over two million New Yorkers.

3 During the Company's 2013 rate
4 case proceedings, Staff proposed a collaborative
5 process that would begin in the rate case
6 proceeding and continue beyond the rate case
7 period, to analyze the potential impacts of climate
8 change on Con Edison's systems and address storm
9 hardening and resiliency efforts.

10 In the 2014 Con Edison rate
11 order, the Commission approved the Company's
12 proposed new design standard to protect its utility
13 systems located in flood zones, which resulted from
14 the collaborative process. This standard includes
15 the use of the most recent Federal Emergency
16 Management Agency, or FEMA, flood plain maps, with
17 the addition of at least three feet of protective
18 construction in anticipation of future sea level
19 rise and other risks. This standard is referred to
20 as the FEMA Plus Three standard.

21 Also in the 2014 rate order, the
22 Commission set revenue requirements, including
23 forecasted storm-hardening budget levels for each
24 year of the respective rate plans, but stated that
25 it expected the collaborative to continue on into

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2 Phase Two and Phase Three to conduct a more
3 detailed review and approval of the proposed
4 storm-hardening projects for those years beyond
5 rate year one.

6 On September 2nd, 2014, the
7 Company filed its Storm Hardening and Resiliency
8 Collaborative Phase Two report. The Phase Two
9 report describes, in detail, the storm hardening
10 and resiliency work Con Edison is currently
11 performing pursuant to the Commission's directive
12 in the 2014 rate order. It also presents, for the
13 Commission's approval, the Company's proposed work
14 for 2015 and 2016.

15 In particular, the report
16 describes storm hardening and resiliency work such
17 as protecting coastal networks from storm surges
18 and water infiltration, the use of submersible
19 equipment, including transformers, addressing the
20 needs of its overhead electric distribution system,
21 substation protection, including reinforced
22 perimeter walls, installing gates and flood walls,
23 and raising critical equipment, gas transmission
24 and distribution system projects, including main
25 replacements, remote-operated valves, liquefied

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2 natural gas plant hardening, and tunnel hardening,
3 hardening of steam generating facilities, and steam
4 distribution systems, and hardening of the
5 telecommunication systems used to monitor and
6 control its generation and distribution systems.

7 The Company also indicated in its
8 Phase Two report that it will continuously monitor
9 and, if warranted, consider a revision to the flood
10 protection design standard, the FEMA Plus Three
11 standard, to reflect updated climate change
12 forecasts and sea level rise protections.

13 With respect to storm hardening
14 and resiliency expenditures, for 2014 it is
15 estimated that Con Edison's storm hardening and
16 resiliency investments were approximately one
17 hundred ninety-three million dollars in total. For
18 2015, the Company's total estimated storm hardening
19 expenditures are three hundred and eighty-six
20 million.

21 The major increase in
22 storm-hardening expenditures from 2014 to 2015 is
23 primarily related to overhead -- electric overhead
24 distribution and substation projects.

25 Overhead distribution projects

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2 include installation of automatic isolation
3 devices, such as fuses, reclosers, and switches to
4 reduce the number of customers impacted as a result
5 of a single point of damage on the system. Other
6 distribution projects involve using various
7 measures, such as redundant feeds, upgraded wire
8 and pole sizes, and installation of breakaway
9 hardware to improve the resiliency of targeted
10 circuits that have experienced relatively more
11 storm damage or distribution facilities that
12 provide critical community needs.

13 The 2015 storm-hardening
14 expenditures also include selective undergrounding
15 projects which would underground certain vulnerable
16 portions of the overhead distribution system.

17 With respect to electric
18 substations, projected expenditure levels for
19 2014 -- for 2015 are above 2014 levels, as well as
20 above the originally forecast levels for 2015 as a
21 result of the adoption of the FEMA Plus Three
22 standard, which both increased the cost to harden
23 previously identified substations, and also
24 resulted in the addition of more substations where
25 flood protection measures would be installed.

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2 Over the term of the two-year
3 electric rate plan and three-year gas and steam
4 rate plans, the most recent forecasted expenditures
5 in the aggregate approximate the spending amounts
6 reflected in the 2014 rate order.

7 Two parties, the City of New York
8 and the Office of the Attorney General, provided
9 comments on Con Edison's Phase Two report. The
10 City of New York raised three issues.

11 One, that natural gas should be
12 the primary fuel for the Company's backup
13 generators, pumps, and similar equipment.

14 Two, that all resiliency projects
15 be completed by 2016.

16 And three, that the City's risk
17 assessment and prioritization model be incorporated
18 into the model used by Con Edison.

19 The Attorney General's Office
20 asserted that Con Edison should immediately
21 reevaluate its flood design standard and that the
22 Commission should mandate that the Company use a
23 FEMA Plus Three -- Plus Five Foot standard.

24 The draft order addresses these
25 issues as follows. With respect to natural gas

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2 the draft order notes that the current model being
3 used by Con Edison is generally reflective of the
4 City's suggestions, but suggests that, through
5 collaborative discussions, the parties further
6 analyze the two models, noting that such analysis
7 should be coordinated for the benefit-cost-analysis
8 work expected to take place in the REV proceeding.

9 Further, the draft order directs
10 Con Edison to include, in its Phase Three report, a
11 detailed discussion regarding whether the Company's
12 risk assessment model should incorporate the
13 economic impact methodology used by the City of New
14 York, including the extent to which the two
15 competing methodologies may overstate or understate
16 actual societal impacts.

17 Finally, with respect to the
18 Attorney General's comments on the design standard,
19 the draft order directs Con Edison to file, within
20 sixty days, a timeline for completion of its
21 climate change and vulnerability study, which would
22 provide a longer-range basis for the ongoing review
23 of the design standard.

24 Until that data is available, it
25 is expected that the Company will design its storm-

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2 hardening measures so that they can be augmented to
3 reflect any change in the sea level projections and
4 FEMA flood zone maps.

5 This concludes my presentation.

6 I'd be happy to take any questions.

7 CHAIR ZIBELMAN: Thank you.

8 Thank you for such a thorough presentation. That
9 was -- that was very good.

10 First of all, I appreciate the
11 continuing work and that continuing attention, not
12 just to the Company, but the parties and Staff on
13 this matter. Clearly, you know, the undertaking we
14 took after Sandy to take a look at hardening and
15 how we would change the system and modify the
16 system to address the extreme weather events, the
17 ability to make it more resilient has really proven
18 out to be of value, and the forward look is -- is
19 very much appreciated.

20 I just have two, I think,
21 questions or points of clarification. And the
22 first is not so much a question -- it is a
23 question. You know, one of the concerns we have,
24 in terms of the integration of gas and electric,
25 is -- is that when we need gas for heating fuels

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2 and it's being used for generation, particularly in
3 winter extreme weather, what -- what are the
4 ramifications of using gas as a -- a backup fuel
5 for the distribution systems? Is there concern or
6 how does the plan address that?

7 MS. MITCHELL: So, the Company
8 still plans for its backup generators and other
9 equipment, pumps and such -- still plans to have
10 enough liquefied fuel on site at each of its sites,
11 and also have some available on standby for when
12 there's a predicted event that they could bring in
13 ahead of time.

14 Using natural gas is another
15 protective measure, so they would actually have
16 dual fuel capability. Additionally, the amount of
17 gas used for these backup generators and other
18 equipment is expected to be low in quantity.

19 CHAIR ZIBELMAN: Thanks.

20 The -- the second question is
21 just -- and you can turn to either of your cohorts
22 to the right or to the left on this one, but if
23 you -- because we're talking about moving and we
24 have a new rate case pending, you want to just take
25 a minute so that it's clear as to how the -- this

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2 approval today affects the rate -- the rate case or
3 does it not affect so there's no confusion on that?

4 And Raj or Doris or Kim, any one
5 of you -- it's just going to be a jump ball.

6 MR. ADDEPALLI: I yield to you.

7 MS. STOUT: The storm hardening
8 was reflected in the prior rate case, so rate
9 allowances were included in the prior rate case.
10 For electric, it covered two years, so I -- I
11 presume the third year of this storm-hardening plan
12 would be considered within the context of this new
13 rate filing.

14 CHAIR ZIBELMAN: Okay. Thank
15 you.

16 Any further questions with
17 respect to this item?

18 COMMISSIONER BURMAN: I don't
19 have any questions. I just wanted to comment and
20 thank folks for the diligence with doing this. I,
21 you know, think it's important also to recognize
22 the Environmental Defense Fund. They've been
23 really historically involved in working in, you
24 know, prior years, as well, under the Bloomberg
25 Administration. They worked with the City very

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2 nicely on the oil to gas conversions, and they
3 continue to work now in coming up with ways to
4 continue those efforts.

5 So I think it's very good to see.
6 And this collaborative really brought together many
7 different folks and -- and really they rolled up
8 their sleeves. So thank you.

9 CHAIR ZIBELMAN: Commissioner?

10 COMMISSIONER SAYRE: I do have a
11 brief comment.

12 CHAIR ZIBELMAN: Okay.

13 COMMISSIONER SAYRE: Just another
14 comment, not a question. Sandy made it perfectly
15 clear that storm hardening and resiliency measures
16 have to be undertaken. And I don't think there's
17 anyone who would disagree with that conclusion.

18 The question is: How much and
19 how fast? And it's the Commission's job to balance
20 that question, balance the costs, which are
21 ultimately reflected in rates, against the risks.
22 I think the order in front of us does a very good
23 job of doing that.

24 CHAIR ZIBELMAN: Thank you.

25 Commissioner Acampora, I don't

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2 want to neglect.

3 COMMISSIONER ACAMPORA: Don't

4 forget me.

5 I really concur with exactly what
6 Commissioner Sayre said. It's always about a
7 balance. And, of course, when the public is out
8 there and they don't have their electric, gas, or
9 steam service because of the storm, naturally they
10 are upset. They are also upset when they get an
11 increase. And it is our position that we are here
12 to balance to make sure.

13 We saw what Superstorm Sandy did.
14 And there always has to be a better plan. And I
15 think we've taken a huge step. And I thank Con
16 Edison for the work that they have done, too, along
17 with all the other interested parties and our staff
18 in coming up with, again, a balance that always has
19 to remain liquid, if you would say that, or
20 flexible because we never know what's coming down
21 the road. But a plan to be prepared is where we
22 need to be.

23 CHAIR ZIBELMAN: Thank you.

24 So with that, I'm going to then
25 move to a vote. And all those in favor of the

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2 recommendation -- let me find my glasses -- to
3 approve the amended Storm Hardening and Resiliency
4 Collaborative Phase Two report as described, please
5 indicate by saying aye.

6 COMMISSIONERS: Aye.

7 CHAIR ZIBELMAN: Opposed?

8 There being no opposition, the
9 recommendation is adopted.

10 We're now going to move to the
11 consent agenda. Do any of the Commissioners wish
12 to recuse or abstain from voting in any of the
13 consent agenda items?

14 Okay. With that then, all those
15 in favor of the recommendations on the consent
16 agenda, please indicate by saying aye.

17 COMMISSIONERS: Aye.

18 CHAIR ZIBELMAN: Opposed?

19 There being no opposition, the
20 recommendations are adopted.

21 Secretary Burgess, are there any
22 other matters in front of us today?

23 SECRETARY BURGESS: There are no
24 other matters today. And the next Commission
25 session will be on February 26th.

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CHAIR ZIBELMAN: Okay. Thank

you.

Thank you all. And we are

adjourned.

(The meeting adjourned at 11:17

a.m.)

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STATE OF NEW YORK

I, Hannah Allen, do hereby certify that the foregoing was reported by me, in the cause, at the time and place, as stated in the caption hereto, at Page 1 hereof; that the foregoing typewritten transcription consisting of pages 1 through 42, is a true record of all proceedings had at the hearing.

IN WITNESS WHEREOF, I have hereunto subscribed my name, this the 12th day of February, 2015.

Hannah Allen, Reporter

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