

BEFORE THE
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of
Consolidated Edison Company of New York, Inc.

Case 08-E-0539

August 2008

Prepared Testimony of:

Rosanne Maiello
Utility Analyst 3
Office of Electric, Gas and
Water
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

1 Q. Please state your name and business address.

2 A. Rosanne E. Maiello, 3 Empire State Plaza,
3 Albany, NY.

4 Q. Ms. Maiello, what is your position with the
5 Department of Public Service?

6 A. I am a Utility Analyst 3 in the Electric Rates &
7 Tariffs Section of the Office of Electric, Gas
8 and Water.

9 Q. Ms. Maiello, please state your education and
10 experience with the Department.

11 A. I graduated from Russell Sage College in 1990
12 with a Bachelor of Science in Business
13 Management. I have been employed by the
14 Department of Public Service since February
15 1982. I have held various administrative
16 positions and in December 1988, I was appointed
17 to a Utility Analyst Position in the Water Rates
18 Section. In May 2002 I joined the Electric
19 Rates & Tariff Section.

20 Q. Ms. Maiello, what are your duties in the
21 Electric Rates & Tariff Section?

22 A. I am responsible for reviewing tariff filings to
23 make sure that they meet Commission requirements
24 and comply with prior Commission orders and

1 current regulations. I provide analysis and
2 recommendations on utility filings and special
3 projects and prepare statistical bill reports on
4 electric utilities. I also review statutory
5 processing requirements for the purpose of
6 streamlining our regulations.

7 Q. Ms. Maiello, what were your assignments in this
8 proceeding?

9 A. I was responsible for reviewing the proposed
10 filed tariff amendments of Consolidated Edison
11 Company of New York, Inc. (Con Edison or the
12 Company).

13 Q. What is the purpose of your testimony?

14 A. The purpose of my testimony is to provide
15 recommendations regarding the method in which
16 Con Edison files its tariff schedules.

17 Q. Does your testimony refer to, or otherwise rely
18 upon, any information produced during the
19 discovery phase of this proceeding?

20 A. Yes. I refer to, and have relied upon, the
21 Company's response to Staff Information Request
22 (IR) DPS-297 which is attached as Exhibit__ (RM-
23 1).

24 Q. Please describe the Department of Public

1 Service's Electronic Tariff System (ETS).

2 A. ETS is a system that was developed in December
3 of 1996 to allow utilities to file, and the
4 Department of Public Service to maintain,
5 tariffs electronically. ETS is intended to
6 allow for more efficient processing of tariff
7 filings along with allowing easier public access
8 to the utilities' official tariffs and letters
9 of transmittal and attachments accompanying the
10 filing of tariffs.

11 Q. What is considered the official utility tariff?

12 A. An official utility tariff schedule is the one
13 approved by the Commission and filed in either
14 paper format or electronic format using ETS.

15 Q. Does the Department of Public Service allow the
16 filing of both paper and electronic tariff
17 filings?

18 A. Yes, however, the Commission stated in Case
19 97-M-0508 Memorandum and Resolution Adopting
20 Regulations to Permit the Electronic Filing of
21 Tariff Schedules, issued and effective
22 February 1, 1999 that "ETS will only achieve its
23 maximum effectiveness when it contains all
24 utility tariffs. Thus, we expect an orderly

1 transition to all tariffs to ETS, with the
2 eventual elimination of paper tariffs."

3 Q. How does Con Edison file its tariff schedules?

4 A. Con Edison files its gas tariffs in ETS but has
5 continued to file its electric tariffs in paper
6 format.

7 Q. What is the advantage of filing in ETS?

8 A. An advantage of filing in ETS is that this
9 system provides both efficiency and clarity for
10 Staff, customers and others that want tariff
11 information. For example, if a customer wants
12 to compare the current effective tariff with a
13 prospective tariff or with corresponding
14 superseded tariffs, it is all readily available
15 on ETS on the Commission's web site:

16 www.dps.state.ny.us.

17 Q. Are you aware that Con Edison's electric tariff
18 schedules are available on its own web site?

19 A. Yes, but on Con Edison's web site one can not
20 make the tariff comparisons that I have
21 discussed. In addition, ETS assigns a case
22 number to each tariff filing which provides an
23 additional tool to search the history of tariff
24 revisions.

1 Q. Has Con Edison provided any reasons why it does
2 not want to convert its electric tariff
3 schedules to electronic format to be included in
4 ETS?

5 A. Yes. In its response to Staff IR DPS-297, Con
6 Edison indicates that it has no plans at this
7 time to convert its electric tariff schedules to
8 ETS format because the conversion is labor
9 intensive and not a high priority to Con Edison.
10 The Company has not provided cost estimates to
11 convert its tariff schedules to ETS format. I
12 would also note that all the major gas
13 utilities, including Con Edison, have already
14 converted to ETS, as have most of the major
15 electric utilities, with the exception of one of
16 National Grid's electric tariffs, and Orange and
17 Rockland Utilities, Inc., which is an affiliate
18 of Con Edison.

19 Q. Do you have any recommendations regarding the
20 Company's tariff filings?

21 A. Yes. I recommend that the Commission direct Con
22 Edison to submit a plan identifying what it
23 would need to do in order to convert its
24 electric tariff schedules to ETS format. The

1 plan should identify any potential barriers to
2 converting and include incremental cost
3 estimates and a schedule that would complete the
4 transition to ETS within the next three years.
5 Staff is willing to work with the Company to
6 develop the requirements necessary to effect the
7 conversion of their electric tariffs into ETS
8 format that is efficient and cost-effective.

9 Q. Does this conclude your testimony at this time?

10 A. Yes.