

Consumer Power Advocates

Continuum Health Partners
Fordham University
Luthin Associates, Inc.
Memorial Sloan Kettering Cancer Center
NYU Hospitals Center

Montefiore Medical Center
Mount Sinai Medical Center
New York Presbyterian Hospital
New York University

September 9, 2013

By Electronic Mail

Hon. Kathleen H. Burgess
Secretary
Public Service Commission
Three Empire Plaza
Albany, NY 12223-1350

Re: Case 13-G-0031 – Con Edison Gas Rates
Response to the Con Ed Opposition to the CPA Motion

Dear Secretary Burgess:

On August 29, 2013, Consumer Power Advocates submitted a Motion to Allow New Evidence in the above captioned case. This letter is the CPA response to the Con Edison opposition submitted September 5.

The Company opposition correctly noted that what CPA characterized as an “interruption” was, in fact, not an interruption of delivery service, but rather a discontinuance of service at two particular receipt points. Nevertheless, this loss of the opportunity to accept gas at even a single receipt point requires interruptible customers to use other, presumably more costly receipt points. The mere possibility of the loss of any receipt point causes prudent suppliers to incur additional cost to secure redundant pipeline capacity for interruptible customers. These costs are inevitably passed through to interruptible customers alone, but the reliability benefit is enjoyed by all customers. Thus the document in question, a Company notice to discontinue receipt at the White Plains (Tennessee) and TETCO (Goethals) city gates, goes directly to two issues raised by CPA: the customers’ total cost of interruptible service, and the reliability value provided by interruptible customers to the entire system.

The Company did not dispute that the document in question could not have been offered earlier.

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For the above reasons, the Company's opposition should be rejected, and the CPA motion should be approved.

Sincerely,

Catherine M. Luthin

Executive Director

Cc: Hon. Paul Agresta
Hon. Julia Smead Bielawski
Hon. Eleanor Stein
All active parties

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