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Kenneth Sheehan
Acting Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Re: In the Matter of the Board's Review of the Government Energy
Aggregation ("GEA") Rules
BPU Docket No. EX14111343

Dear Acting Secretary Sheehan:

Rockland Electric Company ("RECO") submits this letter in response to the February 19, 2015 request by Board of Public Utilities Staff ("Staff") in the above-referenced proceeding. Staff requested a high level estimate of the costs that RECO would incur to implement the requisite electronic data interchange ("EDI") system modifications that would allow RECO to distinguish individual switches to third party suppliers from those switches resulting from a GEA program. RECO notes that its computer systems are integrated with the systems of its parent, Orange and Rockland Utilities, Inc., and its Pennsylvania utility affiliate, Pike County Light and Power Company ("PCL&P"). Both RECO and PCL&P adhere to the New York EDI implementation standards. As such, the addition of an EDI indicator would need to be implemented for all three companies in all three states. Alternate suppliers in all three service territories would be required to populate this field when transmitting an enrollment request, even though the field would be an "N" in New York and Pennsylvania. RECO estimates that the cost to implement this change will be approximately \$193,000 (including the costs of implementation and testing).

Staff also asked whether RECO will be able to provide the additional information requested by Con Edison Solutions ("Solutions"), including 24 months of customer-specific usage information, with specific customer identification information deleted. RECO would note that Solutions has not provided any justification for its request, which would require system modifications to produce such data. The data would include customers who reside in the municipality based on the information available to RECO; the municipality would need to review the data and determine whether it is correct. Of the items requested by Solutions, RECO will have the most difficulty providing 24 months of data because of the enormous amount of data that this particular item will

produce. In addition, RECO is unsure of what is meant by “type of meter”, so it cannot comment on its ability to provide that element at this time.

In light of these circumstances, Solutions should be required to justify why it needs the information it has requested, before RECO is directed to produce such information. Moreover, before producing such information, the Board will need to make adequate provision for RECO’s recovery of the incremental costs it will incur in providing such information.

Respectfully submitted,

/s/

Kerri Kirschbaum
Senior Attorney