

# Comments from Ho-Chen Chien of Con Edison

## 12/13/2005

Con Edison proposes the following regarding revenue metering systems that do not meet the standards detailed in the NYISO Revenue Meter Requirements Manual.

1. NYISO to pursue FERC approval to establish a cost recovery mechanism for revenue metering upgrades required by the NYISO.
2. The owner of a revenue metering system that does not meet the NYISO revenue meter requirements shall replace the meter with a revenue-grade meter within one year from the acceptance of this requirement by NYISO, and shall submit such costs to NYISO for recovery.
3. The Metering Authoring of each revenue metering system shall perform a cost-benefit study on each such meter within 12 months from the acceptance of this requirement by NYISO. The study shall include
  - a. Description of equipment associated with the existing revenue metering system.
  - b. Total cost required to upgrade the existing revenue metering system.
4. The NYISO will verify results of cost-benefit studies provided by the metering authorities.
5. The NYISO will calculate the upgrade cost recovery period associated with each metering system by dividing the total upgrade cost with estimated annual financial impact due to improvement of metering accuracy. The latter is estimated by multiplying 2% (or 3%) with total generation/transmission in MW and averaged LBMP at a specific location.
6. A revenue metering system with a cost recovery period greater than 3 years is not required to be upgraded. A revenue metering system with a cost recovery period less than 3 years must be upgraded within 24 months.