

**Statement of Consolidated Edison Company of New York, Inc.
On Western New York Public Policy Transmission Planning Process**

Con Edison applauds the NYISO's and the Public Service Commission's efforts to support transmission buildout driven by critical public policy requirements. We recognize that under the NYISO's tariff an appropriate cost allocation methodology in the Western New York process is the responsibility of the New York Public Service Commission and/or the developer of the selected project. If a methodology is not proposed by the NY Public Service Commission or developer the cost allocation will default to a load ratio share basis. Based on the NYISO's Draft Report, we note that the majority of the benefits accrue to certain Western and Upstate regions of the New York Control Area. Left unchanged, the Western New York cost allocation will be based on a load ratio share basis, which will inappropriately allocate significant project costs to regions that experience limited benefits from the project. The New York Public Service Commission has not yet issued a proposed cost allocation methodology that may resolve this issue, but on behalf of our customers we remain focused on a methodology that is commensurate with the beneficiaries pay principles inherent in FERC Order 1000.

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