

NYC Reliability Needs: Responses to Market Questions

Consolidated Edison Company of New York, Inc. (the “Company” or “Con Edison”) acknowledges receipt of a wide variety of questions. The questions presented below are focused on those that pertain to the Company’s January 20, 2026, Request for Information and the process the Company will follow going forward. Further, they are paraphrased and edited for clarity and confidentiality.

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1) Program Scope

- 1. What does "clean and non-emitting" mean?**
 - *The Company does not have an additional definition beyond what has been provided in the Initiating Order.¹ Respondents are encouraged to explain their views concerning why their solution is clean and non-emitting.*
- 2. Where do municipal buildings with NYPA accounts for electric service fit into the equation for this RFI (if at all)?**
 - *The Company recognizes that NYPA customers are not eligible for electric energy efficiency program offerings except through the Non-Wires Solutions*

¹ Case 25-E-0764, Proceeding on Motion of the Commission to Address New York City Reliability Needs, Order Initiating Proceeding and Directing Reliability Contingency Plan (December 18, 2025) (Initiating Order).

framework. The Company welcomes proposals associated with NYPA customers if they are within the geographic areas included in the RFI.

3. Is the intent for new technology or could a firm submit existing technology that may not be as prominent in the market yet?

- *As the Initiating Order directed, the Company is looking for solutions which are proven, or can be demonstrated to be proven, in the field in a timeframe that can support the identified reliability needs (Needs) or a portion of the Needs. The Company will consider whether a solution is technologically and /or commercially mature when evaluating responses.*

4. Would the Company find it helpful for trade associations to talk about current challenges in developing generation in the City, and reinforcing the urgency of the reliability needs (or anything else) in a filing?

- *We will review all submissions in response to the RFI but more general comments for a broader audience may be better suited for submission to the PSC docket.*

5. Will a proposed solution which meets a majority of principles but not all principles be considered? What if a proposed regulatory change would allow the project to meet all principles?

- *If a solution assists in solving the Needs, the Company will review it. Proposals need not be constrained by current regulatory or programmatic rules but should identify any aspect of the proposal that would require changes or exemptions to current rules and regulations. The Company plans to evaluate all solutions put forward in response to the RFI according to its evaluation criteria which includes adherence to the PSC Order requirements and guiding principles.*

6. Are solutions proposed in the Contingency Plan limited to those proposed in response to the RFI? If the RFI solutions cannot solve the needs, either individually or in aggregate, for technical or cost reasons, will the NYPSA required Contingency Plan propose solutions that did not meet all of the RFI principles or that were not proposed in response to the RFI?

- *The Commission directed the Company to consider RFI responses; Company-led solutions; regulatory changes like tariffs, rate structures, and “other measures”; as well as any NYISO Q3 STAR solutions to address the Needs. In our NYC Reliability Contingency Plan, we will explain the basis for the Company’s recommendations, including why the Company does or does not recommend solutions. Reasons the Company may not recommend a solution could include its inability to address the Need, its failure to adhere to*

the Initiating Order's guiding principles or otherwise. Individual solutions are not expected, however, to solve the entire Needs.

- 7. Would the Company consider a respondent whose primary role is solution design, aggregation, program architecture, and implementation management, with delivery executed through third-party partners? If so, what level of contractual or commercial commitment from those partners is expected at the RFI stage?**
- **If working with an independent evaluator or consultant, is The Company open to alternative cost structures (e.g., flat fees, success fees, or hybrid models)?**
 - **Are there any internal resourcing constraints that could be mitigated through engagement of an independent evaluator or consultant?**
 - *The Company will consider a proposal from a respondent that executes delivery through third-party partners. However, the respondent's proposal must include all information requested by the RFI.*
 - *The respondent may submit proposed alternative cost structures for consideration, but respondents must include information in their submittal about the financial support requested to deliver the load relief proposed. The Company has not yet determined the incentive structure, if any, for given solutions.*
 - *The Company is not seeking consulting support through this RFI.*
- 8. Would the Company consider technical consulting support that evaluates RFI responses relative to their ability to address the capacity gap? This would include evaluating to what extent a disparate portfolio of retail service providers and wholesale market participants can be orchestrated to best address this capacity gap, including the control architecture and technology required.**
- *The Company is not seeking consulting support through this RFI.*

2) Geography, Site Information

- 9. Why are you not looking for solutions in Washington Heights, Riverdale, Fordham, Southeastern Bronx and Northeastern Bronx? Are there no reliability issues there?**

- *Due to transmission system topology, capacity increases or demand reductions in these areas do not materially alleviate reliability needs elsewhere in Zone J.*

10. Could you develop a chart and/or map that lists the distinct geographic areas and time periods for which contingency measures are sought?

- *See Figure 1 at the bottom of this document for a map of the service territory. Appendix D of the RFI also has maps of the specific networks that are not eligible.*

11. Will The Company provide additional locational granularity (e.g., sub-area MW targets or indicative hosting capacity constraints) prior to the RFP stage to support solution targeting?

- *Given that solutions are required to address reliability at the transmission level, additional locational granularity below the transmission level for MW targets is not needed. With regards to information indicative of hosting capacity constraints, the Company publishes hosting capacity maps detailing distribution-level capacity constraints on the Company website ([Con Edison Hosting Capacity Maps](#)) that are available for respondent use for proposed solutions connecting to the distribution system.*

12. What level of site control, customer commitment, or interconnection progress is considered sufficient at the RFI stage, and how will "site control" and "demonstrated ability to achieve site control" be verified by the Company? For example, is Appendix J of the SIR ("New York State Standard Site Control Certification Form" with options for (a) Signed option agreement to lease or purchase the Property; (b) Executed lease agreement for the Property; (c) Executed agreement to purchase the Property; of (d) License or other agreement granting exclusive right to use the Property for purposes of constructing and operating the distributed generation facility) sufficient or, for this program with more rigorous RFI requirements, is additional proof such as a redacted lease or option agreement, purchase agreement, or ownership records required? In particular, how will an "exclusive right to use a Property" be distinguished from an exclusive right "to study" a Property for a proposed facility?

- *At the RFI stage, there is no minimum level of site control necessary, but the more site control they demonstrate the better. Respondents should adopt the SIR definition for Site Control. In any subsequent or potential RFP, the Company anticipates it will require complete, firm, and exclusive rights required to execute the proposed solutions. Respondents should indicate the*

necessary site control, stage of interconnection process, and customer commitment for their solution at the time of the RFI.

3) Process, Timeline, Communications

- 13. Does the Company plan to have another tech conference after the one on February 10 discussing the Report that will be generated from responses?**
- *No, the Company does not currently have plans for another technical conference on the Reliability Contingency Plan.*
- 14. Will the Webinar presentation be posted?**
- *Webinar slides have been posted on ConEd.com/PeakSolutions.*
- 15. Instead of constant monitoring on the website, will there be an email list to sign up for updates?**
- *Yes, message PeakSolutions@coned.com to receive email updates.*
- 16. Do you not expect the technical conference on February 10 to have a panel talking about the reliability needs in The Company or the differences of these with what the NYISO is seeing? You expect the tech conference to just be answering questions about the submission of projects to the RFI?**
- *Yes. The Technical Conference will explain the Needs the Company has identified in its Local Transmission Plan (LTP) and help the market understand how aspects of the Needs impact potential solutions (e.g. geographic considerations) along with details of the RFI process. We recognize NYISO's identified reliability needs, however the Technical Conference will only discuss the Company's assessment.*
- 17. What level of stakeholder access and engagement schedule should awardees expect during project work ahead of the June deadline?**
- *The RFI schedule outlines how and when stakeholders can engage in this process including the webinar, the technical conference, and how to ask questions.*
- 18. Can the Company provide a recording or summary of the January 27 webinar for respondents who were unable to attend?**
- *The presentation slides from the January 27th Webinar have been posted to coned.com/PeakSolutions.*
- 19. Under Terms and Conditions, Section 7 in the RFI: As a current vendor with an executed, active agreement with Con ED, would we need to furnish this response with redlines? Can we use our active agreement already in place?**

- *This is purely a Request for Information. The Company will not make any binding agreements associated with the submissions to this RFI. As noted in the Order, the Company may propose issuing Requests for Proposals as part of its NYC Reliability Plan to be filed with the Public Service Commission in June.*

4) Evaluation Approach, Solution Principles

20. Will RFI replies be shared with Department of Public Service (DPS) Staff?

- Yes.

21. Solutions must minimize negative impacts to DACs. Some Solutions not only avoid negative impacts but also bring positive benefits to DACs (e.g., direct bill savings through participation in the Statewide Solar for All [SSFA] program).

How will positive benefits to DACs and/or low-income consumers be factored?

- *The Company will take into consideration any identified impacts, positive or negative, provided to DACs and/or low-income customers that are part of the submission.*

22. Please describe the costs and benefits of interconnection distributed energy storage assets at the local reliability standard or below the standard (e.g., “N-1” within a “N-2” DLA).

- *Respondents should include information in their submittal about the costs to deliver their solution at the local level of reliability and any other level the respondent wishes to include so that the Company understands the feasibility, system availability and cost of their solution(s). The Company has not made any decisions on evaluation methods for potential solution RFPs.*

5) Customers, Incentives, Cost-Effectiveness & Measurement

23. How is the Company structuring potential incentives? (e.g. one-time payment, paid through performance period, etc.)

- *As discussed in the RFI, Respondents should assume that any incentive will be predominantly paid upon project completion. If a solution requires a different incentive structure, Respondents must describe the required incentive structure as a key and necessary assumption.*

24. How will the Company value and pay for reliability services (energy and capacity) when existing programs rules are based on deemed savings?

- Respondents should include information in their submittal about the funding structure they seek to address the Needs.

25. Will The Company be assisting with customer acquisition assuming viable demand reduction strategies are found to be attractive vis a vis this RFI?

- To the extent a solution does not have pre-identified locations or customers, the response should detail who the target customers are, the achievable number of customers that need to be engaged, and the most cost effective and most confident strategy to acquiring the target customers identified.

26. Will the Company require meter-based or telemetry-based measurement and payment on a P4P basis?

- Respondents should propose a measurement approach appropriate for their proposed solution and funding structure.

27. Would the Company prefer to value resources as load modifying resources or market participating resources?

- Both types of resources are eligible to participate in the RFI. Respondents should include information about the means of execution in their submittal.

28. Valuation of Digital Load Management: How does the Company intend to value "Digital Load Management" (e.g., millisecond-level telemetry and active throttling via Class 2/4 Fault Managed Power) compared to traditional "hard" load shedding for the purposes of the kW reduction benchmarks in Attachment B-1?

- Respondents should include in their proposal how the type of load management provided by their solution and associated costs addresses the Needs.

29. Please describe what type of utility communications, control, and/or dispatch platforms are required for Dispatchable Clean NERS to provide "reliable, clearly verifiable impact on system-level demand."

- Respondents should include the communications platforms, protocols, and response times provided by the solution to address the Needs. Systems may be required to satisfy specific direct, communications with the Company.

6) Technology Participation, Dispatch & Operating Requirements

30. Can we propose solutions that leverage the steam system?

- *Yes. Responses to the RFI are not limited to the solutions described as examples and must be clean and non-emitting in accordance with the PSC's initiating Order.*
- 31. Can you confirm that Thermal Ice Storage to be added to an existing Chiller Plant is eligible to participate in this RFI and pursue potential incentives/cost support from ConEdison?**
- *Yes. Responses to the RFI are not limited to the solutions described as examples and must be clean and non-emitting in accordance with the PSC's initiating Order.*
- 32. Has The Company considered reinstating the DMP program to address these reliability concerns?**
- *The Company is considering programmatic offerings to support the Needs.*
- 33. Are you open to a response focused on transmission, including inter-zonal transmission projects?**
- *The Company plans to evaluate all responses to the RFI. The Company notes that as the transmission provider within its retail service territory, the Company has the obligation to design and plan for local transmission upgrades. The Company further notes that the NYISO, under its FERC tariff, can and does evaluate inter-utility transmission solutions if proposed in response to a declared public policy transmission need. There has been no such public policy transmission need declared regarding the Needs identified by the Company.*
- 34. For distribution-tied VDER BESS ≤ 5 MW, what would be required to meet the NYISO reliability requirements? Would standard retail Rider R Value Stack “load modifier” accounts qualify? Or would direct participation in NYISO Energy & Capacity markets (i.e. ERIS & CRIS rights) under, say, Wholesale Value Stack (WVS), be necessary?**
- *Projects are not required to register with the NYISO / be a market participant. Rider R Value Stack accounts may qualify if they meet the requirements of the RFI.*
- 35. Will the Company apply minimum thresholds for MW contribution, duration, or firmness at the individual proposal level, or are modular/partial contributions acceptable?**
- *Responses are not required to address the full Needs and the Company does not specify minimum thresholds. The exception is for proposed solutions including energy storage, where proposed dispatch times must be at least 4 hours long.*

36. Can DR solutions participate simultaneously in these ‘Clean, Non-emitting Reliability Solutions’ and existing Company DR programs if they meet both obligations? (RFI suggests participants must explain impacts, but not whether dual participation is allowed.)

- *To the extent a solution is already under contract in an existing demand response program, Respondents must explain how using the proposed solution to satisfy the Needs will impact the Respondent’s ability to meet its contractual commitments for the existing demand response program (e.g., can the proposed solution offer load relief that satisfies requirements across programs). As stated in the RFI, the Respondent should assume that no other Con Edison incentives are available from other Company programs as they input the total amount of financial support requested from the Company for the proposal under this RFI.*

37. For solutions that utilize NEC Article 726 (Class 4 Fault Managed Power), will the Company support a "Living Lab" or pilot-status designation for projects that provide significant system-level reliability but are awaiting full local adoption of the 2023 NEC within NYC building codes?

- *As stated in the RFI, proposals may include both solutions that are in development and could be accelerated or modified to provide additional peak reduction, as well as new proposed solutions. Respondents should explain in their proposal how they will ensure that, even as a pilot, the solution will be dependable for reliability purposes.*

38. Will the Company accept reliability and performance data from established out-of-state multifamily or hospitality case studies to satisfy the "verifiable impact" requirements for technologies that are new to the New York market?

- *The Company would be open to receiving an analysis of established out-of-state reliability and performance data to evaluate a proposed solution during the RFI. Further, the Company encourages respondents to include information on how they believe such data may be applicable to the New York city context and market. However, when implemented as a reliability solution, the performance must be measurable and verifiable.*

39. In cases where a Class 2/4 digital backbone is installed to support immediate electrification (e.g., window-over-the-sill heat pumps), will the proposal receive additional consideration for establishing the permanent infrastructure required for a future transition to Geothermal Thermal Energy Networks (TENs)?

- *The RFI is focused on identifying projects or solutions that address the Needs.*

7) Forecasting, Needs Methodology & Technical Definitions

- 40. Though Co-Efficient of Performance (or other measures of efficiency) of conventional air conditioners ASHPs and GSHPs at peak demand data may not be readily available from any one source, can you provide any aid in finding them?**
- *The New York State Technical Resource Manual (TRM) is a valuable reference when considering HVAC equipment efficiencies. The URL is <https://dps.ny.gov/technical-resource-manual-trm>.*
- 41. For 2032-2036, please provide the total number of days per summer period that are anticipated to require load relief (i.e., the total MWh load relief needed for the entire five-month capability period).**
- *The load reduction (or load shifting) should be permanent or available during all days of the summer capability period for the proposed hours in support of the Needs.*
- 42. Could you provide the expected number of consecutive peak days? The 24-hour model assumes a “heat ‘buildup’ over a hot spell of a [three] days' duration,” but more information about back-to-back days is needed to consider the charge/discharge cycles of battery energy storage systems over multiple days, or a heat-wave week including weekends.**
- *See question 41.*
- 43. For measuring cost effectiveness, the RFI states: "the Company will primarily consider absolute upfront and ongoing costs." Please define "absolute." How are non-ratepayer incentives to be factored in, such as Federal Investment Tax Credits, sales tax exemptions, and property tax exemptions/abatements?**
- *Absolute means the full cost to develop, install, operate and maintain the proposed solution. Respondents are expected to optimize and account for non- Company derived eligible revenue streams, tax credits, financial incentives, and other funding sources (City, State, Federal) to reduce costs that will ultimately be borne by Customers and include the associated details as part of their submissions. Estimates should be included as Other Revenue Streams on Attachment B-1 or B-2 associated the RFI.*

44. Please explicitly define the technical distinction and relationships between "load relief," "peak load reduction," "system-level demand," and "transmission security needs."

- *For the purposes of this RFI, system level demand is demand across the entirety of New York City (Zone J).*
- *Transmission Security is the ability of the electric systems to withstand sudden disturbances such as electric short circuits or unanticipated loss of system elements. If the electric system cannot withstand these disturbances, then either system-level demand must be reduced or additional MWs are required (Transmission Security Need).*
- *Load Relief is the reduction in demand at any level of the system by employing a solution, while peak load reduction reduces demand during the peak hours. These measures can address a transmission security need.*

45. Please provide network-level data about transmission (TLA)-peak hours versus local DLA network peak hours and describe whether they are coincident.

- *The Company's January 2026 Reliability Needs Report provides load projections reflective of the New York City TLA need hours. The DLAs which make up this TLA may, and do, have different independent peak hours. Respondents may use the CSRP network call windows for the DLAs to inform their proposals.*

46. Please define "off-peak" BESS charging hours. Is it defined by the network-level locationally-variant twelve-hour off-peak period (11pm-11am or 8pm-8am), the tariff-based ten-hour period (10pm-8am), a different period such as 12am-8am, or something based on TLA-level or NYISO zonal-level loads?

- *The applicable "Off-peak" hours for each rate type may be found in the Con Edison Tariff. The off-peak period may be different in future tariffs.*

47. Please provide forecasted reliability needs over the planning horizon by network area, substation area, distribution load area, and transmission load area.

- *The Needs are at the transmission level (not distribution), specific to the overall NYC (Zone J) Transmission Load Area (TLA). The needs are not related to "network area", "substation area", or "distribution load area".*

48. In 2025, the Company released New Call Windows under the Commercial Service Relief Program (CSRP) for 27 networks. Will the implementation of the 24-hour forecasting model determine how those windows are anticipated to change over time?

- *There are various factors that influence the CSRP windows and the Company cannot speculate on how they will change over time.*

8) Regulatory Questions

49. The RFI notes that "Proposals need not be constrained by current regulatory or programmatic rules but should identify any aspect of the proposal that would require changes or exemptions to current rules and regulations." Please describe the Company's proposed pathways to reform Value of Distributed Energy Resources (VDER) Value Stack components (e.g., DRV and LSRV components) and Term- and Auto- Dynamic Load Management (DLM) to better meet transmission security needs.

- *Respondents to this request for information may propose any potential modifications or reforms to any current rules or regulations that would allow them to deliver and operate their proposed solution in support of the Need. The Company will evaluate all potential solutions and regulatory or program changes.*

50. Please describe any proposed changes to the SIR and Non-SIR interconnection study process to better meet transmission security needs, including how off-peak or peak charging profiles are considered for battery energy storage systems (BESS) within the study processes.

- *The Company has not identified any changes needed to the interconnection study process to meet the Needs at this time; Respondents may propose any potential modifications.*

Figure 1: Map of Eligible Networks

