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August 20, 2024

**VIA E-TARIFF FILING**

Hon. Debbie-Anne A. Reese, Acting Secretary  
Federal Energy Regulatory Commission  
Dockets Room, Room 1A  
888 First Street, N.E.  
Washington, DC 20426

**Re: Consolidated Edison Co. of New York, Inc.  
New York Independent System Operator, Inc.  
Docket Nos. ER23-2212-000, -001**

**New York State Electric & Gas Corp.  
New York Independent System Operator, Inc.  
Docket Nos. ER23-1816-001, -002**

**Rochester Gas and Electric Corp.  
New York Independent System Operator, Inc.  
Docket Nos. ER23-1817-001, -002**

**Central Hudson Gas and Electric Corp.  
New York Independent System Operator, Inc.  
Docket No. ER23-2507-001**

**Unopposed Joint Offer of Settlement**

Dear Acting Secretary Reese:

Pursuant to Rule 602 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission's ("Commission" or "FERC"),<sup>1</sup> Consolidated Edison Co. of New York, Inc. ("Consolidated Edison") hereby submits on its behalf and for Central Hudson Gas and Electric Corp. ("Central Hudson"), New York State Electric & Gas Corp. ("NYSEG"), and Rochester Gas and Electric Corp. ("RG&E") (Consolidated Edison, Central Hudson, NYSEG and RG&E collectively, the "Indicated NYTOs") the attached uncontested Joint Offer of Settlement ("Settlement") by the active parties to the

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<sup>1</sup> 18 C.F.R. § 385.602 (2023).

above-referenced proceedings, which were combined on a limited basis for purposes of settlement procedures,<sup>2</sup> but are not consolidated. All active parties to the above-referenced proceedings (each a “Settling Party” and collectively, the “Settling Parties”) either support or do not oppose the Settlement.<sup>3</sup>

The Indicated NYTOs respectfully request that the Settlement be transmitted to Settlement Judge Patricia M. French for certification pursuant to Rule 602(b)(2)(i).<sup>4</sup> The Indicated NYTOs respectfully request that Judge French certify the Settlement to the Commission at the earliest possible date and that the Commission promptly approve the Settlement, without modification or condition, on the grounds that it is fair and reasonable and in the public interest, represents an agreement between each of the Indicated NYTOs and the active parties in each of their respective proceedings, and resolves completely all issues set for hearing and settlement procedures by the Commission in each proceeding concerning the NYISO OATT Rate Schedule 19 (“Rate Schedule 19”).

In addition to this transmittal letter and in accordance with Rule 602(c)(1) of the Commission’s Rules of Practice and Procedure, this filing consists of the following:

1. An Explanatory Statement;
2. The Settlement; and
3. Tariff Record Appendices--*Pro forma* clean and redline tariff records reflecting corresponding revisions to each of the Indicated NYTOs Rate Schedule 19 formula rate templates proposed for implementation in a future filing (included as Appendix A.1, A.2, A.3 and A.4 to the Settlement).

The Indicated NYTOs certify that they are serving a complete copy of this filing on all parties to the above-referenced proceeding, including all Settlement Parties. In accordance with the Commission’s regulations, any initial comments on the Settlement must be filed not later than 20 days after this filing and reply comments may be filed not later than 30 days after this filing, unless otherwise provided by the Commission or Judge French, as the presiding officer.

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<sup>2</sup> See *Order of Chief Judge Partially Granting Motion and Making Substitute Designation of Settlement Judge*, issued Jan. 25, 2024, in Docket Nos. ER23-2212-000, -001, ER23-1816-001, -002, ER23-1817-001, -002, and ER23-2507-001.

<sup>3</sup> The Settling Parties consist of the Indicated NYTOs, joined by New York State Public Service Commission, Municipal Electric Utilities Association of New York, New York Association of Public Power, and New Jersey Division of Rate Counsel. The Indicated NYTOs, as the parties sponsoring this filing, assumes the burden of proof with respect to the Settlement and the related tariff revisions proposed for implementation in a future filing. The New York Independent System Operator, Inc. (“NYISO”) submits this filing on behalf of the Indicated NYTOs solely in its role as administrator of the NYISO Open Access Transmission Tariff (“OATT”) and takes no position on any substantive aspect of this filing at this time.

<sup>4</sup> 18 C.F.R. § 385.602(b)(2)(i).

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Respectfully submitted,

/s/ Susan J. LoFrumento

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Enclosures

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on those parties on the official Service List compiled by the Secretary in the referenced proceedings.

Dated at Birmingham, Alabama, this 20th day of August 2024

/s/ Lyle D. Larson  
Lyle D. Larson