



PUBLIC ADVOCATE FOR THE CITY OF NEW YORK

Jumaane D. Williams

July 19, 2019

John McAvoy
President & Chief Executive Officer
Consolidated Edison of New York, Inc.
4 Irving Place,
New York, NY 10003

Dear Mr. McAvoy:

My staff in the office of Public Advocate have been closely monitoring the investigation of this weekend's blackout in Manhattan and although we have been encouraged by your speedy response to resolve this incident, we have been concerned over a general lack of transparency into the details of the ensuing investigation and its implications.

The press release issued on July 15, 2019 blames a failure of a relay protection system and related redundancy at the West 65th street area substation for the ensuing blackout. This press release was updating previous statements from your organization that the Manhattan blackout was caused by a transmission issue at the West 49th street transmission substation. My office has noted some issues with this update. In particular, we have the following questions:

- It is my understanding that in order to ensure outages are isolated to impact the smallest number of customers, it is standard protocol to inspect area substations before their associated area substations. If your organization knew the 13,000-volt distribution cable at West 64th street had failed and the FDNY had reported a transformer fire at West 65th street as early as 7:30pm that night, why was its related area substation at West 65th not checked first and isolated manually?
- According to public records from [2016](#), your company's own analysis showed that the West 65th No 1 area station can be nearly 2000a above capacity in some circumstances. Additionally, as far back as [2013](#), your own projections had shown the station to be over capacity by this year. Those same records proposed adding forced cooling to increase the capacity of the system. An updated HVAC system was listed as a needed improvement in past rate cases, as were upgraded busses. The records show anticipated project completion years as 2020 and 2019, respectively. Why were these updates delayed, and what is the current status of those updates?
- We understand that at least 4 additional blackouts have occurred around the city since this incident, impacting at least 10,000 customers. How many substations in our city currently face loads over their safe operating capacity? How many can be manually shut off in case of failure? How many do you project will fail in a high heat, peak capacity environment?
- Currently, your company is asking to [raise](#) your already [notably high](#) rates to raise \$695 million from New York ratepayers. While your justification for this increase



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is the need to invest in the safety and reliability of our grid, how can you justify asking the people of New York City to pay your company more if income from your previous rate hikes did not get invested in the programs you used to justify them? How can your company justify the growing dividends paid to your investors while neglecting those who use your service?

I know that your company's mission is to provide energy services to your customers safely, reliably, efficiently, and in an environmentally sound manner, and to improve the quality of life in the communities you serve. My office deeply values the importance of these critical goals. With the upcoming heatwave, I am deeply concerned that there will be more serious outages in the very near future. If our city hits record high temperatures during a blackout, many of our cities most vulnerable people can be put in serious danger. The people of New York deserve better.

I look forward to your expeditious response. For further discussion, please contact First Deputy Public Advocate for Policy Nick Smith, at nsmith@advocate.nyc.gov, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J.D. Williams".

Jumaane D. Williams
Public Advocate for the City of New York