New York State Electric & Gas
And
Rochester Gas and Electric

2018-2019 Winter Supply Plan

Case 18-M-0272

July 16, 2018

Level of confidentiality: **Business Confidential**

NYSEG RG&E

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NYSEG/RG&E 2018-2019 Winter Supply Update Plan

Overview

The enclosed 2018-2019 Winter Supply Update Plan for New York State Electric & Gas (NYSEG) and Rochester Gas and Electric (RG&E) (collectively the Companies), was prepared and submitted for filing as requested by Mr. Chris Stolicky's letter dated May 15, 2018.

The 2018-2019 Winter Supply Update Plan submittal is designed as a series of responses to the list of questions submitted by DPS Staff. The Companies have expanded on various responses based on previous Winter Supply Update Plan meeting discussions. As you view the electronic version, for ease of navigation within the document, you may use the links in the Table of Contents (TOC) or the bookmarks that have been provided. To move to a specific data request, select the specific data request topic from the TOC or the bookmark list, (i.e. *Data Request 1*)

Please note that certain responses will be submitted requesting Trade Secret protection pursuant to the Commission's Codes, Rules and Regulations, 16 NYCRR Section 6-1.3.

Please do not hesitate to contact Alexandra Boecke at 607.762.8675 if further information is required.

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Issues 1 and 2 (Data Requests 1 – 11)

***Please provide the following information related to your company's portfolio and purchasing strategy for the upcoming 2018-19 send out year and anticipated portfolio changes over the next five years*:**

Data Request 1 – System Design Day Capacity Table 1

System design day capacity capability by service area (or gate when indicated) and peak design day demand by service area (or gate when indicated). Please include all capacity volumes, including all recallable capacity assets that are available or needed for peak design day and specify the volumes supporting sales, transportation customers and retail access capacity release. Include last year's 2017-18 Table 1 (final update) data for purposes of comparison. The total capacity capability must meet or exceed the design peak day demand value provided. Identify any projected capacity assets that are not yet finalized but will be prior to the upcoming winter heating season, including both a description and projected completion date.

Response

Table 1 is a summary of all capacity volumes that support sales and transportation customers for the 2017-2018 Winter and 2018-2019 Winter for NYSEG Total, NYSEG DTI, NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen and RG&E.

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand [1]
TOTAL			
Flowing Supplies	220,465	220,657	
Storage Withdrawals	205,560	205,560	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	1,050	1,050	
Cogen Supplies	0	0	
Local Production [2]	6,180	5,466	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:	0	0	
Mandatory Retail Access Capacity	57,095	57,095	
Grandfathered Retail Access Capacity	6,596	6,596	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity [4]	62,083	62,083	
Peak Day Totals	559,029	558,507	512,437
	Peak Day Design Temp:		-10

* City Gate Deliverd by Others and In-Territory Supplies (not LNG or CNG)
** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:
(1) From Table 2 data
(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.
(3) New Marketer Provided Supplies for 2018-19 will be available in August 2018
(4) Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: DTI
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand [1]
DTI			
Flowing Supplies	92,802	92,778	
Storage Withdrawals	127,302	127,302	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	1,050	1,050	
Cogen Supplies	0	0	
Local Production [2]	6,180	5,466	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:	0	0	
Mandatory Retail Access Capacity	45,204	45,204	
Grandfathered Retail Access Capacity	3,520	3,520	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity [4]	26,457	26,457	
Peak Day Totals	302,515	301,777	275,160
	Peak Day Design Temp:		-10

Table Notes:

[1] From Table 2 data

[2] Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

[3] New Marketer Provided Supplies for 2018-19 will be available in August 2018

[4] Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: TCO
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand [1]
TCO			
Flowing Supplies	61,794	61,794	
Storage Withdrawals	68,514	68,514	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production [2]	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:	0	0	
Mandatory Retail Access Capacity	2,730	2,730	
Grandfathered Retail Access Capacity	83	83	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity[4]	21,345	21,345	
		0	
Peak Day Totals	154,466	154,466	142,154
	Peak Day Design Temp:		-10

Table Notes:

(1) From Table 2 data

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) New Marketer Provided Supplies for 2018-19 will be available in August 2018

(4) Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Lockport (TGP)
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand [1]
LOCKPORT (TGP)			
Flowing Supplies	37,090	37,306	
Storage Withdrawals	9,744	9,744	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production [2]	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:	0	0	
Mandatory Retail Access Capacity	7,351	7,351	
Grandfathered Retail Access Capacity	2,803	2,803	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity[4]	8,079	8,079	
Peak Day Totals	65,067	65,283	63,006
		Peak Day Design Temp:	-9

Table Notes:

[1] From Table 2 data

[2] Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

[3] New Marketer Provided Supplies for 2018-19 will be available in August 2018

[4] Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: North Country
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand (1)
NORTH COUNTRY			
Flowing Supplies	12,000	12,000	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production (2)	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies (3):	0	0	
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity(4)	4,695	4,695	
Peak Day Totals	16,695	16,695	16,467
	Peak Day Design Temp:		-20

Table Notes:

(1) From Table 2 data

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) New Marketer Provided Supplies for 2018-19 will be available in August 2018

(4) Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Brewster
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand [1]
BREWSTER			
Flowing Supplies (AGT also servesGoshen)	16,779	16,779	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production [2]	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:	0	0	
Mandatory Retail Access Capacity	1,810	1,810	
Grandfathered Retail Access Capacity	190	190	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity[4]	1,001	1,001	
Peak Day Totals	19,780	19,780	5,375
	Peak Day Design Temp:		-8

Table Notes:

[1] From Table 2 data

[2] Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

[3] New Marketer Provided Supplies for 2018-19 will be available in August 2018

[4] Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Goshen
Submission Date: July 16, 2018

Version #: 1

New York State Electric & Gas	2017-18 Winter	2018-19 Winter	Design Peak Day Demand (1)
GOSHEN			
Flowing Supplies (AGT also serves Brewster)	16,779	16,779	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production (2)	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies (3):	0	0	
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity(4)	506	506	
Peak Day Totals	17,285	17,285	10,275
	Peak Day Design Temp:		-8

Table Notes:

(1) From Table 2 data

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) New Marketer Provided Supplies for 2018-19 will be available in August 2018

(4) Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

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Table 1: Total System Firm Peak Day Capacity (DT)

Company: RG&E
Service Area: RG&E Total
Submission Date: July 16, 2018
Version #: 1

Rochester Gas & Electric	2017-18 Winter	2018-19 Winter	Design Peak Day Demand [1]
RG&E TOTAL			
Flowing Supplies	226,100	226,100	
Storage Withdrawals	179,000	179,000	
Winter Peaking Service * [2]	0	25,000	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production [3]	91	79	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:	0	0	
Mandatory Retail Access Capacity	50,960	50,960	
Grandfathered Retail Access Capacity	14,873	14,873	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity [4][5]	29,704	49,704	
Peak Day Totals	500,728	545,716	530,285
	Peak Day Design Temp:		-10

* City Gate Deliverd by Others and In-Territory Supplies (not LNG or CNG)
** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

[1] From Table 2 data

[2] Anticipated firm citygate supply for winter of 2018-2019

[3] Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

[3] New Marketer Provided Supplies for 2018-19 will be available in August 2018

[4] Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers

[5] 2018-2019 Winter numbers include RED MDTQ increase from last year

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Data Request 2 – Estimated Design Requirements - Table 2

Estimated annual, winter season, and daily requirements by service area (or gate when indicated) for last year and the next five years, using design weather. Include a description of the design weather criteria and explain any changes from the previous year. Specifically, since many areas of the state experienced an extended period of colder than normal weather last winter, how does this experience impact your daily or winter season design parameters and are there any changes required? Also, how is this effecting your storage injection season and how will it be addressed? The 2017-18 actual data experienced last year is to be included for purposes of comparison. Also include any and all service areas (or gate stations when indicated) where moratoriums have been put into place or have the possibility of being instituted in the next five years. Identify where any curtailments to firm customers may occur.

Response

Estimated Requirements (Design Weather): Table 2 provides the actual, winter season, and daily requirements for last year and the estimated next five (5) years, using design weather for NYSEG Total, NYSEG DTI, NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen and RG&E. Design weather criterion is also provided for each of these areas. The Design Winter Heating Degree Day value is typically no less than 10% colder than Normal Winter Criteria. The methodology for determining the design weather criteria is further described in the response to Data Request 4.

Although many areas across NY experienced colder than normal weather storage injections have not been affected by the colder than normal weather either, as both companies met our projected plan targets at the end of the withdrawal period. The 2017-2018 weather experienced last year did not impact NYSEG or RG&E's daily or winter season design parameters.

Currently NYSEG's service territory has a moratorium in place in Lansing. RG&E has no moratoriums in place. The companies do not anticipate any other moratoriums being instituted in the next five years; however the companies continue to evaluate and study system needs as new customers request gas services.

No firm customers were curtailed in the 2017-2018 heating season. NYSEG and RG&E are confident that they can serve firm load in the upcoming heating season with the exception of a force majeure event.

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	26,910	25,703	27,558	27,563	27,506	27,494	27,510
Transportation	31,619	29,257	31,268	31,246	31,273	31,452	31,672
Non-Firm							
Sales	659	325	393	393	393	393	393
Transportation	2,759	2,417	2,815	2,815	2,815	2,815	2,815
Total	61,947	57,701	62,034	62,018	61,988	62,154	62,390
Winter Season							
Firm							
Sales	20,567	19,473	20,902	20,868	20,893	20,918	20,966
Transportation	18,840	17,473	18,205	18,190	18,159	18,218	18,326
Non-Firm							
Sales	424	230	242	242	242	242	242
Transportation	1,370	1,339	1,427	1,427	1,427	1,427	1,427
Total	41,201	38,515	40,776	40,727	40,721	40,806	40,961
Peak Day - Dth [1]							
Firm							
Sales	278,647	268,612	289,157	289,205	288,688	288,573	288,722
Transportation	225,091	191,752	223,280	223,085	223,329	224,958	226,955
Total	503,738	460,364	512,437	512,290	512,017	513,531	515,677

Design Weather is defined as [3]:

Annual	7,723	HDD
Winter	6,576	HDD
Peak Day	75	HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG DTI
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	15,070	14,393	15,432	15,435	15,404	15,396	15,406
Transportation	17,707	16,384	17,510	17,498	17,513	17,613	17,736
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	441	387	450	450	450	450	450
Total	33,218	31,164	33,393	33,384	33,367	33,460	33,592
Winter Season							
Firm							
Sales	11,518	10,905	11,705	11,686	11,700	11,714	11,741
Transportation	10,551	9,785	10,195	10,187	10,169	10,202	10,263
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	260	254	271	271	271	271	271
Total	22,329	20,944	22,171	22,144	22,140	22,188	22,275
NYSEG Peak Day - dth [1]							
Firm							
Sales	143,045	140,103	146,673	146,700	146,411	146,347	146,430
Transportation	128,970	106,509	128,487	128,378	128,515	129,427	130,545
Total	272,015	246,612	275,160	275,078	274,926	275,774	276,975

Design Weather is defined as [3]:

Annual	7,723 HDD
Winter	6,576 HDD
Peak Day	75 HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG TCO
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	6,458	6,169	6,614	6,615	6,602	6,598	6,602
Transportation	7,589	7,022	7,504	7,499	7,506	7,549	7,601
Non-Firm							
Sales	119	58	71	71	71	71	71
Transportation	1,104	967	1,126	1,126	1,126	1,126	1,126
Total	15,269	14,215	15,315	15,311	15,304	15,344	15,401
Winter Season							
Firm							
Sales	4,936	4,674	5,016	5,008	5,014	5,020	5,032
Transportation	4,522	4,194	4,369	4,366	4,358	4,372	4,398
Non-Firm							
Sales	76	41	44	44	44	44	44
Transportation	452	442	471	471	471	471	471
Total	9,986	9,350	9,900	9,888	9,887	9,907	9,944
Peak Day - dth [1]							
Firm							
Sales	85,702	78,773	88,245	88,256	88,132	88,105	88,141
Transportation	54,859	51,534	53,909	53,862	53,921	54,312	54,791
Total	140,561	130,307	142,154	142,118	142,053	142,417	142,932

Design Weather is defined as [3]:

Annual	7,723 HDD
Winter	6,576 HDD
Peak Day	75 HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG LOCKPORT (TGP)
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	3,498	3,341	3,583	3,583	3,576	3,574	3,576
Transportation	4,110	3,803	4,065	4,062	4,066	4,089	4,117
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	579	507	591	591	591	591	591
Total	8,188	7,652	8,239	8,236	8,233	8,254	8,285
Winter Season							
Firm							
Sales	2,674	2,531	2,717	2,713	2,716	2,719	2,726
Transportation	2,449	2,272	2,367	2,365	2,361	2,368	2,382
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	329	321	342	342	342	342	342
Total	5,452	5,124	5,426	5,420	5,419	5,430	5,450
Peak Day - dth							
Firm							
Sales	32,416	31,894	34,383	34,389	34,322	34,307	34,326
Transportation	28,728	22,752	28,623	28,598	28,630	28,842	29,102
Total	61,144	54,646	63,006	62,987	62,952	63,149	63,428

Design Weather is defined as [3]:

Annual	7,080 HDD
Winter	6,152 HDD
Peak Day	74 HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Buffalo (NYSEG) weather point; 30 year average

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG NORTH COUNTRY
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	1,076	1,028	1,102	1,103	1,100	1,100	1,100
Transportation	1,265	1,170	1,251	1,250	1,251	1,258	1,267
Non-Firm							
Sales	501	247	298	298	298	298	298
Transportation	607	532	619	619	619	619	619
Total	3,449	2,977	3,271	3,270	3,269	3,276	3,285
Winter Season							
Firm							
Sales	823	779	836	835	836	837	839
Transportation	754	699	728	728	726	729	733
Non-Firm							
Sales	318	172	182	182	182	182	182
Transportation	329	321	342	342	342	342	342
Total	2,223	1,971	2,088	2,087	2,086	2,090	2,096
Peak Day - dth [1]							
Firm							
Sales	6,091	7,165	7,677	7,679	7,658	7,653	7,659
Transportation	8,850	8,091	8,790	8,782	8,792	8,857	8,937
Total	14,941	15,256	16,467	16,461	16,450	16,510	16,596

Design Weather is defined as [3]:

Annual	7,888 HDD
Winter	6,855 HDD
Peak Day	85 HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Burlington (NYSEG) weather point; 30 year average

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG BREWSTER
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	269	257	276	276	275	275	275
Transportation	316	293	313	312	313	315	317
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	585	550	588	588	588	589	592
Winter Season							
Firm							
Sales	206	195	209	209	209	209	210
Transportation	188	175	182	182	182	182	183
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	394	369	391	391	391	391	393
Peak Day - dth [1]							
Firm							
Sales	3,571	3,417	3,766	3,766	3,761	3,760	3,761
Transportation	1,770	1,452	1,609	1,607	1,609	1,625	1,645
Total	5,341	4,869	5,375	5,373	5,370	5,385	5,406

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG GOSHEN
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	538	514	551	551	550	550	550
Transportation	632	585	625	625	625	629	633
Non-Firm							
Sales	40	19	24	24	24	24	24
Transportation	28	24	28	28	28	28	28
Total	1,238	1,143	1,228	1,228	1,227	1,231	1,235
Winter Season							
Firm							
Sales	411	389	418	417	418	418	419
Transportation	377	349	364	364	363	364	367
Non-Firm							
Sales	30	16	17	17	17	17	17
Transportation	0	0	0	0	0	0	0
Total	818	755	799	798	798	800	803
Peak Day - dth [1]							
Firm							
Sales	7,822	7,260	8,413	8,414	8,404	8,402	8,405
Transportation	1,914	1,414	1,862	1,858	1,863	1,896	1,936
Total	9,736	8,674	10,275	10,272	10,267	10,298	10,341

Design Weather is defined as [3]:

Annual	6,708 HDD
Winter	5,905 HDD
Peak Day	73 HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average

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Table 2: Estimated Requirements (MDT) – Design Weather

Company: RG&E
Service Area: RG&E
Submission Date: July 16, 2018
Version #: 1

RGE	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	27,908	27,597	29,041	29,159	29,102	29,182	29,159
Transportation	35,101	29,899	36,469	36,378	35,838	35,621	35,627
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	63,009	57,495	65,510	65,536	64,939	64,803	64,786
Winter Season							
Firm							
Sales	21,647	20,847	21,769	21,807	21,775	21,761	21,756
Transportation	21,311	18,290	21,379	21,325	20,999	20,903	20,891
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	42,958	39,137	43,148	43,131	42,774	42,665	42,647
Peak Day - Dth							
Firm							
Sales	276,764	279,891	303,483	304,555	304,033	304,765	304,552
Transportation	214,274	182,705	226,802	225,966	221,059	219,092	219,145
Total	491,038	462,596	530,285	530,521	525,092	523,857	523,697

[1] **Design Weather is defined as:**

Annual	7,069	HDD
Winter	6,124	HDD
Peak Day	75	HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] RG&EAnnual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Rochester (RG&E) weather point; 30 year average

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Data Request 3 – Estimated Normal Requirements -Table 3

Same information as requested in (2), but using normal weather. Include a description of the normal weather criteria and the calculation methodology. The 2017-18 data submitted last year is to be included for purposes of comparison. Please Note: if Table 3 is based on a sales forecast using anything less than 30 years of weather data, no part of Table 3 may be used to develop any part of Table 2.

Response

Estimated Requirements (Normal Weather) Table 3 provides the estimated annual, winter season, and daily requirements for last year and the next five (5) years, using 30-year normal weather for NYSEG Total, NYSEG DTI, NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen and RG&E. The normal weather criterion by area is also included. The normal five (5) year forecasts denote a fairly flat projection to total sales over the reporting period.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	24,464	25,703	25,053	25,057	25,006	24,994	25,009
Transportation	28,744	29,257	28,425	28,406	28,430	28,593	28,793
Non-Firm							
Sales	599	325	357	357	357	357	357
Transportation	2,508	2,417	2,559	2,559	2,559	2,559	2,559
Total	56,316	57,701	56,394	56,380	56,352	56,504	56,718
			0.14%	-0.03%	-0.05%	0.27%	0.38%
Winter Season							
Firm							
Sales	18,697	19,473	19,002	18,971	18,993	19,017	19,060
Transportation	17,128	17,473	16,550	16,537	16,508	16,562	16,660
Non-Firm							
Sales	385	230	220	220	220	220	220
Transportation	1,246	1,339	1,297	1,297	1,297	1,297	1,297
Total	37,456	38,515	37,069	37,025	37,019	37,096	37,237
			-1.00%	-0.12%	-0.02%	0.21%	0.38%
Peak Day - dth							
Firm							
Sales	278,647	268,612	289,157	289,205	288,688	288,573	288,722
Transportation	225,091	191,752	223,280	223,085	223,329	224,958	226,955
Total	503,738	460,364	512,437	512,290	512,017	513,531	515,677

(1) Normal Weather is defined as:

Annual	7,020 HDD
Winter	5,977 HDD
Peak Day	75 HDD

[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG DTI
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	13,700	14,393	14,029	14,032	14,003	13,997	14,005
Transportation	16,097	16,384	15,918	15,907	15,921	16,012	16,124
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	401	387	410	410	410	410	410
Total	30,198	31,164	30,357	30,349	30,334	30,418	30,539
Winter Season							
Firm							
Sales	10,471	10,905	10,641	10,624	10,636	10,649	10,673
Transportation	9,591	9,785	9,268	9,260	9,245	9,275	9,330
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	237	254	246	246	246	246	246
Total	20,299	20,944	20,156	20,131	20,127	20,171	20,250
Peak Day - dth							
Firm							
Sales	143,045	140,103	146,673	146,700	146,411	146,347	146,430
Transportation	128,970	106,509	128,487	128,378	128,515	129,427	130,545
Total	272,015	246,612	275,160	275,078	274,926	275,774	276,975

1/ Normal Weather is defined as:

Annual	7,020	HDD
Winter	5,977	HDD
Peak Day	75	HDD

[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG TCO
Submission Date: July 16, 2018
Version #: 1

	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	5,871	6,169	6,013	6,014	6,001	5,999	6,002
Transportation	6,899	7,022	6,822	6,817	6,823	6,862	6,910
Non-Firm							
Sales	108	58	64	64	64	64	64
Transportation	1,003	967	1,024	1,024	1,024	1,024	1,024
Total	13,881	14,215	13,923	13,919	13,913	13,949	14,001
Winter Season							
Firm							
Sales	4,487	4,674	4,560	4,553	4,558	4,564	4,574
Transportation	4,111	4,194	3,972	3,969	3,962	3,975	3,998
Non-Firm							
Sales	69	41	40	40	40	40	40
Transportation	411	442	428	428	428	428	428
Total	9,079	9,350	9,000	8,989	8,988	9,007	9,040
Peak Day - dth							
Firm							
Sales	85,702	78,773	88,245	88,256	88,132	88,105	88,141
Transportation	54,859	51,534	53,909	53,862	53,921	54,312	54,791
Total	140,561	130,307	142,154	142,118	142,053	142,417	142,932

1/ Normal Weather is defined as:

Annual	7,020 HDD
Winter	5,977 HDD
Peak Day	75 HDD

[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG LOCKPORT (TGP)
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual (2)	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	3,180	3,341	3,257	3,257	3,251	3,249	3,251
Transportation	3,737	3,803	3,695	3,693	3,696	3,717	3,743
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	527	507	537	537	537	537	537
Total	7,444	7,652	7,490	7,488	7,484	7,504	7,532
Winter Season							
Firm							
Sales	2,431	2,531	2,470	2,466	2,469	2,472	2,478
Transportation	2,227	2,272	2,152	2,150	2,146	2,153	2,166
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	299	321	311	311	311	311	311
Total	4,956	5,124	4,933	4,927	4,926	4,937	4,955
Peak Day - dth							
Firm							
Sales	32,416	31,894	34,383	34,389	34,322	34,307	34,326
Transportation	28,728	22,752	28,623	28,598	28,630	28,842	29,102
Total	61,144	54,646	63,006	62,987	62,952	63,149	63,428

1/ Normal Weather is defined as:

Annual	6,436	HDD
Winter	5,593	HDD
Peak Day	74	HDD

(2) NYSEG Annual Actual throughput (July 2017 - June 2018)
(3) Weather criterion for Buffalo (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG NORTH COUNTRY
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	979	1,028	1,002	1,002	1,000	1,000	1,000
Transportation	1,150	1,170	1,137	1,136	1,137	1,144	1,152
Non-Firm							
Sales	456	247	271	271	271	271	271
Transportation	552	532	563	563	563	563	563
Total	3,136	2,977	2,974	2,973	2,972	2,978	2,986
Winter Season							
Firm							
Sales	748	779	760	759	760	761	762
Transportation	685	699	662	661	660	662	666
Non-Firm							
Sales	289	172	165	165	165	165	165
Transportation	299	321	311	311	311	311	311
Total	2,021	1,971	1,899	1,897	1,897	1,900	1,905
Peak Day - dth							
Firm							
Sales	6,091	7,165	7,677	7,679	7,658	7,653	7,659
Transportation	8,850	8,091	8,790	8,782	8,792	8,857	8,937
Total	14,941	15,256	16,467	16,461	16,450	16,510	16,596

1/ Normal Weather is defined as:

Annual	7,171 HDD
Winter	6,232 HDD
Peak Day	85 HDD

[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Burlington (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG BREWSTER
Submission Date: July 16, 2018
Version #: 1

NYSEG	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	245	257	251	251	250	250	250
Transportation	287	293	284	284	284	286	288
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	532	550	535	535	534	536	538
Winter Season							
Firm							
Sales	187	195	190	190	190	190	191
Transportation	171	175	166	165	165	166	167
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	358	369	356	355	355	356	357
Peak Day - dth							
Firm							
Sales	3,571	3,417	3,766	3,766	3,761	3,760	3,761
Transportation	1,770	1,452	1,609	1,607	1,609	1,625	1,645
Total	5,341	4,869	5,375	5,373	5,370	5,385	5,406

1/ Normal Weather is defined as:

Annual	6,100 HDD
Winter	5,370 HDD
Peak Day	73 HDD

[2] NYSEG Annual Actual throughput (July 2017 - June 2018)

[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG GOSHEN
Submission Date: July 16, 2018
Version #: 1

	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	489	514	501	501	500	500	500
Transportation	575	585	569	568	569	572	576
Non-Firm							
Sales	36	19	21	21	21	21	21
Transportation	25	24	26	26	26	26	26
Total	1,125	1,143	1,117	1,116	1,116	1,119	1,123
Winter Season							
Firm							
Sales	374	389	380	379	380	380	381
Transportation	343	349	331	331	330	331	333
Non-Firm							
Sales	27	16	15	15	15	15	15
Transportation	0	0	0	0	0	0	0
Total	743	755	726	726	725	727	730
Peak Day - dth							
Firm							
Sales	7,822	7,260	8,413	8,414	8,404	8,402	8,405
Transportation	1,914	1,414	1,862	1,858	1,863	1,896	1,936
Total	9,736	8,674	10,275	10,272	10,267	10,298	10,341

1/ Normal Weather is defined as:

Annual	6,100	HDD
Winter	5,370	HDD
Peak Day	73	HDD

[2] NYSEG Annual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average

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Table 3: Estimated Requirements (MDT) – Normal Weather

Company: RG&E
Service Area: RG&E
Submission Date: July 16, 2018
Version #: 1

RG&E Total	2017-18 Forecast	2017-18 Actual [2]	2018-19	2019-20	2020-21	2021-22	2022-23
Annual							
Firm							
Sales	25,371	27,597	26,401	26,508	26,456	26,529	26,508
Transportation	31,910	29,899	33,154	33,070	32,580	32,383	32,388
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	57,281	57,495	59,555	59,579	59,036	58,912	58,896
Winter Season							
Firm							
Sales	19,679	20,847	19,790	19,824	19,796	19,783	19,778
Transportation	19,374	18,290	19,435	19,386	19,090	19,003	18,992
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	39,053	39,137	39,226	39,210	38,886	38,786	38,770
RG&E Peak Day - dth [1]							
Firm							
Sales	276,764	279,891	303,483	304,555	304,033	304,765	304,552
Transportation	214,274	182,705	226,802	225,966	221,059	219,092	219,145
Total	491,038	462,596	530,285	530,521	525,092	523,857	523,697

(1) Normal Weather is defined as:

Annual	6,425	HDD
Winter	5,567	HDD
Peak Day	75	HDD

[1] Forecasted Peak Day Demand is in Dths/day
[2] RG&EAnnual Actual throughput (July 2017 - June 2018)
[3] Weather criterion for Rochester (RG&E) weather point; 30 year average

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Data Request 4 – Heating Degree Day Source / Uses

Identify your source for heating degree day ("HDD") data, including the specific weather data points used for forecast purposes. Describe your source and/or your calculation of design day and design winter data (i.e. calculated from normal usage or an actual historic period). Identify the time periods used to develop usage per HDD for both design and normal usage, and explain the frequency of updates. If 30 years of HDD data is not being used for design, please explain why. Please explain how usage per HDD for the peak period is calculated and verified.

Response

Heating Degree Data ("HDD")

NYSEG provides gas service to customers that are geographically dispersed across upstate New York. RG&E, on the other hand, provides gas service to customers primarily in the metro-Rochester area. As such, weather patterns may be substantially different for each of these areas, thereby requiring the need for weather data from several locations.

NYSEG and RG&E receive its HDD data from a service arrangement with AWIS Weather Services, Inc. ("AWIS"). The arrangement provides hourly and daily weather data actuals and forecasts for the following locations:

- Albany County Airport (KALB)
- Binghamton/Broome County Regional Airport (KBGM)
- Buffalo International Airport (KBUF)
- Burlington International Airport (KBVT)
- Poughkeepsie (Dutchess County Airport) (KPOU)
- Rochester Airport (KROC)
- Elmira (KELM)
- Niagara Falls (KIAG)
- Penn Yan (KPEO)

NYSEG utilizes a design weather pattern for planning utilizing weather data for seven (7) NYSEG load areas, while RG&E is a single load area. The companies also utilize GasDay, which is a vendor-supplied software application that delivers customized forecasting models trained on historical data weather data. GasDay is used for near-term forecasting, up to seven (7) days in advance.

NYSEG uses the above locations as follows:

1. KBGM weather information for the market areas served by the Dominion Transmission and Columbia Pipeline systems.
2. KBUF weather information for the Lockport area.
3. KBVT weather information is used for daily forecasts for the Plattsburgh and Lowville market areas.
4. KPOU weather information is used for the Brewster and Goshen market areas.

RG&E uses the KROC weather information for the Rochester market area.

For near term forecasting, GasDay is configured to utilize multiple weather stations that closely represent the geographic areas of our service territory. The following list illustrates the various weather stations for NYSEG and RG&E:

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1. KALB (11.31%), KBGM (26.29%), KPEO (36.29%) and KELM (26.12%) weather information for the market areas served by the Dominion Pipeline system.
2. KALB (7.98%), KBGM (50.49%) and KELM (41.53%) weather information for the market areas served by the Columbia Pipeline system.
3. KROC (42.90%) and KIAG (57.10%) weather information for the Lockport area.
4. KBVT (100%) weather information is used for daily forecasts for the Plattsburgh market area.
5. KPOU (100%) weather information is used for the Brewster market area.
6. KALB (8.86%) and KPOU (91.14%) for the Goshen market area.
7. KALB (39.87%), KBVT (41.43%) and KPOU (18.71%) weather information is used for daily forecasts for the Lowville market area.
8. KROC (80.17%), KIAG (5.85%) and KPEO (13.98%) weather information for the Rochester market area.

The design day HDD's for all areas remain unchanged from last year and are summarized as follows:

Area	Design HDD
Binghamton / Olean	75
Brewster	73
Goshen	73
Lockport	74
Lowville	85
Plattsburgh	85
Rochester	75

NYSEG and RG&E incorporated a dynamic analysis several years ago, utilizing the most recent 40-years of data, to develop updated design and normal usage degree day calculations. The analysis was updated to the most recent 40-years of data, and the weather analysis will be updated annually to capture the most recent data. From a planning perspective, there is no consensus within the natural gas industry as to the single best approach for a design day HDD standard. Gas Supply has discussed this subject with Marquette University as well; Marquette's recommendation, based on their research, is that design day HDDs should not be lowered based on the latest 40 years of data. Based on the various industry approaches and Marquette's recommendation, NYSEG and RG&E shall continue to increase the design day HDD should a new peak HDD occur in the current 40 year weather data, however, the design day HDD shall not be lowered. The Design Winter utilizes the rule curve methodology to establish the highest set of HDDs over the previous 40-year period.

Usage per HDD Verification

The Companies conduct a variety of analyses in an effort to validate the design day demand levels for each operating area.

1. The design day analysis evaluation is based upon regression analyses for the following non-daily metered situations:
    a. Previous year(s) December Regression Results
    b. Previous year(s) January Regression Results
    c. Previous year(s) February Regression Results
    d. Previous year(s) December through February Regression Results
    e. Previous year(s) January and February Regression Results

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The average of the various single point regressions for these five (5) scenarios are then utilized to determine base and heat factors and an associated design day estimate .

2. Extrapolation utilizing the heat factor from (1) above multiplied by (design day HDD minus the actual HDD) plus the actual metered load. Then the average, maximum and minimum extrapolated design loads are reviewed.

3. Utilization of total non-daily metered winter heat load divided by the total HDDs multiplied by design day HDD + baseload factor provides a third design day demand estimate.

In addition to the companies calculations described above, NYSEG and RGE&E incorporate a design day analysis, completed by GasDay, in 2015, for comparison. The GasDay design day analysis utilizes a statistical 1 in 40 years temperature conditions (wind adjusted) for each operating area.

Older data may not necessarily be a good indication of the current customer base due to customer base growth, customers changing classes, etc. which makes forecasting for the next period difficult. GasDay de-trends the data, which prevents data such as high load growth for four (4) of the last eight (8) years from being weighted equally for all eight (8) years.

GasDay then de-trends the historical demand data using five (5) different algorithms, to ensure the data is aligned with the current consumption characteristics for winter season. GasDay has found that de-trending the data improves the quality of the winter forecast.

GasDay then employs seven (7) or eight (8) different design day estimate methodologies using equal weighting, for annual and monthly design day demand as well as growth for the next winter period:

1. Five-parameter Historical Flow Adjusted ("HFA") algorithm all days – fitting fifth-order regression models to windows of data; each window contains one (1) year of data that is offset one (1) month from the previous window. From this GasDay can determine the change in usage characteristics through the years of historical data. GasDay then de-trends the data by adjusting the flow by the change in the model parameters to align all the data to the most recent winter period.
2. A line fit through the scatter plot of the 20% coldest days from mid-December through mid-February and evaluating the line at design day conditions.
3. A line fit through the scatter plot of the 20% coldest Mondays through Thursdays from mid-December through mid-February and evaluating the line at design day conditions.
4. Five-parameter HFA algorithm using only Mondays through Thursdays – accounts for demand typically being greater on weekdays than weekends.
5. Five-parameter HFA algorithm with day-of-the-year components for baseload and heatload (13-parameter model) – accounts for baseload being independent of temperature.
6. Five-parameter HFA algorithm with day-of-the-week components for baseload and heatload (13-parameter model) – both baseload and heat load vary by the day of the week.
7. Five-parameter HFA algorithm with both day-of-the-year and day-of-the-week components for both baseload and heat load (21-parameter model).
8. HFA for a historical day with design day conditions using the five parameter HFA algorithm (if design day conditions are for an actual day for which we have flow, the historical flow adjusted value for that days is used as an eighth estimate).

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Data Request 5 – Load Forecasting Tools

Describe the load forecasting tools used to develop the above forecasts. Indicate how all natural gas efficiency programs, Demand Response Programs, Microgrids, Non-Pipe Alternatives (NPA) conducted by your company, contractors or the New York State Energy Research and Development Authority (NYSERDA) have been incorporated into these forecasts and your capacity planning. Provide a summary of the projected energy savings and the actual savings realized to date. How are these savings translated into the normal usage projection in Table 3?

Response

NYSEG and RG&E use a combination of tools to produce the gas load forecast. Econometric models (developed in MetrixND) are used to forecast the revenue class deliveries. Out of model adjustments are sometimes made based on market research and feedback from our Key Account Managers. Instances of these adjustments are rare, however, and would only occur for a significant change in deliveries not captured in the models such as an existing large customer that leaves the system or a new franchise being established. For this current forecast, out of model adjustments include: (1) the impact of a customer's significant load increase to the Rochester distribution system; (2) an adjustment to account for growth attributed to company initiatives; and (3) an adjustment to capture reductions related to Utility-Administered Energy Efficiency (EE) program targets. The impacts of existing gas efficiency programs are assumed to be implicitly contained in the history used to generate the forecasts so out of model adjustments are only made for projected future incremental EE impacts. The annual projected energy savings for NYSEG are 94,486 dth and for RG&E 141,246 dth. The total delivery forecast is then grossed up for system losses to generate the citygate forecast. The actual achieved dth savings reported for 2017 for all gas efficiency programs is 101,400 dth for NYSEG and 176,753 for RG&E. There are currently no existing Demand Response Programs, Microgrids or NPA that impact Table 3 forecasts.

Data Request 6 – Forecast / Planning Horizon

What is your current forecast/planning horizon for supply and capacity purposes and explain why it is used? If you aren't using a minimum of five years for system planning, please explain.

Response

NYSEG and RG&E plans utilize a five (5)-year planning horizon because pipeline capacity commitments to cover design day requirements are typically for a minimum of five (5) years. It should be noted that there may be exceptions to this position, but for only a small component of the portfolio. The planning horizon for capacity requirements can be found in Tables 2 and 3 and is based on the forecast methodology identified in the response to *Data Request 4*.

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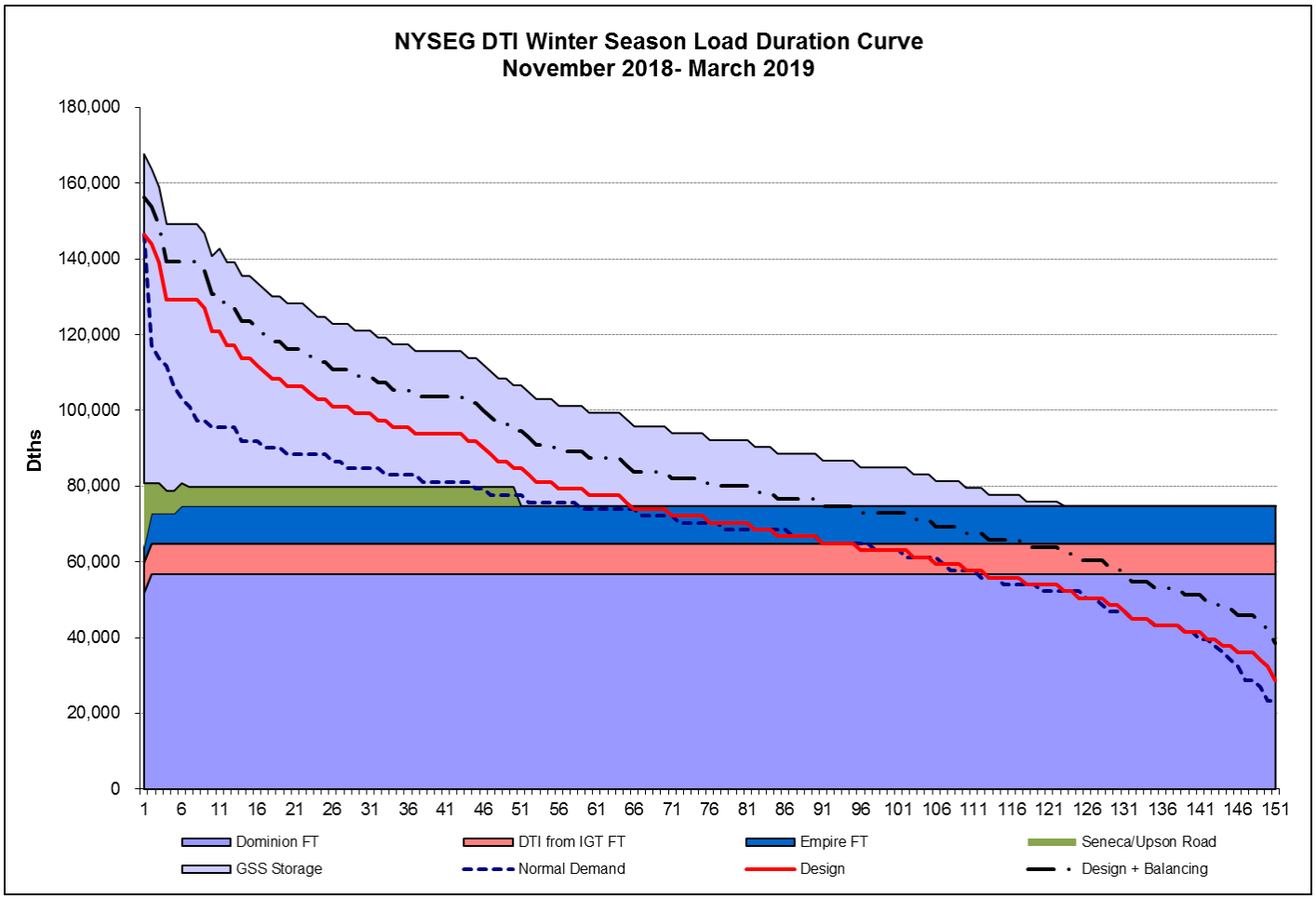
Data Request 7 – Load Duration Curves

A winter season load duration curve for 2018-19 send out year that shows how supplies can meet a severe winter season and peak design day. This should be provided for each service area (or gate when indicate). Include all data in an unlocked digital Microsoft Excel file.

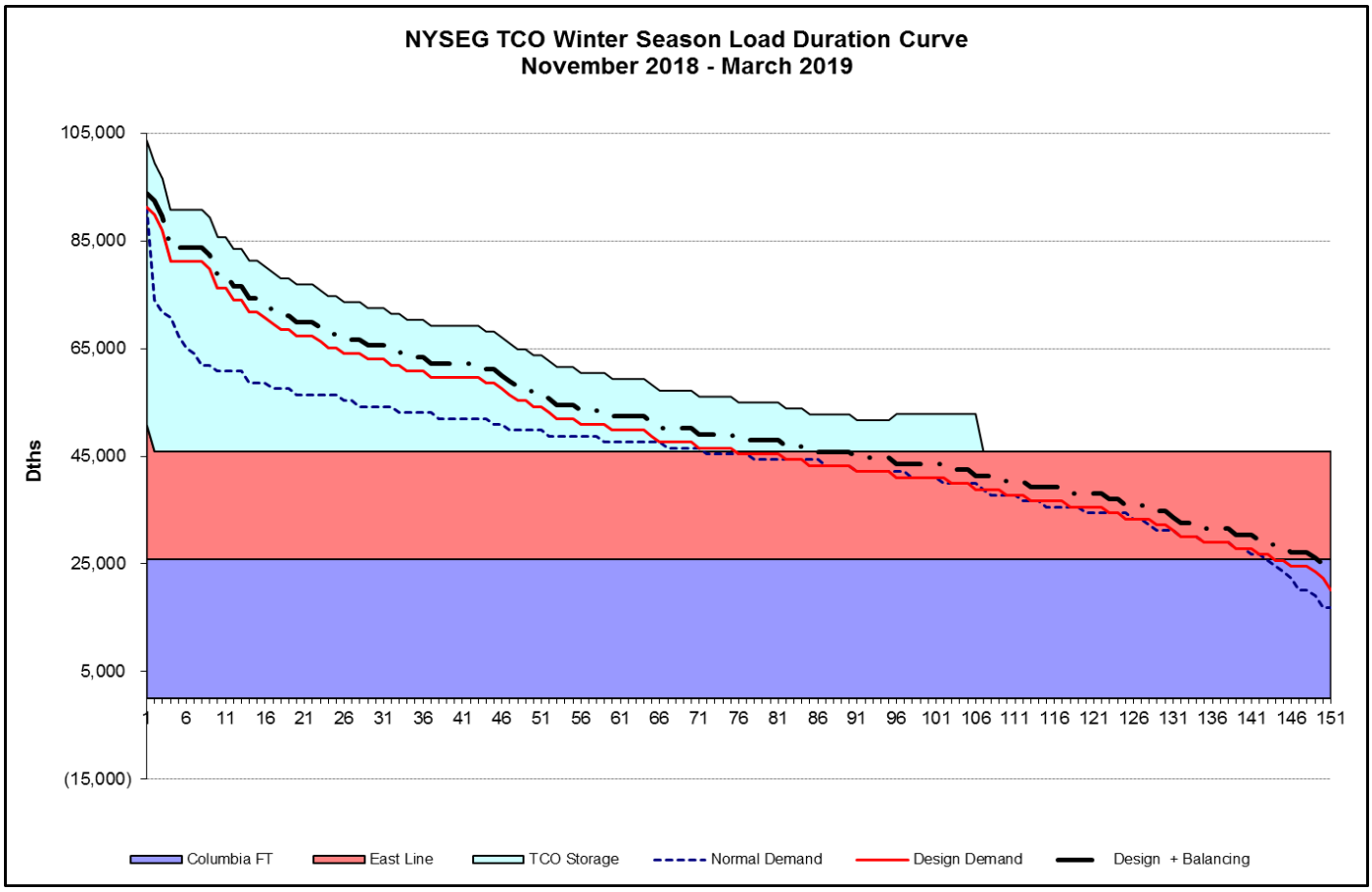
Response

Please find the following 2018-2019 winter season load duration curves for the following areas on next four (4) pages:

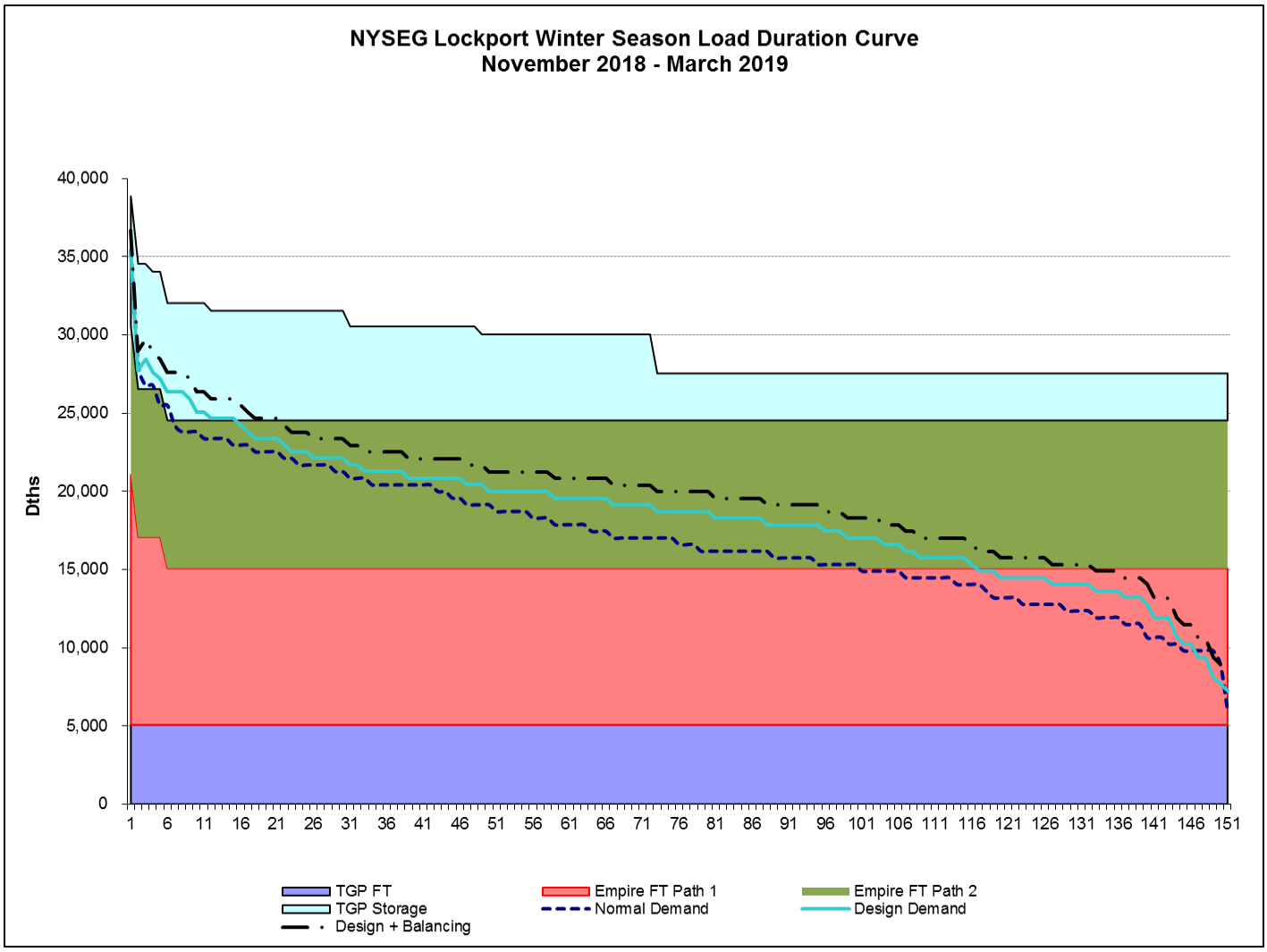
1. NYSEG – Dominion (DTI)
2. NYSEG – Columbia (TCO)
3. NYSEG – Lockport (TGP)
4. NYSEG - North Country
5. NYSEG – Brewster
6. NYSEG - Goshen (O&R)
7. RG&E



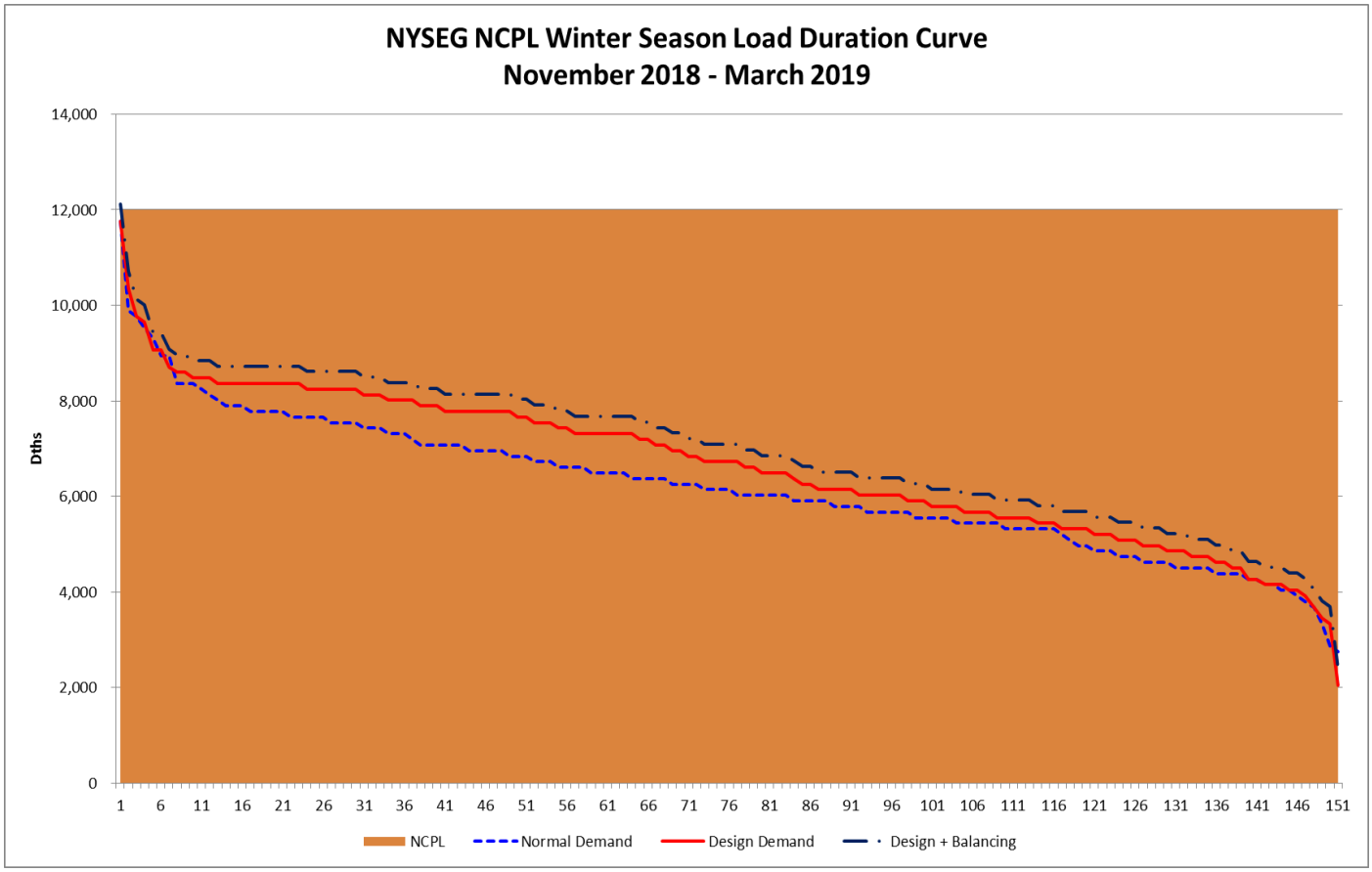
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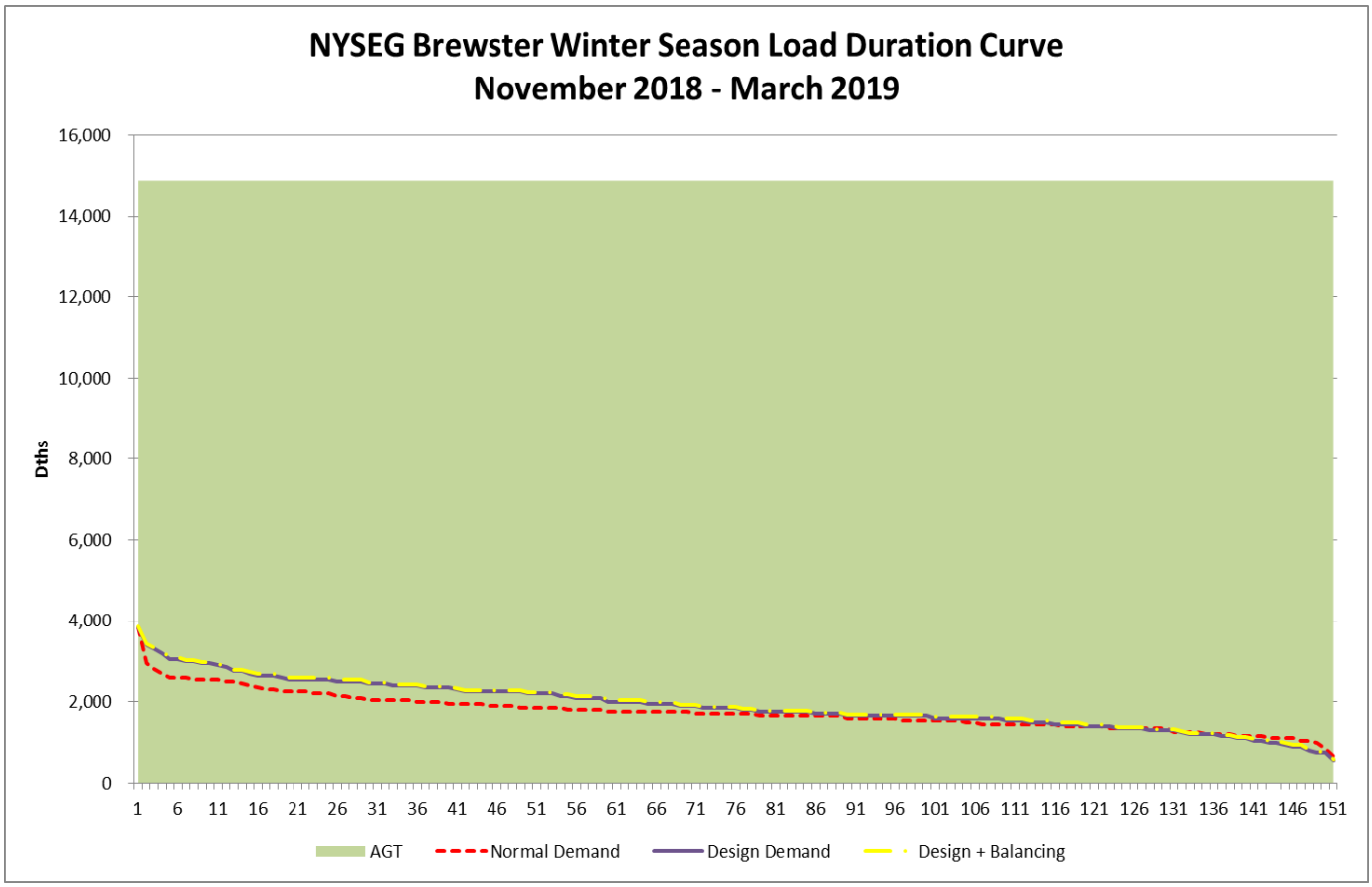
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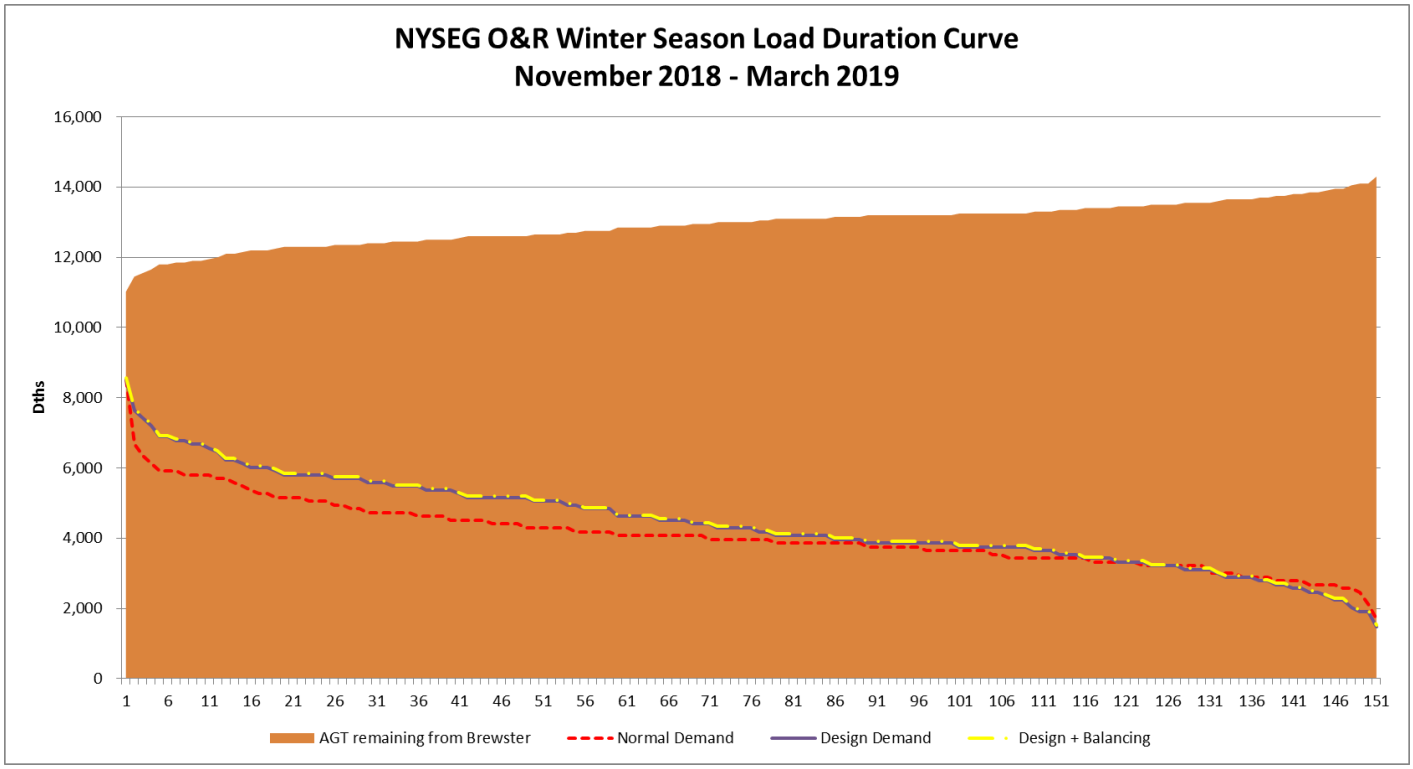
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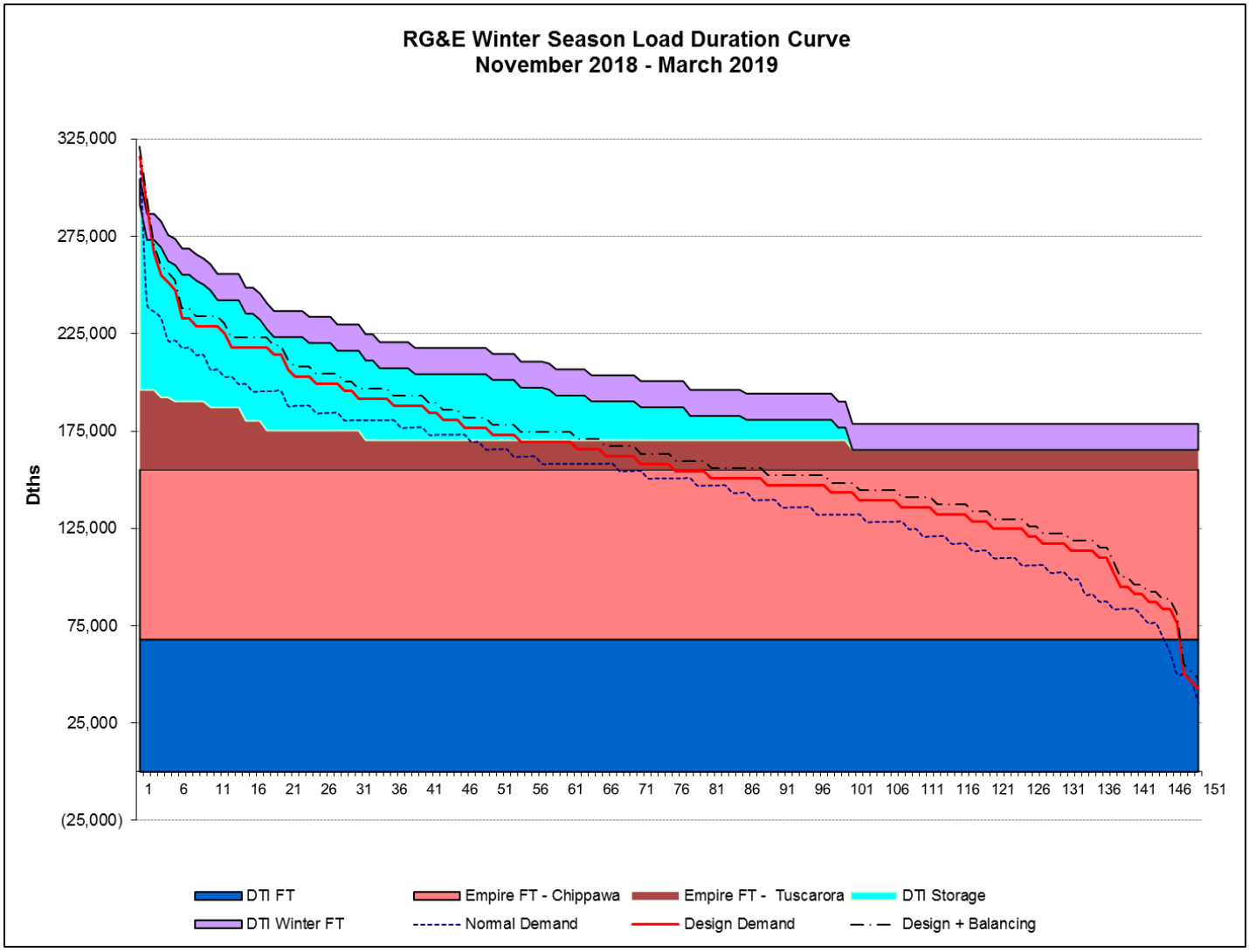
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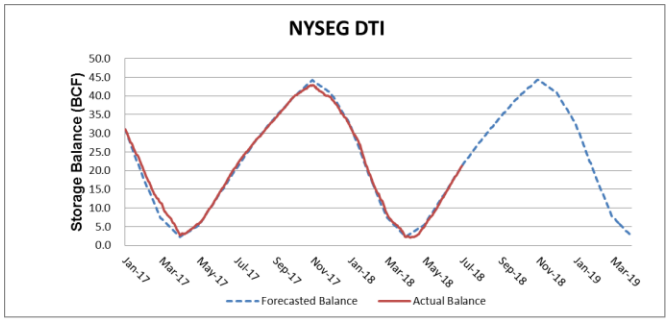
Data Request 8 – Storage Curves

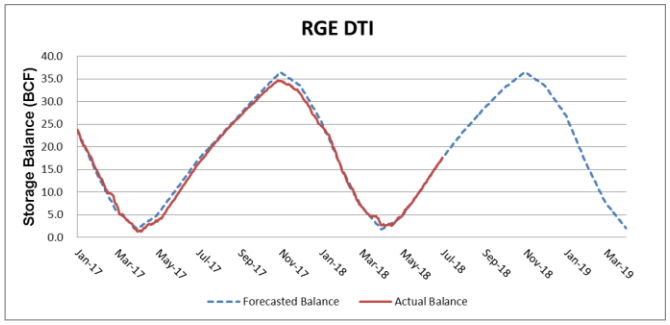
Provide this years and last year's planned storage curves versus actual storage curves for injections and withdrawals.

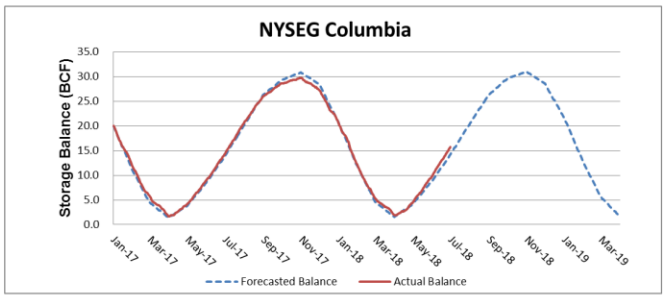
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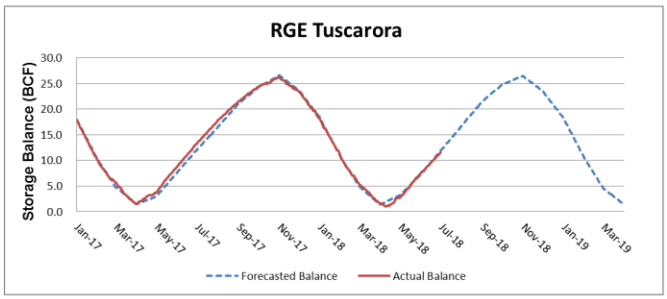
Response

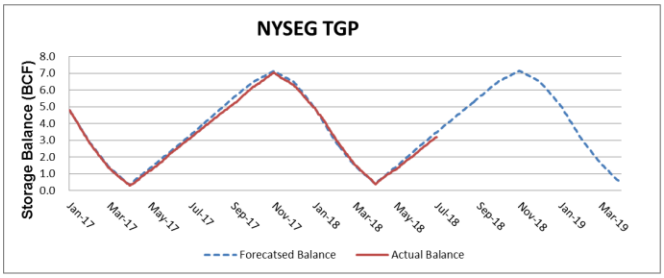
The following graphs represent the planned and actual storage curves for NYSEG and RG&E. The following storage curves are net of retail access migration. Actuals are through June 30, 2018.

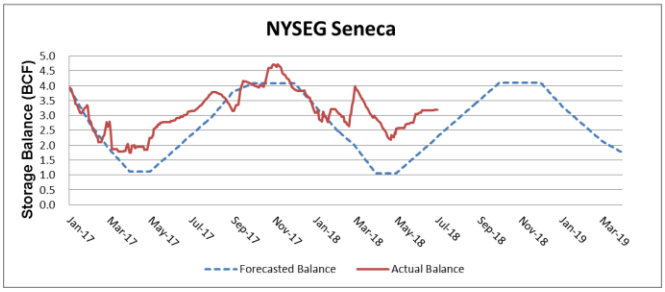












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Data Request 9 – Storage Injection Plan

Describe the storage injection plan for this injection season and highlight any modifications from the prior year plan.

Response

New York State Electric & Gas				
End of :	DTI GSS (300063)	TCO FSS (80349)	TGP (536)	Arlington (SL00001S)
Apr-18	12%	13%	19%	34%
May-18	29%	27%	33%	46%
Jun-18	46%	44%	46%	58%
Jul-18	60%	63%	60%	70%
Aug-18	74%	81%	73%	80%
Sep-18	86%	91%	87%	80%
Oct-18	95%	95%	95%	80%

Rochester Gas and Electric		
End of :	DTI GSS (300084)	ESP FSNN (G12130)
Apr-18	12%	11%
May-18	29%	26%
Jun-18	46%	43%
Jul-18	61%	60%
Aug-18	74%	77%
Sep-18	86%	89%
Oct-18	95%	95%

NYSEG and RG&E's storage injection plan is similar from year to year due to pipeline tariff requirements. Although the percentages change slightly there are no modifications to the plan.

Data Request 10 – Least Cost Dispatch

Provide the method(s) used by the Company to determine or ensure the least cost dispatch when the heating season is warmer than normal.

Response

Gas Supply reviews market pricing on a daily basis including using the ICE Platform and communicating with Suppliers and evaluates the gas needs for each of our demand areas taking into account reliability factors and storage tariff requirements to serve our customers. The following is an example of the market pricing sheet used daily by the buyers to review locational pricing for each company:

Today= Date

VALUE ROUTING

Location	Gas Daily	P/L 1 Fuel	P/L 1 Comdty	Delivered to I/C	P/L 2 Fuel	P/L 2 Comdty	Delivered to CG	Rank	If statements return:
Empire price area 1	1.675	x	x	$1.675	0.30%	$0.0014	$1.681	6	
Empire price area 2	1.725	x	x	$1.725	0.30%	$0.0014	$1.732	7	
Empire price area 3	1.945	x	x	$1.945	0.30%	$0.0014	$1.952	8	
Empire price area 4	2.200	1.23%	$0.00000	$2.227	0.30%	$0.0014	$2.235	9	Highest Cost
Empire price area 5	1.370	x	x	$1.370	0.30%	$0.0014	$1.376	2	
DTI price area 1	1.300	x	x	$1.300	1.95%	$0.0142	$1.340	1	Lowest Cost
DTI price area 2	1.385	x	x	$1.385	1.95%	$0.0142	$1.427	4	
DTI price area 3	1.355	x	x	$1.355	1.95%	$0.0142	$1.396	3	
DTI price area 4	1.435	x	x	$1.435	1.95%	$0.0142	$1.478	5	

Baseload		
NYMEX close (example only)		$2.000
DTI SP/NP	(0.7000)	$1.300
Chippawa	(0.2000)	$1.800

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Data Request 11 – Must Turn Requirements

Provide the Company must turn requirements for each storage facility(s).

Response

Must turn requirements for each storage facility are as follows:

NYSEG	
DTI GSS (300063)	DTI GSS Tariff requires a minimum turnover by April 15 of 35% of SCQ minus Nov 1 inventory
TCO FSS (80349)	TCO FSS Tariff doesn't have a minimum turnover requirement but a balance requirement to be below 25% of MSQ at the end of March
TGP (536)	No must turn requirements
Alrington (SL00001S)	No must turn requirements

RG&E	
DTI GSS (300084)	DTI GSS Tariff requires a minimum turnover by April 15 of 35% of SCQ minus Nov 1 inventory
ESP FSNN (G12130)	No must turn requirements

In addition to these requirements, our withdrawal rates are consistent with the need to meet reliability during times of extreme heat and cold. NYSEG and RG&E strive to maintain targets and not hit the first ratchet until mid-February.

Issue 3 (Data Requests 12-28)

Please provide the following information related to your company's operations and optimization procedures:

Data Request 12 – Sendout Schedule Forecasting Requirements

A send out schedule (or curve) for forecasting requirements under the varying conditions that are considered in developing the estimates (e.g., temperature, wind, weekend/weekday, etc.).

Response

The Winter Season Load Duration Curves shown in the response to *Data Request 7* illustrate the send out schedule/curve under normal and design conditions for each system. These schedules are derived in the following manner.

The data compiled for the analysis is daily total throughput into the system minus the daily metered transportation throughput to determine non-daily metered (NDM) demand. This NDM demand is regressed against the actual daily heating degree days for a daily firm demand function (see below) The GTS base / heat factors are used to account for the migration of NDM customers to transportation on the NYSEG and RG&E systems, see equation on page 42. The result will be a firm sales demand for which the LDC will provide gas supply.

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Daily Firm Demand = $(A - a_{GTS}) + [(B - b_{GTS}) * W]$ Where:

A	=	The baseload required for NDM supply at zero degree days (intercept of the y axis when graphed).
a_{GTS}	=	The baseload calculated for the migrating customers. (Usage base factor)
B	=	The sensitivity to the weather. A one (1) degree increase in temperature will increase the demand for gas by a factor of B (slope of the linear curve)
b_{GTS}	=	The heat load calculated for the migrating customers. (Usage heat factor)
W	=	Heating degree days - is a measurement of the temperature calculated by subtracting the average temperature for a day from 65 degrees.

Data Request 13 – Gas Supply Portfolio – Tables 4-6

Gas supply portfolio information (highlight changes as indicated on the charts, including all capacity or supply contracts remaining to be finalized prior to the winter heating season):

a) ***Table 4***

Transportation capacity data including contract volumes and expiration dates. Please be prepared to discuss how the capacity is actually used during our meeting.

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Response

See Table 4 for NYSEG and RGE, which illustrates the full contractual obligation for each company.

Table 4: Firm Transportation Capacity - Winter 2018-2019

Company: RG&E
Submission Date: July 16, 2018
Version #: 1

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Winter Quantity (MDT)	Annual Quantity (MDT)	Expiration Date [1]
Flowing Gas To Citygate					
Dominion Energy Transmission, Inc. - 100021	FTNN	108,600	16,399	35,787	03/31/2020 (E)
Empire Pipeline, Inc. - 12131	FTNN	117,500	17,743	42,888	3/31/2026
Total		**226,100**	**34,141**	**78,675**	
Upstream Pipeline Support [2]					
TransCanada PipeLines Limited - 2939	FT	46,929	7,086	17,129	***10/31/2020***
Total		**46,929**	**7,086**	**17,129**	
Deliveries from Storage					
Dominion Energy Transmission, Inc. - 700018	FTNN, FT	124,000	18,724	18,724	03/31/2020 (E)
Empire Pipeline, Inc. - 12131	FTNN	55,000	8,305	20,075	3/31/2026
Total		**179,000**	**27,029**	**38,799**	
Winter Peaking Service					
Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)					
Total		**405,100**	**61,170**	**117,474**	

***** Any changes from the previous year's report are in bold italics.***

[1] An (E) designates and "Evergreen" arrangement.

[2] Capacity used to deliver gas to pipelines that deliver to the citygate.

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Table 4: Firm Transportation Capacity - Winter 2018-2019

Company: NYSEG
Submission Date: July 16, 2018
Version #: 1

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Winter Quantity (MDT)	Annual Quantity (MDT)	Expiration Date[1]
Flowing Gas To Citygate					
Algonquin Gas Transmission Company - 9225	AFT-1	16,779	2,534	6,124	***10/31/2019 (E)***
Dominion Energy Transmission, Inc. - 100036	FTNN	80,140	12,101	29,251	03/31/2022 (E)
Dominion Energy Transmission, Inc. - 100120	FTNN	20,000	3,020	7,300	03/31/2020 (E)
Dominion Energy Transmission, Inc. - 200058	FT	8,000	1,208	2,920	03/31/2022 (E)
Dominion Energy Transmission, Inc. - 200392	FT	700	106	256	03/31/2025 (E)
Dominion Energy Transmission, Inc. - 5B7282	FTNN	2,300	347	840	10/31/2025
Empire Pipeline, Inc. - F12132	FTNN	34,816	5,257	12,708	03/31/2021 (E)
Iroquois Gas Transmission System, L.P. - R-520-01	RTS-FT	2,638	398	963	11/01/2022 (E)
North Country Gas Pipeline Corporation - 734(3)	FT	12,000	1,812	3,524	12/21/2020 (E)
Columbia Gas Transmission, LLC - 80348	FTS	36,794	5,556	13,430	10/31/2019
Tennessee Gas Pipeline Company, L.L.C. - 46732	FTATGP	2,490	376	909	10/31/2021
Tennessee Gas Pipeline Company, L.L.C. - 62405	FT-A	4,000	604	1,460	10/31/2019
Total		**220,657**	**33,319**	**79,684**	
Upstream Pipeline Support [2]					
Columbia Gulf Transmission Company - 80242	FTS1	24,146	3,646	8,687	10/31/2019
Iroquois Gas Transmission System, L.P. - R-520-01	RTS	14,561	2,199	5,315	11/01/2022 (E)
TransCanada PipeLines Limited - 51369	FT	8,132	1,228	2,968	10/31/2022
TransCanada PipeLines Limited - 52499	FT-NR	4,327	653	1,579	10/31/2018
TransCanada PipeLines Limited - 53004 [3]	**FT-NR**	**692**	**104**	**253**	**10/31/2019**
TransCanada PipeLines Limited - XXXXX [4]	**FT**	**6,568**	**992**	**2,397**	**10/31/2033**
TransCanada PipeLines Limited - XXXXX [4]	**FT**	**5,132**	**775**	**1,873**	**10/31/2033**
Total		***63,558***	***9,597***	***23,072***	
Deliveries from Storage					
Dominion Energy Transmission, Inc. - 700014	FTNN	110,302	16,656	16,656	03/31/2022 (E)
Columbia Gas Transmission, LLC - 80350	SST	68,514	10,346	18,739	3/31/2020
Tennessee Gas Pipeline Company, L.L.C. - 203	FS-MA	9,744	1,471	3,557	10/31/2021 (E)
		188,560	**28,473**	**38,951**	
Winter Peaking Service					
Xpress Natural Gas LLC	CNG Distribution	1,050	11	11	3/31/2020
Total		**1,050**	**11**	**11**	
Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)					
Total		***410,267***	***61,802***	***118,645***	

***** Any changes from the previous year's report are in bold italics.***

[1] An (E) designates and "Evergreen" arrangement.

[2] Capacity used to deliver gas to pipelines that deliver to the citygate.

[3] Contract will take effect only if Iroquois project does not commence as of 11/1/2018

[4] New Short Haul Contract to take effect 11/1/2018 for commencement of Iroquois project

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Table 5

Storage capacity data, including contract volumes and expiration dates. At our meeting, please be prepared to provide the current average price of gas in storage and your forecast for November 1.

Response

See Table 5 for NYSEG and RGE which shows the full contractual obligation for each company.

Table 5: Firm Storage Capacity & Storage Plan – Winter 2018-2019

Company: NYSEG
Submission Date: July 16, 2018
Version #: 1

Storage Company Name	Rate Schedule	Daily Quantity (DT) (1)	Winter Quantity (MDT) (2)	Expiration Date (3)
Market Area Storage				
Arlington Storage - SL00001S (4)	FSS	51,000	510	3/31/2021
Columbia Gas Transmission, LLC - 80349	FSS	68,514	4,222	3/31/2020
Dominion Energy Transmission, Inc. - 300063	GSS	110,302	5,922	03/31/2022 (E)
Tennessee Gas Pipeline Company, L.L.C. - 536	FS-MA	9,744	880	10/31/2021 (E)
Total		**239,560**	**11,534**	
Production Area Storage				
Total		**239,560**	**11,534**	

Company: RG&E
Submission Date: July 16, 2018
Version #: 1

Storage Company Name	Rate Schedule	Daily Quantity (DT) (1)	Winter Quantity (MDT) (2)	Expiration Date (3)
Market Area Storage				
Dominion Energy Transmission, Inc. - 300084	GSS	124,000	5,000	03/31/2020 (E)
Empire Pipeline, Inc. - G12130	FSNN	55,000	3,753	03/31/2026 (E)
Total		**179,000**	**8,753**	
Production Area Storage				
Total		**179,000**	**8,753**	

**** Any changes from the previous year's report are in bold italics.***

(1) Capacity used to deliver gas to pipelines that deliver to the citygate

(2) Winter Quantity = MSQ

(3) An (E) designates and "Evergreen" arrangement

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b) ***Table 6***

Gas supply contract data including contract volumes, terms and expiration dates.

Response

Please refer to the next four (4) pages for details related to the 2018-19 results from the NYSEG and RG&E RFQs issued to suppliers in June 2018. The quantities, by receipt point, have also been provided by month.

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Table 6: Gas Supply Contracts – Winter 2018-2019

Company: NYSEG
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas

Transporter	Supplier	Receipt Point	AVG Daily Quantity (Dth) [1]	Winter Quantity (MDT)	Annual Quantity (MDT)	Demand ($/Dth-Month)	Commodity ($/Dth)	Flexibility [2]	Expiration Date	Supply Basin [3]
Long Term (>5 years) by FT										
[redacted]										
Immediate Term (1 to 5 years) by FT										
[redacted]										
Short Term (<1 year) by FT										
[redacted]										
Purchases Other than FT										
[redacted]										
Total			[redacted]							

Changes from previous year are highlighted

[1] See page 41 for daily amount by winter month
[2] 100% Swing daily quantity is the maximum
[3] "A for Appalachia, "M" for Marcellus, "C" for Canadian, "G" for Gulf

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Table 6: Gas Supply Contracts – Winter 2018-2019
Monthly Breakdown

Company: NYSEG
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas - Monthly Breakdown								
Transporter	Supplier	Receipt Point	NOV (Dth/d)	DEC (Dth/d)	JAN (Dth/d)	FEB (Dth/d)	MAR (Dth/d)	AVG Daily Quantity (Dth)
Short Term (<1 year) by FT								
[redacted]								
Purchases Other than FT								
[redacted]								
Total			[redacted]					

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Table 6: Gas Supply Contracts – Winter 2018-2019

Company: RG&E
Submission Date: July 16, 2018
Version #: 1

Rochester Gas & Electric

Transporter	Supplier	Receipt Point	AVG Daily Quantity (Dth) [1]	Winter Quantity (MDT)	Annual Quantity (MDT)	Demand ($/Dth-Month)	Commodity ($/Dth)	Flexibility [2]	Expiration Date	Supply Basin [3]
Long Term (>5 years) by FT										
[redacted]										
Immediate Term (1 to 5 years) by FT										
[redacted]										
Short Term (<1 year) by FT										
[redacted]										
Purchases other than by FT										
[redacted]										
Total			[redacted]							

Changes from previous year are highlighted
[1] See page 43 for daily amount by winter month
[2] 100% Swing daily quantity is the maximum
[3] "A for Appalachia, "M" for Marcellus, "C" for Canadian, "G" for Gulf

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Table 6: Gas Supply Contracts – Winter 2018-2019
Monthly Breakdown

Company: RG&E
Submission Date: July 16, 2018
Version #: 1

Rochester Gas & Electric- Monthly Breakdown

Transporter	Supplier	Receipt Point	NOV (Dth/d)	DEC (Dth/d)	JAN (Dth/d)	FEB (Dth/d)	MAR (Dth/d)	AVG Daily Quantity (Dth)
Short Term (<1 year) by FT								
[redacted]								
Purchases other than by FT								
[redacted]								
Total			[redacted]					

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Data Request 14 – Gas System Flow Diagram

Please provide a flow diagram of the gas system showing how the assets included in Tables 4, 5 and 6 are utilized to provide service to your customers.

Response

Below are very simplified views of how the various interstate and intrastate pipelines are utilized to serve each of NYSEG's geographically dispersed load centers, as well as RG&E's load center. The figures that follow illustrate the contractual rights in greater detail.

New York State Electric & Gas
Pipeline Services and Gas Flows for Winter Peak Day

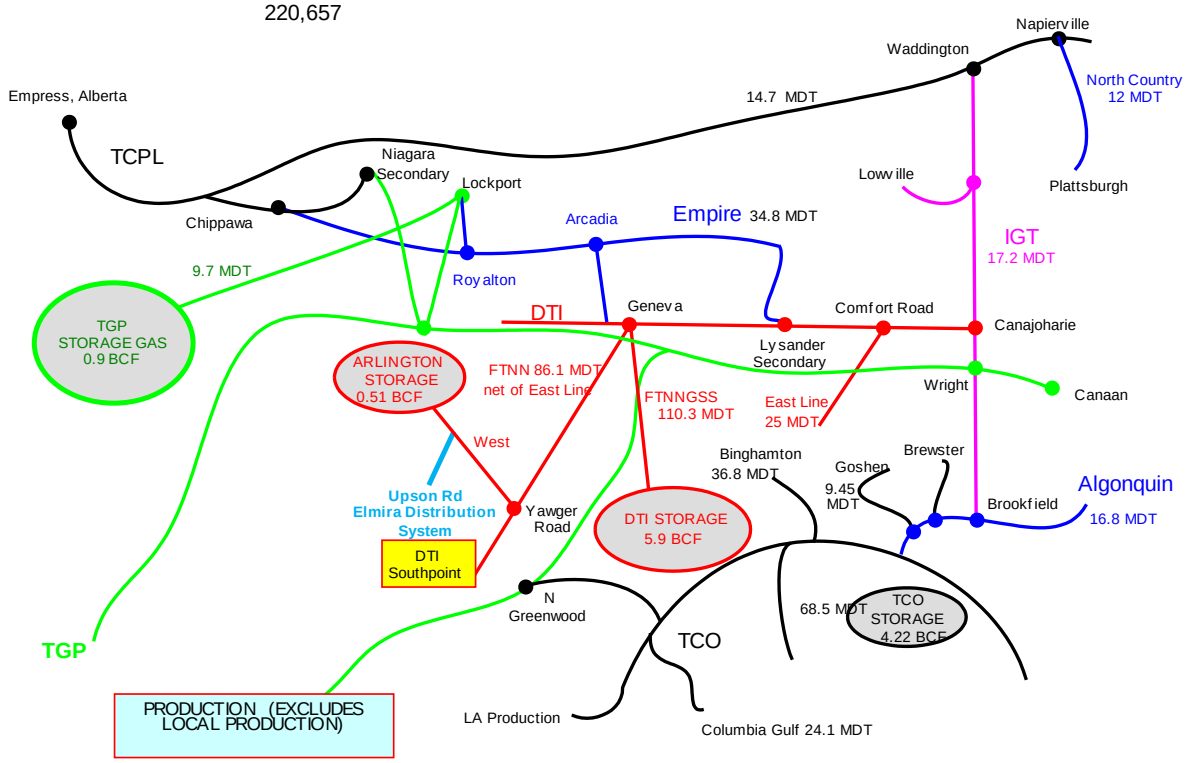
Effective for Plan Year 2018-2019
Winter Maximum Daily Quantity = 427,267 Dths/day

Pipe	Flowing to CG
AGT	16,779
DTI	108,140
DTI Mech	3,000
ESP	34,816
IGT	2,638
NCPL	12,000
TCO	36,794
TGP	6,490
	220,657

Pipe	Storage to CG
DTI	110,302
TGP	9,744
TCO	68,514
	188,560

Storage to Elmira Distribution System
17,000 Estimate

CNG Mechanicville Distribution
1,050

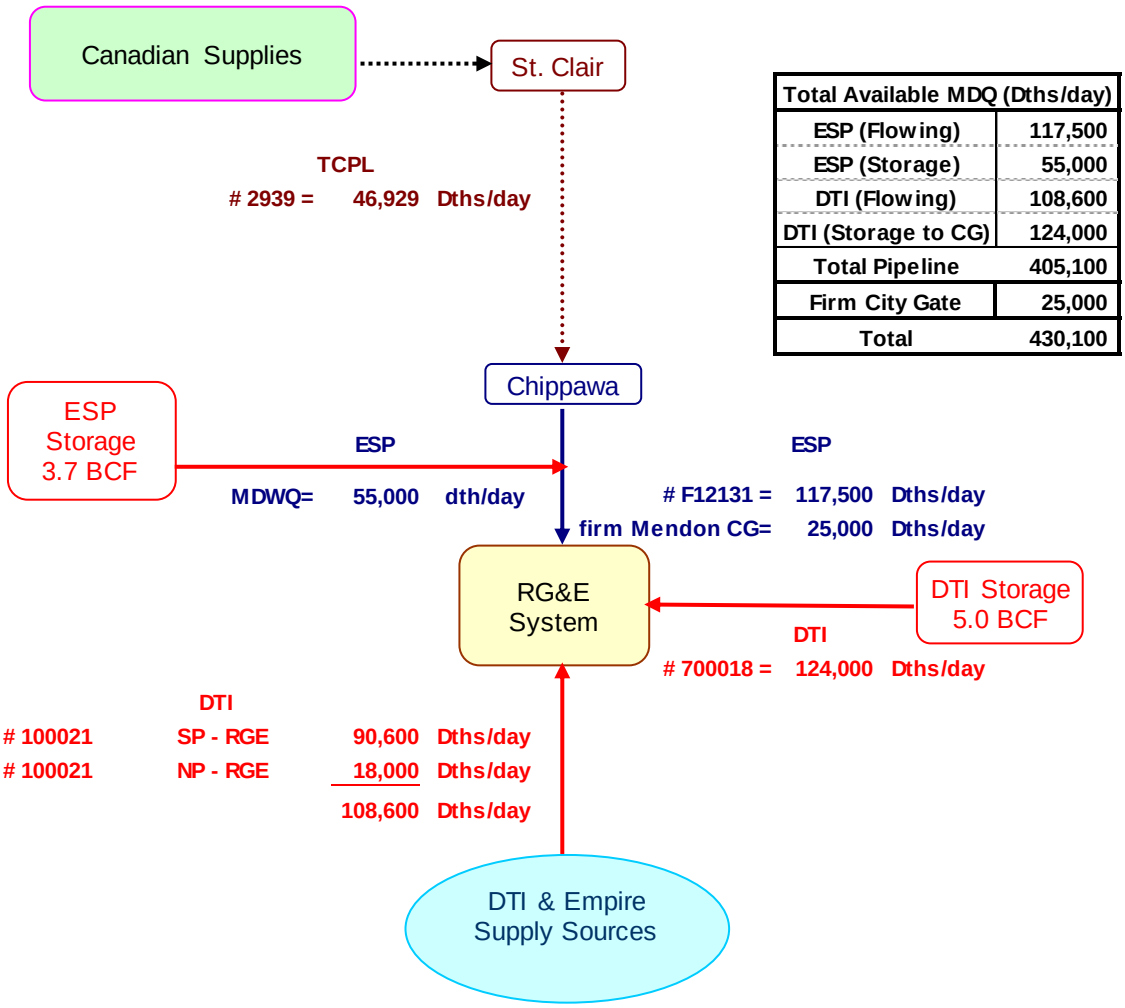


IGT transport capacity is 2,638 dth flowing to citygate and the remaining 14,5613 dth is upstream
CNG Mechanicville increased to 1,050 dth

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Rochester Gas & Electric Corporation
Pipeline Services and Gas Flows for Winter Peak Day

Effective for Plan Year 2018-2019
Winter Maximum Daily Quantity = 410,100 Dths/day



Total Available MDQ (Dths/day)	
ESP (Flowing)	117,500
ESP (Storage)	55,000
DTI (Flowing)	108,600
DTI (Storage to CG)	124,000
Total Pipeline	405,100
Firm City Gate	25,000
Total	430,100

Data Request 15 – Asset Projects

Are you aware of any pipeline or other capacity asset projects that will or could impact your ability to deliver or supply gas (i.e. Constitution Pipeline, NFGS, Northern Access, Williams Northeast Supply Enhancement Project, etc.)?

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Response

The Companies monitor the progress of pipeline announcements and projects to determine opportunities for system needs. The Companies continue to follow the proceedings for the certification of Constitution Pipeline as well as Enbridge's Atlantic Bridge Project that will add additional capacity to Algonquin Gas Transmission Pipeline. In addition, NYSEG continues to monitor the progress on the

TransCanada Dawn Extension Pipeline Project that will restructure NYSEG's TCPL long haul capacity from Empress to Waddington.

Data Request 16 – Peak Shaving

Describe, if applicable, current practices and any anticipated changes related to on-system peaking facilities and other peak shaving techniques. If you operate LNG peaking facilities, please describe current plans for any activities at the facilities that would interrupt their availability and steps being taken to mitigate those interruptions. Please also list any anticipated permitting issues or resistance from local or other government entities.

Response

NYSEG added on-system peaking service through the use of compressed natural gas ("CNG") for the Mechanicville franchise area. This capability was placed in service during the 2015-16 winter period. As for peak shaving techniques, current practices would include the use of each company's respective tariffs, which would include the interruption/curtailment of supply. Neither NYSEG nor RG&E own or operate any LNG peaking facilities.

Data Request 17 – OFO's and Curtailments

A list of dates, times and durations of all OFOs and interruptions or curtailments on the NYSEG and RG&E systems during the 2017-2018 heating season. Please differentiate the interruptions and curtailments between electric generator and other interruptible customer class curtailments.

Response

See *Attachment 1: NYSEG and RG&E OFO's, System Alerts, and Curtailments*.

Neither NYSEG nor RG&E interrupted electric generators served with natural gas. NYSEG interrupted the following Interruptible Customers during the 2017-18 heating season:

- AO Fox Hospital
- Chenango Memorial Hospital
- Chobani
- Cobleskill Stone
- Kerry Bio-Science
- Lutz Feed
- Norwich Pharmaceutical
- SUNY Oneonta.

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Presently, RG&E does not have any interruptible customers.

Data Request 18 – Planning for Interruptible Service Classes

An explanation of how the company determines capacity and peaking supplies required for each of its interruptible service classes if utilized.

Response

For NYSEG and RG&E, the company does not plan for capacity and/or peaking supplies for its interruptible service classes.

RG&E, interruptible gas service tariff was effective October 2017. There are currently no customers enrolled under this service class

---

Data Request 19 – Long / Short Term Forecasting Process

A description of the long and short term forecasting process used for gas dispatch purposes. Include all weather services and a description of any in-house software utilized. Please explain how accurate your short term forecasts were during the 2017-18 heating season by using a back cast after the actual weather is known.

Response

Long-Term Forecast Process

Econometric models for each customer class are used for long-term gas forecasting. For residential deliveries a separate econometric model is used to forecast customer counts which are then multiplied by the estimated use per customer forecast. For the non-residential classes (commercial, industrial, municipal) econometric models are used to forecast total deliveries for each customer class. Aggregating the customer class delivery forecasts yields annual total deliveries forecast which is then adjusted for system losses to generate an annual citygate forecast, as described in Data Request 5.

Each day at approximately 6 AM, the process for estimating the various system area load requirements for the next five (5) days begins. NYSEG and RG&E, with its geographically diverse service territories and various approved tariff service offerings, develop load forecasts for several load areas, seven (7) for NYSEG and one (1) for RG&E, across several inter/intrastate pipelines.

NYSEG and RG&E utilize two (2) processes: a vendor-supplied dynamic modeling system (GasDay), and a forecast that is based on a forecast of HDD and a month-based regression analysis for each load area. When forecasting load demand, the Companies develop forecasts that include all end-users; therefore the forecast is on a total load basis.

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The primary daily forecasting method, GasDay, is a vendor-supplied software application that delivers customized forecasting models trained on very specific historical data. GasDay provides a daily forecast (up to 8 days forward) for all but two (2) of NYSEG's and RG&E's operating areas. GasDay contains a powerful set of analytical tools used to evaluate forecasting results and the underlying data that produced them. Additionally, NYSEG and RG&E utilize GasDay's Intraday Forecast option which contains additional datasets and models needed to support multiple forecast periods in a single day.

Lastly, due to the geographically diverse load centers, NYSEG and RG&E utilize the Weather Station Optimization ("WSO") service to improve forecasting accuracies by using carefully tuned weighted averages of weather forecasts from multiple stations in or near a specific load center. For example, the former methodology to forecast the DTI load center utilized the KBGM weather station. Utilizing the WSO service, by adding the KALB (11.3%), KELM (26.12%), KPEO (36.29%) and KGBM (26.29%) weather stations to the forecasting tool, the analysis indicates that the standard error will improve by 870 Dths as compared to weighting the KBGM station data by 100%.

It is important to evaluate the results of the forecast to ensure that each area load forecast seems reasonable. NYSEG and RG&E also utilize a "Similar Day" in GasDay, which searches through a database to find days that exhibited similar weather characteristics to those used in the aforementioned process. The program displays the actual gas use data from the similar day(s). The intention of the program is to aid the forecaster by allowing them to compare gas load forecast to actual gas use from days with comparable weather.

After the historical and the Similar Days process have been reviewed, the forecaster can make an adjustment to the area load forecast, if necessary. The adjustment could be applied to take into consideration of known customer outages on the system or to better match forecast results to recent load trends.

Weather Forecasting Service

As provided in the response to *Data Request 4*, the companies utilize AWIS Weather Services, Inc. for its weather data needs.

The accuracy of short-term forecasting models, using perfect weather data for the 2017-18 heating season, were as follows:

Op Area	MAPE
RG&E Total Load	2.49%
RG&E NDM	2.83%
DTI Total Load	2.76%
TCO Total Load	3.17%
Lockport Total Load	2.49%
NCPL Total Load	3.04%
AGT Total Load	3.60%

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Data Request 20 – Management Audit

If your company has had a management audit within the last three years, please list any recommendations from that audit that relate to gas supply procurement, load forecasting, gas price risk management, or system planning. Explain whether or not these recommendations have been implemented, and the status of any changes.

Response

Overland Consulting was selected to perform the Management and Operations Audits, for New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation, in April 2017. Both Companies are awaiting the final audit report and recommendations which are anticipated in July 2018.

Data Request 21 – Asset Management / Optimization Agreements

A detailed description of any existing asset management or asset optimization agreements, as well as any such agreements being considered or planned. All agreements that include firm capacity and/or supply that are recallable during the winter heating season should be included in Table 1.

Response

The Companies are presently involved, in the following asset optimization arrangements.

Canadian Optimization (NYSEG and RG&E)
NYSEG and RG&E executed an optimization agreements which expire October 31, 2018. NYSEG and RG&E release their respective TCPL capacity monthly to the counterparty for a guaranteed annual recovery over a 12-month term.

Both the TCPL and optimization agreements grant first rights (by 8:30 AM each day) on the transportation capacity, and if needed, supply.

NYSEG and RG&E will issue an RFQ to optimize the Canadian assets in the near future for a one (1) year term.

As with any opportunity, market dynamics are the driving force in determining and valuing any optimization effort. The Companies plan to evaluate opportunities for the non-domestic contract assets, however, the evolution of new pipeline/expansions will undoubtedly change the value and need of such arrangements.

Data Request 22 – Off System Sales / Capacity Release

A description of your company's plans and strategy with respect to off-system sales, capacity release and streaming arrangements for the 2018-19 winter season as well as any such transactions that extend beyond the 2018-19 winter.

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Response

Both NYSEG and RG&E implement plans and strategies in an attempt to maximize off-system sales, capacity release and other portfolio optimization transactions, as appropriate. Neither company has any streaming arrangements for the 2018-2019 winter season. Both companies engage the services of a third-party to assist in Canadian portfolio optimization as provided in the response to *Data Request 21*.

The process used in determining what assets are available for off-system sales and capacity release during 2018-2019 will remain similar to previous years. It should be noted, however, as the LDC's contracted asset base changes, the ability to perform off-system sales and capacity release increases or decreases proportionately.

In order to identify assets available for optimization, long-term and short-term plans are prepared and in the process a determination is made concerning what combination of assets is needed to meet system requirements. Based on this determination, NYSEG and RG&E enter into various off-system sales and capacity release transactions. All such transactions are done under terms that ensure each LDC has the necessary rights of recall should system requirements dictate this requirement.

Data Request 23 – Mandatory Capacity Release / Grandfathered

Status of mandatory capacity release and grandfathered capacity programs.

a) Status of marketer compliance with the Commission's primary point capacity requirement for grandfathered capacity. Include how much grandfathered capacity remains on your system.

Response

For NYSEG, an email with an attached affidavit template was sent to each active ESCO on June 7, 2018, this was also posted in our Gas Tracking System ("GTS") system. The email and GTS posting requested executed affidavits and copies of all price-redacted contracts used for proving/verifying primary point capacity be returned to the Company no later than August 1, 2018. Additionally, as provided in NYSEG's NY PSC-approved tariff, if an ESCO wishes to designate a customer as firm secondary rather than to prove primary point capacity, they must do so in writing to the customer and the Company no later than August 1, 2018.

Grandfathered capacity was reviewed in April 2018. The amount of grandfathered capacity on NYSEG's system is 6,596 Dths (across all pooling areas). This represents no change from last year's filing.

For RG&E, an email with an attached affidavit template was also sent to each active ESCO on June 7, 2018, this was also posted in our GTS system. The letter requested executed affidavits and copies of all price-redacted contracts used for proving/verifying primary point capacity be returned to the Company no later than August 1, 2018. Additionally, as provided in RG&E's NY PSC-approved tariff, if an ESCO wishes to designate a customer as firm secondary rather than to prove primary point capacity, they must do so in writing to the customer and the Company also no later than August 1, 2018. Furthermore, an ESCO must demonstrate they have firm primary point capacity for the Empire

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portion of their design day load back to Dawn, or they must prove they have a firm supply contract at Chippawa, or another point downstream of Chippawa.

Grandfathered capacity was reviewed in April 2018. The amount of grandfathered capacity on RG&E's system is 14,873 Dths. This represents no change from last year's filing.

b) **Please describe the methodology utilized to determine the mandatory capacity release to the marketers. Indicate how this compares with the methodology utilized to determine capacity required for firm sales customers.**

Response

Capacity requirements and releases are based on the Maximum Daily Aggregated Pool Quantity requirement for the customers in each ESCOs pool for the month at the citygate. The capacity that is released to the ESCO on behalf of non-daily metered customers is based on 66 Heating Degree Days. The capacity released to ESCOs serving daily metered customers that are mandatory capacity release customers is based on 75 HDD.

Capacity required for firm sales customers is determined by forecasting the non-daily metered design day by area less the capacity allocated for non-daily metered migrated customers. The capacity allocated for non-daily metered customers is based upon historical demands by each individual customer (base and heat factor determinants).

c) Please describe how your company keeps marketers informed of changes in procedures. Include the frequency and past/proposed dates of marketer meetings relating to the 2018-2019 heating season.

Response

NYSEG and RG&E communicate with ESCOs on a very frequent basis. Each of the three (3) Lead Analysts in the Supplier Relations Group is assigned a number of ESCOs for whom they are the single point of contact. The Lead Analysts have almost daily contact with ESCOs through email and telephone calls. The Companies send out generic emails to all ESCOs when this is appropriate, otherwise specific communication is used to contact an ESCO.

Since last year's initial Winter Supply Plan filing, the Companies have hosted one (1) Gas Marketer Operating Group ("GMOG") meeting (October 19, 2017). This meeting was used to discuss winter preparedness, reliability issues, and RG&E System Constraints changes. In response to the Joint Proposal issued and effective June 15, 2016, the Companies shall convene a GMOG meeting annually in advance of the winter supply period. No specific date has yet been established for 2018. The companies are no longer required to hold a GMOG meeting annually each spring. NYSEG and RG&E will hold any additional meetings on an as-needed basis.

d) List the pipelines and allocation percentages being utilized for the mandatory assignment of capacity.

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Response

Please refer to the tables on the next page for NYSEG and RG&E's list of pipelines and allocations percentages being utilized for the mandatory capacity release program.

RG&E Capacity Release Receipt & Delivery Points						
	Pooling Area	Tariff Rate	Capacity%*	# of Days**	Receipt Meter(s)	Delivery Meter(s)
1	**DTI**					
	Transport	FTNN	22.58%		Oakford (40208)	20600
	Transport	FT	4.63%		DTI NP	20600
	Transport	FTNNGSS***	28.56%		10002	20600
	Storage	GSS		40	DTI Storage Pt. (10001)	10002
2	**Empire**					
	Transport	FTNN	30.13%		Chippawa 12000010	Mendon 120001010
	Transport	FTNN	14.10%		Tuscarora	Mendon 120001010
	Storage	FSNN		60 days expires on March 31, 2017 68.238 days effective April 1, 2017	Empire Storage Pt.	Empire Storage Pt.
3	**TCPL**					
	Transport	FT	12.0%		St. Clair	Chippawa

* *Capacity % is applied to ESCO peak day (75 HDD daily metered/66 HDD non-daily metered)*

** *Multiply storage transport MDQ result by the # of days for SCQ (Storage Capacity Quantity)*

*** *Not available during the summer (Apr-Oct).*

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NYSEG Capacity Release Receipt & Delivery Points

	Pooling Area	Tariff Rate	Capacity %*	# of Days**	Receipt Meter(s)	Delivery Meter(s)
1	**TGP**					
	Transport (Empire)	FTNN	79%		Corning (22008810)	Royalton (012004010)
	Storage Transport	FT-A	21%		N. Storage (460018)	Lockport (420221)
	Storage	FS-MA		90		N. Storage (460018)
2	**Columbia**					
	Transport	FTS	35%		Leach (801) @ 100%	Binghamton (21)
					Leach (801) @ 100%	Olean (52)
	Storage Transport ***	SST	65%		STOW	Binghamton (21)
	Storage	FSS		61.61904		STOW
	Columbia Gulf	FTS1	100%		Rayne (2700010)	Leach (801)
3	**DTI**					
	Transport	FTNN	53%		Oakford (40208)	20700
	Storage Transport ****	FTNNGSS	47%		DTI Storage Pt. (10002)	20700
	Storage	GSS		54	DTI Storage Pt. (10001)	DTI Storage Pt. (10002)
4	**AGT**					
	AGT	AFT1/ AFT2	100%		Brookfield (00251)	Southeast (00084)
5	**IGT**					
	IGT	RTS12	100%		Waddington (67707)	Brookfield (68098)
6	**NCPL – ESCO Released DTI Capacity**					
	Transport	FTNN	53%		Oakford (40208)	20700
	Storage Transport ****	FTNNGSS	47%		DTI Storage Pt. (10002)	20700
	Storage	GSS		54	DTI Storage Pt. (100°01)	DTI Storage Pt. (10002)
7	**O&R**					
	No Capacity Released on O&R - NYSEG moves ESCO AGT delivery at Stony Point on NYSEG O&R contract					

* *Capacity % is applied to ESCO peak day (75 HDD for daily/66 HDD for non-daily customers)*

** *Multiply storage transport (MDQ result by the # of days for SCQ (storage capacity quantity)*

*** *TCO SST MDQ is half of the winter MDQ during April - Sept*

**** *Not available during the summer (April - October)*

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e) Please provide a comparison between your company's weighted average cost of capacity and the charges paid by marketers and direct customers for released capacity. What process, if any, is utilized to true-up any differences?

Response

NYSEG currently releases capacity to ESCOs and Direct Customers based on the Weighted Average Cost of Capacity ("WACOC") as established through the Natural Gas Collaborative (Case 09-G-0716).

NYSEG calculates a WACOC effective each April 1 for the subsequent twelve (12) month period based on the Company's upstream portfolio of capacity assets. If in any month the actual WACOC should differ from the calculated WACOC by more than five percent (5%), the Company will reset the capacity release rate. Furthermore, due to the implementation of the 5% trigger, NYSEG will not reconcile the WACOC charge to ESCOs. To date; NYSEG's WACOC has not differed more than 5% from the original April filing.

Date	Originally filed WACOC	Actual Cost
Apr-17	$9.5345	$9.5345
May-17	$9.5345	$9.6508
Jun-17	$9.5345	$9.6508
Jul-17	$9.5345	$9.6508
Aug-17	$9.5345	$9.6508
Sep-17	$9.5345	$9.6358
Oct-17	$9.5345	$9.6087
Nov-17	$9.5345	$9.6067
Dec-17	$9.5345	$9.5700
Jan-18	$9.5345	$9.5700
Feb-18	$9.5345	$9.6804
Mar-18	$9.5345	$9.5298

At RG&E, the capacity is released to marketers, at maximum pipeline rates, as a slice of its system

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f) Please describe how your company determines the daily delivery quantities (DDQ) provided to marketers each month for their daily delivery requirements. Provide a sample calculation.

Response

The following formulas are used to calculate the Estimated Total Usage (ETU) for a customer at the citygate:

Winter ETU = [(base usage factor + (winter usage factor *HDD forecast)) * FA]

Summer ETU = [(base usage factor + (summer usage factor *HDD forecast)) * FA]

ETUs are calculated daily based on the current HDD forecast data up to 66 HDDs.

Where:

ETU = Estimated Total Usage
FA = Factor Adjustment

g) Please indicate if any marketers serving core customers on your system failed to perform as anticipated during the previous winter, and if so, what steps you took to ensure reliability of service.

Response

All ESCOs met their delivery requirements and performed as anticipated.

Data Request 24 – Alternate Fuel

Description and status of efforts to verify customer alternative fuel availability and equipment testing, including:

a) Methods utilized to verify dual-fuel customers' capabilities, including power generation customers.

Response

For NYSEG, letters are sent in September to all interruptible customers along with a survey requesting information regarding the customer's alternative fuel storage capability and arrangements to replenish or curtail. All interruptible customers are required to complete the survey form and return it no later than mid-October. See *Attachment 2: NYSEG Interruptible Letter and Alt Fuel Compliance Form 17-18*.

For RG&E letters are sent each year during the month of May or June to all dual fuel customers along with a survey requesting information regarding the customer's alternate fuel storage capability and arrangements to replenish or curtail. See *Attachment 3: RG&E Heating Season Letters and Alt Fuel Compliance Forms*.

At RG&E, there are currently no interruptible customers. An interruptible tariff became effective on September 1, 2017. Should a customer sign up for interruptible service the customer will be required to complete a survey consistent with the current NYSEG policy.

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b) Please provide the results of compliance with the interruptible rules during last winter. Be sure to include the number of customers switched to firm service or removed from gas service due to non-compliance.

Response

All 36 NYSEG interruptible customers, with the exception of 1 customer for 66 hours, were in compliance during the 2017-2018 winter periods. The one customer that was out of compliance experienced operational issues with their boiler during two separate interruptions. The customer has made repairs to boiler and has demonstrated reliable compliance. No customers switched to firm service or were removed from interruptible gas service due to non-compliance.

RG&E did not have any interruptible customers last winter.

c) How many customers will be visited out of how many customers in total? Will all customers with non-compliance issues last winter be visited? How often will the compliant customers be visited?

Response

For NYSEG, following the return of the surveys, on-site inspections are conducted for all interruptible Human Needs/Critical Care customers, 65% of Goshen and Oneonta area customers, and 30% of all other customers. Twelve (12) interruptible natural gas customers are not required to have on-site inspections as they are neither Human Needs/Critical Care nor distillate/#2 fuel oil customers. The total number of customers actually visited during the fall of 2017 was 19 of 37 customers (51%). All 37 NYSEG interruptible customers, with the exception of 1 customer for 66 hours, were in compliance. The one customer with a non-compliance issue last winter will be visited prior to the 2018-2019 heating season. For 2018, approximately 19 of the 36 compliant customers will be visited once, or more, as necessary.

For RG&E, no customers were visited. Information is taken from the surveys returned by the customers. RG&E does not currently have interruptible customers, however, in the event they do in the future, on-site inspections would be scheduled in the first year. After the first year, RG&E would follow similar protocols to NYSEG.

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d) What are the alternate fuels and how many customers are in each fuel category?

Response

Alternate Fuel Type	Number of Customers NYSEG	Number of Customers RG&E
#2 Fuel Oil	19	15
#4 Fuel Oil	1	0
#6 Fuel Oil	2	3
#2 or #6 Fuel Oil	1	0
Vegetable Oil/Yellow Grease	0	1
Propane	3	0
Coal	0	0
Wood Chips	3	0
Waste Oil	2	0
Alternate Natural Gas Connection	1	0

e) Are affidavits required?

Response

NYSEG and RG&E do not require affidavits.

f) Outcome of review? Rechecks?

Response

All NYSEG interruptible customers inspected or surveyed were in compliance.

For RG&E, customers were required to have five (5) days alternate fuel on hand by November 1, 2017 in order for the supplier to not need primary point capacity to serve the customer. Suppliers were notified by Gas Supply of any dual fuel customers not meeting the five (5) day on-hand fuel requirement. Should a dual fuel customer at RG&E become an interruptible customer then an inspection would occur.

g) Provide a copy of this year's (if available) and last year's pre-season letter(s), if applicable. Have you made or are you planning to make any changes to these letters based on the events of the 2017-18 heating season? If yes, what are the changes?

Response

For NYSEG, please see *Attachment 2: NYSEG Interruptible Letter and Alt Fuel Compliance Form 17-18*.

For NYSEG, no changes to the letter have been made or are planned based on the events of the 2017 - 2018 heating season.

For RG&E, please see *Attachment 3: RG&E Heating Season Letters and Alt Fuel Compliance Forms*.

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For RG&E no changes to the letter for dual fuel customers have been made or are planned based on the events of the 2017 – 2018 heating season. Should RG&E have an interruptible customer, then a letter similar NYSEG (*Attachment 2: NYSEG Interruptible Letter and Alt Fuel Compliance Form 17-18*) would be sent to the customer.

h) Did your experience servicing dual fuel customers during last winter indicate the need for additional alternate fuel inventory requirements? If so, what changes do you recommend?

Response

There were no issues experienced serving NYSEG interruptible or RG&E dual fuel customers that would require additional alternate fuel inventory requirements. Six (6) NYSEG customers were interrupted with only one (1) customer not in compliance due to operational issues with their boiler problem.

i) Is the company aware of any issues regarding interruptible customers not receiving their oil deliveries during the winter season? If so, please provide details of when and where this occurred, as well as what the Company would suggest could be done to help these customers?

Response

NYSEG is not aware of any issues regarding interruptible customers not receiving their oil deliveries during the 2017-18 Winter season.

RG&E did not have interruptible customers during the 2017-18 Winter season.

j) Will you be modifying your procedures for verifying alternate fuel inventories being held by interruptible customers (including generators and temperature-controlled customers) as a result of the winter of 2017-18? If so, how? If affidavits are not used, why not?

Response

No modifications to NYSEG or RG&E procedures are planned as a result of the 2017-2018 heating season. Affidavits are not used because it is not a requirement of the NYSEG or RG&E tariffs. Additionally, we have not experienced problems that would necessitate the use of affidavits.

Data Request 25 – Communication Methods

Describe the methods used to communicate with interruptible customers, their marketers/fuel suppliers, NYSERDA and the various Oil Associations in New York prior to, and during, periods of interruption in compliances with Commission Order in Case 11-G-0543.

Response

Interruptible customers provide NYSEG with a 24-hour point of contact. If the need to curtail load is anticipated, NYSEG marketing representatives contact customers to provide as much advance notice as possible. In the event NYSEG needs to shed load, customers are contacted by their NYSEG marketing representative and told how much load to shed and the expected duration of the interruption. During the interruption, the NYSEG marketing representative maintains communication with the

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customer and advises them as conditions change. Communications to customer marketers/fuel suppliers, NYSERDA, and the various Oil Associations in New York prior to, and during periods of interruption in compliance with Commission Order in Case 11-G-0543 is performed by the Gas Supply Group.

RG&E will follow the same protocols as NYSEG if there is an interruptible customer.

Data Request 26 – Interruptible Customers

Please provide the total number of firm dual fuel and interruptible customers, by service class, including how many interruptible are temperature controlled. How will the switch to their alternate fuel be accomplished and ensured? Please indicate the number of process customers that are exempt from maintaining alternate fuel supplies and have indicated intention to do so and provide a copy of the affidavit to be submitted by those customers. Please provide a copy of the letter that will be sent to all dual fuel customers if there are five or more interruptions prior to February 15, per Commission Order in Case 11-G-0543.

Response

The total number of interruptible and firm dual fuel customers by Company is summarized in the table below. None of these customers are temperature controlled

Company	Interruptible		Firm Dual Fuel	
	Service Classification	# of Customers	Service Classification	# of Customers
NYSEG	PSC #87; SC 3	7	PSC #88; SC 1	31
	PSC #88; SC 2	27	PSC #88; SC 5	49
	PSC #88; SC 7	2	PSC #88; SC 14	11
RG&E	PSC #16, SC15	0	PSC #16; SC 3	19
	PSC #16, SC16	0		

Presently, there are 36 NYSEG interruptible natural gas customers. Each of these customers takes service under one of the following NYS PSC-approved tariff services: PSC #87 - SC #3, PSC #88 - SC #2 or SC #7. When situations arise to interrupt NYSEG's interruptible natural gas customers, NYSEG (Marketing & Sales Department) will provide these customers with a minimum two (2) hour notice to curtail/interrupt their natural gas use. Results of the on-site inspections conducted during the Fall of 2017 indicate each of these interruptible customers had demonstrated their ability to utilize their alternate fuel (please see the response to DR24 above).

For the 2017-2018 Winter, there were three (3) process customers that were exempt from maintaining alternate fuel supplies and have signed the compliance form indicating so. The requested compliance form to be submitted by process customers that are exempt from maintaining alternate fuel supplies is a part of the attached Alternate Fuel Compliance Form (please see *Attachment 2: NYSEG Interruptible Letter and Alt Fuel Compliance Form 17-18*).

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For the 2017-2018 Winter, no NYSEG customers were interrupted five (5) or more days prior to February 15, 2018. Therefore, no fuel storage replenishment letters were sent per Commission Order in Case 11-G-0543. The letter sent to dual fuel customers, should the five (5) or more interruption threshold be met prior to February 15th, is provided in *Attachment 4: NYSEG Replenishment of Oil Storage Inventories.*

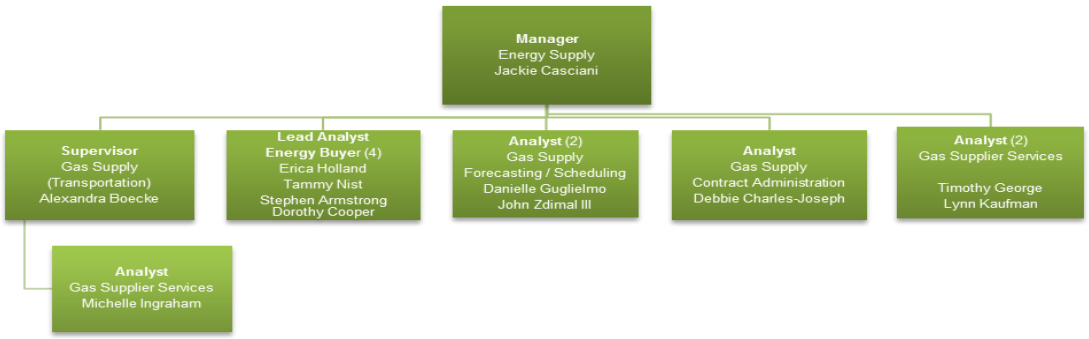
As previously mentioned, RG&E does not have interruptible customers. RG&E will follow the same protocols as NYSEG if a customer signs up for interruptible service.

Data Request 27 – Organization Chart

A current organization chart for your company's gas supply department. Please include a list of contact people for the winter season for updated storage, peaking and other supply-related information. Include the chief dispatcher and telephone numbers for both weekdays and weekends.

Response

Organization Chart – Gas Supply Department for NYSEG and RG&E
As of July 16, 2018



Contact Information for 2018-19 Winter Season for NYSEG and RG&E

Gas Supply - NYSEG and RG&E			
Contact	**Title**	**Office Phone**	**Cell Phone**
Jackie Casciani	Manager, Gas Supply	607.762.8620	607.422.7293
Alexandra Boecke	Supervisor, Gas Supply	607.762.8675	607.644.0802

Gas Control – NYSEG and RG&E			
Contact	**Title**	**Office Phone**	**Cell Phone**
Sue Dornblaser	Manager	585.484.4701	607.760.3918
Louis Armstrong	Supervisor	607.762.4209	607.242.4523

Gas Control – NYSEG and RG&E Weekends / After Hours and Emergencies		
Contact	**Office Phone**	**Cell Phone**
Gas Control Desk - 24 Hour Coverage	607.762.4209	N/A

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Data Request 28 – Natural Gas Conversions

Please provide the following information on conversions to natural gas:

a) Requests received per year, for the last five years, from customers using heating fuels other than natural gas. Provide the data broken down between residential and non-residential customers. If there has been an increase in requests, how is the company handling such an increase?

Response

During the period from January 1, 2013 through May 31, 2018 the following requests were received by customers wanting to switch from another heating fuel to natural gas.

At both NYSEG and RG&E, 2018 requests through May are comparable to the same period in 2017.

Year	NYSEG		RG&E	
	RES	NON-RES	RES	NON-RES
2013	1,422	142	253	24
2014	1,433	155	459	44
2015	1,311	118	304	37
2016	739	99	221	21
2017	712	75	204	8
2018 (through May 31)	263	23	77	12

b) Do you see new opportunities to expand gas services, regardless of the ever changing cost differential between natural gas and its alternatives? If so, please explain any plans and the expected number of customer conversions. Please outline coordination of these activities with Case 12-G-0297, which is investigating expansion of the natural gas system in New York State.

Response

Even with constant fluctuations in the cost differential between natural gas and competing fuels there are definitely opportunities to expand gas service. The Companies are actively pursuing potential customers along existing natural gas mains, main extensions, and new franchise opportunities. NYSEG is evaluating new franchise areas and the expansion of existing limited franchises.

The expected number of conversions is difficult to predict given the multitude of variables that potential customers must factor into their decision to switch to natural gas such as main extension surcharges, fuel savings, conversion costs, availability of financing, etc. NYSEG has a significant expansion project underway in the North Country. The 2018 plan for the North Country includes 20,735 feet of new main making natural gas available to 175 potential customers. NYSEG will continue to look for opportunities to implement neighborhood and community pilot programs in 2018 to continue to test the viability of new methodologies for main extensions.

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c) Identify any areas within your service territory where you have placed a moratorium on the addition of new customers, new service or any restrictions on existing services. Describe the reasons why such a restriction is necessary.

Response

Currently NYSEG has a natural gas moratorium in the Town of Lansing (Tompkins County). The low pressure and limited capacity on the existing natural gas system means that we cannot serve additional customers. In response to input from some in the community, NYSEG has developed a plan to examine further options in Tompkins County.

d) Please provide a list of Title V air permit holders in your service territory (available on the DEC website) and indicate whether there is currently natural gas service to each.

Response

A list of Title V air permit holders in the NYSEG and RG&E service territories are as listed:

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NYSEG Service Territory

Title V Air Permit Holders: NYSEG Service Territory		
Permit Holder	**Location**	**Natural Gas Service**
Anchor Glass Container Corp	Elmira	Yes
Auburn Sanitary Landfill No 2	Auburn	Yes
Binghamton Co-Generation Plant	Binghamton	Yes
Borg Warner	Ithaca	Yes
Broome County Landfill	Binghamton	No
Broome County LFG Recovery Facility	Binghamton	No
Buckeye Pipe Line Co	Auburn	No
Cayuga Operating Company, LLC	Ithaca	No
Cornell University Main Campus	Ithaca	Yes - direct pipeline connection
Neenah Northeast (Fibermark)	Lowville	Yes
Guardian Industries Corp	Geneva	Yes
Gunlocke Co	Wayland	Yes
Huron Campus	Endicott	Yes
Kennedy Valve Div. McWane, Inc.	Elmira	Yes
Kerry	Norwich	Yes
Lockport Cogeneration Facility	Lockport	Yes – direct pipeline connection
Lyonsdale Biomass LLC	Lyons Falls	No
Mill Services, Inc.	Cobleskill	Yes
Nucor Steel Auburn Inc.	Auburn	Yes
Owens Brockway Glass Container Inc.	Auburn	Yes
Pactiv LLC	Canandaigua	Yes
Pactiv Technology Center	Canandaigua	Yes
Pall Trinity Micro	Cortland	Yes
Pliant LLC (DBA Berry Plastics Corp)	Macedon	Yes
Saint Gobain Adfors America Inc.	Albion	Yes
Seneca Energy LFGTE Facility	Seneca Fall	No
Seneca Meadows SWMF	Waterloo	No
Silgan Containers Corp	Lyons	Yes
SUNY At Binghamton	Binghamton	Yes
US Salt – Watkins Glen Refinery	Watkins Glen	Yes - direct pipeline connection
Vandemark Chemical Inc.	Lockport	Yes
Wyeth Pharmaceuticals	Rouses Point	Yes

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RG&E Service Territory

Title V Air Permit Holders: RG&E Service Territory		
Permit Holder	**Location**	**Natural Gas Service**
American Packaging Corp	Rochester	Yes
Buckeye Rochester South Terminal	Rochester	Yes
Carestream Health At Eastman Bus Pk	Rochester	No
Hammer Packaging Corp	Rochester	Yes
Mill Seat Landfill	Rochester	Yes
Monroe Livingston Sanitary Landfilll	Scottsville	No
Red-Rochester LLC At Eastman	Rochester	Yes
Rochester Silver Works	Rochester	Yes
Semiconductor Components Industries LLC (Truesense Imaging)	Rochester	Yes
Seneca Foods	Marion	Yes
Sunoco Partners M & T Roch Terminal	Rochester	No
Xerox Joseph C Wilson Ctr For Tech	Webster	Yes

e) If you serve customers in the New York City area, describe your analysis and the impacts to your system of the city's anticipated proposal to require larger buildings to convert from heavy fuel oils (#4 and #6) to lighter oil (#2 and bio-fuels) and natural gas for space heating.

Response

NYSEG and RG&E do not serve customers in the New York City area.

f) Please provide a list of natural gas distribution system expansion projects, including new franchise opportunities, which are being pursued in the next five years. If there are none, please explain how this is justified given the Commission's stated goal of expanding the natural gas system in New York State.

Response

NYSEG and RG&E are pursuing several main extension projects which are summarized in the table below with a list provided in *Attachment 5: Gas Main Extension Projects*.

Company	Project Status	Number of Projects	Interested Customers	Other Potential Customers	Footage
NYSEG	Approved	5	11	3	2,136
	Pending	26	203	566	57,207
	Total	**31**	**214**	**569**	**59,343**
RG&E	Approved	3	4	2	1,028
	Pending	17	124	114	26,041
	Total	**20**	**128**	**116**	**27,069**

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In 2018, NYSEG will be constructing the final phase of the North Country franchise expansion with 20,735 feet of natural gas main being installed making gas available to 175 potential customers.

NYSEG is investigating franchise opportunities for the municipalities listed in *Attachment 6: NYSEG Franchise Opportunities*.

g) Please provide a 3-year forecast of all projects advancing REV-like clean energy/demand response natural gas solutions.

Response

At this time, no projects have been identified.

h) Please identify any potential use of renewable gas resources, or demand response program proposals that may address capacity or pressure constrained service areas, that could be utilized to reduce peak day demand and alleviate the need for additional interstate pipeline capacity or gas distribution network upgrades.

Response

At this time there are no renewable gas resources, geothermal, or solar programs at NYSEG or RG&E that will impact our peak day demand.

i) Please identify any potential use of CNG or LNG as a non-pipes alternative (NPA) to alleviate the need for additional interstate pipeline capacity or gas distribution network upgrades.

Response

NYSEG currently has a CNG peaking facility installed in the Mechanicville Division to provide gas pressure and capacity during peak periods.

NYSEG is also exploring several options, including CNG, as an option to serve additional load in the Oneonta area.

RG&E currently has no CNG or LNG facilities.

Issue 4 (Data Requests 29-31)

Please provide the following information related to your company's plans to diversify purchases and manage gas price risk:

Data Request 29 – Gas Purchasing Strategy

A description of your company's gas purchasing strategy, including:

a) Information regarding gas purchases for last year and any planned changes for this year. Did your experience during the winter of 2017-18 lead to any changes? If so, what are the changes? If not, why not? Please include an identification of the amount of Canadian, domestic gas (identify shale gas purchases if available) and CNG/LNG purchased.

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Response

Neither Company procures LNG for system needs.

Canadian purchases have declined where domestic gas options are available due to relative pricing and escalating TransCanada Pipeline demand rates.

In calendar year 2017, Marcellus purchases comprised nearly 81% of the total NYSEG gas supply, down from 86% in 2016. Canadian purchases comprised approximately 14% of the total NYSEG gas supply, up from 9% in 2016. The remaining gas purchases are a combination of Gulf supplies, market area purchases and local production. RG&E purchases of Marcellus gas comprised 93% of RG&E's gas supply in 2017, down from 100% in 2016. Canadian gas during 2017 was approximately 7% of the total gas supply, up from <1% in 2016.

Neither NYSEG nor RG&E changed their gas purchasing strategies based on the winter of 2017-18. Both companies met all storage obligations. Baseload and swing contracts were in place and utilized according to the contracted transportation capacity of each company's portfolio.

b) The types of contracts and associated contract flexibility.

Response

Winter term contracts for baseload and swing supplies are entered into annually. 2018-19 winter supply arrangements and their character of service are located in Table 6 of *Data Request 13.c*.

c) The extent of planned reliance on firm gas, spot gas, swing gas, etc.

Response

System supply gas is baseloaded on a monthly basis to cover minimum day requirements. Swing gas is purchased to cover forecasted daily demand fluctuations. Storage gas constitutes 41% of NYSEG's and 29% of RG&E's winter demand requirements.

d) The description of any triggers to purchase spot (daily) gas.

Response

ICE is checked daily to compare market price compared to winter swing term deals. Lower pricing is a trigger to purchase spot gas.

e) Pricing terms, indices, etc. of the contracts.

Response

Baseload supplies are purchased utilizing the NYMEX settle price and a locked-in physical basis amount or a monthly index price. Swing supplies are often tied to Gas Daily indices, although they can also be at a fixed price.

f) The liquid point(s) that you typically purchase at.

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Response

Dominion South and North Point, Corning, Columbia Gulf Mainline, Columbia Gas Appalachia Pool, Chippawa, TGP 500 Leg, TGP Zn 4 200 leg, TCPL Dawn, , IGT Receipt (Waddington), Leidy Transco and TGP Northern Storage point.

g) The effects that recent and proposed pipeline projects and new supply sources of gas have had on your current (and long-term) purchasing strategy. Include the breakdown of the volumes of gas purchased for the 2017-18 winter and projected for the 2018-19 winter purchases from the Northeast (Marcellus/Utica), mid-continent, Gulf and Canadian supply regions.

Response

As recently demonstrated by the development of Marcellus supply sources, these supplies have reduced the basis prices back to Henry Hub well below traditional levels from DTI North and South Point. REX Pipeline has become a receipt point for Marcellus gas for east to west deliveries. Lebanon and Clarington, which once traded below DTI South Point, now trade at a premium to this Marcellus centered trading location. Flow reversals into Canada of Marcellus gas have all but eliminated the Niagara import pricing location. Likewise Empire State Pipeline gas, which was primarily Canadian sourced, is now sourced from the Corning/Pennsylvania Marcellus region. In the near-term, the impact has kept downward pressure on commodity pricing allowing for a more liquid, less volatile commodity market. Furthermore, the supplies are coming in from different points on pipeline systems and gas is flowing in different paths from what the pipeline has been designed to do. Producers are filling pipelines at a very fast rate, which is causing some pipelines to demand that gas be brought onto their system from other, less desirable, supply points.

However, from a long-term perspective, the impact is not as clear. This is primarily due to the supply-demand relationship and how that balance is impacted from various pipeline proposals or other decisions. Many proposed Northeast projects and pipelines are designed to take gas away from the Marcellus and Utica Basins. These pipeline projects have potential to increase the commodity price on gas in the area. These proposed projects will be monitored as to the effect they may have on pricing and the companies' portfolios.

The following table provides a percentage breakdown of actual purchased supplies by supply location for the winter of 2017-18 and a forecast for the winter of 2018-2019.

	NYSEG		RG&E	
Supply Location	**2017-2018 Actual**	**2018-2019 Forecast**	**2017-2018 Actual**	**2018-2019 Forecast**
Canadian	14%	15%	7%	5%
Gulf	4%	3%	0%	0%
Local Production	1%	5%	0%	0%
Marcellus	81%	77%	93%	95%
Mid	0%	0%	0%	0%

h) Strategy for using storage assets going forward in light of Marcellus area production, since what was once market area may now be considered production area.

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Response

NYSEG and RG&E continue to utilize storage assets as a means to levelize our gas purchases throughout the year and mitigate potential price spikes during winter high demand periods.

i) Any analysis of your use of long-haul capacity versus short haul and/or local production going forward, including any contracts recently or planned to be converted from long-haul to short-haul.

Response

NYSEG and RG&E continuously evaluate the value of transitioning the portfolio for each company with less long-haul related transportation services to a portfolio with more short-haul related transportation services.

The use of local production sources in place of long-haul or short-haul capacity still poses a reliability concern, both from a supply perspective as well as a supply diversity perspective. Gas quality issues as well as consistent production levels continue to be challenging from time to time.

Data Request 30 – Gas Price Risk – Table 7

A description of your company's gas price risk management strategy, including answers to the following questions:

a) What percentage of your gas supply do you hedge (1) physically and (2) financially?

Response

Both NYSEG and RG&E hedge between 50% and 60% of their projected winter requirements. For NYSEG, approximately 44% of the projected winter season throughput is in storage on November 1. For RG&E, approximately 30% of the projected winter season throughput is in storage on November 1.

b) Please break this down between storage and fixed price contracts.

Response

Neither NYSEG nor RG&E currently enter into fixed price physical contracts for a period greater than one month. All physical hedges for winter are storage.

c) If you use fixed price contracts, how, when and in what increments are they purchased?

Response

Neither NYSEG nor RG&E currently enter into fixed price physical contracts for a period greater than one month.

d) Please provide the breakdown between futures and options (include quantities of each type on an annual and winter season basis).

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Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility. NYSEG has a quantity of 2,190 MDT financial futures for the winter season. RG&E has a quantity of 4,520 MDT financial futures for the winter season.

e) How do you finance your swap/futures? Do you pay for them at the time of purchase or delivery?

Response

NYMEX and swap agreement (contract for difference) contracts are "financed" through cash and/or letters of credit, where required (to cover maintenance margin and mark-to-market valuations). NYMEX Future purchases are exited at or near contract expiration and are typically settled on that date. Bilateral agreements are typically invoiced on business day 10 following the date of the monthly settlement.

f) What types of options do you use?

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

g) Describe how you decide which types of options to use.

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

h) How much and what percentage of total gas costs, booked to the GAC, do you spend on options?

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

i) How far out, when, and in what increments do you purchase futures?

Response

For any given month's hedging requirement, both NYSEG and RG&E purchase 75% of the contracts 12 months in advance and 25% of the contracts 16 months in advance.

j) How has your hedging strategy changed in the past year? Did your experience during the winter of 2017-18 lead to any changes? If so, what are the changes? If not, why not?

Response

Neither NYSEG nor RG&E have made changes to their hedging strategies in the past year.

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k) Describe any lessons learned in the past year.

Response

Due to the inability to "time and beat the market", reducing potential upside price exposure through a sound structured hedging strategy is the best way to mitigate volatility.

l) Do you calculate gas price volatility, if so how, where and what time period do you use?

Response

NYSEG and RG&E have a conservative hedging strategy designed specifically to address price volatility. The goal is to mitigate the risk of volatility on behalf of customers. As participants in the wholesale markets, NYSEG and RG&E are very aware of on-going price changes, but do not currently calculate volatility.

m) How do you determine the success or failure of your hedging program?

Response

NYSEG and RG&E regularly monitor the hedging program to ensure that its fundamental goals are met; these goals are established in a) and i) above.

n) Please provide internal reporting, oversight, and audit structure of you hedging program.

Response

Both NYSEG and RG&E's Gas hedging practices are governed by the following:

- Energy Supply Risk Management Procedures Manual
- Avangrid Derivatives Policy
- Sarbanes Oxley Cycles 9 and 11
- Avangrid Accounting Policy Reference Manual
- FAS 133

Audits of the Gas Supply Department's adherence to the controls contained in the above documents are conducted at least once a year by internal and/or external auditors. In addition, weekly commodity meetings are held to review the current gas market. Monthly meetings are held by the Energy Services Risk Management Oversight Committee to discuss current gas supply issues.

o) ***Table 7***
Actual price hedging performance versus planned price hedging performance for last year, a summary of "lessons learned", and arrangements for this year. Include separate quantities for each hedging instrument.

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Response

The NYSEG and RG&E hedging program is structured to mitigate price volatility, not managed to specific price performance. Each Company considers pricing information for the winter plan 2017-18 to be Trade Secret; therefore, certain data in Tables 7 (NYSEG) and 7 (RG&E) is being provided under Trade Secret Protection. Table 7 is found on the next two pages.

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Table 7: Winter Supply Hedges Summary

Company: NYSEG
Submission Date: July 16, 2018
Version #: 1

New York State Electric & Gas: Winter 2017 – 2018 Purchasing Plan & Projected

Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
	TOTAL	[redacted]	

New York State Electric & Gas: Winter 2017 – 2018 ACTUAL Purchasing & Prices

Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
	TOTAL	[redacted]	[redacted]

New York State Electric & Gas: Winter 2018 – 2019 Purchasing Plan & Projected

Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

*Market Area Storage WACOG estimated value based on NYMEX on 7/3/2018

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Table 7: Winter Supply Hedges Summary

Company: RG&E
Submission Date: July 16, 2018
Version #: 1

Rochester Gas & Electric: Winter 2017 – 2018 Purchasing Plan & Projected Prices			
Percent Hedged Normal Weather	**Portfolio Summary**	**Amount (MDT)**	**Price Commodity**
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

Rochester Gas & Electric: Winter 2016 – 2017 ACTUAL Purchasing & Prices			
Percent Hedged Normal Weather	**Portfolio Summary**	**Amount (MDT)**	**Price Commodity**
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

Rochester Gas & Electric: Winter 2017 – 2018 Purchasing Plan & Projected Prices			
Percent Hedged Normal Weather	**Portfolio Summary**	**Amount (MDT)**	**Price Commodity**
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

*Market Area Storage WACOG estimated value based on NYMEX on 7/3/2018

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Data Request 31 – Local Production / Landfill

How has your use of local production/landfill/renewable gas changed over the past year? Please provide the average daily volumes of local produced gas acquired for the previous heating season and a forecast for the upcoming season. Also, include any plans to connect new or additional local production to your distribution systems. What percentage of your system throughput is local production? Include the total volume of locally produced gas that entered your system annually since 2008 until the present. How much of this gas is directly tied into your distribution system?

Response

Since supply in any given load pocket cannot be considered reliable, NYSEG and RG&E have contracted to purchase local production volumes on an interruptible basis.

NYSEG's average daily purchase for the 2017-2018 heating season was 1,713 Dths/day, down from the previous heating season of 4,818 Dths/day.

RG&E's average daily purchase for the 2017-2018 heating season was 0 Dths/day, down from the previous of 65 Dths/day.

On an annual basis, NYSEG's and RG&E's purchases as a percentage of total system demand are as follows:

	NYSEG (in Dths)			RG&E (in Dths)		
Calendar Year	Local	Total	Percent	Local	Total	Percent
2008	2,885,313	56,919,046	5.07%	81,244	51,556,139	0.16%
2009	3,521,659	57,621,449	6.11%	36,620	50,016,066	0.07%
2010	3,501,564	52,422,442	6.68%	33,830	48,119,708	0.07%
2011	3,976,911	53,664,417	7.41%	32,263	48,815,534	0.07%
2012	2,959,993	51,161,522	5.79%	30,731	45,097,455	0.07%
2013	3,601,418	56,115,710	6.42%	28,841	51,698,913	0.06%
2014	3,133,600	59,727,509	5.25%	24,377	54,362,158	0.04%
2015	1,957,891	56,598,127	3.46%	18,761	51,656,546	0.04%
2016	1,260,277	54,053,143	2.33%	16,610	49,455,063	0.03%
2017	641,783	55,169,904	1.16%	-	52,191,020	0.00%

For the upcoming heating season, NYSEG has only one Local production supplier to purchase from which is directly tied to an LDC and RG&E has no local production being purchased for system supply. There are no known additional local production interconnects planned at this time.

Data Request 32 – Renewable Natural Gas (RNG)

Identify when and how standards for connecting Renewable Natural Gas (RNG) projects will be filed with the Commission. If there are no plans to file RNG standards, please explain why.

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Response

NYSEG and RG&E do not plan to file RNG standards with the PSC. NYSEG and RGE apply the companies' local production standards to RNG projects. These include gas quality specifications, standard tap agreement, and construction and operations standards. A few speculative RNG companies have approached NYSEG and RG&E regarding connection. NYSEG and RG&E have been and continue to work with the RNG companies, but to date none of those companies have progressed beyond reviewing gas quality standards and the tap agreement.

Issue 5 (Data Requests 33-38)

Please provide the following information related to changing market conditions:

Data Request 33 – Convergence of the Gas and Electric Markets

A discussion of the impacts of the convergence of the gas and electric markets in your company's service territory, including:

a) Increase in summer load from last year.

Response

NYSEG anticipates a reduction in summer load due to the closing of the BOP Plant in Johnson City, NY. In June we are seeing an increase in load at RG&E from the existing daily metered customer, Recycled Energy Development (RED) which has converted from coal to natural gas for their generation capabilities. However, at this time, the Companies have not identified any changes or significant issues related to convergence of the electric and natural gas markets.

b) Changes in system operations from last year including how gas-fired electric generators' needs and behavior during last winter impacted your distribution system operations.

Response

The Companies have not identified any issues related to system operations. Many of the generators currently connected to the NYSEG and RG&E distribution system are smaller in nature and do not impact distribution system operations.

c) Need for distribution system facilities improvements.

Response

NYSEG and RG&E have not identified a need for distribution system improvements for electric generation.

d) Available information on generators' upstream capacity arrangements.

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Response

Neither NYSEG nor RG&E have any information on any generator's upstream capacity arrangements. Typically, a generator aligns itself with a market participant that manages significant assets for its customer base.

e) Relationship between your company and its electric, steam operations or affiliate-owned generation, including any peaking service agreements.

Response

While NYSEG does not own any gas-fired generation, it does have a lease arrangement for the Auburn gas turbine. Natural gas fuel for the gas turbine is priced at NYSEG's SC2 tariff rate that is provided by NYSEG' regulated gas utility. NYSEG does not have any contractual relationship with affiliate-owned generation.

RG&E does not own gas-fired generation and therefore is not involved with electric or steam operations. RG&E does not have any contractual relationship with affiliated-owned generation.

f) Distributed Generation/CHP, including any micro-grid applications, and their impact on peak design-day forecasting. List all known planned projects and locations on the system.

Response

At this time neither NYSEG nor RG&E can identify any significant issues related to convergence. The Companies are not aware of any effects on system reliability, or any issues regarding the electric interface or the interconnection at this time. However, it should be noted that due to the increased reliance of natural gas-fired generation and the increased demand on days when gas system reliability could be at risk, the New York Independent System Operator ("NYISO") issued a guide titled "NYISO Expectations of Generator Operation During a Gas Restriction or Interruption User's Guide" (Guide 19) in May 2017. While this guide is applicable to all generators that are available to be bid into the NYISO markets, the guide also describes the NYISO's expectations for entities that bid into the NYISO-administered markets during times when an operational flow order or other legally authorized instructions restricting the use of natural gas-related balancing services. The guide can be found on http://www.nyiso.com/public/webdocs/markets_operations/documents/Manuals_and_Guides/Guides/User_Guides/UG-19_OFO%20UG_v1%200_Final.pdf. The Companies are not aware of any effects on system reliability, or any issues regarding the electric interface or the interconnection at this time.

g) Provide a list of all electric generators in your service territory, and indicate whether or not they are currently attached to your distribution system. If so, indicate the maximum daily delivery quantity of the generating station.

Please see *Attachment 7: Electric Generators in Service Territory*.

h) Outline typical communications between gas-fired generators in your service territory and your natural gas control center, and explain any improvements planned for those communications.

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Response

Many of the generators currently connected to the NYSEG and RG&E distribution system are smaller in nature and do not impact system operations. Therefore, there is little communication between the Gas Control Center and these smaller connected generators.

As noted in section a) Recycled Energy Development (RED) completed the process of converting their generator from coal to natural gas. To date, there has not been an impact on distribution system operation and no need for regular communication. However, if load is increased in a manner that impacts distribution system operations, the gas control center would establish regular communications with the facility to discuss items as such as plant shut down or start up, planned station maintenance, gas delivery system concerns, etc.

Data Request 34 – Northeast Shale

A discussion of the realized and expected impacts on gas prices, gas price volatility, and required upstream assets from recent and proposed pipeline expansions and the development of Northeast (Marcellus/Utica) shale gas wells and related infrastructure.

Response

Taken in isolation, recent and proposed pipeline expansions and the development of Marcellus shale gas wells and related infrastructure combine to put downward pressure on basis between the markets where these deliveries are made and the more traditional production area trading points (i.e. Henry Hub, LA). Any number of events, such as the rise of LNG facilities projects can affect the wholesale markets for natural gas therefore NYSEG and RG&E cannot predict with any certainty that the current environment of dampened and relatively stable prices will continue in the future.

Despite this uncertainty, NYSEG and RG&E have acted to reduce upstream or long-haul contracts where robust alternative supply has provided the opportunity to de-contract while maintaining access to reliable sources of supply. The first example of this was the turn back of Texas Gas capacity into Dominion at Lebanon (NYSEG, 2011 and RG&E, 2012). In 2012, NYSEG reduced its long-haul TCPL entitlements into Chippawa and Waddington. More recently, NYSEG turned back Tennessee long haul capacity (14,816) effective 10/31/2014 in favor of a corresponding quantity of Empire capacity. Similarly, RG&E reduced its short-haul TCPL entitlements into Chippawa (also in 2012 & 2015).

Both NYSEG and RG&E purchase local production supplies behind the Companies city gates where available to save on upstream pipeline transportation costs.

NYSEG and RG&E will continue to investigate key projects that will provide benefit to its customers. NYSEG and RG&E will continue to update Staff as projects develop and opportunities to reduce cost and/or enhance reliability become actionable.

Data Request 35 – Other Projects

Please discuss any other major projects that will affect your purchasing strategy over the next five years and your anticipated responses to these changes.

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Response

The development of Marcellus and Utica shale supplies and the desire to get those supplies to market has had, and will continue to have an impact to how commodity is purchased, at least for the next two (2) to four (4) years. The oversupply situation in the northeast will potentially begin to resolve itself as projects to move shale gas to other markets are built, bringing a tighter balance to the supply-demand mismatch. While many takeaway pipeline projects have been approved outside of New York State or are in the process of being approved, there should still be sufficient supplies in the area for the upcoming years. Commodity pricing may increase on the Marcellus and Utica gas due to the takeaway project and the Companies will continue to monitor best cost gas to serve their customers.

Data Request 36 – Natural Gas Vehicles

Currently, how much natural gas is being sold on an annual basis for use in natural gas vehicles? How has this changed over the past few years and how do you anticipate that this will change over the five year planning period in your service territory?

Response

NYSEG currently delivers natural gas to 2 CNG fueling stations using 99,098 Dth per year. Since the last report 14 NYS DOT and 2 private CNG stations have been decommissioned. Total CNG usage since the last report has decreased approximately 27%.

RG&E currently delivers natural gas to 6 CNG fueling stations using 145,249 Dth per year. Since the last report 2 NYS DOT and 2 private CNG station have been decommissioned. Total CNG usage since the last report has increased approximately 49%.

NYSEG and RG&E are currently working with a consulting firm to complete a feasibility study for the use of CNG as a transportation fuel. The study may offer insight for future CNG opportunities.

Data Request 37 – CNG / LNG

Have you been approached by or had any discussions with outside entities regarding the construction of compressed natural gas (CNG) or liquefied natural gas (LNG) fueling stations? If so, please explain. What impediments do you see for the expansion of CNG and LNG transportation?

Response

NYSEG and RG&E have not recently been approached by and had discussions with outside entities regarding the construction of compressed natural gas fueling stations. Currently NYSEG and RG&E provide natural gas delivery service to eight (8) CNG fueling stations which are owned and operated by outside entities. NYSEG and RG&E will evaluate any future proposed opportunities to provide natural gas delivery service to CNG fueling stations.

Potential impediment for the expansion of CNG transportation in NYSEG and RG&E service areas include the following:

- Adequate pressure and/or capacity availability on the natural gas distribution system to serve a fueling station at a particular location
- The lower driving range of CNG vehicles compared to gasoline/diesel vehicles.
- The cost associated with construction of CNG fueling stations.

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- A high number of low mileage fleets that can't justify the cost of converting to CNG.

Data Request 38 – Pipeline Projects

Please list potential pipeline projects you are interested in, identifying the pipeline, delivery point, and daily delivery quantity you might take. Provide a list of all pipelines that you are communicating with on a regular basis regarding expansion projects on their pipeline systems that might be filed with the Federal Energy Regulatory Commission.

Response

Both NYSEG and RG&E regularly communicate with the intra- and interstate pipelines serving its service territory. NYSEG has executed a Precedent Agreement with TCPL for additional capacity to serve the Plattsburgh load center. Other than the previously announced expansions on Empire Pipeline, DTI, TCO, TGP and Constitution, neither NYSEG nor RG&E are aware of any additional expansions.

Issue 6 (Data Request 39)

Please provide the following information regarding bill impacts:

Data Request 39 – Billing Comparisons -Table 8

Bill impact comparison of last winter versus the forecasted 2017-18 winter. Include the work papers used to develop Table 8 (note: they should also tie to the numbers in Table 7).

Response

Please see Tables 8.1 and 8.2, on the next two (2) pages, which represent NYSEG's and RG&E's bill comparisons.

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Table 8.1: Bill Comparison (Excluding Taxes)
Winter 2016-17 to Winter 2017-18

Company: NYSEG
Submission Date: July 7, 2017
Version #: 1

1	2	3	4	5	6
NYSEG	2017-18 Average Residential Heating Customer Winter Bill	2017-18 Average Residential Heating Customer Winter Bill	2018-19 Forecasted Residential Heating Customer Winter Bill	Commodity Related Percent Change from Last Winter	Expected Percent Change from Last Winter
	Actual	Normalized	Normalized	(column 4 - column 3) / column 3	(column 4 - column 2) / column 2
Total Delivery Costs	$341.23	$337.55	$353.95	4.9%	3.7%
Total Capacity Costs	$99.90	$96.85	$75.93	-21.6%	-24.0%
GAC Costs (Commodity)	$194.98	$190.06	$201.84	6.2%	3.5%
[1] GAC Reconciliation	($6.53)	($6.20)	($1.53)	-75.3%	-76.6%
[2] GAC Surcharges and Refunds	$16.32	$15.84	$18.01	13.7%	10.4%
Total Commodity Costs	$204.77	$199.70	$218.32	9.3%	6.6%
Total Winter Bill	$645.90	$634.10	$648.20	2.2%	0.4%

Assumptions:

Normal = 926 Therms/year with 710 Therms of winter use

Last Year = 733 Therms of winter use

Notes:

[1] Identify the impact of any GAC reconcilliation surcharge or refund mechanism.
2018 Annual Reconciliation of Gas Cost ($0.006301)/therm
2019 No estimate at this time

[2] Identify the impact of any other surcharges or refunds included in bills.
- Merchant Function Charge (MFC) average rate $.025194/therm (Winter 2017/18 $0.021866)
- Heater Fuel average rate $.000336/therm (Winter 2017/18 $0.000335)
- System Performance Adjustment average rate $.000093/therm (Winter 2017/18 $0.000056)

	Make up of Monthly Bill Impact -	**2018-2019 Winter**
1	Delivery	51.12%
2	GRT	2.08%
3	Monthly Rate (GAC) Adjustment	0.44%
4	Gas Cost Factor	42.66%
5	Systems Benefits Charge	1.05%
6	Merchant Function Charge	2.73%
7	Revenue Decoupling Mechanism (RDM)	-0.08%
8	Temporary NY State Surcharge	0.00%
9	Other	0.00%
		100.00%

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Table 8.2: Bill Comparison (Excluding Taxes)
Winter 2016-17 to Winter 2017-18

Company: RG&E
Submission Date: July 16, 2018
Version #: 1

1	2	3	4	5	6
RG&E	2017-18 Average Residential Heating Customer Winter Bill	2017-18 Average Residential Heating Customer Winter Bill	2018-19 Forecasted Residential Heating Customer Winter Bill	Commodity Related Percent Change from Last Winter	Expected Percent Change from Last Winter
	Actual	Normalized	Normalized	(column 4 - column 3) / column 3	(column 4 - column 2) / column 2
Total Delivery Costs	$303.78	$298.55	$310.63	4.0%	2.3%
Total Capacity Costs	$73.41	$71.65	$75.02	4.7%	2.2%
GAC Costs (Commodity)	$189.39	$186.57	$199.59	7.0%	5.4%
[1] GAC Reconciliation	$8.75	$8.36	$1.60	-80.9%	-81.7%
[2] GAC Surcharges and Refunds	$11.53	$11.29	$13.04	15.6%	13.1%
Total Commodity Costs	$209.67	$206.22	$214.23	3.9%	2.2%
Total Winter Bill	$586.86	$576.42	$599.89	4.1%	2.2%

Assumptions:

Normal = _960___ Therms/year with __715__ Therms of winter use

Last Year = __732___ Therms of winter use

Notes:

[1] Identify the impact of any GAC reconcilliation surcharge or refund mechanism. 2017/2018 annual rec $.004973/therm ,SPA charge $.001497/therm. Forecast for annual reconcilation for 2018/2019 $0.0000/therm (unknown)
[2] Identify the impact of any other surcharges or refunds included in bills. (Heater Fuel, R&D, Interdepartmental sales, Transp. Revenues 2017-2018 -$.0067; 2018-2019 -$.0066

Make up of Monthly Bill Impact - _____

1	Delivery	49.99%
2	GRT	1.04%
3	Monthly Rate (GAC) Adjustment	45.02%
4	Gas Cost Factor	0.00%
5	Systems Benefits Charge	1.04%
6	Merchant Function Charge	2.96%
7	Revenue Decoupling Mechanism (RDM)	-0.05%
8	Temporary NY State Surcharge	0.00%
9	Other	0.00%
		100.00%

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Attachment 1: NYSEG & RG&E OFO's, System Alerts and Curtailments
Response to Data Request 17

New York State Electric and Gas: Winter 2017-2018 System Alerts, OFOs & Curtailments					
Type of Notice	**Effective Date**	**Effective Time**	**Date Lifted**	**Time Lifted**	**Pooling Area**
SA	11/1/2017	11:30 AM	12/7/2017	10:00 AM	AGT
SA	12/8/2017	10:00 AM	12/18/2017	10:00 AM	DTI
SA	12/8/2017	10:00 AM	12/13/2017	10:00 AM	TGP
SA	12/14/2017	10:00 AM	12/28/2017	3:00 PM	MPC and O&R
SA	12/19/2017	1:00 PM	12/21/2017	10:00 AM	TGP
SA	12/23/2017	10:00 AM	12/26/2017	3:15 PM	IGT
SA	12/22/2017	10:00 AM	12/26/2017	10:00 AM	TGP
SA	12/28/2017	10:00 AM	1/9/2018	10:00 AM	TCO
SA	1/4/2018	1:00 PM	4/12/2018	10:00 AM	NYSEG System Wide
SA	1/10/2018	2:00 PM	1/13/2018	10:00 AM	TGP
SA	1/27/2018	10:00 AM	1/30/2018	10:00 AM	TGP
SA	2/10/2018	10:00 AM	4/2/2018	10:00 AM	TGP
SA	2/9/2018	11:40 AM	3/2/2018	10:00 AM	AGT
SA	3/8/2018	10:00 AM	4/12/2018	10:00 AM	DTI
SA	3/30/2018	10:00 AM	4/2/2018	10:00 AM	AGT
SA	3/30/2018	10:00 AM	4/2/2018	10:00 AM	TGP
OFO	11/10/2017	10:00 AM	11/13/2017	11:45 AM	TGP
OFO	12/7/2017	10:00 AM	1/11/2018	11:00 AM	AGT
OFO	12/13/2017	10:00 AM	12/16/2017	10:00 AM	TGP
OFO	12/13/2017	10:00 AM	12/16/2017	10:00 AM	IGT
OFO	12/16/2017	10:00 AM	12/19/2017	10:00 AM	TGP
OFO	12/21/2017	10:00 AM	12/22/2017	12:00 PM	TGP
OFO	12/26/2017	3:15 PM	1/3/2018	10:00 AM	IGT
OFO	12/26/2017	10:00 AM	1/9/2018	10:00 AM	DTI
OFO	12/26/2017	10:00 AM	1/10/2018	10:00 AM	TGP
OFO	12/28/2017	3:00 PM	1/19/2018	10:00 AM	MPC and O&R
OFO	1/4/2018	10:00 AM	1/9/2018	10:00 AM	IGT
OFO	1/10/2018	10:00 AM	1/10/2018	1:30 PM	TGP Downstream of STA 245
OFO	1/13/2018	10:00 AM	1/20/2018	10:00 AM	AGT
OFO	1/13/2018	10:00 AM	1/19/2018	10:00 AM	DETI
OFO	1/13/2018	10:00 AM	1/20/2018	10:00 AM	TGP
OFO	1/24/2018	10:00 AM	2/5/2018	10:18 AM	AGT
OFO	1/24/2018	10:00 AM	1/27/2018	10:00 AM	TGP
OFO	1/30/2018	10:00 AM	1/31/2018	11:00 AM	TGP
OFO	1/31/2018	10:00 AM	2/9/2018	11:24 AM	MPC
OFO	1/31/2018	11:00 AM	2/2/2018	10:00 AM	TGP Downstream of STA 245
OFO	2/2/2018	10:00 AM	2/10/2018	10:00 AM	TGP
OFO	2/2/2018	10:00 AM	2/14/2018	8:29 AM	IGTS
OFO	2/8/2018	10:00 AM	2/9/2018	10:40 AM	AGT
OFO	3/2/2018	10:00 AM	3/27/2018	10:31 AM	AGT
OFO	3/2/2018	10:00 AM	3/27/2018	10:49 AM	MPC and O&R
CI	12/14/2017	11:00 PM	12/15/2017	1:00 PM	SUNY Oneonta
CI	12/26/2017	11:00 PM	12/27/2017	1:00 PM	SUNY Oneonta
CI	12/26/2017	11:00 PM	12/27/2017	1:00 PM	Kerry Bioscience
CI	12/26/2017	11:00 PM	12/27/2017	1:00 PM	Chobani
CI	12/27/2017	9:00 PM	12/29/2017	1:00 PM	SUNY Oneonta
CI	12/27/2017	9:00 PM	12/29/2017	12:00 NOON	Kerry Bioscience

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New York State Electric and Gas: Winter 2017-2018 System Alerts, OFOs & Curtailments

Type of Notice	Effective Date	Effective Time	Date Lifted	Time Lifted	Pooling Area
CI	12/27/2017	9:00 PM	12/29/2017	12:00 NOON	Chobani
CI	12/27/2017	9:00 PM	12/29/2017	12:00 NOON	AO Fox Hospital
CI	12/29/2017	10:00 PM	12/30/2017	12:00 PM	SUNY Oneonta
CI	12/29/2017	10:00 PM	12/30/2017	12:00 PM	Kerry Bioscience
CI	12/30/2017	11:00 PM	1/2/2018	1:00 PM	SUNY Oneonta
CI	12/30/2017	11:00 PM	1/2/2018	1:00 PM	Kerry Bioscience
CI	12/31/2017	7:00 PM	1/2/2018	1:00 PM	Chobani
CI	12/31/2017	7:00 PM	12/31/2017	7:00 PM	AO Fox Hospital
CI	12/31/2017	7:00 PM	1/1/2018	3:00 PM	Chenango Memorial Hospital
CI	12/31/2017	7:00 PM	1/1/2018	3:00 PM	Cobleskill Stone
CI	12/31/2017	7:00 PM	1/1/2018	3:00 PM	Norwich Pharmaceutical
CI	12/31/2017	7:00 PM	1/1/2018	3:00 PM	Lutz Feed
CI	1/2/2018	11:00 PM	1/3/2018	10:00 AM	SUNY Oneonta
CI	1/2/2018	11:00 PM	1/3/2018	10:00 AM	Kerry Bioscience
CI	1/2/2018	11:00 PM	1/3/2018	10:00 AM	Chobani
CI	1/4/2018	8:00 PM	1/7/2018	3:00 PM	AO Fox Hospital
CI	1/4/2018	8:00 PM	1/7/2018	3:00 PM	Kerry Bioscience
CI	1/4/2018	8:00 PM	1/7/2018	8:00 PM	SUNY Oneonta
CI	1/4/2018	8:00 PM	1/7/2018	3:00 PM	Chobani
CI	1/5/2018	5:00 PM	1/7/2018	3:00 PM	Chenango Memorial Hospital
CI	1/5/2018	5:00 PM	1/7/2018	3:00 PM	Cobleskill Stone
CI	1/5/2018	5:00 PM	1/7/2018	3:00 PM	Norwich Pharmaceuticals
CI	1/5/2018	5:00 PM	1/7/2018	3:00 PM	Lutz Feed
CI	1/13/2018	10:00 PM	1/15/2018	1:00 PM	SUNY Oneonta
CI	1/13/2018	10:00 PM	1/15/2018	1:00 PM	Kerry Bioscience
CI	1/13/2018	10:00 PM	1/15/2018	1:00 PM	Chobani
CI	1/17/2018	11:00 PM	1/18/2018	1:00 PM	SUNY Oneonta
CI	1/17/2018	11:00 PM	1/18/2018	1:00 PM	Kerry Bioscience
CI	2/2/2018	8:00 PM	2/3/2018	11:00 AM	SUNY Oneonta
CI	2/2/2018	8:00 PM	2/3/2018	11:00 AM	Kerry Bioscience

Rochester Gas & Electric: Winter 2017-2018 System Alerts, OFOs & Curtailments

Type of Notice	Effective Date	Effective Time	Date Lifted	Time Lifted	Pooling Area
SA	12/8/2017	10:00 AM	12/18/2017	10:00 AM	DTI
SA	1/4/2018	1:00 PM	4/12/2017	10:00 AM	RG&E System Wide
SA	3/8/2018	10:00 AM	4/12/2017	10:00 AM	DTI
OFO	12/17/2017	10:00 AM	12/20/2017	10:00 AM	DTI & ESP
OFO	12/26/2017	10:00 AM	1/9/2018	10:00 AM	DTI
OFO	1/13/2018	10:00 AM	1/19/2018	10:00 AM	DETI

CI = Customer Interruption
OFO = Operation Flow Order
SA = System Alert

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Attachment 2: NYSEG Interruptible Letter and Alt Fuel Compliance Form 17-18
Response to Data Request 24a, 24g and 26

September xx, 2017

xxxxxxxx
xxxxxxxx
xxxxxxxx
xxxxxxxx
xxxxxxxx

Re: Interruptible Service Requirements for the 2017/2018 Heating Season

Dear xxxxxxxxx:

NYSEG is required to make an annual assessment of the emergency interruption capability of our interruptible rate natural gas customers. This requirement was established in 2000, and applies to all interruptible rate gas customers for utilities across the state. More information regarding the Public Service Commission (PSC) requirements and NYSEG's tariffs may be found at the PSC website: www.dps.state.ny.us.

The assessment is required of all interruptible rate gas customers who use Distillate Fuel (No. 2 oil, diesel, or kerosene) as their alternate fuel, and all customers who are considered "human needs" customers (those who house people, such as hospitals, prisons, and colleges with dormitories), regardless of their alternate fuel. The requirements do not apply to non-human needs customers who use other sources for their alternate fuel (for example, No. 4 oil, No. 6 oil, propane or coal). The PSC, through NYSEG has established specific requirements for alternate fuel capability, to ensure the ability of interruptible customers to interrupt, should the need arise. The requirements are summarized below:

- Those customers who use Distillate Fuel as described above must show sufficient storage of fuel for the coming heating season. This requirement can be fulfilled in one of the following ways:

  1) **Onsite storage sufficient for ten (10) days of possible interruption. As a guide, the PSC suggests the customer consider the average of the last 3 years' use when determining requirements for a 10-day supply.**

  2) **If a 10-day supply is not available onsite, the customer must show that the onsite storage is full at the beginning of the heating season and arrangements not dependent on spot market purchases are in place for replenishment of storage tanks during an interruption. The on-site storage and replenishment arrangements must equal at least ten days' use during a possible period of interruption.**

  3) As an alternative to filling onsite storage, a customer may elect to shut down operations "for the duration of the critical period." It must be stressed that this option requires a willingness to be shut down for an indefinite period of time, and as many times as interruptions may be imposed during the heating season.

- If a customer fails to maintain the required level of oil storage and replenishment arrangements, the gas utility is required to charge a 30% price premium for the period which covers the time the customer is known by the gas utility to be out of compliance with the order. This means that the customer will be billed the greater of 130% of the cost of the applicable gas equivalent alternate fuel price or one hundred thirty percent of the otherwise applicable sales gas price less an estimate of the Customer's natural gas price, as determined by the Company.

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- Compliance with the fuel oil requirement at the beginning of the heating season does not insure continued compliance. If the alternate fuel supply is used during periods of non-interruption, the customer will need to replenish the fuel up to the minimum levels.

- Natural gas utilities are required to inspect a representative group of customers to ensure that proper storage levels are on hand or that replenishment arrangements are in place, and that dual fuel equipment is operable.

Compliance with the terms of your interruptible natural gas service requires that you complete the attached survey form and return it no later than October 13, 2017. Please return the survey form via facsimile at (607) 762-5922; electronically at ejpersonius@nyseg.com; or mail at:

Ed Personius
Manager, Programs and Projects
New York State Electric & Gas Corporation
P.O. Box 5224
Binghamton, NY 13902-5224

In addition, you will receive a site visit from me if you are a “human needs” customer. If you have No. 2 distillate fuel as your alternative fuel and you are not a human needs customer, you may or may not receive a site visit to confirm the results of the survey.

You may wish to consult NYSEG’s electronic bulletin board for historic usage information, available at www.gas.nyseg.com. Should you have any questions, please do not hesitate to call me at (xxx) xxx-xxxx.

Sincerely,
Xxxxxxxxxx
Account Manager
Enclosure

Please Reply by October 13, 2017

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NYSEG Interruptible Gas Service Customer Alternate Fuel Compliance Form

Company Name: _____
Address: _____
Name/Title of person completing this form: _____
Telephone Number: _____
Date form completed: _____

1. Is your facility a "human needs" concern that houses people (such as a hospital, prison, or college with dormitories)? Yes _____ No_____

2. Does your firm use distillate fuels (#2 oil, kerosene, or diesel) as a backup if natural gas delivery is interrupted? Yes _____ No_____

Please continue with the rest of the survey ONLY if you answered YES to either or both questions 1 and 2.

If you answered NO to both questions, please sign here: _____

Methods of Compliance: The Public Service Commission (PSC) has determined interruptible rate customers can comply with the requirements of the order in one of the following three ways. Please select the best option for your company and complete the questions, which apply to the method of compliance, which you have chosen.

1) Onsite storage sufficient for ten (10) days of possible interruption. As a guide, the PSC suggests the customer consider the average of the last 3 years' use when determining requirements for a ten-day supply. - **Please complete the following Part A only**.

2) Onsite storage full at the beginning of the heating season and arrangements not dependent on spot market purchases are in place for replenishment of storage tanks during an interruption - this method may be used if a 10-day supply is not available onsite. The on-site storage and replenishment arrangements must equal at least ten days' use during a possible period of interruption. **Please complete the following Part B only**.

3) Curtailment of those operations that normally use gas, rather than switching to a distillate fuel, if natural gas supplies are interrupted. We acknowledge that this option could require an indefinite number and duration of shutdown periods, because interruption periods are not easily forecasted. **Please complete the following Part C only**.

If you need assistance in obtaining historic use information, please utilize the NYSEG Gas Tracking System at https://iusa.gastrackingsystem.com, or contact your NYSEG Account Representative.

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Part A: - Complete this part for the full 10-day storage capacity option.

1. Number of gallons of oil storage tank capacity _____

2. Number of gallons of oil you plan to have on hand by 11/1/2017 _____

3. Number of therms of natural gas you could use in a 10 day period of interruption (use the most representative 10-day period for your operations.)

   _____

4. Equivalent number of gallons of oil used in a 10 day period
   - For #2 oil divide the # of therms of gas from #3 by 1.39 _____
   - For #4 oil divide the # of therms of gas from #3 by 1.45 _____
   - For #6 oil divide # of therms of gas from #3 by 1.50 _____
   - Other _____

5. # of days supply represented by total tank capacity (the # reported in question 1, divided by the # of gallons used in a 10 day period from question 4, multiplied by 10)

   _____

6. # of days supply represented by planned 11/1/2017 inventory level (the # reported in question 2, divided by the # from question 4, multiplied by 10) _____

7. You may use a viable substitute alternate fuel to provide part of the 10-day storage inventory. If you plan to use an alternate fuel (non-distillate fuel, i.e. #6, wood, coal) as part of the inventory, please provide a description of that fuel storage inventory and calculations to support the remainder of the 10-day storage inventory.

Signed: _____

Part B: - Complete this part if your tank storage capacity is less than the required 10-day supply.

1. Number of gallons of oil storage tank capacity _____

2. Number of gallons of oil you plan to have on hand by 11/1/2017 _____

3. Number of therms of natural gas you could use in a 10 day period of interruption (use the most representative 10-day period for your operations.)

   _____

4. Equivalent number of gallons of oil used in a 10-day period
   - For #2 oil divide the # of therms of gas from #3 by 1.39 _____
   - For #4 oil divide the # of therms of gas from #3 by 1.45 _____
   - For #6 oil divide # of therms of gas from #3 by 1.50 _____
   - Other _____

5. # of days supply represented by total tank capacity (the # reported in question 1, divided by the # of gallons used in a 10 day period from question 4, multiplied by 10)

   _____

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6. # of days supply represented by planned 11/1/2017 inventory level (the # reported in question 2, divided by the # from question 4, multiplied by 10)

_____

7. You may use a viable substitute alternate fuel to provide part of the 10-day storage inventory. If you plan to use an alternate fuel (non-distillate fuel, i.e. #6, wood, coal) as part of the inventory, please provide a description of that fuel storage inventory and calculations to support the remainder of the 10-day storage inventory.

8. Since a 10-day storage inventory is not an option, you must have arrangements to replenish your supply during an interruption. Please describe your arrangements and attach copies of any relevant documents.

Signed: _____

Part C: - Complete this part if your compliance option is shutting down alternate fuel operations.

1. Rather than obtain a 10-day supply of alternate fuel, we plan to comply with this order by curtailing alternate fuel operations during any and all periods of interruption in the 2017/2018 heating season. We acknowledge that this option could require an indefinite number and duration of shutdown periods, because interruption periods are not easily forecasted.

Signed: _____

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Attachment 3: RG&E Heating Season Letters and Alt Fuel Compliance Forms
Response to Data Request 24.a and 24.g

[Date]

[Company]
[Contact]
[Mailing Address]
[City], [State] [Zip Code]

Dear [Name]:

RG&E natural gas transportation customers that have an alternate fuel supply are required to demonstrate to us that they have alternate fuel capabilities to meet their peak day usage requirements. If a facility is out of compliance your natural gas supplier will be required to secure firm primary point capacity on the interstate pipeline to meet your peak day natural gas requirements.

Our records indicate that the facilities listed below have alternate fuel capabilities.

[Facility #1]	[Service Address #1]
[Facility #2]	[Service Address #1]
[Facility #3]	[Service Address #3]

The RG&E tariff requires that you have five days alternate fuel supply on site effective November 1st each year and that your alternate fuel system is operational.

Please find enclosed the annual certification form that must be completed and returned to me no later than May 31, 2017. The completed compliance form(s) should be e-mailed to me at the address noted below. Upon receipt of the certification we will verify your compliance and notify you and your supplier if your facility is out of compliance. If you do not return the completed compliance form your facility will be considered out of compliance.

If you have any questions about this letter, the compliance form or the requirements outlined above, please contact me at [Account Manager Phone Number].

Sincerely,

[Account Manager]
Key Account Manager
Rochester Gas and Electric Corporation

[Account Manager email]

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RG&E Alternate Fuel System Compliance Form

Natural gas customers served under Service Classification No. 3 with alternate fuel capability are required to demonstrate to RG&E that they have alternate fuel capability to meet their peak day needs if their supplier does not have primary point capacity to serve them on a firm basis. The alternate fuel system and supply must be capable of handling an extended outage for a period of at least five days. It is the Customer's responsibility to provide annual proof or certification that the equipment has been tested and the planned fuel supply that will be on site as of November 1, 2017. These requirements also apply to Service Classification No. 7 accounts with annual use greater than or equal to 35,000 therms.

Please complete this form and return it via e-mail to no later than May 31, 2017.

Account No:

Business Name:

Service Address:

Type of Alternate Fuel:	
Alternate fuel inventory currently on site (gallons):	
Alternate fuel inventory planned to be on site as of 11/01/2017 (gallons):	
Number of therms of natural gas you could use in a 5 day period of interruption during a peak winter period?	
Do you test your alternate fuel system and do you plan for it to be operational on 11/01/2017?	

Based on the information provided, we will determine if this facility will meet the compliance requirements as of November 1, 2017. We will notify you if this facility does not meet the compliance requirements.

I attest to accuracy of the information provided above and understand the obligation to maintain an operational alternate fuel system and adequate fuel inventory to meet up to a five day natural gas interruption.

Name: _____

Title: _____

Signature: _____

Date: _____

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Sent Via E-mail

RG&E natural gas transportation customers that have an alternate fuel supply are required to demonstrate to us that they have alternate fuel capabilities to meet their peak day usage requirements. If a facility is out of compliance your natural gas supplier will be required to secure firm primary point capacity on the interstate pipeline to meet your peak day natural gas requirements.

The RG&E tariff requires that you have five days alternate fuel supply on site effective November 1st each year and that your alternate fuel system is operational.

Attached are the annual dual fuel compliance form(s) that must be completed and returned no later than **June 15, 2018**. Please send the completed compliance form(s) to GasMarketing@RGE.com.

Upon receipt of the certification we will verify your compliance and notify you and your supplier if your facility is out of compliance. If you do not return the completed compliance form your facility will be considered out of compliance.

If you have any questions about this requirement or the compliance form, please contact me.

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RG&E Alternate Fuel System Compliance Form

Natural gas customers served under Service Classification No. 3 with alternate fuel capability are required to demonstrate to RG&E that they have alternate fuel capability to meet their peak day needs if their supplier does not have primary point capacity to serve them on a firm basis. The alternate fuel system and supply must be capable of handling an extended outage for a period of at least five days. It is the Customer's responsibility to provide annual proof or certification that the equipment has been tested and the planned fuel supply that will be on site as of November 1, 2018. These requirements also apply to Service Classification No. 7 accounts with annual use greater than or equal to 35,000 therms.

Please complete this form and return it via e-mail to no later than May 31, 2018.

Account No:

Business Name:

Service Address:

Type of Alternate Fuel:	
Alternate fuel inventory currently on site (gallons):	
Alternate fuel inventory planned to be on site as of 11/01/2018 (gallons):	
Number of therms of natural gas you could use in a 5 day period of interruption during a peak winter period?	
Do you test your alternate fuel system and do you plan for it to be operational on 11/01/2018?	

Based on the information provided, we will determine if this facility will meet the compliance requirements as of November 1, 2018. We will notify you if this facility does not meet the compliance requirements.

I attest to accuracy of the information provided above and understand the obligation to maintain an operational alternate fuel system and adequate fuel inventory to meet up to a five day natural gas interruption.

Name: _____

Title: _____

Signature: _____

Date: _____

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Attachment 4: NYSEG Replenishment of Oil Storage Inventories
Response to Data Request 26

Company Letterhead

[DATE]

[CUSTOMER NAME]
[CUSTOMER ADDRESS]

Re: Replenishment of Oil Storage Inventories

Dear [CUSTOMER NAME]:

NYSEG is required to send a letter to our interruptible gas service customers to alert them of the potential need to replenish oil storage inventories whenever accumulated gas service interruptions exceed a total of five (5) days prior to February 15. Our records indicate that you have been interrupted [x] days this heating season. Please review your supply and ensure it is sufficient for the remaining heating season.

Should you have any questions, please contact me at [PHONE NUMBER].

Sincerely,

Account Manager

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Attachment 5: Gas Main Extension Projects
Response to Data Request 28f

Project Status	Project Name	Division	Interested Customers	Other Potential Customers	Footage
Approved	Stone Falls Rd - Dansville	Hornell	1	0	250
Approved	Brewster Hill Rd - Brewster	Brewster	3	3	445
Approved	Scotchtown Ave - Goshen	Binghamton	2	0	650
Approved	Higby Rd – Johnson City	Binghamton	2	0	278
Approved	Hibiscus Lane	Auburn	3	0	513
Pending	Transit Rd - Newfane	Lockport	5	10	1,425
Pending	Morgan Rd - Oneonta	Oneonta	5	10	145
Pending	Franklin St - Binghamton	Binghamton	1	4	660
Pending	McFadden Rd - Binghamton	Binghamton	1	4	380
Pending	Riverview St - Appalachin	Binghamton	2	10	900
Pending	Colesville Rd - Kirkwood	Binghamton	2	5	650
Pending	Crescent Dr - Binghamton	Binghamton	1	9	700
Pending	Locke Dr - Binghamton	Binghamton	1	9	800
Pending	Pollard Hill Rd	Binghamton	4	31	3,500
Pending	Town of Maine	Binghamton	92	120	11,950
Pending	Route 311 / Heritage Dr Brewster	Brewster	4	20	1,200
Pending	Burdick Rd - Patterson	Brewster	2	13	1,350
Pending	Wooded Hill Pk & Ridge Way - Brewster	Brewster	2	25	1,845
Pending	Maple Wood Dr - Southeast	Brewster	2	21	2,236
Pending	PutnamTerr / Piffard St - Brewster	Brewster	4	16	1,200
Pending	Blackberry Dr - Brewster	Brewster	2	10	600
Pending	Orchard St - Walden	Brewster	3	8	550
Pending	Stone Ridge Rd - Brewster	Brewster	3	33	1,580
Pending	Ivy Hill Rd - Walden	Brewster	2	14	760
Pending	Coldenham Rd - Walden	Brewster	2	10	1,078
Pending	Oakland Ave - Walden	Brewster	4	35	1,850
Pending	Town of Cheshire	Geneva	51	140	20,505
Pending	Howard Loop - Geneva	Geneva	3	5	460
Pending	New Michigan Rd - Canandaigua	Geneva	2	1	245
Pending	Mountainview Dr - Oneonta	Oneonta	1	3	300
Pending	East Vargo Rd – Horseheads	Hornell	2	0	338

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Project Status	Project Name	Division	Interested Customers	Other Potential Customers	Footage
Approved	Plains Rd – Mendon	Rochester	2	0	355
Approved	Pease Rd - Williamson	Rochester	1	0	245
Approved	Dow Rd- York	Rochester	1	2	428
Pending	Rush Mendon Rd – Mendon PH 2	Rochester	2	0	355
Pending	Village of Churchville	Rochester	25	14	2991
Pending	Village of Leroy –Quinlan Dr	Rochester	19	22	5,736
Pending	Hogmire Rd	Rochester	7	0	3,500
Pending	Kennedy Rd - Penfield	Rochester	12	2	1,545
Pending	Furman Rd - Perinton	Rochester	1	0	250
Pending	Lincoln Rd - Walworth	Rochester	2	5	500
Pending	Plank Rd - Walworth	Rochester	3	0	365
Pending	South St Dr	Rochester	2	1	275
Pending	Finley Rd - Walworth	Rochester	5	5	1,240
Pending	Marchner Rd Webster	Rochester	5	3	1,850
Pending	Roosevelt Highway	Rochester	5	10	1,224
Pending	Emily Ct to Winterberry Dr - Bergen	Rochester	31	45	4,700
Pending	Slocum Rd – Ontario	Rochester	2	5	870
Pending	Reservoir Rd- Geneseo	Rochester	1	0	125
Pending	Redmond Rd - Ontario	Rochester	1	1	225
Pending	Ridge Rd - Sodus	Rochester	1	1	290

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Attachment 6: NYSEG Franchise Opportunities
Response to Data Request 28f

OpCo	Division	Municipalities	Franchise Type
NYSEG	Plattsburgh	Town of Schuyler Falls	New
NYSEG	Plattsburgh	Town of Beekmantown	New
NYSEG	Geneva	Town of Romulus	Expansion of Existing Limited Franchise
NYSEG	Geneva	Town of Ovid	New
NYSEG	Geneva	Village of Ovid	New
NYSEG	Elmira	Village of Odessa	New

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Attachment 7: Electric Generators in Service Territory (Response to Data Request 32g)

New York State Electric & Gas Corporation

Distribution (Total = 7,269)

Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens
0.000	3	2.850	1	4.505	1	5.670	1
0.380	1	2.880	8	4.515	24	5.680	1
0.740	2	2.900	1	4.520	5	5.700	2
0.760	2	2.925	1	4.550	1	5.712	2
0.900	1	2.940	4	4.560	6	5.750	4
0.960	2	2.943	2	4.578	5	5.760	15
1.000	4	2.960	1	4.590	2	5.775	1
1.100	2	3.000	295	4.600	13	5.800	2
1.152	1	3.010	14	4.615	1	5.805	26
1.200	3	3.150	1	4.620	1	5.810	2
1.280	1	3.200	4	4.655	1	5.830	1
1.430	1	3.225	7	4.690	1	5.880	1
1.440	1	3.270	2	4.700	1	5.886	6
1.460	1	3.300	14	4.720	1	5.900	2
1.480	1	3.336	1	4.725	2	6.000	685
1.500	4	3.354	1	4.730	22	6.020	50
1.545	1	3.400	1	4.750	4	6.075	1
1.600	2	3.420	3	4.760	3	6.080	6
1.620	1	3.440	18	4.770	1	6.120	2
1.675	1	3.450	2	4.800	77	6.125	1
1.680	2	3.500	33	4.900	3	6.160	1
1.720	4	3.510	1	4.905	3	6.188	1
1.800	11	3.520	4	4.928	1	6.200	1
1.840	1	3.560	1	4.945	10	6.235	11
1.900	2	3.570	1	4.950	2	6.240	3
1.904	1	3.600	44	4.980	1	6.250	2
1.920	1	3.655	15	5.000	607	6.300	13
1.935	1	3.660	1	5.040	6	6.400	7
1.960	1	3.675	1	5.085	3	6.426	1
1.962	1	3.680	3	5.100	33	6.440	1
2.000	24	3.700	1	5.120	11	6.450	44
2.100	7	3.750	4	5.144	1	6.475	1
2.142	1	3.760	2	5.160	46	6.480	2
2.150	7	3.800	197	5.167	1	6.500	28
2.175	1	3.840	11	5.184	1	6.540	1
2.200	2	3.850	2	5.200	16	6.555	1
2.240	5	3.870	29	5.220	1	6.580	1
2.250	5	3.900	1	5.230	2	6.600	23
2.275	1	3.920	2	5.235	1	6.664	2
2.300	4	3.924	7	5.236	1	6.665	4
2.365	3	3.927	1	5.240	1	6.670	1
2.370	1	3.960	2	5.250	23	6.700	3
2.380	1	4.000	202	5.280	2	6.720	17
2.400	25	4.080	2	5.290	1	6.750	13
2.450	2	4.085	10	5.300	4	6.800	17
2.470	1	4.090	2	5.320	1	6.840	3
2.500	81	4.140	3	5.360	1	6.860	1
2.520	3	4.150	1	5.370	1	6.867	13
2.550	2	4.160	1	5.375	17	6.880	23
2.560	4	4.180	2	5.400	3	6.890	1
2.580	29	4.200	46	5.440	4	6.900	8
2.600	4	4.250	6	5.450	3	6.960	3
2.616	1	4.284	1	5.460	3	6.975	1
2.640	2	4.300	31	5.500	21	7.000	282
2.660	1	4.320	5	5.520	8	7.035	1
2.700	5	4.370	1	5.550	1	7.040	11
2.730	1	4.400	2	5.559	1	7.050	5
2.750	3	4.420	1	5.590	23	7.080	3
2.760	3	4.440	1	5.600	8	7.095	17
2.800	3	4.480	7	5.640	2	7.100	3
2.820	3	4.500	23	5.650	1	7.140	1
	295		**1,091**		**1,051**		**1,386**

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New York State Electric & Gas Corporation
Distribution (Total = 7,269)

Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens
7.160	1	9.000	85	11.520	6	15.800	5
7.194	2	9.030	9	11.600	3	15.900	1
7.200	39	9.100	6	11.610	4	15.910	1
7.250	3	9.156	2	11.700	1	16.000	19
7.280	1	9.165	1	11.750	2	16.020	1
7.300	7	9.180	1	11.760	1	16.060	1
7.310	22	9.200	7	11.800	3	16.250	1
7.350	1	9.245	2	11.825	1	16.320	1
7.360	4	9.250	6	11.830	2	16.400	6
7.370	1	9.280	1	11.925	1	16.500	2
7.380	1	9.282	1	11.985	1	16.555	1
7.400	3	9.380	1	12.000	159	16.770	1
7.420	1	9.400	1	12.040	2	16.800	3
7.500	53	9.450	2	12.255	2	16.905	1
7.520	1	9.460	9	12.470	2	16.990	1
7.525	12	9.500	6	12.500	13	17.000	19
7.530	4	9.540	1	12.600	8	17.010	1
7.560	2	9.600	17	12.685	1	17.160	1
7.600	418	9.616	1	12.700	9	17.200	3
7.650	1	9.640	1	12.750	3	17.250	1
7.672	1	9.660	1	12.800	3	17.280	1
7.680	31	9.675	4	12.900	6	17.400	6
7.700	118	9.680	1	12.960	1	17.450	1
7.740	21	9.690	1	13.000	15	17.472	1
7.750	7	9.750	6	13.110	1	17.500	1
7.774	1	9.800	14	13.120	1	17.600	11
7.796	1	9.810	2	13.178	1	17.640	1
7.800	12	9.890	5	13.200	2	17.850	1
7.820	1	9.900	7	13.250	1	17.920	1
7.840	2	9.945	2	13.300	1	18.000	38
7.848	8	9.984	5	13.330	2	18.400	4
7.850	2	9.990	2	13.440	4	18.450	1
7.860	1	9.995	1	13.500	5	18.490	1
7.875	1	10.000	507	13.600	10	18.500	1
7.920	1	10.080	2	13.680	1	18.560	2
7.950	1	10.105	1	13.700	1	18.630	1
7.955	8	10.110	1	13.734	2	18.720	1
7.960	1	10.200	13	13.750	1	18.800	2
7.996	1	10.240	2	13.800	7	18.900	1
8.000	137	10.250	2	13.880	1	19.000	8
8.085	1	10.290	1	13.975	1	19.250	1
8.100	1	10.320	10	14.000	28	19.440	1
8.120	2	10.350	1	14.160	2	19.570	1
8.170	19	10.400	13	14.190	3	19.800	1
8.200	26	10.500	5	14.200	5	19.924	1
8.250	7	10.530	1	14.360	1	20.000	55
8.280	2	10.535	3	14.400	9	20.160	1
8.300	2	10.540	1	14.560	2	20.300	1
8.305	1	10.560	1	14.600	2	20.400	1
8.320	2	10.600	2	14.700	1	20.500	1
8.350	4	10.700	2	14.720	1	20.640	1
8.385	8	10.720	1	14.800	1	20.700	1
8.390	3	10.750	8	14.835	1	21.000	20
8.400	20	10.800	6	14.840	1	21.400	5
8.500	10	10.840	1	14.850	1	21.400	1
8.510	2	10.880	3	14.995	1	21.420	1
8.600	30	10.950	1	15.000	62	21.600	1
8.640	7	10.965	3	15.200	52	21.680	1
8.655	1	11.000	60	15.265	1	21.700	1
8.750	5	11.040	3	15.360	4	21.750	1
8.760	1	11.100	1	15.400	18	22.000	9
8.800	24	11.180	7	15.480	1	22.200	1
8.815	14	11.200	4	15.500	2	22.500	12
8.829	1	11.250	2	15.680	1	22.800	18
8.840	1	11.395	1	15.696	1	23.000	3
8.880	1	11.400	113	15.700	1	23.100	6
8.960	5	11.500	6	15.750	1	23.600	1
	1,133		999		494		301

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New York State Electric & Gas Corporation							
Distribution (Total = 7,269)						Transmission (Total=20)	
Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens
23.680	1	48.000	9	250.000	2	11,550.000	1
23.700	1	48.880	2	260.000	5	16,200.000	1
23.760	1	49.000	3	275.000	1	20,000.000	1
23.900	2	49.200	1	288.000	1	30,000.000	1
24.000	31	49.725	1	300.000	4	40,500.000	1
24.150	1	49.900	4	320.000	1	46,000.000	1
24.320	3	49.920	2	336.000	2	48,000.000	1
24.400	1	49.975	1	352.000	1	56,600.000	1
24.500	1	49.980	5	364.000	1	57,400.000	1
24.600	1	50.000	34	375.000	3	67,000.000	1
24.680	2	50.400	1	380.000	2	94,400.000	1
24.864	1	51.000	2	390.000	1	112,000.500	1
24.880	1	52.500	1	400.000	1	125,000.000	2
24.900	1	55.000	2	410.000	1	126,000.000	1
24.920	1	56.000	3	432.000	2	144,000.000	1
24.940	1	57.000	1	460.000	1	176,500.000	1
25.000	12	57.790	1	475.000	1	240,000.000	1
25.200	9	59.160	1	492.000	1	655,100.000	1
25.245	1	60.000	3	500.000	3	942,000.000	1
25.380	1	60.200	1	502.000	1		
25.800	1	61.600	1	531.000	1		
26.400	1	62.500	2	532.000	1		
27.000	1	64.285	1	560.000	1		
27.500	1	67.000	1	570.000	1		
27.600	1	68.400	1	600.000	1		
28.000	2	70.000	4	629.000	1		
28.800	1	72.000	2	633.000	2		
29.400	1	75.000	4	652.000	1		
30.000	25	76.000	1	666.000	1		
30.800	2	80.000	2	792.000	1		
31.400	1	82.070	1	865.800	1		
31.500	1	84.480	1	950.000	1		
33.000	1	85.000	1	975.000	1		
34.200	4	87.000	2	995.000	1		
35.000	4	89.500	1	1,000.000	6		
35.440	1	90.000	3	1,150.000	2		
36.000	5	91.200	1	1,200.000	1		
36.400	1	93.000	1	1,260.000	1		
37.000	1	96.000	1	1,400.000	1		
37.440	1	100.000	7	1,484.000	1		
37.500	2	101.600	1	1,500.000	2		
37.600	1	105.000	1	1,520.000	1		
37.800	1	114.000	2	1,600.000	1		
38.000	3	120.000	6	1,679.000	1		
38.300	1	126.000	1	1,700.000	1		
38.400	1	130.000	2	1,762.500	1		
39.000	1	131.200	1	1,798.200	1		
39.400	1	140.000	1	1,872.000	1		
40.000	28	144.000	3	1,918.000	1		
41.000	2	150.000	16	2,000.000	14		
41.800	1	153.200	1	2,100.000	1		
42.000	20	159.000	1	2,445.000	1		
42.300	1	160.000	2	2,600.000	1		
42.570	1	161.600	1	3,200.000	2		
42.800	4	166.500	1	4,000.000	1		
43.000	4	168.000	1	4,100.000	1		
43.008	1	170.000	1	4,920.000	1		
43.095	1	175.000	1	5,200.000	1		
43.500	2	178.300	1	5,500.000	1		
43.680	1	180.000	5	6,000.000	1		
44.000	3	184.000	1	6,400.000	2		
44.720	1	200.000	4	7,400.000	1		
45.000	14	210.000	1	10,000.000	1		
45.400	1	220.000	1	11,200.000	1		
45.600	5	225.000	3	12,400.000	1		
45.825	1	230.000	1	15,000.000	1		
46.000	2	240.000	2	17,600.000	1		
47.500	1	243.000	1	18,500.000	1		
	234		179		106		20

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Attachment 7: Electric Generators in Service Territory (Response to Data Request 32g)

Rochester Gas & Electric

Distribution (Total = 1,399)

Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens
0.460	1	4.515	4	6.730	1	10.000	72
1.100	1	4.520	1	6.800	1	10.080	2
1.250	1	4.560	1	6.867	1	10.105	1
1.430	1	4.600	4	6.880	9	10.234	1
1.620	1	4.730	4	6.890	1	10.320	2
1.720	1	4.750	2	7.000	58	10.500	1
1.750	1	4.800	8	7.050	1	10.540	1
1.792	1	4.945	3	7.095	5	10.600	1
1.800	3	4.950	2	7.120	1	10.700	1
1.840	1	5.000	112	7.200	5	10.750	1
1.920	1	5.040	2	7.280	1	10.752	1
2.000	9	5.100	4	7.310	9	10.800	1
2.100	3	5.120	2	7.360	1	10.880	1
2.150	1	5.160	5	7.370	1	10.950	1
2.365	1	5.220	1	7.440	1	11.000	5
2.400	6	5.232	2	7.500	10	11.200	1
2.500	13	5.280	1	7.525	2	11.395	1
2.520	1	5.300	1	7.530	2	11.400	24
2.580	3	5.375	3	7.560	1	11.508	1
2.640	1	5.380	1	7.600	56	11.610	1
2.700	3	5.400	2	7.650	1	11.650	1
2.760	3	5.450	1	7.680	2	12.000	34
2.800	2	5.472	1	7.700	23	12.260	1
2.940	2	5.500	8	7.740	7	12.420	1
3.000	66	5.590	6	7.848	1	12.500	3
3.010	3	5.640	1	7.920	1	12.700	2
3.040	1	5.710	2	7.950	1	12.753	1
3.080	1	5.712	1	7.955	1	12.800	1
3.225	3	5.720	1	8.000	17	12.900	3
3.330	1	5.750	7	8.170	3	12.960	1
3.332	1	5.760	4	8.200	2	13.000	7
3.350	1	5.800	1	8.215	1	13.400	1
3.360	1	5.805	10	8.250	3	13.500	2
3.420	1	5.810	4	8.300	1	13.600	2
3.440	3	5.850	1	8.320	1	13.760	1
3.500	8	5.880	1	8.350	5	13.800	1
3.570	1	5.886	1	8.385	3	14.000	3
3.600	4	6.000	133	8.390	1	14.160	1
3.655	1	6.010	1	8.400	2	14.200	1
3.680	1	6.020	9	8.500	1	14.400	1
3.710	1	6.080	1	8.502	1	14.800	1
3.750	1	6.095	1	8.550	1	15.000	13
3.780	2	6.200	1	8.600	7	15.200	4
3.800	43	6.235	2	8.640	1	15.344	1
3.840	1	6.250	2	8.750	1	15.400	4
3.870	6	6.260	1	8.800	5	15.480	1
3.924	1	6.300	1	8.815	3	15.800	1
4.000	65	6.400	3	8.960	3	15.840	1
4.085	1	6.410	1	9.000	16	16.000	3
4.090	1	6.420	1	9.030	3	16.400	3
4.100	1	6.426	1	9.250	1	16.450	1
4.140	2	6.440	1	9.460	1	16.500	1
4.180	1	6.450	8	9.600	3	17.000	3
4.200	1	6.480	1	9.675	1	18.000	9
4.250	5	6.500	7	9.750	2	18.225	1
4.300	7	6.540	1	9.760	1	18.500	1
4.320	1	6.664	1	9.800	3	18.600	1
4.480	1	6.665	3	9.890	1	18.675	1
4.500	4	6.670	2	9.995	1	18.800	1
	303		**397**		**299**		**239**

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Rochester Gas & Electric							
Distribution (Total = 1,399)						Transmission (Total=4)	
Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens	Nameplate Rating (kW)	Total Gens
19.000	2	417.600	1			8,500.000	1
19.350	1	432.000	1			18,000.000	1
20.000	7	450.000	1			40,000.000	1
20.400	1	480.000	1			614,000.000	1
21.000	3	500.000	1				
21.600	2	520.000	1				
21.900	2	525.000	1				
21.930	1	750.000	1				
22.800	2	820.000	1				
23.800	1	850.000	1				
24.000	1	899.000	1				
25.000	1	995.000	1				
25.100	1	1,206.400	1				
25.200	5	1,242.000	1				
28.000	3	1,260.000	1				
30.000	4	1,500.000	1				
30.210	1	1,600.000	1				
31.750	1	1,675.000	2				
34.500	2	1,750.000	1				
35.000	1	1,825.000	1				
36.000	2	1,960.000	1				
36.120	1	1,975.000	3				
37.500	2	1,980.000	1				
40.000	6	2,000.000	1				
42.000	3	3,000.000	1				
43.380	1	5,400.000	1				
44.000	1	5,600.000	1				
44.720	1	6,400.000	1				
45.000	1	8,500.000	1				
45.600	2	45,600.000	1				
47.400	1						
47.800	1						
48.000	3						
49.680	1						
50.000	8						
50.700	1						
51.000	1						
54.000	1						
55.500	1						
70.000	2						
72.000	3						
75.000	3						
80.000	2						
83.700	1						
84.000	1						
90.000	2						
96.000	1						
97.600	2						
100.000	2						
120.000	2						
144.000	1						
150.000	6						
168.000	3						
190.000	1						
192.000	1						
195.000	1						
225.000	3						
249.900	1						
260.000	2						
266.000	1						
308.000	1						
325.000	2						
336.000	1						
360.000	1						
380.000	1						
399.600	1						
	128		33		-		4

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