



James A. Lahtinen
Vice President
Rates and Regulatory Economics

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VIA ELECTRONIC FILING

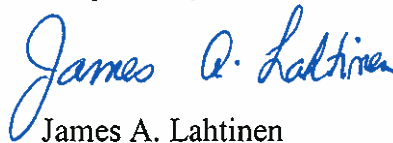
Honorable Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case 09-M-0544 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR Proposed Amendments to Chapter I, Subchapters A, C and G, Chapter II, Subchapters A and G, Chapter III, Subchapters A and G, Chapter IV, Subchapters C and G, Chapter V, Subchapters A and F, Chapter VI, Subchapters A, E and F, Chapter VII, Subchapters C and D, and Chapter VIII, Subchapter B

Dear Secretary Brillling:

New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation hereby submit Comments in the above-referenced Case.

Respectfully submitted,


James A. Lahtinen

Attachment

An equal opportunity employer

RG&E | 89 East Avenue | Rochester, NY 14649-0001
tel (585) 724-8409 | fax (585) 724-8668 | james_lahtinen@rge.com

www.nyseg.com | www.rge.com



**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR Proposed Amendments to Chapter I, Subchapters A, C and G, Chapter II, Subchapters A and G, Chapter III, Subchapters A and G, Chapter IV, Subchapters C and G, Chapter V, Subchapters A and F, Chapter VI, Subchapters A, E and F, Chapter VII, Subchapters C and D, and Chapter VIII, Subchapter B

Case 09-M-0544

**COMMENTS OF
NEW YORK STATE ELECTRIC & GAS CORPORATION
AND
ROCHESTER GAS AND ELECTRIC CORPORATION**

New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E", with NYSEG "the Companies"), hereby submit these comments in response to the Notice of Proposed Rule Making issued November 30, 2010 regarding the Commission's proposal to amend the rules in 16 NYCRR Chapters I, II, III, IV, V, VI, VII, and VIII. The Commission has proposed amendments to 16 NYCRR to provide for electronic filing and service as the preferred method. Under specific circumstances, hard copy filing and service will be allowed.

The Companies support the Commission's proposed updating of its procedures to expressly authorize electronic filing and service. Electronic filing and service should conserve resources and be more efficient for all parties, as well as for the Commission. The Companies look forward to working with the Commission and Department of Public Service Staff on any specific implementation issues that might arise as electronic filing is implemented.

Dated: January 27, 2011