STATE OF NEW YORK PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on November 16, 2017

COMMISSIONERS PRESENT:

John B. Rhodes, Chair Gregg C. Sayre Diane X. Burman, concurring James S. Alesi

- CASE 16-E-0710 Tariff filing by New York State Electric & Gas Corporation to Revise its Electric Tariff Schedule, P.S.C. No. 121 to Offer Company-Owned LED Street Lighting Options for Customers Served Under Service Classification No. 3.
- CASE 16-E-0711 Tariff Filing by Rochester Gas and Electric Corporation to Revise its Electric Tariff Schedule, P.S.C. No. 18 to Offer Company-Owned LED Street Lighting Options for Customers Served Under Service Classification No. 1.

ORDER APPROVING TARIFF AMENDMENTS WITH MODIFICATIONS

(Issued and Effective November 16, 2017)

BY THE COMMISSION:

INTRODUCTION

On December 15, 2016, New York State Electric & Gas Corporation (NYSEG) and Rochester Gas and Electric Corporation (RG&E) (together, the Companies) filed amendments to their respective electric tariff schedules to incorporate Companyowned, Company-Maintained light emitting diode (LED) street lighting options in NYSEG's Service Classification (SC) No. 3-Standard Street Lighting Service and RG&E's SC No. 1 - Street Lighting Service pursuant to the Commission's 2016 Rate Order in Case 15-E-0283, <u>et al</u>.¹ The 2016 Rate Order adopted the terms of the Joint Proposal which provided that within six months of the date of its issuance, the Companies would make separate tariff filings offering Company-owned LED street lighting options for Commission review. By this Order, the Commission approves, with modifications, the tariff amendments listed in Appendix A.

BACKGROUND

Pursuant to the 2016 Rate Order, the Companies were required to make separate tariff filings within six months of the issuance of the 2016 Rate Order that will offer Companyowned LED street lighting options. NYSEG and RG&E's respective service territories include approximately 500 and 83 municipalities served under each Company's respective Companyowned street lighting tariffs. NYSEG and RG&E administered an electronic survey to the municipalities within their service territories to elicit input on general interest in LED street lights, as well as feedback on topics such as lighting type, quality, and the importance of additional features such as dimming. Based on a review of the Companies' existing Companyowned street light luminaries, the survey responses, other utility-LED street light programs, and discussions with United Illuminating Company,² the Companies proposed four Company-owned LED street lighting options.

¹ Case 15-E-0283, <u>et al.</u>, <u>NYSEG and RG&E - Electric and Gas</u> <u>Rates</u>, Order Approving Electric and Gas Rate Plans in Accord with Joint Proposal (issued June 15, 2016) (2016 Rate Order).

² United Illuminating Company, an affiliate of NYSEG and RG&E, currently offers LED service throughout its service territory.

TARIFF FILINGS

The Companies propose to offer four LED luminaire options, which they believe, meet the Companies' standards at a Correlated Color Temperature (CCT) of 4,000 Kelvin (K): 34 watts, 66 watts, 113 watts and 166 watts to replace the 50, 70, 100, 150, 175, 250 and 400-watt Cobra head luminaires that are currently offered. The Companies propose that their respective obligations to install or replace non-LED luminaires with LED luminaires in any annual period be limited to 15 percent of their respective currently installed street light luminaires. Under the Companies' proposals, the replacement or installation would be on a first-come, first-served basis, subject to the Companies' consideration of issues such as geographical location. The customer must commit to converting the greater of 20 percent of its existing installed luminaires or a minimum of 100 luminaires per bill account in an annual period. Additionally, the Companies propose that the luminaires to be replaced must be contained in a single contiguous geographic area and each municipality would be responsible for the system design, and would be required to compensate the Companies for the remaining book value of the luminaires being replaced, which would be determined by the Companies and based on the municipality's currently installed luminaires. The Companies would require a one-time, up-front payment for the remaining book value of the luminaires being replaced.

The Companies requested waiver of the requirements of Public Service Law §66(12)(b) and 16 NYCRR §720-8.1 regarding newspaper publication because the revisions only affect municipal customers and the Companies plan to notify all impacted customers directly via electronic mail.

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NOTICES OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), Notices of Proposed Rulemaking were published in the <u>State Register</u> on January 4, 2017 [SAPA Nos. 16-E-0710SP1 and 16-E-0711SP1]. The time for submission of comments pursuant to the Notices expired on February 21, 2017. On February 24, 2017, comments were received from Mid-Hudson Streetlight Consortium (MHSC). NYSEG filed reply comments on March 14, 2017.³

The comments filed by MHSC identify a number of concerns related to NYSEG's filing. The comments state the following positions: 3,000 K CCT luminaire options should be offered, as opposed to the Companies' 4,000 K proposal; the majority of LED options are oversized; Operations and Maintenance (O&M) costs are high; the undepreciated book value of the existing luminaires should be socialized across all ratepayers; High Pressure Sodium (HPS) luminaires should be reclassified as non-standard and replacement of all failed luminaires should be with LED options using a maintenance approach; additional language should be added to the tariff to outline the process for conversion to company-owned LEDs; and the LED conversion rate should be increased to 35 percent per year.

NYSEG replied to MHSC's comments regarding: fixture specifications (size and CCT); level of O&M costs; calculation and socialization of the undepreciated book value of luminaires to be replaced; reclassification of HPS fixtures as non-standard and replacing all failed luminaires with LED luminaires using a

³ Although MHSC and NYSEG filed comments after the expiration of the comment period, the Commission has considered MHSC's comments in its discretion and in the interest of ensuring a complete record.

maintenance approach; and increasing the annual conversion rate. NYSEG re-stated and defended its originally filed positions.

LEGAL AUTHORITY

Pursuant to Public Service Law (PSL) §§ 5, 65(1) and (8), and 66(1) and (12), the Commission has the legal authority to review proposed tariff leaves, as well as modify, reject or approve such filed tariffs. As such, the Commission has the legal authority to review the Companies' filings and approve and make effective tariff amendments, as prescribed in this Order.

DISCUSSION AND CONCLUSION

By this order, the Commission approves the LED luminaire options and rates listed in Appendix B of this Order. The approved rates are lower than those proposed by the Companies. The wattages of the four proposed LED luminaires have been revised to reflect the lowest quote option used to derive the new LED luminaire rates.

LED Rates

NYSEG and RG&E developed their proposed rates based on a fixed charge study. This study used the luminaire quotes from a manufacturer who had a 10-year replacement warranty on the LED heads to calculate the annual cost of providing service over the life of the LED luminaires. The annual cost of providing service was levelized over the proposed average service life of 29 years. The Companies calculated a comparative rate for the current HPS luminaire options using the same method. The Companies then took the difference of the LED and HPS levelized cost based rates and added the incremental dollar difference between them to the current tariff HPS luminaire rate to derive rates for each of the four proposed LED luminaire options. The rates approved by this order result from modifications to the

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methodology and inputs to the Companies' pricing model, as discussed below.

1. Luminaire Rate Calculation

While the Companies' levelized rate methodology used to calculate the proposed LED replacement cost rates is consistent with the recently approved LED luminaire tariff options for Central Hudson Gas & Electric Corporation⁴ and Orange and Rockland Utilities, Inc.,⁵ NYSEG and RG&E's method of increasing the LED luminaire rates to reflect an increment over currently effective HPS rates is not. The NYSEG rate calculation developed cost-based rates that were lower than the currently effective rates for HPS luminaires, while the RG&E rate calculation developed cost-based rates which contained a mixture of higher and lower rates than the current rates HPS luminaires.

The Companies' method of increasing the cost-based LED luminaire rates for NYSEG and RG&E is unacceptable. The replacement cost-based rate methodology used to derive the NYSEG LED luminaire rates provides an exact, cost-based rate with annual savings, for all LED conversion scenarios, when coupled with energy savings and the additional modifications as discussed below. While the cost-based rates for RG&E do not provide as great of savings as NYSEG, savings still exist under almost every option, when coupled with energy savings and the modifications discussed below. In order to provide customers with the proper price signals, the authorized RG&E rates

⁴ Case 16-E-0616, <u>Central Hudson Gas and Electric Corporation –</u> <u>LED Luminaire Tariff Amendments</u>, Order Approving Addition of LED Street Lighting Options with Modifications (Issued March 10, 2017) (CH LED Order).

⁵ Case 16-E-0226, Orange and Rockland Utilities, Inc. - LED Luminaire Tariff Amendments, Order Approving Tariff Amendments with Modifications (Issued March 10, 2017) (O&R LED Order).

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contained in Appendix B use the following hybrid method to calculate the proposed LED options: utilize the levelized costbased LED luminaire rate for the two largest wattage LED luminaire options, while discounting the levelized cost-based rates for the two lowest wattage LED luminaire options by the same discount percentage as exists between the current HPS luminaire levelized cost-based rates and the current tariff HPS luminaire rates.

2. Price of Luminaires

The Companies provided four vendor quotes per luminaire offering. In developing their respective rates, the Companies did not choose the lowest cost option. The Companies provided Staff with the list of vendors along with the manufacturer specifications for each of the LED luminaire quotes. One manufacturer's luminaires had a rated life that was 40 percent less than the other three LED luminaire options for each of the four proposed offerings. The pricing for the new LED luminaires is based on the lowest quote from the remaining three manufacturers.

3. Average Service Life

The Companies proposed an Average Service Life (ASL) of 29 years for the proposed LED luminaire options. The majority of the manufacturer specification sheets state the expected life of the LED light engines and electronic drivers to be 100,000 hours. The Companies' historic level of annual burn hours is approximately 4,200 hours. Based on the rated burn hours, and the Companies' historic annual burn hours, a 20 year ASL is more appropriate for the LED luminaires. This is consistent with the 20 year ASL adopted in the CH LED Order and O&R LED Order.

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4. Operation and Maintenance Expenses

In developing the annual cost of providing service for the LED luminaires, the Companies reflected a level of operation and maintenance (O&M) costs using an estimated ratio of 2016 street lighting O&M expenses to the average distribution plant costs. The Companies allocated one hundred percent of this percentage to current non-LED luminaires, and twenty percent to LED luminaires. This methodology results in a reasonable LED O&M rate for RG&E; however, it provides an excessive O&M rate for NYSEG.

According to Staff research of published literature on LED street lights, the LED luminaires will require less maintenance than non-LED fixtures.⁶ The primary reason for this is that HPS and other traditional luminaires require re-lamping when bulbs burn out, every four to five years. LED luminaires do not require such maintenance, as generally LEDs last four times as long as the bulbs used in traditional luminaires. In contrast with the O&M on traditional luminaires, O&M on LED luminaires consists primarily of replacing the photocell, which turns the luminaire on and off. The photocells need to be replaced after approximately 10 years, or once during the expected life of an LED luminaire. The LED luminaire rates, therefore, should reflect this reduced level of O&M. However, when using NYSEG's labor assumptions, coupled with the cost of a photocell, to calculate the cost of replacing the LED luminaire photocell, NYSEG's proposed O&M rate covers more than two photocell replacements over the life of an LED luminaire.

⁶ United States Department of Energy "Solid-State-Lighting R&D Plan": issued June 2016; Page 37. The report can be found at <u>https://energy.gov/sites/prod/files/2016/06/f32/ssl rd-</u> plan %20jun2016 2.pdf.

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Consistent with previously approved LED luminaire rates for other utilities,⁷ the approved rates will allow NYSEG to collect O&M expenses associated with the replacement of a photocell one time over the life of an LED luminaire. The O&M costs comprise an average of approximately 1.2 percent of the total LED luminaire costs, as compared to the approximately 2.4 percent proposed by NYSEG. The rates listed in Appendix B to this order reflect the O&M rate using NYSEG's costs of replacing a failed photocell.

5. Labor Expense

In its calculation of LED rates, NYSEG reflected labor costs using a historical average internal employee labor rate. NYSEG also included overtime labor in its calculation. RG&E, however, plans to use contracted labor for LED work and therefore relied on estimated outside contractor installation costs.

While NYSEG claimed to be using historical average labor costs, the costs it reflected were higher than the current approved wages per its union contract. The authorized NYSEG rates contained in Appendix B reflect union approved labor rates. Additionally, due to the nature of the work, there is no need for overtime labor and therefore overtime costs were eliminated from the calculation.

⁷ Case 15-E-0645, <u>Niagara Mohawk Power Corporation d/b/a</u> <u>National Grid - LED Street Lighting</u>, Order Adopting the Addition of LED Street Lighting Options (issued May 23, 2016) (National Grid LED Order); Case 16-E-0523, <u>City of Jamestown</u> <u>Board of Public Utilities - LED Street Lighting</u>, Order Adopting LED Street Lighting Options (issued January 26, 2017) (Jamestown LED Order).

6. Property Tax Percentage

In the calculation of LED rates, the Companies applied a property tax percentage to the projected plant costs. The property tax percentage was calculated using historical property tax and plant amounts. The Companies included other taxes in the calculation besides property taxes, including payroll taxes, Gross Receipts Tax and sales and use tax, even though these taxes were also reflected separately elsewhere in the rates calculation. The Companies agreed this was a double count in response to a Staff information request. The approved rates in Appendix B include the correction for this error.

LED Luminaire Wattage Options

In their filings, the Companies proposed LED luminaire options to replace their current cobra head roadway luminaires which currently make up 79 percent and 65 percent of companyowned street lights for NYSEG and RG&E, respectively. The Companies have proposed new LED luminaires with wattages of: 34 watts, 66 watts, 113 watts, and 166 watts. The Companies used the wattages from the fixtures to develop the monthly energy usage. Considering the Commission has revised the LED options using the lowest applicable quote, the corresponding wattages for the lowest quoted LED luminaires should be incorporated into the development of the rates. The new LED wattage options are: 25 watts, 67 watts, 104 watts, and 166 watts. Additionally, replacing the Companies' proposed 34 watt LED with a 25 watt LED is responsive to comments received and consistent with previous Commission-approved LED tariff options. Inclusion of a low wattage, cost effective option for customers looking to convert low-wattage HPS, Mercury Vapor (MV), Incandescent, and Metal Halide (MH) luminaires is important to meet municipalities' needs and results in even greater energy savings. The Companies

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are directed to use the 25 watt LED luminaire in lieu of the proposed 34 watt LED luminaire.

Potential LED Savings

Under the Companies' proposed rates, and using the average annual volumetric rates for the year ending September 30, 2017, the annual savings for NYSEG customers ranged from negative \$10.51 for a proposed 34 watt LED luminaire converting from a 70 watt HPS luminaire to savings of \$156.83 for the proposed 113 watt LED luminaire converting a 250 watt MH luminaire. The annual savings for RG&E's customers ranged from negative \$56.07 for a 166 watt LED luminaire converting from a 400 watt MH luminaire to a savings of \$47.32 for a 34 watt LED luminaire converting from a 100-watt incandescent luminaire.

With the modifications discussed above, the annual savings for NYSEG customers range from \$32.78 for a 25 watt LED luminaire converting from a 70 watt MH luminaire to \$235.93 for a 150 watt LED luminaire converting from a 400 watt MH luminaire. When applying the modifications discussed above, the annual savings for RG&E customers range from negative \$3.57 for a 25 watt LED luminaire converting from a 50 watt HPS luminaire, to a savings of \$105.75 for a 150 watt LED luminaire converting from a 400 watt MV luminaire.

Correlated Color Temperature

The Companies' proposed to purchase and offer LED luminaires with a CCT of 4,000 K. In their cover letter, the Companies stated that the LED options were selected based upon the Companies' review of existing Company-owned luminaires, responses to the customer issued survey, other utility LED street light programs, and discussions with their affiliate, United Illuminating Company. The Companies explained, in their cover letter, that the proposed LED options were selected as they are comparable replacements for the majority of the

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current, non-LED, street lighting luminaires within the Companies' service territories.

As discussed in the O&R Order, Staff research has found that the perceived rendering of the color of the lights can have an impact on customers' acceptance of the lighting fixtures, as lower temperature LED luminaires produce light similar to traditional street lighting, such as HPS luminaires. The perceived color emitted by LED luminaires varies with the CCT of the fixture; 3,000 K LED luminaires emit a "warm white" light, more similar to HPS luminaires, while 4,000 K luminaires emit a "neutral white" or a blue-white color. Additionally, some jurisdictions have found the light output from 4,000 K fixtures to be preferred, particularly for roadway (non-residential) applications. The perception of color will be dependent upon individual preferences and environmental conditions, including light output from other sources.

At the time of the Companies' filings, LED options for 3,000 K CCT were more costly and less efficient than the proposed 4,000 K CCT luminaires in both price and efficiency. However, since the original filing, the 3,000 K luminaires have become more competitively priced while providing similar energy savings as the 4,000 K luminaires. The Companies have provided prices for the 3,000 K and 4,000 K luminaire offerings demonstrating there is currently no difference in price between the 3,000 K and 4,000 K options and have agreed to offer both sets of luminaires, if requested by customers. The Companies have stated that they purchase street lighting luminaires upon customer request, therefore providing additional options does not increase inventory costs.

The Companies are directed to provide two sets of LED luminaire offerings, with the same wattage, for 3,000 K CCT and 4,000 K CCT. The rates approved by this order, provide a total of eight luminaire offerings, four in each CCT, 3,000 K and

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4,000 K. These offerings will allow municipalities with additional options for potential LED conversions. Street lighting customers should consider their individual design objectives and make informed decisions regarding their choice to upgrade to LED street lighting technology.

Conversion Plan & Recovery of Undepreciated Book Value

NYSEG and RG&E proposed to implement LED conversion at a rate of no more than 15 percent of the Companies' currently installed street light luminaires on a first come, first served basis. The Companies' seek to retain discretion to consider geographical location when scheduling luminaire replacements. The Companies propose that customers be required to commit to a conversion rate of no less than 20 percent of their currently installed street light luminaires, or a minimum of 100 lights, whichever is greater. The Companies argue that their current customers under Company-owned, Company maintained street lighting classes are smaller sized, diverse municipalities spread over a large service territory.

NYSEG and RG&E proposed to collect the remaining book value from customers who have requested LED conversions through a one-time, up-front payment. Financing options for reimbursing the Companies for the undepreciated book value are discussed in the "Financing" section, below.

The LED options approved in this order mostly provide cost savings on an annual basis. With the rate modifications discussed above, the estimated average payback period for NYSEG customers is approximately 0.6 years, while the average payback period for RG&E customers is approximately 1.7 years.⁸

⁸ In this sense, "payback" means how long it will take for the annual savings from converting to LED luminaires to equal the required payment of the undepreciated book value of the replaced luminaires.

Consistent with previously approved LED tariff filings, municipalities willing to make the investment to expedite conversion to LED street lighting should be afforded a reasonable opportunity to do so. In order to ensure that municipalities have the opportunity to convert existing luminaires to more energy efficient LED luminaires within a reasonable timeframe, the Commission directs NYSEG and RG&E to allow for the conversion of a minimum of 20 percent of each Companies' installed Company-owned, Company-maintained street lights,⁹ at the request of municipalities, on an annual basis. Municipalities would be required to pay the undepreciated book value of the replaced luminaires. The Companies' proposal to require customers to commit to a conversion rate of no less than 20 percent of their currently installed street light luminaires, or a minimum of 100 lights, whichever is greater is reasonable to avoid necessitating replacement of luminaires in an inefficient manner, and is also approved.

Revenue Decoupling Mechanism (RDM)

Pursuant to the 2016 Rate Order, NYSEG and RG&E are allowed a RDM for street lighting, contingent upon approval of LED street lighting options. In their filing, the Companies stated that they will be filing tariff provisions by March 31, 2017 to implement a RDM commencing on May 1, 2017. Considering this tariff filing has been postponed to December 1, 2017, NYSEG and RG&E are required to file necessary RDM tariff provisions on or before November 27, 2017 to be effective on December 1, 2017.

Replacement of Failed Existing Luminaires

At this time, the Commission concludes that replacing failed non-LED luminaires with LED replacements is appropriate,

⁹ This would allow for replacement of all Company-owned luminaires within five years.

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given the development of the technology and the relative costs and benefits of converting to LED luminaires. The Companies shall define a failed luminaire as one needing replacement and shall not include regular maintenance items such as re-lamping or changing of the photocell. Such conversions are not considered to be requested by the customer, and the customer should not be directly charged for the conversion. This treatment of undepreciated book value is consistent with the Commission's determination in the CH LED Order, Jamestown LED Order, National Grid LED Order, and O&R LED Order.

Further, both Companies shall obtain customer consent prior to implementing the maintenance option and consult with the customer regarding the LED replacement options. The Commission acknowledges that while a municipality may choose to participate in the replacement program, in the future that customer may decide to convert to LEDs on a system-wide basis. Without the opportunity to research, study, and explore the options and to identify the specific LED option(s) it prefers, the municipality may find that the luminaires installed by the Company to replace failed non-LED luminaires do not meet the municipality's needs. Later correcting and re-aligning luminaires converted on an ad hoc basis to conform with the municipality's system-wide plans would place an additional financial burden on the municipality, as it would be required to pay-off the undepreciated book value related to the more recently installed LED luminaires if it wanted to replace them before the end of the luminaires' useful lives. To accomplish this, the Companies are directed to work with the municipalities to establish communication and implementation plans of how to proceed with LED replacements for failed luminaires.

In addition to the above, the Commission recommends that municipalities request that LED luminaires be installed

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whenever appropriate in new non-roadway installations. Further, while we understand decorative LED luminaires may currently be cost prohibitive, the Company should continue to assess the economics of such options and submit applicable tariff modifications when warranted.

Technical Assistance

The proposed LED luminaires filed by NYSEG and RG&E provide adequate options as replacements for current non-LED fixtures. The Commission notes that, due to the objective of community acceptance in any LED street lighting endeavor, it is necessary for requesting municipalities to identify the LED fixtures that meet their respective community's needs. Conversion of non-LED luminaires to LED luminaires using a "onefor-one" replacement approach can result in inconsistent lighting appearances and/or apparent over-lighting. Acceptance of LEDs, specifically various wattages, may depend on the types of luminaires currently installed, such as HPS, MV, MH, and incandescent. Not all existing technologies illuminate roadways and surrounding environments equally. Selecting the appropriate LED for specific applications is essential for acceptance of the replacement LED luminaires.

While municipalities may have varying degrees of knowledge and experience in this area, the Commission again calls attention to the availability of the New York State Energy Research and Development Authority (NYSERDA) to provide technical assistance in this area to interested municipalities. Depending on which LED option(s) each municipality ultimately chooses to replace current non-LED fixtures, savings observed could potentially be greater than stated herein. Financing

The Companies proposed to collect the undepreciated book value directly from the customer requesting the LED

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conversions dependent upon the specific installation. The Companies would require the municipality to pay this amount at the time of conversion. In their filings, NYSEG and RG&E state that municipalities interested in financing conversion costs could reach out to the New York Green Bank (NYGB) to discuss financing options.

While NYGB does not provide direct lending, in its 2017-18 Business Plan,¹⁰ the NYGB states it has been in conversations with multiple utilities and municipalities seeking to convert their street lights, and has developed several financing options that may be developed into a standardized offering during its 2017 - 18 Plan Year. Further, the NYGB states it expects to continue to proactively engage municipalities and utilities interested in such financial solutions.

Through discussions with NYSEG and RG&E, Staff has learned that the Companies are amenable to providing financing to municipal customers pursuing conversions through the LED tariffs approved by this Order. If a municipal customer requests to finance the undepreciated book value of its street lighting assets with the Companies, the Companies shall provide the customer with an option to finance the undepreciated book value, at a rate equal to the Companies' respective pre-tax weighted average costs of capital. This provides the opportunity for municipalities to pay for the undepreciated book value over time with the savings resulting from the conversion to LED luminaires.

¹⁰ NY Green Bank's Annual Business Plan, issued June 19, 2017, can be found at https://greenbank.ny.gov/-/media/greenbanknew/files/nygb-2017-business-plan.pdf.

Energy Efficiency

Implementing LED street lighting can play a role in helping the State achieve its clean energy goals, however any such initiative should be considered along with, and in the context of, the Company's full portfolio of energy efficiency initiatives. For that reason, NYSEG and RGE are encouraged to consider proposing an energy efficiency initiative to meet these objectives as part of its Energy Efficiency Transition Implementation Plan or as a component of its next rate filing.

The Commission orders:

1. The tariff amendments filed by New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation and listed in Appendix A shall become effective on December 1, 2017, provided that the Companies file further revisions consistent with the discussion in the body of this Order, on not less than 10 days' notice to become effective on December 1, 2017.

2. New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation shall file Revenue Decoupling Mechanism tariff provisions consistent with the discussion in the body of this Order, on or before November 27, 2017 to become effective on December 1, 2017.

3. The requirements of Public Service Law §66(12)(b) and 16 NYCRR §720-8.1 as to newspaper publication for the proposed changes and with respect to the tariff amendments directed in Ordering Clauses 1 and 2 are waived.

4. In the Secretary's sole discretion, the deadlines set forth in this order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least one day prior to the affected deadline.

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5. These proceedings are closed.

By the Commission,

(SIGNED)

KATHLEEN H. BURGESS Secretary

APPENDIX A

SUBJECT: Filing by NEW YORK STATE ELECTRIC & GAS CORPORATION Amendments to Schedule P.S.C. No. 121 - Electricity Original Leaf No. 61.3 Fourth Revised Leaf No. 4 Fifth Revised Leaves Nos. 7, 60 Sixteenth Revised Leaves Nos. 43, 57 Issued: December 15, 2016 Effective: May 1, 2017 Postponed to December 1, 2017. Filings by ROCHESTER GAS AND ELECTRIC CORPORATION Amendments to Schedule P.S.C. No. 18 - Electricity Original Leaf No. 36.2 First Revised Leaf No. 32 Twelfth Revised Leaf No. 28 Thirteenth Revised Leaf No. 29 Fourteenth Revised Leaf No. 27 Issued: December 16, 2016 Effective: May 1, 2017 Postponed to December 1, 2017. Thirteenth Revised Leaf No. 28 Fifteenth Revised Leaf No. 27 Issued: January 4, 2017 Effective: May 1, 2017 Postponed to December 1, 2017. SAPAS: 16-E-0710SP1 - STATE REGISTER - January 4, 2017 16-E-0711SP1 - STATE REGISTER - January 4, 2017 NEWSPAPER PUBLICATION: Waived

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NYSEG LED Luminaires (applicable to both; 3000 and 4000 Kelvin)															
			Annual Charge Effective					Annual Charge Effective				/e			
				Dec	cember 1, 2017						May 1, 2018				
Proposed		Approved	Prop	osed	Арры	roved	Red	uction		Proposed		Approved		Reduction	
LED		LED	Monthly Monthly in Monthly			Monthly		Monthly		in Monthly					
Luminaire		Luminaire	Luminaire Luminaire		Luminaire			Lumi	naire	Lumi	lnaire	Lumi	naire		
Wattages		Wattages	rates Rates Rates			rates R		Rate	Rates		Rates				
34		25	\$	7.56	\$	4.23	\$	3.32		\$	7.92	\$	4.43	\$	3.49
66		67	\$	8.49	\$	4.79	\$	3.71		\$	8.86	\$	5.01	\$	3.85
113		104	\$	8.38	\$	5.89	Ş	2.49		\$	8.75	\$	6.16	\$	2.58
166		150	\$	12.31	\$	6.07	\$	6.24		Ş	12.70	\$	6.35	\$	6.34

Commission Approved Monthly Rates

RG&E LED Luminaires (applicable to both; 3000 and 4000 Kelvin)											
			Annual Charge Effective				Annual Charge Effective				
			December 1, 2017				May 1, 2018				
Proposed		Approved	Proposed	Approved	Reduction		Proposed	Approved	Reduction		
LED		LED	Monthly	Monthly	in Monthly		Monthly	Monthly	in Monthly		
Luminaire		Luminaire	Luminaire	Luminaire	Luminaire		Luminaire	Luminaire	Luminaire		
Wattages		Wattages	rates	Rates	Rates		rates	Rates	Rates		
34		25	\$ 2.78961	\$2.34250	\$ 0.4471		\$ 2.90448	\$2.49093	\$ 0.4135		
66		67	\$ 5.31661	\$4.87254	\$ 0.4441		\$ 5.52506	\$5.18129	\$ 0.3438		
113		104	\$ 8.26851	\$6.09141	\$ 2.1771		\$ 8.61774	\$6.47740	\$ 2.1403		
166		150	\$13.75454	\$6.28673	\$ 7.4678		\$14.27701	\$6.68509	\$ 7.5919		