



Mark O. Marini
Director - Regulatory

September 19, 2016

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess, Secretary
State of New York
Department of Public Service
Three Empire State Plaza
Albany, NY 12223

Dear Secretary Burgess:

Pursuant to the *Notice Concerning New Case Number and Soliciting Comments*, issued by the New York State Public Service Commission (the "Commission") on July 12, 2016, New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation (collectively the "Companies") respectfully are providing this supplemental response to the *Reply of the Joint Utilities to Initial Comments on the Proposal to Allow New York Power Authority Customers to Participate in Clean Energy Programs*.

Respectfully submitted,

A handwritten signature in black ink that reads "Mark O. Marini".

Mark O. Marini

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

In the Matter of New York)
Power Authority Customer) Case 16-M-0395
Opt-In to Clean Energy)
Programs)

Proceeding on Motion of the)
Commission to Consider a) Case 14-M-0094
Clean Energy Fund)

In the Matter of Utility) Case 15-M-0252
Energy Efficiency Programs)

**SUPPLEMENTAL REPLY OF NEW YORK STATE ELECTRIC & GAS
CORPORATION AND ROCHESTER GAS AND ELECTRIC CORPORATION TO
INITIAL COMMENTS ON THE PROPOSAL TO ALLOW NEW YORK POWER
AUTHORITY CUSTOMERS TO PARTICIPATE IN CLEAN ENERGY PROGRAMS**

Pursuant to the *Notice Concerning New Case Number and Soliciting Comments*¹ (the “Notice”) issued by the New York State Public Service Commission (the “Commission”) on July 12, 2016, New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (collectively, the “Companies”) respectfully submit these supplemental reply comments to address the New York Power Authority’s (“NYPA”) initial comments² regarding the *Proposal of New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation to Allow New York Power Authority Customers to Participate in Clean Energy Fund Program*.

¹ Case 16-M-0395, *In the Matter of New York Power Authority Customer Opt-In to Clean Energy Programs* (“NYPA Customer Opt-In Proceeding”), Notice Concerning New Case Number and Soliciting Comments (issued July 12, 2016).

² Comments of the New York Power Authority, p.8.

The Companies are providing clarification in response to NYPA’s comment regarding the administrative burden of Companies’ proposal to verify if a NYPA Economic Development Program (EDP) customer qualifies as a partial pay customer. NYSEG has several of the customers that NYPA identified that participate in EDP programs where the customer’s allocation exceeds their annual peak demand. Upon application of a customer to participate in energy efficiency programs offered by the Companies or by New York State Energy Research and Development Agency (“NYSERDA”), the Companies will verify if the customer is one of the several customers that were identified³ and then provide the request to “opt-in to pay” to NYPA, consistent with the process outlined in the *Reply of the Joint Utilities to Initial Comments on the Proposal to Allow New York Power Authority Customers to Participate in Clean Energy Programs*⁴. This process will not impose additional administrative burdens on NYPA and ensure those customers are paying their share similarly to all other non-NYPA customers. With the above clarification, the Companies support the proposal put forth by the Joint Utilities.

Respectfully submitted,



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³ The Companies would also conduct the same analysis for any new NYPA EDP customers.

⁴ Joint Utilities comments, p. 5