

**New York State Electric & Gas Corporation  
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380  
Request for Information**

**Requesting Party:** Multiple Intervenors

**Request No.:** NYRC-1419 (MI-59-84)

**Date of Request:** September 23, 2025

**Response Due Date:** October 3, 2025

**Date of Reply:** October 2, 2025

**Witness:** Mary Haskell/Mike Del Negro/Paula McMichael/Christine Alexander

**Panel:** Customer Service Panel

**Subject:**

**Question:**

59. Specify the minimum number of actual meter reads that NYSEG and RG&E annually must conduct for each customer. Include in your response a reference to the authority that established this minimum requirement.
60. Does the minimum number of actual meter reads that NYSEG and RG&E annually must conduct for each customer in a calendar year vary depending on the rate class under which the customer takes service? Explain your answer in detail.
61. Does NYSEG track the number of estimated meter reads by rate class? If yes, then provide, for each of the previous five Rate Years, the number of estimated meter reads by rate class and the number of customers in each rate class. If no, explain why not.
62. Does RG&E track the number of estimated meter reads by rate class? If the answer is yes, then provide, for each of the previous five Rate Years, the number of estimated meter reads by rate class and the number of customers in each rate class. If the answer is no, explain why not.
63. Has the New York State Public Service Commission (“PSC”) established a maximum limit on the consecutive number of estimated meter reads that NYSEG may conduct for an individual customer in a 12-month period? If the answer yes, specify the amount and

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provide a reference to the applicable PSC order. If the answer is no, explain whether NYSEG or RG&E has set its own limit.

64. Has the PSC established a maximum limit on the consecutive number of estimated meter reads that RG&E may conduct for an individual customer in a 12-month period? If the answer is yes, specify the amount and provide a reference to the applicable PSC order. If the answer is no, explain whether NYSEG or RG&E has set its own limit.
65. Has the PSC established a maximum limit on the total number of estimated meter reads that either NYSEG or RG&E may conduct for an individual customer in a 12-month period? If the answer is yes, specify the amount and provide a reference to the applicable PSC order. If the answer is no, explain whether NYSEG or RG&E has set its own limit.
66. Explain in detail how NYSEG reconciles estimated to actual meter reads for billing purposes.
67. Explain in detail how RG&E reconciles estimated to actual meter reads for billing purposes.
68. Does the NYSEG Percent of Estimated Bills metric account for all customer classes or only a subset of customer types? Explain your response in detail.
69. Does the RG&E Percent of Estimated Bills metric account for all customer classes or only a subset of customer types? Explain your response in detail.
70. Does NYSEG follow the “no access” procedures described on page 47 of the Panel’s Direct Testimony when trying to access meters of customers taking service under S.C. 7-1, S.C. 7-2, S.C. 7-3, and S.C. 7-4? If your response is in the negative, explain in detail the procedures utilized to seek access to those meters.
71. Does RG&E follow the “no access” procedures described on page 47 of the Panel’s Direct Testimony when trying to access meters of customers taking service under any of the S.C. 8 sub-classes? If your response is in the negative, explain in detail the procedures utilized to seek access to those meters.

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72. With reference to pages 46-47 of the Panel's Direct Testimony, explain how NYSEG documents instances in which the utility fails to obtain an actual meter read from customers taking service under S.C. 7-1, S.C. 7-2, S.C. 7-3, and S.C. 7-4 because the meter is inaccessible due to access or safety issues. Include in your response an explanation of how the utility attempts to gain access before concluding that the meter is inaccessible.
  
73. With respect to pages 46-47 of the Panel's Direct Testimony, explain how RG&E documents instances in which the utility fails to obtain an actual meter read from customers taking service under any of the S.C. 8 sub-classes because the meter is inaccessible due to access or safety issues. Include in your response an explanation of how the utility attempts to gain access before concluding that the meter is inaccessible.
  
74. Specify the amount of uncollectibles for the NYSEG electric business in each of the last five Rate Years. Provide the requested information by rate class if available, or by customer classification if not.
  
75. Specify the amount of uncollectibles for the NYSEG gas business in each of the last five Rate Years. Provide the requested information by rate class if available, or by customer classification if not.
  
76. Specify the amount of uncollectibles for the RG&E electric business in each of the last five Rate Years. Provide the requested information by rate class if available, or by customer classification if not.
  
77. Specify the amount of uncollectibles for the RG&E gas business in each of the last five Rate Years. Provide the requested information by rate class if available, or by customer classification if not.
  
78. Explain how uncollectible costs are allocated to the: (a) NYSEG electric rate classes; (b) NYSEG gas rate classes; (c) RG&E electric rate classes; and (d) RG&E gas rate classes.
  
79. For each of the last five Rate Years, specify the amount of credit and collection costs incurred by the NYSEG electric business. Provide the requested information by rate class if available, or by customer classification if not.

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80. For each of the last five Rate Years, specify the amount of credit and collection costs incurred by the NYSEG gas business. Provide the requested information by rate class if available, or by customer classification if not.
81. For each of the last five Rate Years, specify the amount of credit and collection costs incurred by the RG&E electric business. Provide the requested information by rate class if available, or by customer classification if not.
82. For each of the last five Rate Years, specify the amount of credit and collection costs incurred by the RG&E gas business. Provide the requested information by rate class if available, or by customer classification if not.
83. Explain how credit and collection costs are allocated to the: (a) NYSEG electric rate classes; (b) NYSEG gas rate classes; (c) RG&E electric rate classes; and (d) RG&E gas rate classes.
84. Do the Companies track energy efficiency program costs by rate class? If yes, provide the amount of energy efficiency program costs by rate class, for each of the last five Rate Years, for: (a) the NYSEG electric business; (b) the NYSEG gas business; (c) the RG&E electric business; and (d) the RG&E gas business. If no, provide the requested information by customer classification.

**Response:**

59. The New York State Public Service Commission (PSC) has not established a fixed numeric limit on the consecutive number of estimated meter reads that the Companies may conduct for an individual customer in a 12-month period.

However, the regulations under the Home Energy Fair Practices Act (HEFPA), specifically 16 NYCRR §11.13, impose procedural requirements that effectively limit the duration of consecutive estimated bills for residential customers. For non-residential (commercial) customers similar requirements are outlined in 16 NYCRR §13.8.

- For residential customers, HEFPA §11.13 requires utilities to take escalating actions after:

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- 4 months or 2 billing periods of estimates: reasonable efforts to obtain an actual read.
  - 6 months or 3 billing periods: offer a special appointment.
  - 8 months or 4 billing periods: issue a notice of potential charges and court action if access is not provided.
- For non-residential (commercial) customers, 16 NYCRR §13.8 outlines similar but more specific escalation procedures:
- Estimated bills may be issued under defined conditions (e.g., lack of access, lost readings, etc.).
  - After 2 consecutive estimated bills for demand accounts or 4 for non-demand accounts, utilities must begin issuing no-access notices.
  - After 10 consecutive estimated bills (including those based on remote or customer readings), utilities may impose no-access charges (up to \$100) and pursue termination or court-ordered access.

These provisions serve as de facto limits and require utilities to take corrective action to obtain actual meter readings. NYSEG adheres to these regulatory requirements and has not implemented a separate numeric cap beyond those established by HEFPA and 16 NYCRR §13.8.

60. While the PSC does not set a uniform numeric minimum for actual meter reads per year, the required frequency and urgency of actual reads vary by rate class, particularly between residential, non-demand commercial, and demand commercial accounts. These differences are embedded in the escalation procedures and access enforcement mechanisms outlined in HEFPA §11.13 and 16 NYCRR §13.8.
61. Yes, please see attachment 1 page 2.
62. Yes, please see attachment 1 page 1.
63. The PSC has not established a fixed numeric limit on the consecutive number of estimated meter reads that NYSEG may conduct for an individual customer in a 12-month period.

However, procedural limits are imposed through:

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- HEFPA regulations (16 NYCRR §11.13) for residential customers
- 16 NYCRR §13.8 for non-residential (commercial) customers

These regulations require utilities to take escalating actions after a defined number of consecutive estimated bills. See response to question 59.

64. RG&E follows the same process as outlined in the response about NYSEG in Question 63.

65. The PSC has not established a fixed numeric limit on the total number of estimated meter reads that the Companies may conduct for an individual customer in a 12-month period.

However, procedural limits are imposed through:

- HEFPA regulations (16 NYCRR §11.13) for residential customers
- 16 NYCRR §13.8 for non-residential customers

These regulations require utilities to take escalating corrective actions based on the number of consecutive estimated bills, rather than total annual estimates.

66. At NYSEG to reconcile estimated to actual meter reads for billing purposes, when an actual meter reading is obtained, the difference between the actual read and the estimated reading is billed.

If the actual reading is lower than the previous estimated reading, the billing for the estimated reading is cancelled and the account is rebilled with the actual usage for the total time period.

67. The same process is used at RG&E as described for NYSEG the response to question 66.

68. Yes, the NYSEG Percent of Estimated Bills metric accounts for all customer classes.

The metric is calculated as the ratio of estimated bills to on-cycle bills sent to customers, regardless of service classification. It includes all bill documents associated with scheduled meter reads, whether monthly or bi-monthly, based on the final bill period.

This methodology ensures that the estimated bills metric reflects performance across the full customer base, not a subset.

69. RG&E follows the same process as NYSEG outlined in our response to question 68.

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70. Yes, NYSEG follows the “no access” procedures described on page 47 of the Panel’s Direct Testimony when attempting to access meters for customers taking service under Service Classifications 7-1, 7-2, 7-3, and 7-4.

In addition to the standard procedures, the following protocols apply specifically to customers with demand meters and MV-90 interval meters:

**Demand Meters:**

If a meter reading attempt by a Meter Reader-Collector (MRC) is missed, a second attempt is automatically issued and scheduled to be worked within the subsequent days to ensure an actual read is obtained.

**MV-90 Interval Meters:**

If an MRC is unable to gain access to the meter, a Meter Technician is dispatched as a second attempt to download the interval data directly from the meter.

Additionally, for these customers, no door hanger is left following a missed read attempt. This is because demand and MV-90 customers cannot provide manual reads, and therefore the standard customer notification process via door hanger is not applicable.

These additional steps are part of NYSEG’s efforts to minimize estimated bills and ensure accurate billing for customers with advanced metering configurations.

71. Yes, RG&E follows the same “no access” procedures described on page 47 of the Panel’s Direct Testimony when attempting to access meters for customers taking service under any of the S.C. 8 sub-classes. These procedures are consistent with those used by NYSEG for Service Class 7 customers.

72. When NYSEG is unable to obtain an actual meter read due to access or safety issues for customers taking service under S.C. 7-1, S.C. 7-2, S.C. 7-3, and S.C. 7-4, the following documentation and follow-up procedures are used:

- The field employee documents the specific access issue in the account (e.g., locked gate, no adult present, unsafe conditions).
- The account is coded to reflect the failed access attempt.

Exceptions:

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- For customers with demand meters, if the initial read attempt by a MRC is missed, a second attempt is automatically issued and scheduled to be worked within the subsequent days.
- For customers with MV-90 interval meters, if the MRC is unable to obtain a read, a Meter Technician is dispatched to download the interval data directly from the meter.
- For both demand and MV-90 customers, no door hanger is left, as these customers cannot provide manual reads, and notification via card is not applicable.

These procedures ensure that access issues are properly documented and that additional steps are taken to minimize estimated billing for customers with advanced metering configurations.

73. RG&E follows the same procedures for documenting and responding to inaccessible meters for customers taking service under any of the S.C. 8 sub-classes as NYSEG does for Service Class 7 customers. See response to question 72.
74. Please see Attachment 2 for the the amount of uncollectibles for the NYSEG electric business in each of the last five Rate Years.
75. Please see Attachment 2 for the amount of uncollectibles for the NYSEG gas business in each of the last five Rate Years.
76. Please see Attachment 2 for the amount of uncollectibles for the RG&E electric business in each of the last five Rate Years.
77. Please see Attachment 2 for the amount of uncollectibles for the RG&E gas business in each of the last five Rate Years.
78. The allocation of uncollectibles is collected by the orders within the general ledgers. Each customer has an order assigned based on their classification.
79. Please see Attachment 3 for the amount of credit and collection costs incurred by the NYSEG electric business for the last five Rate Years.
80. Please see Attachment 3 for the amount of credit and collection costs incurred by the NYSEG gas business for the last five Rate Years.
81. Please see Attachment 3 for the amount of credit and collection costs incurred by the RG&E electric business for the last five Rate Years.

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82. Please see Attachment 3 for the amount of credit and collection costs incurred by the RG&E gas business for the last five Rate Years.
83. The credit and collection costs are allocated to the: (a) NYSEG electric rate classes; (b) NYSEG gas rate classes; (c) RG&E electric rate classes; and (d) RG&E gas rate classes using the Companies common allocator percentages.
84. No, we do not. The credit and collection costs for energy efficiency has been included in base rates in the last JP. The collection values (from which the base rates were determined) are listed in the last 2 joint proposals in the appendices and allocated by OPCO (NYSEG Electric, NYSEG Gas, RGE Electric and RGE gas). In the NYSEG and RGE electric there is budget set aside for EE and another line item set aside for heat pumps (building electrification).

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Attachment 1, page 1 of 2

Year	Type	ServiceClass	Number of Estimates
2020	EL	1	2325715
2020	EL	2	165714
2020	EL	3	2293
2020	EL	4	3559
2020	EL	7	22075
2020	EL	8	136
2020	EL	9	776
2021	EL	1	2451855
2021	EL	2	170134
2021	EL	3	3047
2021	EL	4	8167
2021	EL	7	22546
2021	EL	8	228
2021	EL	9	810
2021	EL	14	3
2022	EL	1	2535995
2022	EL	2	185057
2022	EL	3	3699
2022	EL	4	9364
2022	EL	7	26440
2022	EL	8	290
2022	EL	9	880
2022	EL	14	2
2023	EL	1	2009616
2023	EL	2	135648
2023	EL	3	1765
2023	EL	4	3583
2023	EL	7	12973
2023	EL	8	287
2023	EL	9	568
2023	EL	14	3
2024	EL	1	1299550
2024	EL	2	91586
2024	EL	3	1705
2024	EL	4	2439
2024	EL	6	5
2024	EL	7	12003
2024	EL	8	574
2024	EL	9	378
2024	EL	14	1
2025	EL	1	344350
2025	EL	2	24705
2025	EL	3	587
2025	EL	4	796
2025	EL	7	3367
2025	EL	8	577
2025	EL	9	87
2025	EL	14	11
2020	GS	1	2032463
2020	GS	5	210096
2021	GS	1	2200376
2021	GS	5	194070
2022	GS	1	2265974
2022	GS	5	160141
2023	GS	1	1996204
2023	GS	3	13
2023	GS	5	103417
2024	GS	1	1542693
2024	GS	3	10
2024	GS	5	71036
2025	GS	1	679315
2025	GS	3	1
2025	GS	5	25957

EL	Electric Service
GS	Gas Service
<b>RGE Electric Service Class</b>	
1	Residential Service
2	General Service - Small Use
3	General Service - 100 kW Minimum
4	Residential Service Time-of-Use Rate
7	General Service - 12 kW Minimum
8	Large General Service - Time-of-Use Rate
9	General Service - Time-of-Use
14	Standby Service
<b>RGE Gas Service Class</b>	
1	General Service
3	Large Transportation Service
5	Small Transportation Service

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Attachment 1, Page 2 of 2

Year	Type	ServiceClass	Number of Estimates
2020	EL	1	4352783
2020	EL	2	24696
2020	EL	3	236
2020	EL	6	444987
2020	EL	7	1463
2020	EL	8	893958
2020	EL	9	15259
2020	EL	11	8
2020	EL	12	3100
2021	EL	1	4310095
2021	EL	2	16684
2021	EL	3	275
2021	EL	6	438056
2021	EL	7	831
2021	EL	8	888444
2021	EL	9	14935
2021	EL	11	2
2021	EL	12	3032
2022	EL	1	4473291
2022	EL	2	23283
2022	EL	3	341
2022	EL	6	460376
2022	EL	7	891
2022	EL	8	896720
2022	EL	9	15646
2022	EL	11	2
2022	EL	12	3478
2023	EL	1	3892235
2023	EL	2	29415
2023	EL	3	415
2023	EL	6	405536
2023	EL	7	1298
2023	EL	8	765722
2023	EL	9	13372
2023	EL	11	3
2023	EL	12	2283
2024	EL	1	3012328
2024	EL	2	27068
2024	EL	3	492
2024	EL	6	322533
2024	EL	7	1342
2024	EL	8	597861
2024	EL	9	10542
2024	EL	11	12
2024	EL	12	2590
2025	EL	1	929803
2025	EL	2	10963
2025	EL	3	264
2025	EL	6	108003
2025	EL	7	666
2025	EL	8	236408
2025	EL	9	4047
2025	EL	11	19
2025	EL	12	976
2020	GS	1	1550208
2020	GS	2	133598
2020	GS	5	12
2020	GS	13	126335
2020	GS	14	36468
2021	GS	1	1574469
2021	GS	2	130919
2021	GS	5	11
2021	GS	13	105618
2021	GS	14	32854
2022	GS	1	1606110
2022	GS	2	132484
2022	GS	5	6
2022	GS	13	87704
2022	GS	14	30894
2023	GS	1	1496378
2023	GS	2	126815
2023	GS	5	11
2023	GS	13	64868
2023	GS	14	26971
2024	GS	1	1270422
2024	GS	2	107012
2024	GS	5	8
2024	GS	13	44195
2024	GS	14	21637
2025	GS	1	584016
2025	GS	2	51226
2025	GS	5	1
2025	GS	13	17474
2025	GS	14	9450

EL	Electric Service
GS	Gas Service
NYSEG Electric Service Class	
1	Residential Service
2	General Service with Demand Metering
3	Primary Service - 25 KW or more
6	General Service
7	Large General Service with Time-of-Use Metering
8	Residential - Day Night Service
9	General Service - Day Night Service
11	Standby Service
12	Residential Service with Time-of-Use Metering
NYSEG Gas Service Class	
1	Firm Transportation Service
2	Interruptible Transportation Service
5	Small Firm Transportation Service
13	Residential Firm Aggregation Transportation Service
14	Non-Residential Firm Aggregation Transportation Service

**NYSEG**

**Write-Offs by Customer Classification  
(Customer and Supply Option)  
Rate Years 2021-2025**

NYSEG Electric	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
Residential Full	2,300,957	6,003,333	13,814,981	24,653,243	29,745,361
Residential R/A	209,441	425,380	773,612	1,004,310	995,084
Commercial Full	312,041	954,361	1,744,743	3,693,354	3,705,867
Commercial R/A	196,512	207,243	280,385	1,233,923	729,019
Industrial Full	13,025	12,458	5,460	269	38,260
Industrial R/A	1,669	6,283	37,798	368,907	100,797
Municipal Full	4,183	(541)	2,129	27,031	4,284
Municipal R/A	6	1,209	23,316	43,776	2,940
Street Lighting Full	-	-	-	5	-
Street Lighting R/A	-	-	-	-	-
<b>Total Electric</b>	<b>3,037,833</b>	<b>7,609,726</b>	<b>16,682,423</b>	<b>31,024,817</b>	<b>35,321,613</b>

**NYSEG Gas**

Residential Full	754,235	1,897,224	4,157,137	5,617,125	6,766,850
Residential R/A	(113,257)	34,780	98,692	35,422	106,372
Commercial Full	181,538	366,377	552,655	1,040,742	1,191,982
Commercial R/A	58,514	31,420	167,561	169,172	113,318
Industrial Full	21,190	509	44,195	(726)	6,896
Industrial R/A	-	345	18	602	7,602
Municipal Full	1	23	1,262	1,112	-
Municipal R/A	-	-	14	1,142	-
<b>Total Gas</b>	<b>902,222</b>	<b>2,330,677</b>	<b>5,021,533</b>	<b>6,864,590</b>	<b>8,193,021</b>

**Grand Total**                    **3,940,055**    **9,940,403**    **21,703,956**    **37,889,407**    **43,514,634**

**RGE**

**Write-Offs by Customer Classification  
(Customer and Supply Option)  
Rate Years 2021-2025**

RGE Electric	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
Residential Full	1,200,244	2,091,453	4,799,133	9,002,001	14,680,539
Residential R/A	128,927	759,094	2,786,222	2,833,367	4,318,633
Commercial Full	504,567	295,056	1,003,654	1,051,040	1,748,828
Commercial R/A	419,521	114,995	539,184	586,496	631,986
Industrial Full	(85)	2,801	7,431	6,479	7,623
Industrial R/A	(21)	-	230,832	3,442	-
Municipal Full	-	-	-	-	47
Municipal R/A	10,090	(604)	1,183	10,214	395
Street Lighting Full	-	-	-	-	-
Street Lighting R/A	-	-	-	-	-
<b>Total Electric</b>	<b>2,263,243</b>	<b>3,262,796</b>	<b>9,367,640</b>	<b>13,493,039</b>	<b>21,388,052</b>

**RGE Gas**

RGE Gas	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
Residential Full	794,030	1,747,555	4,736,701	6,260,569	11,447,519
Residential R/A	(74,303)	(47,709)	291,174	(97,847)	53,390
Commercial Full	159,213	165,203	281,549	449,965	765,537
Commercial R/A	342,063	24,789	61,478	135,907	119,542
Industrial Full	1,094	45	3,219	205	692
Industrial R/A	-	-	-	-	1,069
Municipal Full	-	(214)	314	8,378	(721)
Municipal R/A	-	-	2	25	1
<b>Total Gas</b>	<b>1,222,097</b>	<b>1,889,669</b>	<b>5,374,436</b>	<b>6,757,201</b>	<b>12,387,029</b>

**Grand Total**                    **3,485,340**    **5,152,465**    **14,742,076**    **20,250,240**    **33,775,081**

The electric and gas totals above includes the common/unallocated amounts as mentioned in question #78. Below explains the allocation.

The breakout of the write offs above are collected by the orders within the general ledger. Each customer has an order assigned based on their classification.

However, a small amount of the write offs in the billing system are not driven by the customers order and is directed to a nondescriptive order.

When putting together the data above the unassigned write-off amount is allocated by the percentage of each customer type within the total.

Attachment 3, Page 1 of 1

	<b>RY1</b>	<b>RY2</b>	<b>RY3</b>	<b>RY4</b>	<b>RY5</b>	
<b>NYSEG</b>	<b>5/1/20 - 4/30/21</b>	<b>5/1/21 - 4/30/22</b>	<b>5/1/22 - 4/30/23</b>	<b>5/1/23 - 4/30/24</b>	<b>5/1/24 - 4/30/25</b>	<b>Total</b>
Electric Total	2,761,827.71	2,791,081.21	4,276,309.73	7,128,723.87	7,111,994.66	24,069,937.19
Gas Total	815,669.33	824,308.96	1,262,191.38	2,105,374.41	2,100,433.66	7,107,977.73
<b>Total</b>	<b>3,577,497.04</b>	<b>3,615,390.17</b>	<b>5,538,501.11</b>	<b>9,234,098.28</b>	<b>9,212,428.32</b>	<b>31,177,914.92</b>

	<b>RY1</b>	<b>RY2</b>	<b>RY3</b>	<b>RY4</b>	<b>RY5</b>	
<b>RGE</b>	<b>5/1/20 - 4/30/21</b>	<b>5/1/21 - 4/30/22</b>	<b>5/1/22 - 4/30/23</b>	<b>5/1/23 - 4/30/24</b>	<b>5/1/24 - 4/30/25</b>	<b>Total</b>
Electric Total	2,585,869.41	2,809,167.97	3,711,759.82	4,804,327.84	4,006,279.25	17,917,404.30
Gas Total	763,702.37	829,650.65	1,096,029.17	1,418,894.75	1,183,201.65	5,291,478.58
<b>Total</b>	<b>3,349,571.78</b>	<b>3,638,818.62</b>	<b>4,807,788.99</b>	<b>6,223,222.59</b>	<b>5,189,480.90</b>	<b>23,208,882.88</b>

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**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380  
Request for Information**

**Requesting Party:** Multiple Intervenors

**Request No.:** NYRC-1497 (MI-93-97)

**Date of Request:** September 25, 2025

**Response Due Date:** October 6, 2025

**Date of Reply:** October 5, 2025

**Witness:** Thomas Garrity/Angela Baio/Christine Alexander

**Panel:** Customer Service Panel

**Subject:**

**Question:**

93 Does NYSEG track customer calls to its call centers by rate class or customer classification?

- a. If yes, provide the total number of calls to its call centers for each of the past five Rate Years, broken down based on rate class, if that information is available, or by customer classification if it is not.
- b. If NYSEG does not track customer calls in this manner, explain why not.

94. Does RG&E track customer calls to its call centers by rate class or customer classification?

- a. If yes, provide the total number of calls to its call centers for each of the past five Rate Years, broken down based on rate class, if that information is available, or by customer classification if it is not.
- b. If RG&E does not track customer calls in this manner, explain why not.

95. Is there a demand and/or usage threshold above which a NYSEG customer is assigned a specific account manager?

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- a. If yes, specify the threshold and explain when and how the account manager is assigned to a customer.
  - b. If no, explain when and how NYSEG assigns an account manager to a customer.
96. Is there a demand and/or usage threshold above which an RG&E customer is assigned a specific account manager?
- a. If yes, specify the threshold and explain when and how the account manager is assigned to a customer.
  - b. If no, explain when and how RG&E assigns an account manager to a customer.
97. Confirm that one function of an account manager is to discuss questions and concerns that the customer otherwise might seek to address through a utility call center. If not confirmed, explain your response in detail.

**Response:**

- 93 NYSEG does not track customers / callers this way. All customers use the same sets of phone numbers to contact Customer Service and the IVR directs calls based on the issue the customer is calling about, rather than caller type.
- 94 RG&E does not track customers / callers this way. All customers use the same sets of phone numbers to contact Customer Service and the IVR directs calls based on the issue the customer is calling about, rather than caller type.
- 95
- a. No, there is no demand/usage threshold for a customer to be assigned to an account manager.
  - b. Each new large commercial/industrial customer is evaluated on a case-by-case basis to determine if an Account Manager should be assigned.

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- a. No, there is no demand/usage threshold for a customer to be assigned to an account manager.
- b. Each new large commercial/industrial customer is evaluated on a case-by-case basis to determine if an Account Manager should be assigned.

97. Account managers have specific expertise and training in handling large/complex customer accounts that may not be able to be handled by the utility call center.

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Request for Information**

**Requesting Party:** Multiple Intervenors

**Request No.:** NYRC-1609 (MI-106)

**Date of Request:** October 7, 2025

**Response Due Date:** October 17, 2025

**Date of Reply:** October 16, 2025

**Witness:** Amy Adams, Christine Alexander, Christopher Bush

**Panel:** Customer Service Panel

**Subject:**

**Question:**

106. With reference to the Company's response to MI-62, explain why the number of estimated meter reads for customers taking electric service under the S.C. 8 classes increased from 136 in 2020, to 577 in 2025 (to date).

**Response:**

106. The fluctuation in estimated meter reads for customers under the S.C. 8 between 2020-2025 can generally be attributed to a combination of operational, technological, and customer-specific factors such as:

- Physical barriers such as locked gates, indoor meter locations, or obstructions (e.g., snow, debris) can prevent meter readers from accessing the meter.
- Customer refusal or absence may also hinder access, especially in cases where meters are located inside buildings.
- Aggressive animals, unsafe property conditions, or environmental hazards (e.g., flooding, structural damage) may lead field staff to skip a read for safety reasons.
- Weather events or emergencies may temporarily disrupt meter reading operations.
- Non-AMI meters (i.e., meters not equipped with remote reading capabilities) require manual reads, which are more prone to being missed.
- Communication failures in phone lines dedicated to MV90 systems can also lead to gaps in data, prompting estimated reads for customers requiring Mandatory Hourly Pricing.
- Vacant properties, seasonal usage, or intermittent occupancy can lead to estimation if no usage data is available or if access is inconsistent.

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**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380  
Request for Information**

**Requesting Party:** Multiple Intervenors

**Request No.:** NYRC-1672 (MI-112-118)

**Date of Request:** October 15, 2025

**Response Due Date:** October 27, 2025

**Date of Reply:** October 27, 2025

**Witness:** Amy Adams/Thomas Garrity/Christine Alexander

**Panel:** Customer Service Panel

**Subject:**

**Question:**

112. With respect to the Panel's response to MI-95, specify for NYSEG:

- a. the number of customers in each rate class and sub-class that have been assigned to an Account Manager;
- b. the number of Account Managers that have customer-specific assignments in each rate class and sub-class; and
- c. the demand and monthly usage associated with the smallest customer assigned to an Account Manager in each rate class and sub-class; if necessary to avoid providing information that may be considered commercially-sensitive and/or confidential, the requested demand and usage information may be rounded to avoid disclosing such data.

113. With respect to the Panel's response to MI-96, specify for RG&E:

- a. the number of customers in each rate class and sub-class that have been assigned to an Account Manager;
- b. the number of Account Managers that have customer-specific assignments in each rate class and sub-class; and

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- c. the lowest demand and monthly usage associated with the smallest customer assigned to an Account Manager in each rate class and sub-class; if necessary to avoid providing information that may be considered commercially-sensitive and/or confidential, the requested demand and usage information may be rounded if necessary to avoid disclosing such data.
114. Does NYSEG track the accuracy of bills issued to customers? If yes, explain in detail how NYSEG evaluates bill accuracy. If no, explain why not.
115. Does RG&E track the accuracy of bills issued to customers? If yes, explain in detail how RG&E evaluates bill accuracy. If no, explain why not.
116. Explain the circumstances under which NYSEG would not issue a monthly bill to an existing customer taking service under one of the S.C. 7 sub-classes, and how the utility keeps track of whether or not a bill is issued to a customer each month and the number and frequency of bills not being issued to a customer over time.
117. Explain the circumstances under which RG&E would not issue a monthly bill to an existing customer taking service under one of the S.C. 8 sub-classes or S.C. 14, and how the utility keeps track of whether or not a bill is issued to a customer each month and the number and frequency of bills not being issued to a customer over time.
118. For NYSEG and RG&E customer premises with both gas and electric meters, explain the circumstances in which a customer could receive a monthly bill that reflects an actual read of one meter but an estimated read of the other meter.

**Response:**

- 112.
- a. The Company does not maintain a customer list broken down by rate class and it is not readily available. NYSEG Key Accounts are typically SC7-1, 7-2, 7-3 and 7-4. There may be instances where one large KA customer has hundreds of accounts, which may fall into different rate categories. The total number of customers accounts coded KA are 867 (one customer may have multiple accounts).

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- b. There are 10 Business Relations Managers at NYSEG, but do not have it broken down by rate class. Key Accounts are typically SC7-1, 7-2, 7-3 and 7-4. There may be instances where one large KA customer has hundreds of accounts, which may fall into different rate categories.
- c. There may be instances where one large KA customer has hundreds of accounts, which may fall into different rate categories. As a result, there is the potential for an SC-2 customer (greater than 5kW but less than 500kW) and SC-3 customer (25kW-499kW) to have an Account Manager.

113.

- a. RG&E does not maintain a customer list broken down by rate class and it is not readily available. Key Accounts at RG&E are typically SC-08. However, there may be instances where one large KA customer has hundreds of accounts, which may fall into different categories. The current number of accounts coded KA are 465 (one customer may have multiple accounts).
- b. There are four Business Relations Managers at RG&E, but do not have it broken down by rate class. Key Accounts at RG&E are typically SC8. There may be instances where one large KA customer has hundreds of accounts, which may fall into different rate categories.
- c. There may be instances where one large KA customer has hundreds of accounts, which may fall into different rate categories. As a result, there is the potential for an SC 2 ( $\leq 12\text{kW}$  or  $\leq 3,000\text{kWh mo}$ ), SC-3 (100kW minimum) and SC7 ( $>12\text{kW}$  or  $>3,000\text{kWh/mo}$ ) customers to have an Account Manager.

114. NYSEG evaluates bill accuracy in instances where billed usage is significantly above or below expected values based on historical billed consumption. In these instances, the bills are flagged by the system and require manual review before they can be sent out to customers, ensuring accuracy.

Additionally, NYSEG tracks the number of bills that are adjusted after issuance in a monthly CSPI report. This typically occurs as the result of inaccurate meter reads or meter reads that are lower than previously billed estimates.

115. RG&E evaluates bill accuracy in instances where billed usage is significantly above or below expected values based on historical billed consumption. In these instances, the bills are flagged by the system and require manual review before they can be sent out to customers, ensuring accuracy.

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Additionally, RG&E tracks the number of bills that are adjusted after issuance in a monthly CSPI report. This typically occurs as the result of inaccurate meter reads or meter reads that are lower than previously billed estimates.

116. Typically, a monthly bill may not be issued for a NYSEG customer due to the required manual review (as discussed in response to question 114 above). Delayed bills are tracked to ensure compliance with applicable Public Service Law provisions which limit back billing. NYSEG does not currently track the number or frequency of bills not issued to specific customers over time.
117. Typically, a monthly bill may not issue for an RG&E customer due to requiring manual review (see 114 above). Delayed bills are tracked to ensure compliance with applicable Public Service Law provisions which limit back billing. RG&E does not currently track the number or frequency of bills not issued to specific customers over time.
118. Typically, a customer could receive a monthly bill that reflects an actual read of one meter but an estimated read of the other meter only if:
  - The company is only able to access one of the two meters (i.e., one meter is outside while the other is in the basement, or behind a locked gate); or
  - The customer has an AMI (Smart Meter) installed for only one of the two meters, and not the other.

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**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380  
Request for Information**

**Requesting Party:** Multiple Intervenors

**Request No.:** NYRC-1990 (MI-163)

**Date of Request:** January 16, 2026

**Response Due Date:** January 26, 2026

**Date of Reply:** January 20, 2026

**Witness:** Christine Alexander, David Harrington, Paula McMichael

**Panel:** Customer Service Panel

**Subject:**

**Question:**

163. With reference to the Panel’s responses to MI-104 and MI-105, confirm that a customer may read its meter and provide that data to the Companies for billing purposes. If confirmed, explain in detail the circumstances under which a customer may provide its utility with a meter read, the protocols that apply to this opportunity, and how the customer coordinates with the utility to ensure that the customer’s read is used for billing purposes. If not confirmed, explain why the Panel provided “customer read bills” in response to the indicated information requests.

**Response:**

163. The Companies confirm that a customer may read its meter and provide that reading to NYSEG or RG&E for billing purposes. This practice is permitted and supported by New York regulations, Commission policy, and Company tariff aligned customer read offerings.

**Customers may provide meter readings under multiple circumstances:**

1. When an Actual Reading Cannot Be Obtained by the Company

Under the Home Energy Fair Practices Act (HEFPA), specifically 16 NYCRR §11.13, a utility must take reasonable actions to obtain an actual read when access is unavailable or estimated bills have been issued. HEFPA explicitly identifies customer provided readings via phone or mail as an acceptable means of obtaining an actual meter reading.

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2. During Normal Billing Cycles

Customers may voluntarily submit a meter reading during their normal billing cycle. The Companies accept such readings as long as they are consistent with the meter's characteristics and usage history.

3. As Part of Company Supported Customer Meter Reading Options

Both Companies provide customer-read options, consistent with applicable tariffs and Commission requirements, for customers whose meter type and service classification are eligible for customer-provided readings. Eligible customers may submit readings on a monthly, bi-monthly, or interim basis, which can reduce the frequency of estimated bills

4. When a Customer Seeks to Avoid Estimated Bills

Customers who wish to prevent estimated bills may supply meter readings in accordance with provided deadlines and submission channels.

**Protocols Applicable to Customer Provided Meter Readings**

1. Accepted Submission Channels

Customers may submit readings using channels offered by the Companies, which include:

- Online submission through Company websites,
- Automated telephone systems,
- Customer Service representatives (via phone or email), or
- Mail in meter reading cards (consistent with 16 NYCRR §11.13 and 16 NYCRR §14.12).

These channels satisfy the regulatory requirement that utilities provide customers with multiple ways to supply their own reads.

2. Validation Requirements

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Customer supplied readings must be reasonable and plausible. The Companies review submitted readings to ensure they align with:

- The meter type,
- Expected usage patterns, and
- Prior billing history

If a reading appears implausible, the Companies may seek confirmation or request that the customer reread the meter.

3. Use for Billing Purposes

Once validated, customer provided readings are treated as actual meter readings and used for billing in the same manner as Company reads. This satisfies HEFPA requirements for obtaining an actual read when available.

**Customer Coordination to Ensure the Read Is Used for Billing**

To ensure that a customer provided reading is used for billing, the customer must:

1. Submit the reading within the timeframe specified on their bill or reminder notice;
2. Provide the complete reading as displayed on the meter; and
3. Use any of the standard submission channels described above.

Customers who participate in recurring meter read programs may receive reminder notices identifying when the Companies are ready to accept readings for use in the next billing cycle.

**Explanation of “Customer Read Bills” in MI 104 and MI 105**

As reflected in the Companies’ responses to MI 104 and MI 105, “customer read bills” refer to bills issued using a meter reading submitted by the customer rather than obtained by the Company or estimated. These totals demonstrate that the Companies routinely receive, validate, and bill from customers provided readings consistent with HEFPA and tariff aligned procedures.

Consistent with HEFPA (16 NYCRR §11.13), Commission policy, and Company tariff aligned practices; customers may provide their own meter readings, and the Companies accept such

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readings for billing when they are reasonable and valid. Customer provided readings play an important role in minimizing estimated bills and ensuring accurate billing for customers.

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Request for Information**

**Requesting Party:** Multiple Intervenors  
**Request No.:** NYRC-2033 (MI-173)  
**Date of Request:** January 27, 2026  
**Response Due Date:** February 6, 2026  
**Date of Reply:** February 5, 2026  
**Witness:** Paula McMichael/Christine Alexander  
**Panel:** Customer Service Panel  
**Subject:**

**Question:**

173. Confirm that any customer may provide a meter reading for billing purposes. If not confirmed, specify the customer classes that are eligible to provide a meter reading for billing purposes.

**Response:**

173. NYSEG and RG&E confirm that customers in all residential service classifications are eligible to provide a customer-read meter reading for billing purposes.

In addition, for non-residential customers, any service classification that utilizes a standard, non-demand metering configuration is eligible to submit customer-provided meter readings. These meters record only consumption (kWh or ccf), do not require interval or demand data, and can be reliably validated through normal billing system.

The Companies do not permit most commercial and industrial customers; particularly those billed on demand, interval, or other complex rate structures to submit self-read meter readings.

Accordingly, beyond the residential classes and the non-residential classes listed above, other commercial and industrial customers are not eligible to provide self-submitted meter readings for billing.