

October 15, 2025

**VIA ELECTRONIC MAIL**

Honorable Michelle L. Phillips  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**RE: Case 20-M-0082 – Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data**

**JOINT UTILITIES’ REQUEST FOR EXTENSION REGARDING NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE UPDATED GUIDANCE FOR UTILITY INTEGRATED ENERGY DATA RESOURCE REPORTING**

Dear Secretary Phillips:

Pursuant to the request by the New York State Department of Public Service (“DPS”) in the October 1, 2025 *Updated Guidance for Utility Integrated Energy Data Resource Reporting* filed in the subject proceeding (“Updated Guidance”)<sup>1</sup> with the New York State Public Service Commission (“Commission”) which provides more specificity for the Integrated Energy Data Resource (“IEDR”) Phase 2 utility quarterly and annual reports required by the Commission’s January 19, 2024 *Order Approving Integrated Energy Data Resource Phase 2 Budgets*,<sup>2</sup> DPS Staff established October 31, 2025 as the deadline for each of the Joint Utilities<sup>3</sup> to file a 2024 summary and updated Q1 2025 and Q2 2025 reports using the quarterly budget reporting template attached to the Updated Guidance. Although each of the Joint Utilities are committed to completing and filing the requested 2024 summary and updated Q1 2025 and Q2 2025 reports as required by the Updated Guidance, a modest amount of additional time is needed to do so.

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<sup>1</sup> Case 20-M-0082, *Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data* (“IEDR Proceeding”); New York State Department of Public Service Updated Guidance for Utility Integrated Data Resource Reporting (filed October 1, 2025).

<sup>2</sup> IEDR Proceeding, *Order Approving Integrated Energy Data Resource Phase 2 Budgets* (issued January 19, 2024).

<sup>3</sup> The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Liberty Utilities (St. Lawrence Gas) Corporation, New York State Electric & Gas Corporation, National Fuel Gas Distribution Corporation, The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

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Upon conferring with DPS Staff, the Joint Utilities believe that a two-week extension for completing and filing their respective 2024 summaries and updated Q1 2025 and Q2 2025 reports, which is fourteen (14) calendar days from the date established in the Update Guidance, is sufficient.

The Joint Utilities hereby respectfully request an extension to November 14, 2025 to file their respective 2024 summaries and updated Q1 2025 and Q2 2025 reports using the quarterly budget reporting template attached to the Updated Guidance.

Thank you for your consideration in this matter.

Respectfully submitted on behalf of the  
Joint Utilities,

*/s/ Janet M. Audunson*

Janet M. Audunson  
Assistant General Counsel

cc: Marco Padula, DPS Staff (via electronic mail)  
Jeffrey Frederick, DPS Staff (via electronic mail)