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Technical Conference Regarding Strategic Decommissioning of NYSEG/RG&E Gas Distribution Systems

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1. Introduction

New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E") (collectively, "the Companies") submit this report in compliance with the New York Public Service Commission's ("NYPSC") Order Regarding Long-Term Natural Gas Plan and Directing Further Actions in Case 23-G-0437, issued and effective January 23, 2025; Ordering paragraph 9.

The information presented in this report summarizes the discussions and results of the technical conferences held on March 21 and April 29, 2025. The conferences were well attended with active participation by stakeholders representing various entities. The report includes a summary of the conferences, stakeholder input, criteria for decommissioning gas main segments, Non-Pipe Alternatives ("NPAs") identified after the technical conference based on the technical conference discussions, and the Companies' continuing efforts to evaluate new opportunities and fulfill the Commission's directives under this order.

2. Summary of Technical Conference #1

On March 21, 2025, the Companies hosted the first technical conference focused on developing criteria for the strategic decommissioning of natural gas main segments. Participants included Companies' staff, Department of Public Service (DPS) staff, and various stakeholders (attendance list provided in Appendix A). The Companies reviewed key aspects of the gas system, electric system, related programs, and costs to inform the strategic decommissioning criteria discussion. These topics included: current non-pipe alternative (NPA) process and application of NPAs to leak prone pipe (LPP) replacements, conservation and load management programs, application of electric distribution system planning to gas decommissioning, gas distribution system decommissioning criteria, and cost considerations for conversion of customers from gas to electric. The Companies presented the technical criteria for gas main segment decommissioning as well as other considerations that impact electrification of gas load including electric system capacity, cost of conversion, and customer choice for participation.

After the Companies' presentation concluded, a question-and-answer open discussion tabletop provided stakeholders the opportunity to provide feedback and input to the Companies.

3. Technical Conference #1 Presentation

Non-Pipes Alternatives (NPA)

- NPA Screening Criteria
- NPA Project Development and Benefit Cost Analysis
- Lansing NPA Portfolio
- NPA Community Outreach
- NPA Cost Recovery

Leak Prone Pipe (LPP) Program and Process

- LPP Process for Identifying Segments
- LPP Process for Engaging Customers
- LPP Example Project
- LPP Community Outreach
- LPP Cost Recovery

Conservation and Load Management

- Overview of Residential Energy Efficiency Programs
- Overview of Commercial Energy Efficiency Programs
- Weatherization as a road map to electrification
- Overview of Clean Heat Program
- Overview of Community Outreach

Electric Capacity Considerations

- Historic Load Growth
- Current Capacity Constraints
- System Load Forecasting

Gas Strategic Decommissioning Concept

- Identification Criteria
- Criteria for Ideal Segments vs Challenging Segments
- GIS Map example of Ideal vs Challenging Segments

Cost Considerations for Strategic Decommissioning

- Estimated Costs for Residential Electrification (Excluding Building Shell Work)
- Estimated Costs for Multifamily Electrifciation (Excluding Building Shell Work)
- Estimated Costs for Commercial Electrification (Excluding Building Shell Work)
- Other Considerations such as administration, unamortized gas infrastructure, increased utility costs for customers, utility electrical infrastructure upgrades, and the cost to remove gas infrastructure.

Summary/Key Considerations while developing Criteria

- Customer Cost and Choice
- Electric System
- Energy Efficiency
- Gas System

4. Technical Conference #1 Tabletop

Throughout the presentation as well as during the open tabletop discussion, questions were taken and responses provided. The Companies received the following input concerning needs from stakeholders:

1. Longer planning timelines for NPAs and early engagement of customers.
2. Customer outreach, education, and financial incentives need improvement to encourage customers to switch to electrification.
3. Involve local stakeholders, municipal officials, and community champions to identify and target areas for decommissioning.
4. Criteria for decommissioning should include:
    a. Gas system radial feeds/ dead-end segments/LPP (prioritize simpler segments first)
    b. Electric system capacity (possible constraints and need for upgrades)
    c. Cost recovery for electrification of customer (weatherization, Clean Heat and energy efficiency programs, NPA incentives)
    d. Avoid newer pipes and looped gas systems
    e. Customer impacts (type of customer i.e. residential/industrial, number of customers and customer density, customer choice)
    f. Cost feasibility
5. Companies should request additional staffing, if necessary, in next rate case to perform NPA analyses.

Additional information was also requested of the Companies by stakeholders:

1. Definition of a successful NPA
    a. The Companies are currently engaged with multiple LPP projects as well as a portfolio of NPA projects in the Lansing area. Two project examples were given during the technical conference of successful NPAs the Companies' have implemented despite having a benefit cost ratio under one.
2. Provide a full breakdown of LPP NPA Project Costs

    a. During the Technical Conference, the Companies provided an example project that was completed in 2023. The total cost was provided, but a breakdown of all costs cannot be provided. These costs are proprietary to the contractors that the Companies' engaged to perform the LPP NPA work.
3. Hold a second conference
    a. A second conference was scheduled and is summarized in the following sections.

Post-conference, email input was provided by NY Geothermal Energy Organization (NY-GEO) regarding the use of air and ground source heat pumps. NY-GEO's input is included in Appendix A.

5. Summary of Technical Conference #2

On April 29, 2025, NYSEG and RG&E hosted a second conference (attendance list provided in Appendix B) at the request of DPS Staff and stakeholders who were present at the first conference. The second conference was designed to be an interactive tabletop exercise focused on discussions of solutions with stakeholders for two gas segment decommissioning scenarios. The Companies provided two segments, "Ideal" and "Challenging" to discuss, along with initial questions for consideration (PowerPoint presentation and meeting minutes are provided in Appendix B).

6. Technical Conference #2 Presentations

The Companies limited the presentation during the second conference and focused on the existing technical feasibility criteria for gas main decommissioning. The Companies presented what would be considered an Ideal and Challenging gas main segment candidate for strategic decommissioning.

An Ideal segment was considered as one with:

1. A LPP or gas distribution system reliability need
    a. Able to use current NPA/LPP framework and process for evaluation
2. Radial feeds ("dead ends")
    a. Gas distribution system operational impact contained to the radial-main considered
3. Customer impact

    a. Residential customers with a low number of gas services on the segment
4. Electric system impact
    a. Adequate capacity to serve the converted gas load

A Challenging segment was considered as one with:

1. Newer pipe and/or customer contribution
    a. Customer(s) made an investment or cost contribution in construction of the gas main segment
    b. Pipeline not fully depreciated
2. Loop feeds and pressure systems above 60Pounds Per Square inch Guage (psig)
    a. Could negatively impact operations of gas distribution system downstream
3. Higher number of customers/type of customer
    a. More customers to serve and may include hard to electrify loads (i.e. industrial or other high heat loads)
4. Electric system impact
    a. May require electric system upgrade to serve converted gas load

Ideal and Challenging segments to decommission have similar challenges, so the Companies provided initial questions to guide the tabletop exercise discussion. The questions to consider included:

- What are options for people if only some customers want to electrify?
- What type of customer outreach should be done?
- What if some customers just replaced their boiler and are currently paying for a loan?
- What if project benefit cost analysis (BCA) is under one?
- What if there is no traditional project to compare this project against?
- If there are multifamily units on the segment, how do you handle the landlord/tenant dynamic?
- What if there are commercial customers on the segment?
- How do you handle the increased costs to the customer? For instance, maybe the customer only had the bedrooms cooled with window air conditioner and now the customer has central air throughout the house?
- What if the area has electrical constraints?
- Where do you start with this segment (Challenging)? Not technically feasible.

7. Technical Conference #2 Tabletop Exercise

During this conference, the focus was stakeholder engagement and feedback. Throughout the conference. The Companies listened to stakeholders and noted their recommendations. The Companies received the following input from stakeholders:

- Request for extended planning timeline discussed in more detail than Technical Conference #1. It was suggested that there was a need to identify and make customers aware of gas segment decommissioning up to five years in advance as this will allow the customers to plan and make informed decisions on when they should replace gas equipment.
- It was suggested that an additional criterion to add was an ideal segment needing to be isolated by at least 100' from the active gas distribution system.
    - The Companies do not recommend adding this to the criteria for gas decommissioning. If a segment is retired, customers would no longer be within 100' of a gas line except for customers close to the central main where the retired segment stems off. It is noted that the obligation to serve customers remains in place and customers may pay for a gas main extension over 100' in length.
- Obtain and use customer-owned equipment data for prioritizing segments
    - Though the Companies appreciate the suggestion to obtain and use customer-owned equipment data to identify customers for strategic decommissioning, the Companies are not responsible for customer owned-equipment by definition. The Companies do not have means and methods to collect and maintain this data. Obtaining and maintaining this data would be a heavy administrative and cost burden to ratepayers with low chance of accurate findings.
- Customer emergency replacement of a gas heating system need versus waiting for an electrification project.
    - This would require the Companies to provide training and influence the stocking of electrification measures for contractors. Electrification measures sometimes require upgrades to electrical systems which would not be able to be done in an emergency. The most important factor when considering emergency replacements is

ensuring customers have heat in their homes during heating months.

- Decommission pipes that are as close to fully depreciated as possible
    - The Companies use capital projects as a baseline for the Benefit Cost Analysis (BCA) calculation. If there is no project associated with fully depreciated pipes, there would be no pathway forward for recovery of a decommissioning project. The Companies encourage stakeholders to take advantage of the incentives offered through the Clean Heat Programs for areas where there are no planned projects.
- Add a propane alternative for customers not ready to fully electrify similar to National Fuel's (NF's) program.
    - The Companies contacted NF regarding its Transitional Propane Service, Service Class 10. NF does not have customers using this service nor have customers used this service class for at least 10 years.
- Focus on Ideal segments rather than Complex
    - Criteria for Ideal vs Complex lines to decommission are shown in the PowerPoint presentations included in the Appendices. The Companies concur with this recommendation.
- Target building owners and tenants in Low-Income Communities (LICs)
    - While generally owner/tenant and multi-family dwellings will fall into the Complex segment categories, they may be included in Ideal segments. The Companies will consider how this criterion might be included for segment identification. For example, it might be a criterion used to prioritize Ideal segments for electrification.
- Need to raise customer awareness of benefits of electrification, incentives and programs that support
    - Post Conferences, the Companies identified a possible method of customer outreach that includes participation by local stakeholders, municipal officials, and community champions, recommending they include links where appropriate on their websites to associated information on the Companies' website.
    - The Companies have existing robust customer outreach programs and offerings for energy efficiency, which better enable conversion from gas to electric. Outreach also encourages programs and offerings that help make existing buildings heat pump ready and

promote geothermal heat pumps. Additional information and examples of this outreach are contained in Appendix C.

8. Post-Technical Conference #2 Stakeholder Feedback

Post-conference input was received from Cornell Cooperative Extension Tompkins County (CCE Tompkins) and combined input was received from: Fossil Free Tompkins, Carol Chock, Campaign for Renewable Energy, NY Geothermal Energy Organization, Alliance for a Green Economy, Sierra Club, and New Yorkers for Clean Power (FFT et.al.). Their input is included in Appendix B.

CCE Tompkins' input regarding need for increased financial incentives to customers to convert from natural gas and need for post-conversion utility cost relief aligns with input from other stakeholders during both conferences. The Companies appreciate their insight and experience from working with NYSEG on the current Lansing NPA program. Conversion incentives and utility cost relief are outside the scope of this order.

FFT et. al. state that the requirements of the order are not met. The Companies disagree. The requirements of the order as stated on pages 53 and 76 are met in full as summarized, discussed, and presented in this report.

The Companies agree with FFT et. al. Section 1 that the conferences were well supported by all stakeholders. Section 2, in addition to the Companies' upcoming rate cases the NPA and Gas Long Term Plan proceedings are the appropriate vehicles to continue discussion with stakeholders regarding transition of customer from natural gas use to other fuels. FFT et. al. suggested criteria in Section 3 of the written comments are similar to those provided and addressed during the conferences, discussed earlier in this report, and in the criteria described in the following section of this report. Regarding Section 4, a 20-year plan for full gas system decommissioning is beyond the scope of this order and the long-term plan. Many of the challenges identified in Section 5 are outside the scope of this order and discussed in this report. The Companies' recommendations relative to this order are described in Section 8 Outcomes. With respect to many of the stakeholder requests, the Companies emphasize that the Level 1 criteria described below is critical. Without a proposed gas main replacement project or system reliability need, there is no basis for a CBA to

evaluate cost effectiveness of decommissioning via electrification or other NPA alternative.

Additional input and suggestions made by stakeholders that are outside the scope of this order are included in Appendix D.

Information requests from stakeholders:

- Can the reduction in O&M cost be used to offset the cost of decommissioning pipe?
    - O&M costs are currently included as part of the BCA screenings for projects.

9. Outcomes

9.1. Criteria for Segment Decommissioning

The probability of a gas distribution segment being decommissioned ranges from Ideal to Challenging, as presented (Appendix B, slide 4), stakeholders agreed that the Ideal segment example presented during Technical Conference #2 should be the focus of decommissioning at this early stage. Based on the Ideal segment, criteria for decommissioning are relatively straightforward. The criteria can be thought of in levels, with the first level representing the greatest population of segments that could be decommissioned. Each level represents the next step in the criteria the segment must pass for decommissioning. The following is the Companies' recommendation for criteria based on stakeholder input and the Companies' experience decommissioning segments for LPP replacements.

Level 1 – gas distribution project (LPP replacement, other replacement, or reliability need)

Level 2 - gas distribution system operating characteristics (dead-ends or one-way, radial feed)

Level 3 – customer impacts (focus on residential customers only and number of customers included, i.e., not to exceed 20 customers)

Level 4 – electric distribution system capacity to serve

Level 5 – cost effectiveness of electrification or NPA alternative, BCA versus gas distribution project (Level 1)

Level 6 – customer choice for participation

9.2. Potential NPAs

The conferences themselves did not directly produce new NPAs for consideration during the Conferences. The Companies' takeaway from the conferences was that more proactive LPP identification and community outreach is necessary to influence customer planning for the future. The Companies agree that targeting customers on Ideal segments is the best path forward and could lead to more success with the current program offerings.

The Companies will begin to test the process of proactive outreach for Spring Street Ext and Hillcrest Dr, both located in Tompkins County. Through the discussions surrounding strategic decommissioning, the companies looked for two LPP projects which would be considered Ideal LPP segments as discussed and summarized in this paper. Below describes the projects which were selected:

- Hillcrest Dr., located in the Town of Ithaca, is a radial feed with 818 linear feet of bare steel pipe which is scheduled to be replaced prior to 2030. There are seven gas services located on the street which would need to terminate for this project to move forward. The companies performed a streamlined BCA using basic assumptions and past project information. The results of this streamlined screening was a 0.84. In a situation like this, the Companies will generally pursue since they are unaware of all of the building characteristics such as the amount of appliances which will need to be electrified. Once actual costs for the project are understood and if the costs decrease, there is potential for a BCA of 1 which would allow the project to move forward.
- Spring St Extension is located in Town of Groton and includes multiple radial feeds, making it an ideal project to either fully electrify or prune some of these feeds if there is some customer resistance. This is dependent on the customers' acceptance of the proposals. This project has 13 gas services spanning over 2,967 linear feet of steel wrapped steel pipe. This pipe has been scheduled to be replace prior to 2030. The results of the Companies' preliminary streamlined BCA was a 1.41, making it an ideal location to pursue. The BCA for the project could increase or decrease depending on the actual work that would need to be completed to electrify these homes/businesses.

The NPA evaluation will accommodate the criteria described in this summary of the conferences. The goal of identifying these optimal segments is to initiate customer outreach and education well ahead of the LPP project's planned installation before 2030. This early engagement aims to influence customer behavior and improve the

likelihood of successful NPA implementation, ultimately supporting the decommissioning of targeted gas main segments.

9.3. Additional Recommended Company Actions

The Companies will continue to replace LPP through 2030 as discussed in the current Joint Proposal. Based on stakeholder suggestions, the Companies will modify and improve customer outreach and education efforts regarding electrification and conversion of gas service to other fuel choices to customers located on Ideal LPP segments in Tompkins County. Modification to customer outreach will include initiating outreach sooner, making customers aware of potential upcoming NPAs through 2030. Based on the outcome in Tompkins County, the changes to customer outreach may be extended to other areas of the Companies' territories. Increase in costs to implement earlier and more extensive customer outreach may be addressed in the NPA order proceeding and deferred for recovery.

The Companies appreciate the robust attendance and participation of Stakeholders in the two conferences. The suggestions and feedback are valuable in improving the Companies' NPA process. Attendance lists and stakeholder input received via email, post-conferences, are contained in Appendices A and B for the first and second conferences respectively.

10. Reference List

Appendix A: Technical Conference 1 Materials

Appendix B: Technical Conference 2 Materials

Appendix C: NYSEG and RG&E Customer Outreach Programs

Appendix D: Stakeholder Input Outside Order Scope

Appendix A: Technical Conference 1 Materials

Meeting title	NYSEG and RG&E Technical Conference 1 Regarding Strategic Decommissioning (23-G-0437)
Attended participants	64
Start time	3/21/25, 8:50:50 AM
End time	3/21/25, 12:30:18 PM
Meeting duration	3h 39m 27s
Average attendance time	2h 40m 32s

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Technical Conference Regarding Strategic Decommissioning of NYSEG/RG&E Gas Distribution Systems

03/21/2025

Technical Conference Opening Remarks

- Meeting will be recorded
- Identification of phone number only participants (complete attendance record)
- Purpose: hold a technical conference to achieve the requirements and objectives stated in 23-G-0437, Order #9 detailed on page 53 of the Order
- Meeting format: presentations with Q&A at end of each presenter, followed by a roundtable discussion led by DPS Staff
- Presenters:
  - Larry Rush – Manager, Non-Pipes and Non-Wires Alternatives
  - Bruce Balch – Manager, NYSEG Distribution Planning
  - Michael Del Negro – Senior Manager – Delivery Conservation & Load Mgmt
  - Brian Jacobs – Senior Manager Gas System Planning

Agenda

- Non-Pipes Alternatives Process (NPA)
- Leak Prone Pipe Program Process (LPP)
- NPA/LPP Community Outreach
- NPA/LPP Cost Recovery
- Energy Efficiency and Clean Heat
- Electric Capacity Considerations
- Gas Strategic Decommissioning Concept
- Cost Considerations for Strategic Decommissioning
- Summary
- Break
- Round Table Discussion

Non-Pipes Alternatives Process

What is a Non-Pipes Alternative (NPA)?

An NPA utilizes cost-effective third-party solutions to defer or avoid certain traditional natural gas capital pipeline projects needed to address system reliability concerns.

- NYSEG and RG&E's commitment to a zero-net increase in billed natural gas use under current rate plan;
- Climate Leadership and Community Protection Act (CLCPA); and
- New York Public Service Commission Reforming the Energy Vision (REV).
- Delivery of other benefits to society and customers including lower energy costs achieved through reduced capital spending

Supply Side NPA Solutions	Demand Side NPA Solutions
✓ Renewable natural gas ✓ Hydrogen ✓ Compressed and liquified natural gas	✓ Heat pumps / beneficial electrification ✓ Fuel switching ✓ Thermal storage ✓ Targeted energy efficiency ✓ Targeted demand response ✓ Heat recovery systems ✓ Combined heat and power technology

General Non-Pipes Alternatives (NPA) Process – Screening Criteria

- NYSEG and RG&E Joint Proposal states projects are not suitable for NPA consideration if conditions pose an immediate threat to public safety or construction is imminent (i.e., within 12 months)
- All other projects are potential NPA candidates
- We are using the following screening criteria to identify projects not suitable for NPA solutions:

Category	Description
Construction Imminent	Highway/municipal
Construction Imminent	Active corrosion
Threat to Public Safety	Significantly reduces ability to reliably provide gas service
Threat to Public Safety	Eliminates gas service to downstream/out-of-scope existing customers
Threat to Public Safety	Active leak
Customer Funded Projects	100% customer-funded new connections and/or projects fully covered by the natural gas tariff

General Non-Pipes Alternatives (NPA) Process – Project Development

The Joint Proposal established the NPA process.

1
- Natural gas system need identification

2
- Determine NPA feasibility
- Apply screening criteria to identify beneficial candidates

3
- Development of solutions
- Traditional gas system solution development
- NPA solution development (small vs. large project process)

4
- Project evaluation including benefit cost analysis (BCA) to determine economic and technical feasibility

NPA Benefit Cost Analysis (BCA)

Small Projects	Large Projects
≤ $2M	> $2M
Streamlined BCA to determine the potential economic and technical feasibility	Full BCA analysis performed prior to detailed engineering, permitting, and construction, and before more than 5% total project cost has been spent
May or may not include a full-scale solicitation	Requires full-scale solicitation

Project Example – NYSEG Lansing Non-Pipes Alternatives (NPA) Portfolio

History

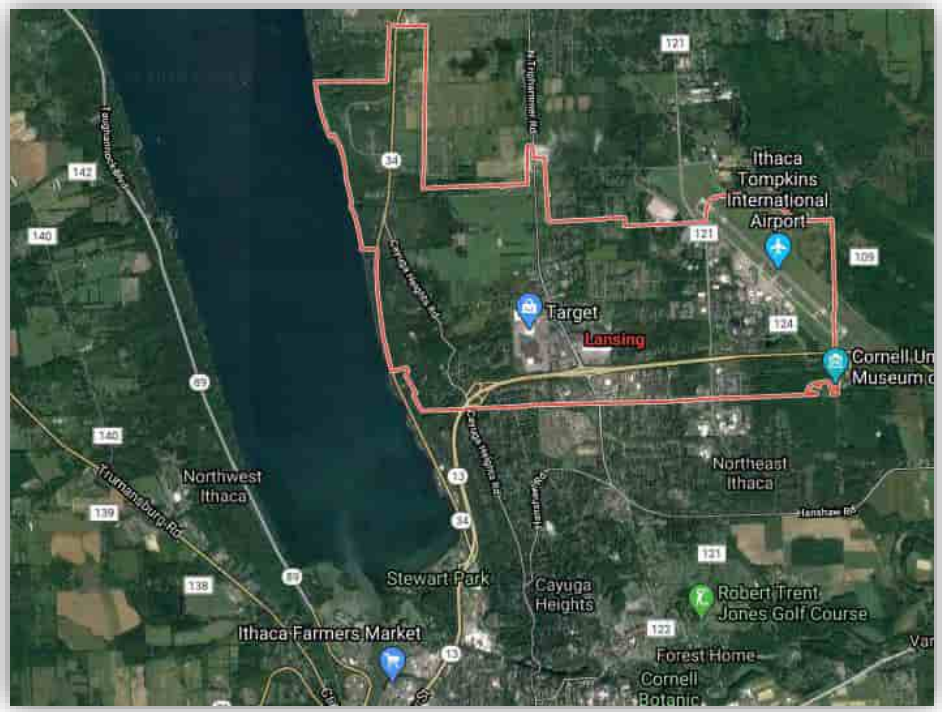
- Ithaca-Lansing natural gas distribution system is designed for Maximum Allowable Operating Pressure ("MAOP") of 60 Pounds Per Square Inch Guage (PSIG)
- NYSEG's Gas Engineering standards for reliability recommend system pressures ≥ 50% of MAOP
- 2,300 natural gas customers served in Lansing Area

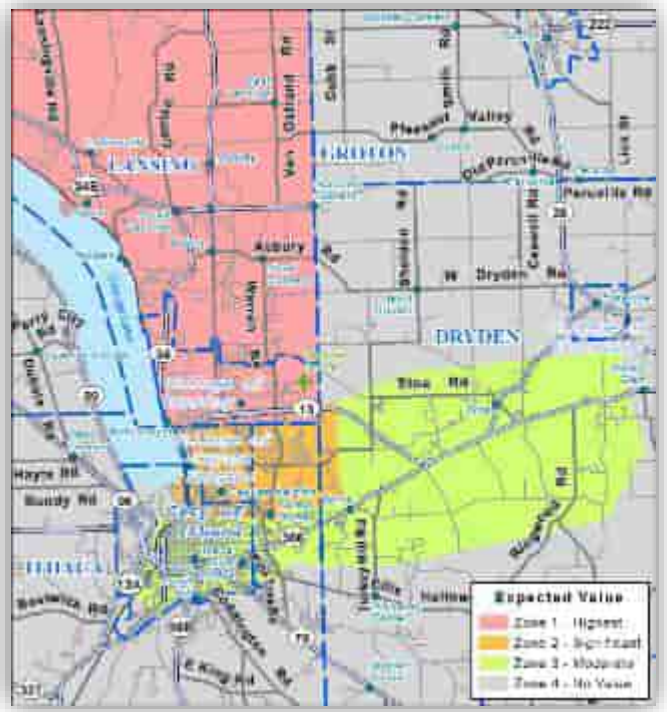
Reliability Issues

- Ithaca region experienced significant growth, resulting in lower system pressure since the mid 2010s
- Design day pressure (prior to East Shore): 21.5 PSIG using 2022 model (35.8% of MAOP)
- A steady decline in the % of MAOP has led to reliability concerns of the distribution system impacting Lansing

Lansing Gas Moratorium

- Began February 2015
- NYSEG unable to approve applications for expanded gas service from new or existing customers in Lansing





Project Example – NYSEG Lansing Non-Pipes Alternatives (NPA) Portfolio

Residential Heat Pumps

Regional HVAC installers

Residential energy audits

Install heat pumps

Provide support with energy efficiency solutions

Single Commercial Ground Source Heat Pump

Install Ground Source Heat Pump

Install energy efficiency measures

Community Ground Source Heat Pump

Build community geothermal loop

Install heat pumps in 25 customers homes and connect to loop

Install energy efficiency measures

Energy Efficiency at Two Public Authority Buildings

Install high efficiency natural gas boilers

Install energy efficiency measures

Education & Outreach

Provide educational program with local schools

Perform community-based outreach

Increase awareness of ongoing Lansing NPA Projects

Increase project participation

64 events 2022-2024

Project Example – NYSEG Lansing Non-Pipes Alternatives (NPA) Portfolio

Technology Type	MCFH Reduction	Cost
Residential Heat Pumps	42.7	$6,403,500
Lansing Single Commercial Ground Source Heat Pump	0.4	$131,166
Lansing Community Ground Source Heat Pump	2.1	$1,311,387
Lansing Energy Efficiency at Two Public Authority Buildings	4.1	$710,437
Lansing Education & Outreach Program	Complements other proposal MCFH reduction goal	$245,718
Total	49.3	$8,802,208

MCFH = Thousand Cubic Feet per Hour

Leak Prone Pipe Program Process

Leak Prone Pipe (LPP) Replacement Program

NYSEG and RG&E developed a **streamlined approach** to evaluating LPP replacement projects that can potentially be **addressed through an NPA solution**

- Objective is to achieve **full electrification** of buildings located in LPP replacement areas
- As allowed under Joint Proposal, **incentive stacking** will be used to combine NPA-based incentives with other available incentives (e.g., Clean Heat Program)
- NYSEG and RG&E get a **one-for-one credit** toward the overall LPP replacement mileage targets if an NPA solution is implemented in lieu of the traditional LPP replacement project

Leak Prone Pipe (LPP) Process

Goal

- Electrify 100% of customers in target area (or portion of customers at the end of a main)
- Heating, water heating, cooking, fireplace, pool heating, commercial processes, etc.

1

- Perform internal review of LPP projects to prioritize list based on time of need, availability of customer information, type of pipe, and likelihood of project success

2

- Perform preliminary streamlined benefit cost analysis, research area/community data (disadvantaged community, median income level, etc.), compile vulnerable location and segment risk data

3

- Leverage contracted third party experts and trade ally network to conduct customer outreach
- Educational efforts include direct mailers, in person meetings, and phone/email outreach

4

- Third party develops a comprehensive conversion proposal for each customer and performs the installation
- Offer standard conversion package at no cost to the customer (some measures may require co-pay)
- Incentive includes available EE incentives + LPP kicker to cover incremental cost

Whole Home Electrification Program

Whole Home Electrification Program was implemented by NYSEG & RGE in 2022

100% electrification of customers within a LPP segment

Standard conversion package offered at **no cost** to customer

Leak Prone Pipe (LPP) Project Example – RG&E

Project Details:

- In **November 2023**, Avangrid launched **its first Whole Home Electrification Project**.
- The project **replaced, leak-prone gas pipes with NPAs** to enable full home electrification.
- Total Project Cost: **$146,934** with an average cost of ~$49,000 per home, covering infrastructure upgrades, electrification installations, and energy-efficient appliances.
  - **119 feet of aging gas main removed**.
  - **Three homes fully electrified**.
  - Expected to reduce design day gas demand by **~0.173 MCFH.**
  - **A significant step toward energy efficiency and decarbonization.**

Non-Pipes Alternatives & Leak Prone Pipe Community Outreach

Community Outreach

Leak Prone Pipe (LPP)	Targeted outreach campaign to educate residents about program benefits
	Information provided about energy efficiency, safety improvements, and long-term cost savings
	Goal is to successfully secure customer agreements for electrification
	Website for program information
Lansing Non-Pipe Alternatives (NPA) Portfolio	Selected 3rd party with successful track record of outreach and education in energy field
	Direct mail to customers eligible for services
	64 Community events between 2022 - 2024
	Door to door canvassing by 3rd Party Developers

Non-Pipes Alternatives & Leak Prone Pipe Cost Recovery

Cost Recovery

- General Costs not applicable to specific NPA projects are O&M Expenses
- Costs Associated with assets that are owned by NYSEG/RGE will be treated as capital investments (CAPEX)
- Costs incurred for the implementation of new NPAs during the current rate period are deferred with carrying costs.
- Costs are amortized over the anticipated “used and useful” life of installed assets and equipment with offsetting credits to the extent that an NPA Project defers/avoids the need for a traditional infrastructure. NPA projects without a clearly measurable period for amortization shall use a 20-year default amortization period.
- During the term of the Rate Plan and until base rates are reset, the amortized costs are recovered through a separate surcharge. Any unamortized costs plus carrying charges will be incorporated into base rates when gas base rates are reset
- Costs incurred to advance pipeline projects which are deferred or avoided are deferred for recovery until addressed in a future proceeding

Conservation and Load Management Programs and Clean Heat

Key Themes, Strategies and Objectives

- Continue progress towards statewide clean energy, electrification, and emissions goals
- Align with DPS Strategic Framework Envisioned
- Retire/phase out traditional “non-strategic” EE measures and programs
- Focused efforts on expanding NYS Clean Heat
- Make all homes and buildings “heat pump ready”
- Support and Community outreach for Disadvantaged Communities
- Cohesive work/collaboration with NYSERDA’s statewide LMI Programs

As the grid is becoming cleaner, electrification becomes more and more important.

Residential Programs

Measures Prioritized:

- **“Weatherization”**
  - Insulation & Air Sealing
  - Door sweeps
  - Caulk & spray foam
  - Weatherstripping
  - Water pipe wraps
- **Heat Pump Water Heating**
- **Pool Pumps & Heaters**
- **Thermostats**

Discontinued Programs

Behavioral ✖
Appliance recycling ✖
HVAC Rebates ✖
Online Marketplace ?

Shifting to NENY vision of strategic incentives and programs

Disadvantaged Community Outreach

Outreach to schools, senior centers, home shows, other local events that support DAC customers.

Referrals to NYSERDA Statewide

Retail Products

- Instant discounts via local retailers
- Small scale and DIY projects
- More affordable/immediate solutions

Small successes can lead to deeper savings projects

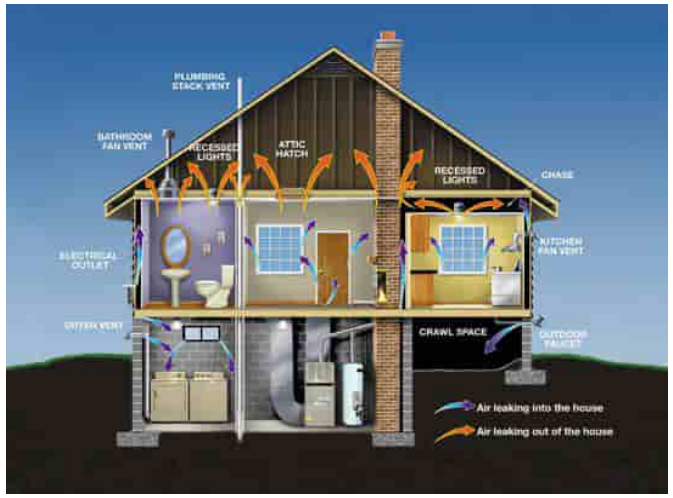
New Construction

- Market-Rate home construction incentives
- Work with builders toward exceeding efficiency savings codes
- Referrals to Clean Heat

Multi-Family

- Free energy use assessments
- Direct-install measures for in-unit and common areas
- Referrals to Clean Heat

Weatherization Efforts
Home Insulation and Air Sealing Program



Objective: Provide pathway to insulate non-LMI residential homes and make them "heat pump ready"

Description	Professional installation of insulation and air sealing. Incentives will focus heavily on overcoming that "first cost barrier" Coordination with our neighboring utilities where applicable.
Delivery Method	Local installation contractors to assist with outreach and analysis of homeowners' unique weatherization needs, Installation contractor would apply a discount to the consumer and then apply for reimbursement. Referrals and cross promotions to Clean Heat Program.
Target Market	Targeted list of high usage customers whose homes have low R-values based on virtual assessments. Customers that are not ready for a heat pump but still wish to reduce their heating usage and bills

Commercial Programs

- For any commercial customer that has an SBC charge on their bill
- Measures covered:
  - Lighting controls
  - HVAC
  - Water heating
  - Food service
  - Agriculture
  - Heating/cooling process systems

Commercial & Industrial Rebates

- Incentives offered to all large commercial customers for installing new, high-efficiency equipment

Small Business

- Less than 110 kW per month
- Incentives to small business electric customers for installing new, high-efficiency equipment

Retro-Commissioning

- Large commercial customers
- Comprehensive system evaluations
- Provide technical studies
- Requires up front commitment to make upgrades

Strategic Energy Management

- Help facility managers develop simple best practice solutions in facility:
- HVAC maintenance schedules
- Smarter temp settings
- Develop long-term plan to optimize energy consumption

Midstream Rebate

- Instant discounts offered through local supply houses and distributors
- No application or waiting for a reimbursement check

Clean Heat Program

Objective: convert all buildings from combustion heating systems to heat pumps

Program Description	Incentives: air source heat pump systems, ground source heat pump systems, and heat pump water heaters. Statewide Collaborative effort with NYSERDA + NY utilities
Delivery Method	Partnership with local installation contractors Participating contractors submit incentive applications to the program and pass those incentive savings on to customers. Coordination with sustainability organizations will also continue to advance heat pump adoption through outreach and education.
Target Market	All residential, multifamily, commercial, and industrial buildings

Energy Efficiency Outreach

Events, Communications and Partnerships

NYSEG · RG&E
Part of the Avangrid family

Robust, targeted outreach efforts through various channels

Marketing and outreach of energy efficiency programs and rebates with a strategic multi-channel approach.

- Outreach events
- Vendor events
- Direct Mail
- Email
- Earned Media
- Paid media campaigns
- Point of purchase
- Web
- Customer communications

Events

Over 130 events hosted and/or participated in last year (2024).

Direct Customer Communications

Targeted direct mail and email campaigns to customers. Point of purchase for retail products

Partnerships

Low-income outreach with food banks and non-profits. School kit program for elementary schools statewide.

Electric Capacity Considerations

NYSEG
An Avangrid company

RG&E
An Avangrid company

Relatively Flat Load Growth over Past 20-Years

- Only the past 25 years have seen relatively stable electricity consumption in the US
- For the Past 25 years, Right-Sizing meant sizing equipment for stagnant load forecasts
- Right-sizing from 1960s through 1990s: Increasing equipment capacity[1] at the time of new build or replacement
  - Can offer substantial cost savings over the long-term by avoiding replacement of equipment within its useful life

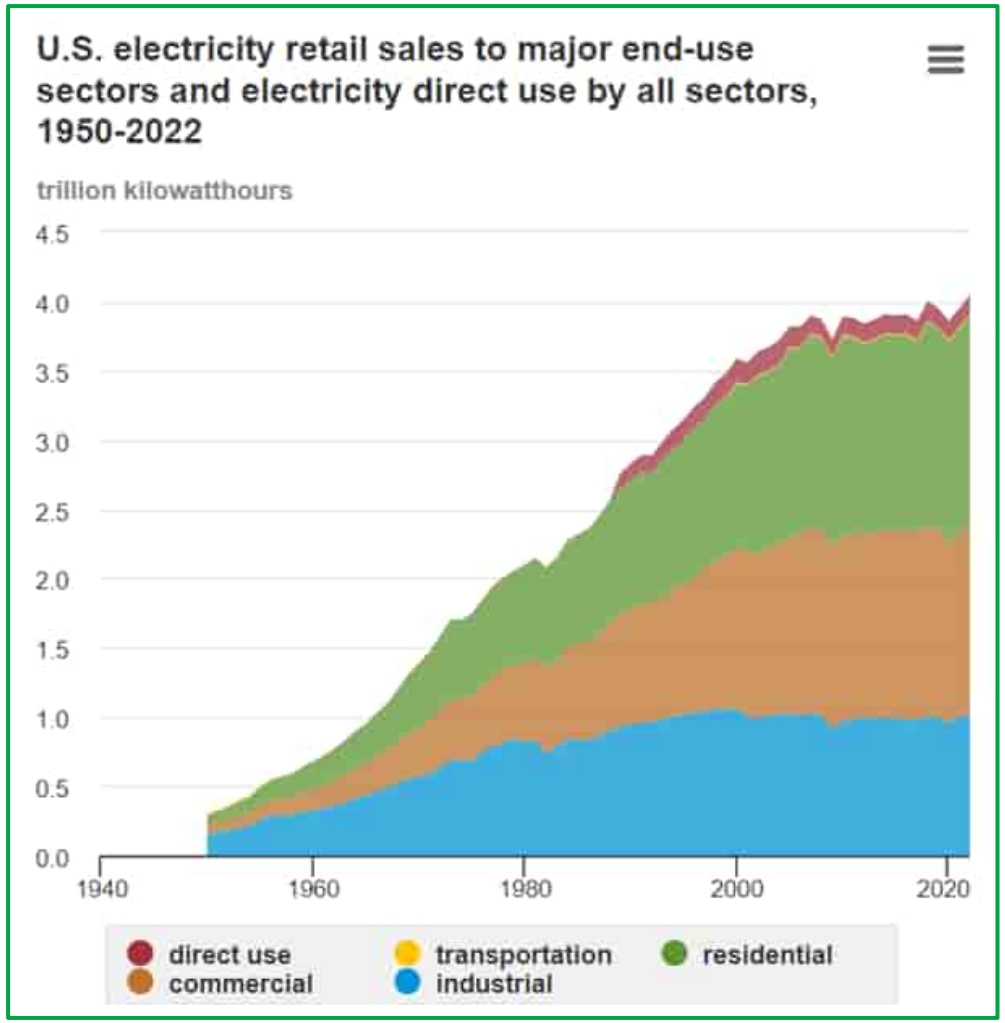


Figure 1: U.S. Electric Load Demand

[1]Refers to Right-sizing of new equipment such that it can accommodate existing capacity needs as well as significant forecasted load growth due to electrification efforts. Due to stagnant load growth in the past 25 years, oversizing equipment has not been necessary to obtain sufficient capacity margin.

Current Capacity Constraints on the NYSEG and RG&E System

NYSEG
An Avangrid company

RG&E
An Avangrid company

Current State of the Distribution System

- NYSEG – RG&E are currently performing reactive analyses to develop solutions to connect customers as the requests come in
- 13 NYSEG Divisions with about 515 substation and taps feeding customer load
  - About 35% of all substations have at least one capacity constraint[1]
  - Many locations have issues with interconnecting new customers today
- 4 Divisions with 156 substations and taps feeding customer load
  - About 42% of all transformers have at least one capacity constraint[1]
  - Many locations have issues with interconnecting new customers today
- Areas with more capacity constraints should be **prioritized** for analysis

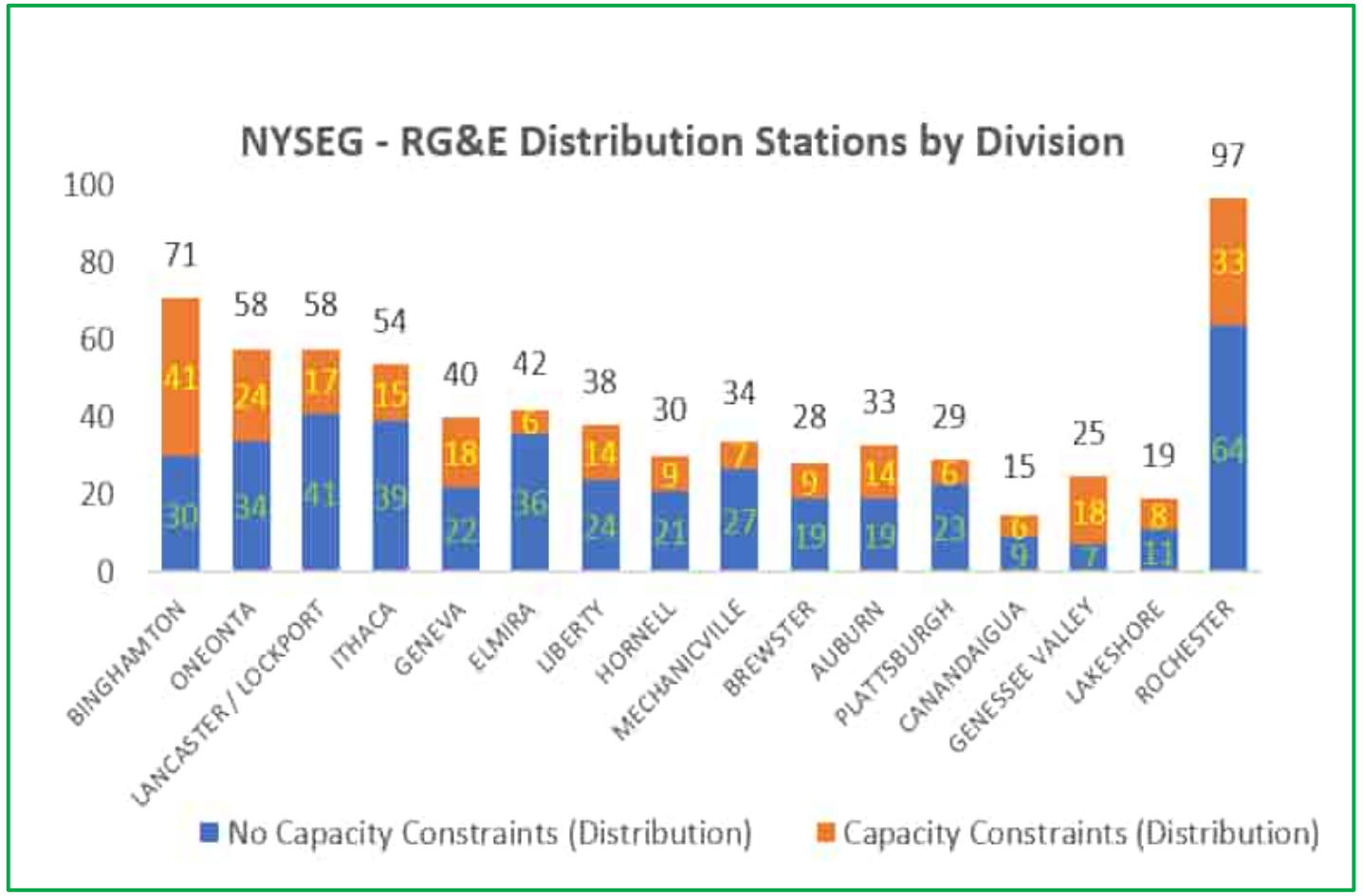


Figure 2: NYSEG – RG&E Distribution Stations by Division

Note: Capacity constraint is defined as less than 1 MW of capacity left on any one feeder or transformer at a substation as this would likely result in the rejection of a new load interconnection request

Note: No transmission constraints were considered, it is likely that load additions would also be constrained by the transmission

System Load Forecasting

Significant Winter and Summer Load Growth

- In 5-Years (2029), **Winter Peak** is forecasted to grow by 12.6%, 10-Year (2024) by 41.4%, and 20-Year (2044) by 100.3%.
- In 5-Years (2029), **Summer Peak** is forecasted to grow by -2.1%, 10-Year (2024) by 3.1%, and 20-Year (2044) by 17.0%.
- Most of the load growth will be during the winter peak residential sector due to electrification in heating, such as heat pumps and resistive elements as shown in the table below.

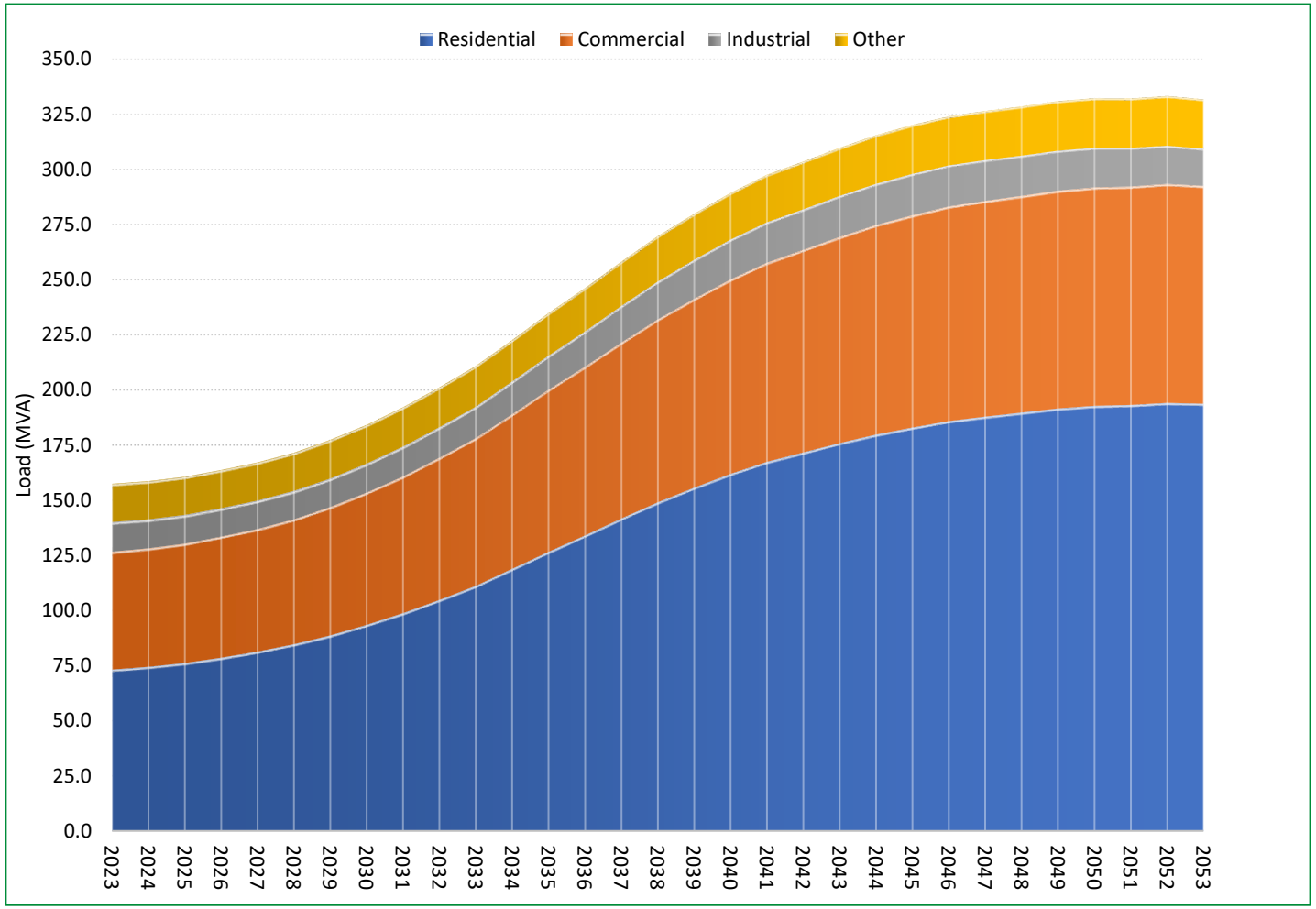


Figure 3: Ithaca Winter Load Growth with Sector Share of Total Load

Note: System load forecasts are determined based on internal and external (NYISO) growth projections. These forecasts are based on growth characteristics of distinct sectors including residential, commercial, industrial, and transportation.

Gas Strategic Decommissioning Concept

Gas Distribution System Strategic Decommissioning – Identification Criteria

"...convene a technical conference to develop criteria for identifying potential segments of infrastructure for strategic decommissioning..."

Defined Set of Specific Identification Criteria

1. **Gas System Consideration & Needs**
    - **Prioritize areas with known reliability and/or infrastructure needs: moratoria, vulnerable locations, Leak Prone Pipe**
2. **Gas System Topology & Configuration**
    - **Prioritize Radial-Feeds/Dead-ends**
3. **Customer Impact**
    - **Prioritize Residential with manageable scale and/or phases**

Gas Distribution System Strategic Decommissioning – Identification Criteria

"...identify potential areas of the gas infrastructure in Tompkins County that possibly includes LPP or other needs for infrastructure upgrade, and where decommissioning would not negatively impact customers downstream."

The spectrum of parameters to consider regarding the suitability of gas main segments for potential decommissioning.

Ideal Segments → Challenging Segments

Leak Prone Pipe & System Reliability Needs
Established NPA framework and process for evaluation

MOST Radial Feeds ("dead-ends")
System Impact is contained to the radial-main in question

Customer Impact
Residential; Number of Gas Services

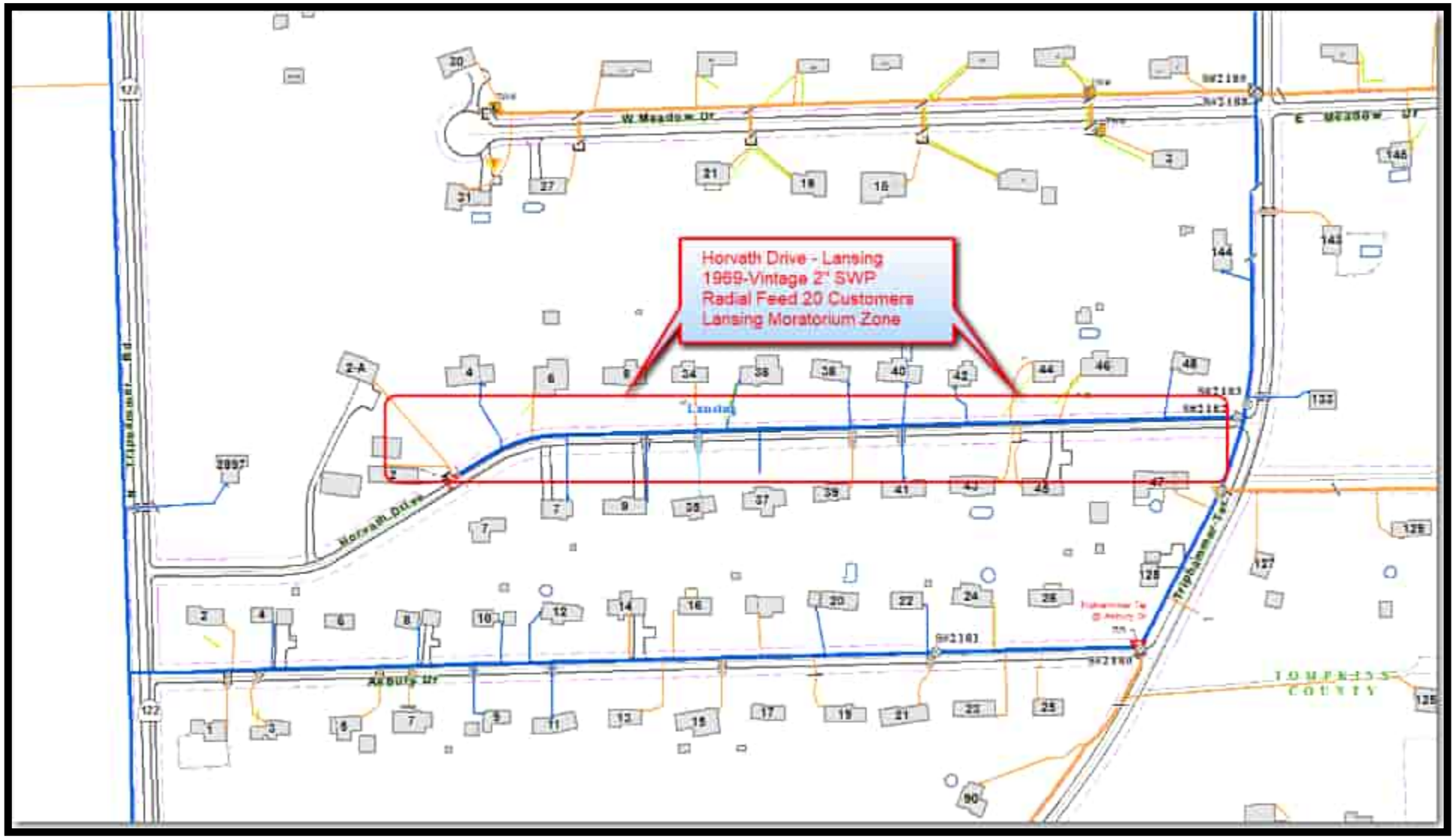
Newer Pipe and/or Customer Contribution
Where a customer has made an investment or contribution in the infrastructure.

Looped Feeds & Feeder Mains
Negatively impact downstream pressure, flows and level of service.

Customer Impact
Industrial and hard-to-electrify loads

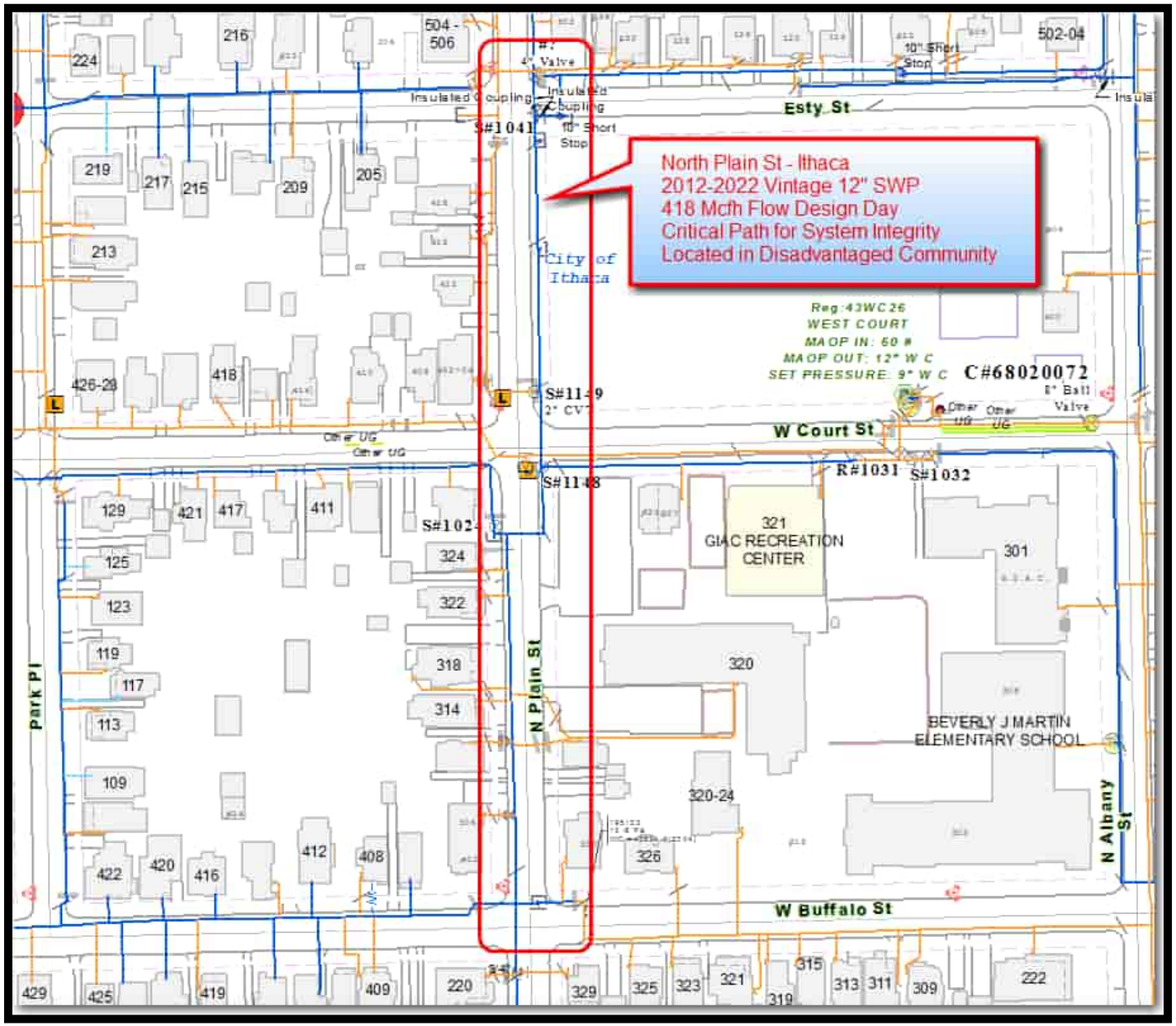
Gas Distribution System Strategic Decommissioning – Identification Criteria

Example of a "good" candidate for potential decommissioning:



Gas Distribution System Strategic Decommissioning – Identification Criteria

Example of a “challenging” candidate for potential decommissioning :



Cost Considerations for Strategic Decommissioning

Estimated Costs for Residential Electrification (Excluding Shell Improvements*)

Product	Residential	Multifamily** (Small)	Multifamily** (Large)
Cooktop	$400 - $1,200	$400 - $1,200	$400 - $1,200
Clothes Dryer	$500 - $1,500	$500 - $1,500	$500 - $1,500
Water Heater	$900 - $4,000	$900 - $3,700	$900 - $3,700
Air Source Heat Pump (ASHP)	$13,000 - $20,000	$13,000 - $30,100	$19,400 - $42,900
Ground Source Heat Pump (GSHP)	$24,000 - $38,800	$29,000 - $42,900	$40,800 - $56,000
Electrical Modifications***	$2,600 - $5,000	$800 - $4,900	$800 - $4,900
Total Range W/ ASHP	**$17,400 - $31,700**	**$15,600 - $41,400**	**$20,600 - $54,200**
Total Range W/ GSHP	**$28,400 - $50,500**	**$31,600 - $54,200**	**$43,400 - $62,700**

*Building shell improvements (e.g., air sealing, insulation) are not included in these costs but can impact system performance and energy savings. Without weatherization, electrification may lead to higher operating costs and reduced efficiency. Costs also vary based on building type, age, and existing heating system. Evaluating and upgrading the building shell before installing and upgrading the building shell before installing heat pumps is recommended to ensure proper system sizing and efficiency.
**Cost per Multifamily Unit
***Cost for labor, wiring, and other expenses associated with appliances installed not included in this cost. Those costs are rolled into the cost of install of the appliance.

Data source: *New York Building Electrification and Decarbonization Costs, June 2022, Rosen Consulting Group*

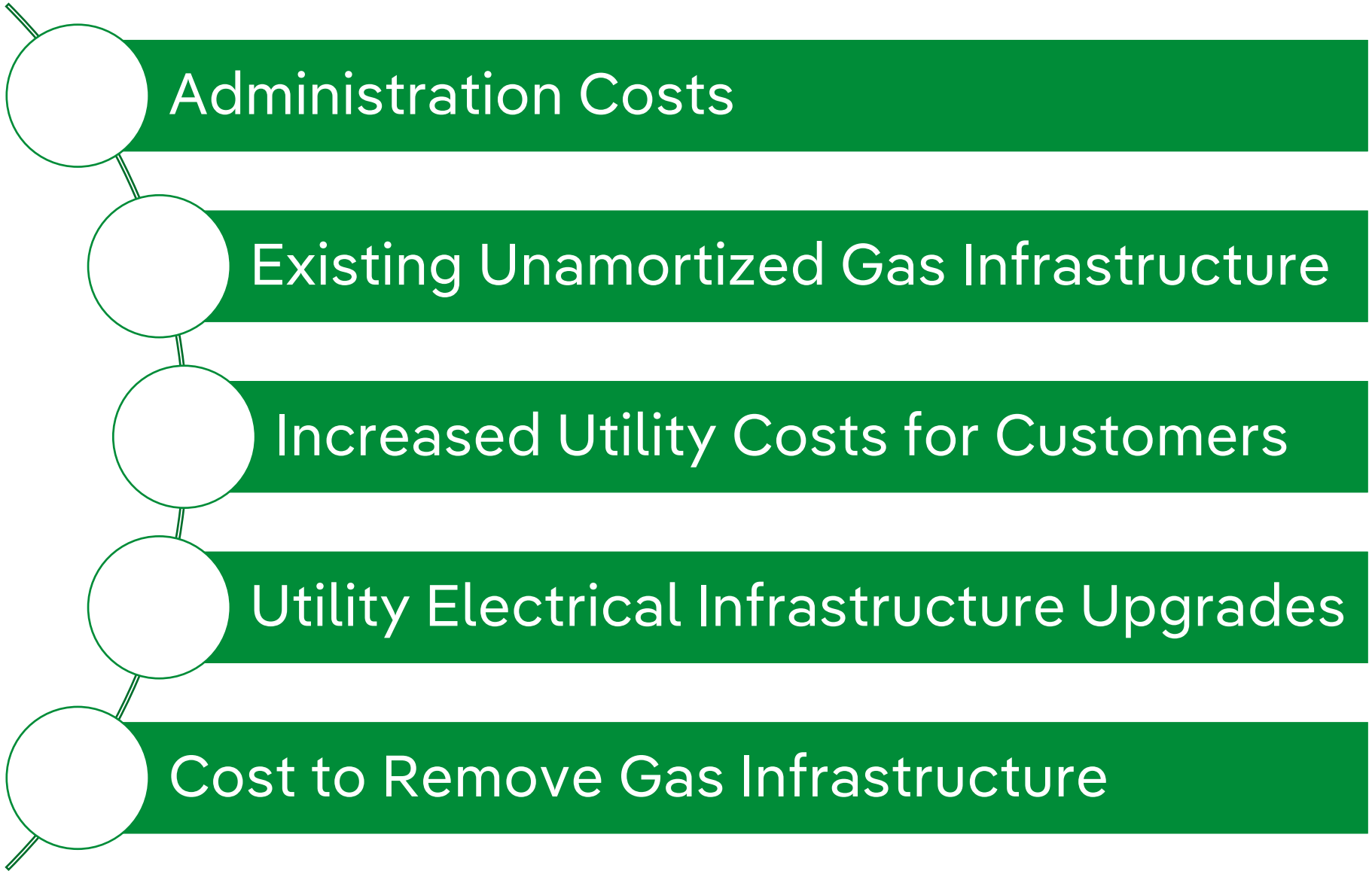
Estimated Cost for Commercial Electrification (Excluding Shell Improvements*)

Product	Commercial Office ($/sq.ft)	Average Cost for an NY Commercial Office (16,400 sq.ft)
Water Heater	$0.3 – $2.0	$4,920 - $32,800
Air Source Heat Pump (ASHP)	$12 - $18	$196,800 - $295,200
Ground Source Heat Pump (GSHP)	$17 - $21	$278,800 - $344,400
Electrical Modifications**	$0.1 – $0.4	$1,640 - $6,560
Total Range W/ ASHP	**$12.4 – $20.4**	**$203,360 - $334,560**
Total Range W/ GSHP	**$17.4 - $23.4**	**$285,360 - $383,760**

*Building shell improvements (e.g., air sealing, insulation) are not included in these costs but can impact system performance and energy savings. Without weatherization, electrification may lead to higher operating costs and reduced efficiency. Costs also vary based on building type, age, and existing heating system. Evaluating and upgrading the building shell before installing and upgrading the building shell before installing heat pumps is recommended to ensure proper system sizing and efficiency.
**Cost for labor, wiring, and other expenses associated with appliances installed not included in this cost. Those costs are rolled into the cost of install of the appliance.

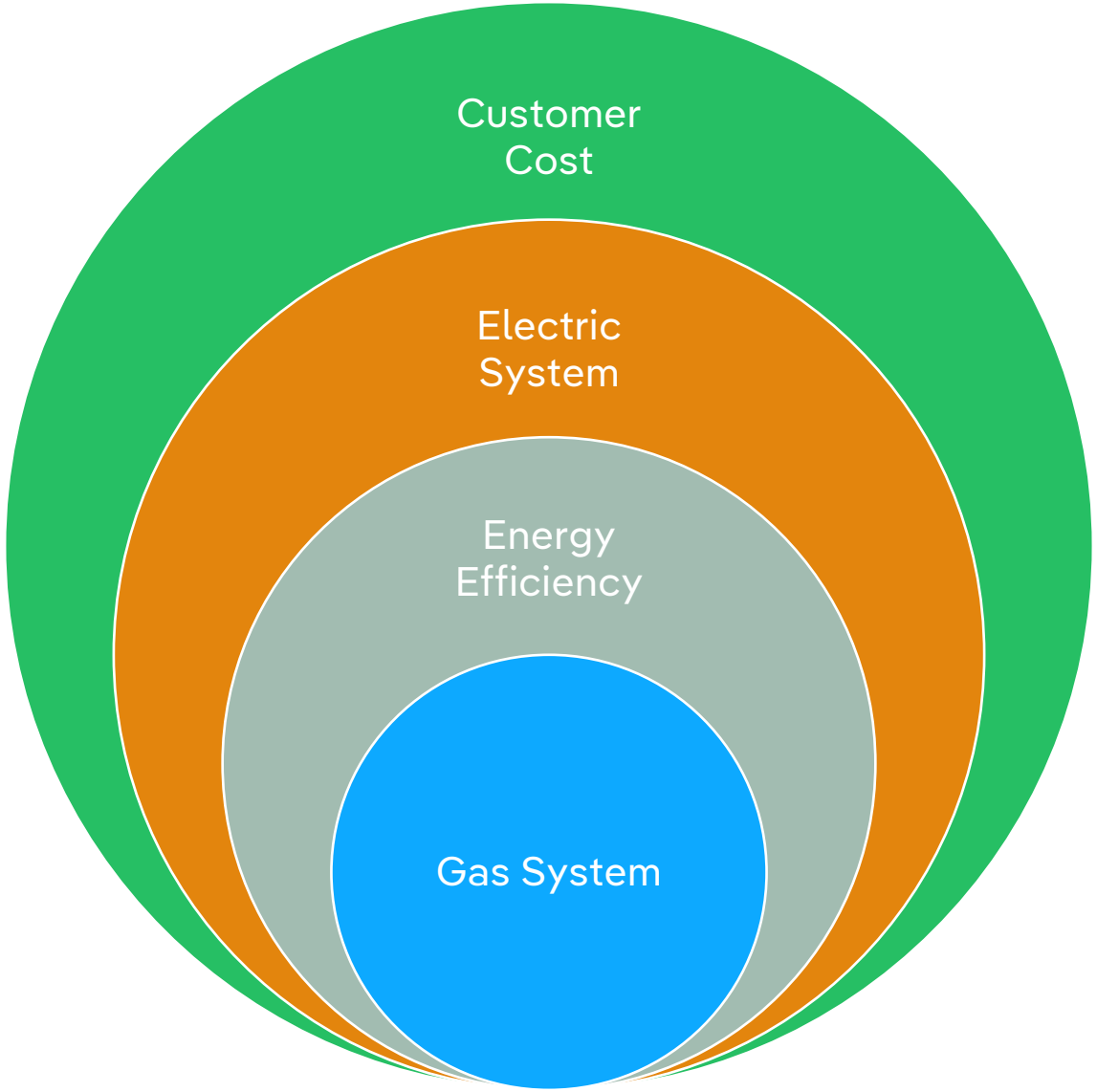
Data source: *New York Building Electrification and Decarbonization Costs, June 2022, Rosen Consulting Group*

Other Cost Considerations for Strategic Decommissioning



Summary

Key Considerations While Developing Criteria



Break

Round Table Discussion

Meeting Minutes

New York State Electric & Gas and Rochester Gas and Electric Technical Conference regarding Strategic Decommissioning

Date: March 21, 2025
Meeting Start: 8:50 AM EST
Meeting End: 12:30 PM EST

New York State Electric & Gas and Rochester Gas and Electric Presenters

Name	Role
Bruce Balch	Manager, Distribution Planning
Michael Del Negro	Senior Manager, Delivery Conservation and Load Management
Brian Jacobs	Senior Manager, Gas System Planning
Yvette LaBombard	Senior Director, Gas Engineering
Lawrence Rush	Manager, Non-Pipes and Non-Wires Alternatives

New York State Electric & Gas and Rochester Gas and Electric Note Takers

Name	Role
Janelle Bourgeois	Lead Analyst, Clean Energy Policy, and Strategy
Lori Cole	Senior Manager, Regulatory

New York Department of Public Service Moderator

Name
Cynthia McCarran

New York Department of Public Service Staff

Name
Mark Carpenter
Daniel Gadmoski
Brandon Goodrich
Brian Grode
Kevin Manz
Ian Mauro
Richard Schuler
Andrew Timbrook
Michael Vera
Kayla Whitaker

Attendees

Name	Organization		Name	Organization
Michael Abel	Rochester Gas and Electric		Erin Hogan	New York State Electric & Gas
Seth Berkman	NYSERDA		Siobhan Hull	Cornell Cooperative Extension
Josh Berman	Sierra Club		Benjamin Kuebrich	Alliance for a Green Economy
Victoria Billups	Rochester Gas and Electric		Thoms Lynch	Empire Advocates
Anna Binau	New York Department of State		Kelly McGee	Institute for Policy Integrity
Katie Borgella	Tompkins County Planning Department		Sayf Merzouk	Avangrid
Haley Brown	Rochester Gas and Electric		Kellan Morgan	Rochester Gas and Electric
Terry Carroll	Tompkins County Planning Department		Malak Nassereddine	Building Decarbonization Coalition
Roman Cefali	IBEW Local Union 10		Tyler Olney	Guidehouse
Carol Chock	Ratepayers and Community Intervenors		Nathan Pomerhn	Rochester Gas and Electric
Joe Dammel	RMI		John Rath	NY-GEO
Hailley Delisle	Tompkins County Planning Department		Thomas Scappatccci	Avangrid
Amanda De Vito Trinsey	Couch White LLP		Angela Schorr	NRG Energy
Timur Dogan	Cornell		Elizabeth Stein	NYU School of Law
John Duchesneau	Rochester District Heating Cooperative		Sean Sullivan	Avangrid
Brian Eden	Cornell		Frank Walsh	Avangrid
Jeremy Euto	Avangrid		Shari Wells	New York State Electric & Gas
Chris Galantino	Charles River Associates		Irene Weiser	Fossil Free Tompkins
John Gonzalez	The Brattle Group		Christopher Wentlent	Representative Upstate NY Municipal Utilities
John Haff	New York Department of State		Danni Williams	New York State Electric & Gas

Agenda

1. Introduction and Opening Remarks
2. Purpose of the Conference
3. Presentation by New York State Electric and Gas and Rochester Gas & Electric regarding strategic decommissioning with Q&A
4. Roundtable Discussion

Detailed Notes

Introduction and Opening Remarks

Yvette LaBombard started the meeting, confirmed the recording, and went over the agenda. Dial-in attendees identified themselves.

Purpose of the Conference

Ordering Clause 9 of the *Order Regarding long-Term Natural Gas Plan and Directing Further Actions* issued and effected on January 23, 2025, in the 23-G-0437 proceedings provides that, within sixty days from the Order, the Companies will convene a technical conference to develop criteria for identifying potential segments of infrastructure for strategic decommissioning.

Presentation by New York State Electric and Gas and Rochester Gas and Electric Regarding Strategic Decommissioning

Lawrence Rush, Manager, Non-Pipes and Non-Wires Alternatives at New York State Electric and Gas, discussed the Non-Pipes Alternative (NPA) and Leak Prone Pipe (LPP) Replacement Program including an overview of community outreach, cost recovery, and example projects.

An NPA process is a cost-effective third-party solution that defers or avoids natural gas reliability projects. Suitable projects go through the NPA process established by the Joint Proposal including a benefit-cost analysis with projects costing more than $2 million requiring a more detailed analysis. Leak prone pipe programs aim to electrify buildings in areas requiring pipe replacement. The Joint Proposal along with NYSEG and RG&E offer incentive stacking and one-for-one credits to encourage NPA alternatives for leak prone pipe replacement.

The programs use targeted campaigns to educate residents. Methods include direct mailers and sixty-four community events. Cost recovery is done through mechanisms including in Operating and Maintenance Expenses for general costs, as capital investments, deferral of costs in the current rate period, and amortization of installed assets.

The Lansing NPA Portfolio identified a need when the area faced reliability concerns resulting in a moratorium on new service connections. The NPA program had multiple offerings for customers including heat pumps, energy efficiency options, and education and community outreach. The 2023 Whole Home Electrification Pilot in RG&E service territory replaced leak prone pipe with full home electrification. This removed 119 feet of aging main, electrified three homes, and cost $146,934.

Q&A (moderated by Yvette LaBombard)

- **NPA Process Clarification**

Timur Dugan (Cornell) and Seth Berkman (NYSERDA) asked for more information on the Companies identify segments. Lawrence Rush explained the Companies consider all capital projects for potential NPAs, and that segments are identified by engineering before going to the NPA team to determine project feasibility.

- **Cost Breakdown of Whole Home Electrification**

Josh Berman (Sierra Club) asked for a more detailed cost breakdown of the Whole House Electrification program. Lawrence Rush did not have that breakdown during the conference but will follow-up as an action item.

- **Capital Planning**

Richard Schuler (DPS) asked how the Companies identify capital needs through hydraulic modeling. Yvette LaBombard explained system planning identifies pressure through hydraulic modeling and leak prone pipe has criteria including age, type of pipe, and prioritization. Terry Carrol (Tompkins County Planning Department) asked how the Companies factor NPAs into their long-term capital plans. Yvette LaBombard explained the Companies identify leak prone pipe a year or two in advance, which has been successful.

Yvette also provided a recap of the agenda for those who had difficulty getting on the call and confirmed the Companies were taking notes.

Michael Del Negro, Senior Manager, Delivery Conservation and Load Management, provided an overview of the Company's energy efficiency and clean heat programs. The programs aim to support progress toward statewide clean energy, electrification, and emissions goals by focusing on home weatherization, heat pumps, and smart thermostats. The company hosts events, uses direct mail and email communication with customers, and develops partnerships with local groups to educate and engage customers. The programs offer rebates to commercial and residential customers who participate.

Q&A (moderated by Yvette LaBombard)

- **Tabletop Exercise**

Carol Chock (Rate Payers and Community Intervenors) and Benjamin Kuebrich (Alliance for a Green Economy) asked when the Companies would begin the tabletop exercise. Cynthia McCarran (DPS) from New York Department of Public Service clarified the Public Service Commission ordered NYSEG and RG&E to hold the conference and write a report summarizing the conference and incorporating feedback and suggestions from the conference.

Bruce Balch, Manager, Distribution Planning, provided an overview of electric capacity considerations including historical load growth, current capacity constraints in the distribution system, and system load forecasting with a focus on Ithaca. Historical load growth had been flat over a 20-year period, leading to a "right-size" system that increased system capacity at the time of new build or replacement. Electrification has caused increasing load growth, leading to capacity constraints and a shift toward a winter peak as customers install electric heat options.

Q&A (moderated by Yvette LaBombard)

- **Tabletop Exercise**

Benjamin Kuebrich (Alliance for a Green Economy) asked when the Companies would conduct the tabletop exercise. Erin Hogan explained the presentations outlined considerations required to go into development of criteria for decommissioning.

- **Load Growth Assumptions**

Carol Chock (Ratepayers and Community Intervenors) asked about the assumptions behind load growth data. Bruce Balch explained the load growth projections are based on the New York ISO Gold Book Standard.

- **Involvement of Local Stakeholders**

Carol Chock (Ratepayers and Community Intervenors) asked how local stakeholders are engaged. Bruce Balch explained the Companies have an internal economic development team for those engagements.

- **Electric System Capacity Considerations**

Irene Weiser (Fossil Free Tompkins) identified the importance of considering the season and the type of heat pump when considering electric system capacity and strategic decommissioning. Bruce Balch explained electric system capacity is considered for all NPAs and is also evaluated annually.

Brian Jacobs, Senior Manager, Gas System Planning**,** discussed gas system planning, criteria for decommissioning, and provided maps showing types of segments for decommissioning based on difficulty.

Potential criteria for decommissioning include gas system consideration and needs, gas system topology and configuration, and customer impact. Ideal segments for decommissioning align with required leak prone pipe replacement or areas with existing reliability issues, are radial feeds (dead-ends), and involve a manageable number of residential customers. A challenging segment would involve newer gas pipes or projects with a customer contribution, looped and feeder mains, and customers with industrial or hard-to-electrify loads.

Q&A (moderated by Yvette LaBombard)

- **Map Development**

Seth Berkman (NYSERDA) asked how the Companies developed the maps shown in the presentation. Brian Jacobs explained the maps were made using GIS, with layers added for the gas or electric systems.

- **Integration of Gas and Electric System Data**

Timur Dogan (Cornell) mentioned a collaboration between Cornell and the Companies to integrate electric and gas system data in a digital twin of Ithaca. Bruce Balch and Brian Jacobs expressed interest in the possibility and will follow-up.

Josh Berman (Sierra Club) and Elisabeth Stein (NYU School of Law) asked how GIS and mapping teams might integrate data from the gas and electric systems. Bruce Balch and Brian Jacobs from the Companies confirmed the databases for the gas and electric systems are separate, but there would discuss the suggestion of integrating them with the GIS teams.

Seth Berkman (NYSERDA) asked if manipulable mapping information could be made available to electrical contractors or customers. Cynthia McCarran (DPS) explained this may be possible, but customers would need to be protected. Integration for public access may involve non-disclosure agreements.

- **Community Outreach and Education**

Irene Weiser (Fossil Free Tompkins) discussed the importance of community outreach and electric system considerations in the decommissioning process. Benjamin Kuebrich (Alliance for a Green Economy) asked how the specific residents on the sample maps were being engaged to electrify. Brian Jacobs explained the maps were for informational purposes to show an ideal and challenging segment.

- **Technical Conference Report Suggestions**

Seth Berkman (NYSERDA) would like to see "soft consideration" in the Companies' report on the conference including resources, staff, and day-to-day operational challenges.

Lawrence Rush, Manager, Non-Pipes and Non-Wires Alternatives at New York State Electric and Gas, concluded the presentation with a discussion of cost considerations including estimates for electrification of residential homes, small multi-family homes, and large multi-family homes.

Yvette LaBombard, Senior Director, Gas Engineering, provided a summary of the presentation.

Roundtable Discussion (moderated by Cynthia McCarran from the NY PSC)

- **Top-Down vs. Bottom-Up Approach**

Cynthia McCarran (DPS) identified the importance of both top-down and bottom-up approaches in identifying segments for strategic decommissioning. The top-down approach focuses on the gas system's technical aspects. The bottom-up approach focuses on community engagement, outreach, and education.

- **Community Involvement**

Irene Weiser (Fossil Free Tompkins) and Carol Chock (Ratepayers and Community Intervenors) emphasized the need for community involvement in the strategic decommissioning process. This could include identifying neighborhoods and streets that could be electrified and collaborating with municipal officials to engage those communities.

- **Heat Pumps and Electric Rates**

John Rath (NY-GEO) provided comments including the need to include equipment life in cost figures, consider peak shaving benefits provided by heat pumps, highlight the cost-effectiveness of heat pumps, and consider electric rates for heat pump customers.

- **Next Steps**

Carol Chock (Ratepayers and Community Intervenors) and Benjamin Kuebrich (Alliance for a Green Economy**)** would like to see future meetings to further develop criteria for decommissioning, which they would like to include tabletop exercise and engagement of more stakeholders. Cynthia McCarran (DPS) and Erin Hogan mentioned an extension to allow this may be a challenge due the need for inclusion in the upcoming rate case.

Participants were advised that further questions can be sent to: NYRegAdmin@avangrid.com.

Action Items from Attendees

Action	NYSEG/RGE Owner
Josh Berman (Sierra Club) would like a more detailed breakdown of the costs in the Whole Home Electrification Program.	Lawrence Rush to identify that information if possible and follow-up.

Josh Berman (Sierra Club) asked about the possibility of integrating the gas and electric databases.	Bruce Balch and Brian Jacobs will explore this possibility with the Company's GIS teams.
Timur Dugan (Cornell) expressed an interest in collaborating with the Companies to integrate infrastructure information for the gas and electric systems.	Bruce Balch and Brian Jacobs will follow-up on that potential collaboration.

From: John Rath <jrfree59@gmail.com>
Sent: Friday, March 21, 2025 4:08 PM
To: NYRegAdmin <NYRegAdmin@avangrid.com>
Cc: McCarran, Cynthia (DPS) <cynthia.mccarran@dps.ny.gov>
Subject: NY-GEO input following 03212025 LTP technical conference

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Good day Yvette, Erin and Team. Thanks for the opportunity to attend this morning's conference and follow-up with these comments from NY-GEO which I hope will be considered/included in the LTP discussion process.

Air Source and Ground source heat pumps are different in performance, cost, useful life and technologies. Ground source heat pumps are rated at a significantly longer 25 year useful life while air source heat pumps are rated at a 15 year useful life. This should be reflected when comparing installation and operating costs and value to the customer.

There is a monetary value to reduction of infrastructure costs required to build out the electrical grid and gas distribution systems to meet peak heating and cooling days, which ground source heat pumps positively impact and which are not available with air source heat pumps. NY-GEO believes this value should be factored into the economic assessment in the long term plan.

Ground source heat pumps are the "best first cost" to customers in many situations where greenhouse gas reductions and energy bill savings are desired. Weatherization and energy efficiency measures can help/are valued and should be considered as well, but not as a "first cost".

Please let me know if you have any questions or comments. Take care.

John Rath
NY-GEO
cell 817 442-8418

Appendix B: Technical Conference 2 Materials

Meeting title	NYSEG and RG&E Technical Conference 2 Regarding Strategic Decommissioning (23-G-0437)
Attended participants	59
Start time	4/29/25, 9:56:00 AM
End time	4/29/25, 12:09:42 PM
Meeting duration	2h 13m 41s
Average attendance time	1h 42m 35s

2. Participants

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Meeting title	NYSEG and RG&E Technical Conference 2 Regarding Strategic Decommissioning (23-G-0437)
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2. Participants

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Jessica Azulay, AGREE (Unverified)	
Carol Chock, Ratepayer and Community Intervenors (Unverified)	
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Avangrid A member of the Iberdrola Group

Technical Conference #2 Regarding Strategic Decommissioning of NYSEG/RG&E Gas Distribution Systems

04/29/2025

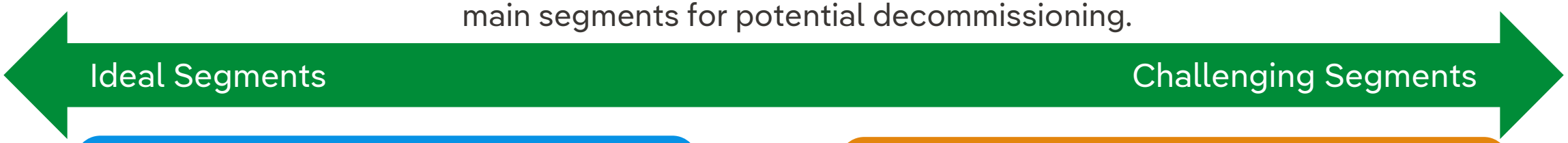
Technical Conference Opening Remarks

- Meeting will be recorded
- Identification of phone number only participants (complete attendance record)
- Purpose: hold a technical conference to achieve the requirements and objectives stated in 23-G-0437, Order #9 detailed on page 53 of the Order
- Meeting format: Tabletop Exercise with Open Discussion
  - Simple and challenging examples
  - Flesh out criteria as we consider project implementation
- Presenters:
  - Yvette LaBombard – Senior Director, Gas Engineering
  - Larry Rush – Manager, Non-Pipes and Non-Wires Alternatives

Potential Criteria for Segment Decommissioning

Gas Distribution System Strategic Decommissioning – Identification Criteria

The spectrum of parameters to consider regarding the suitability of gas main segments for potential decommissioning.



Leak Prone Pipe & System Reliability Needs
Established NPA framework and process for evaluation

MOST Radial Feeds ("dead-ends")
System Impact is contained to the radial-main in question

Customer Impact
Residential; Number of Gas Services

Electric System Impact
Adequate Capacity to Serve

Newer Pipe and/or Customer Contribution
Where a customer has made an investment or contribution in the infrastructure.

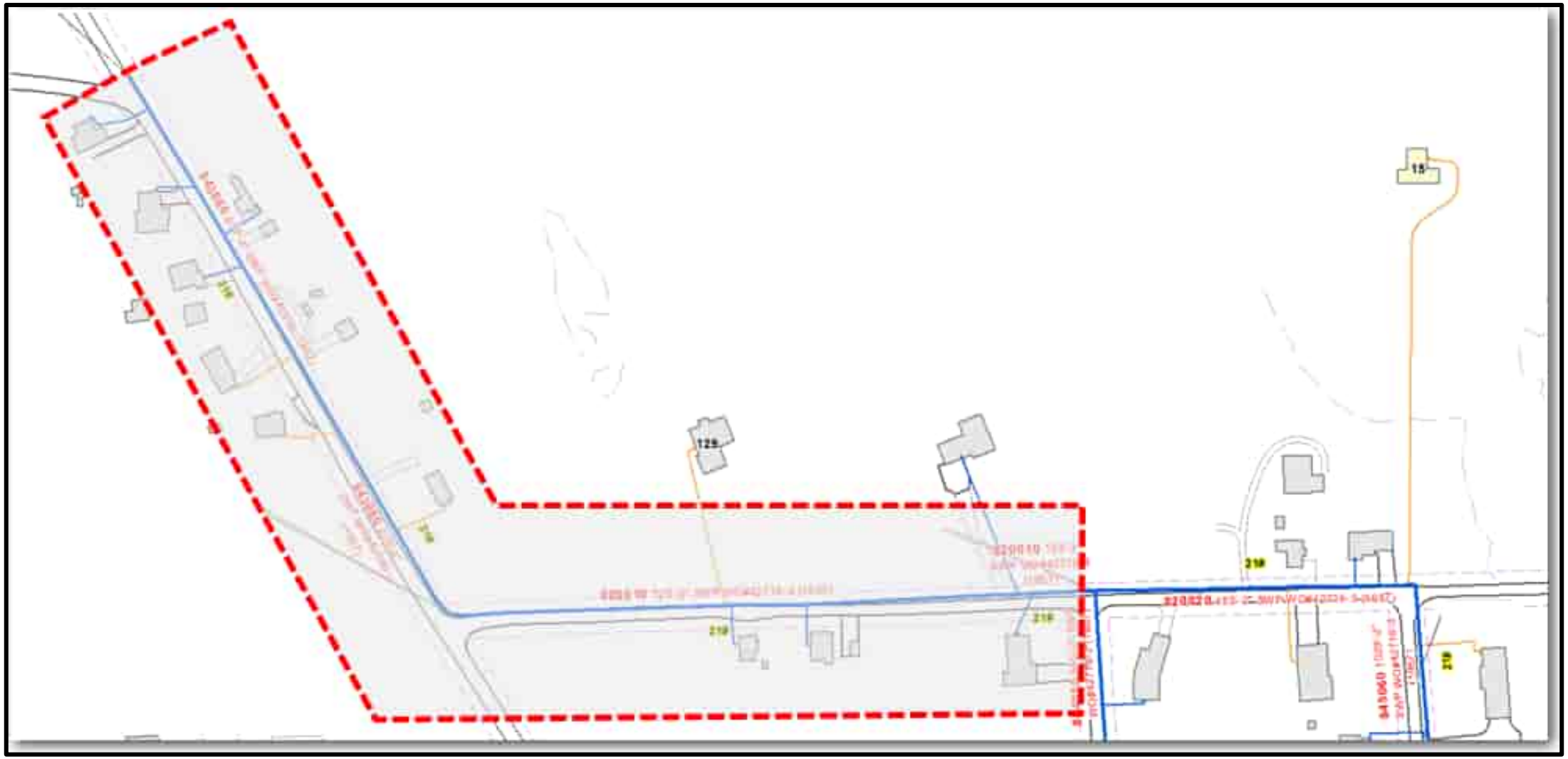
Looped Feeds & Feeder Mains
Negatively impact downstream pressure, flows and level of service.

Customer Impact
Industrial and hard-to-electrify loads

Electric System Impact
Requires System Upgrades to Serve

Ideal Segment

Gas Distribution System Strategic Decommissioning – Ideal Segment



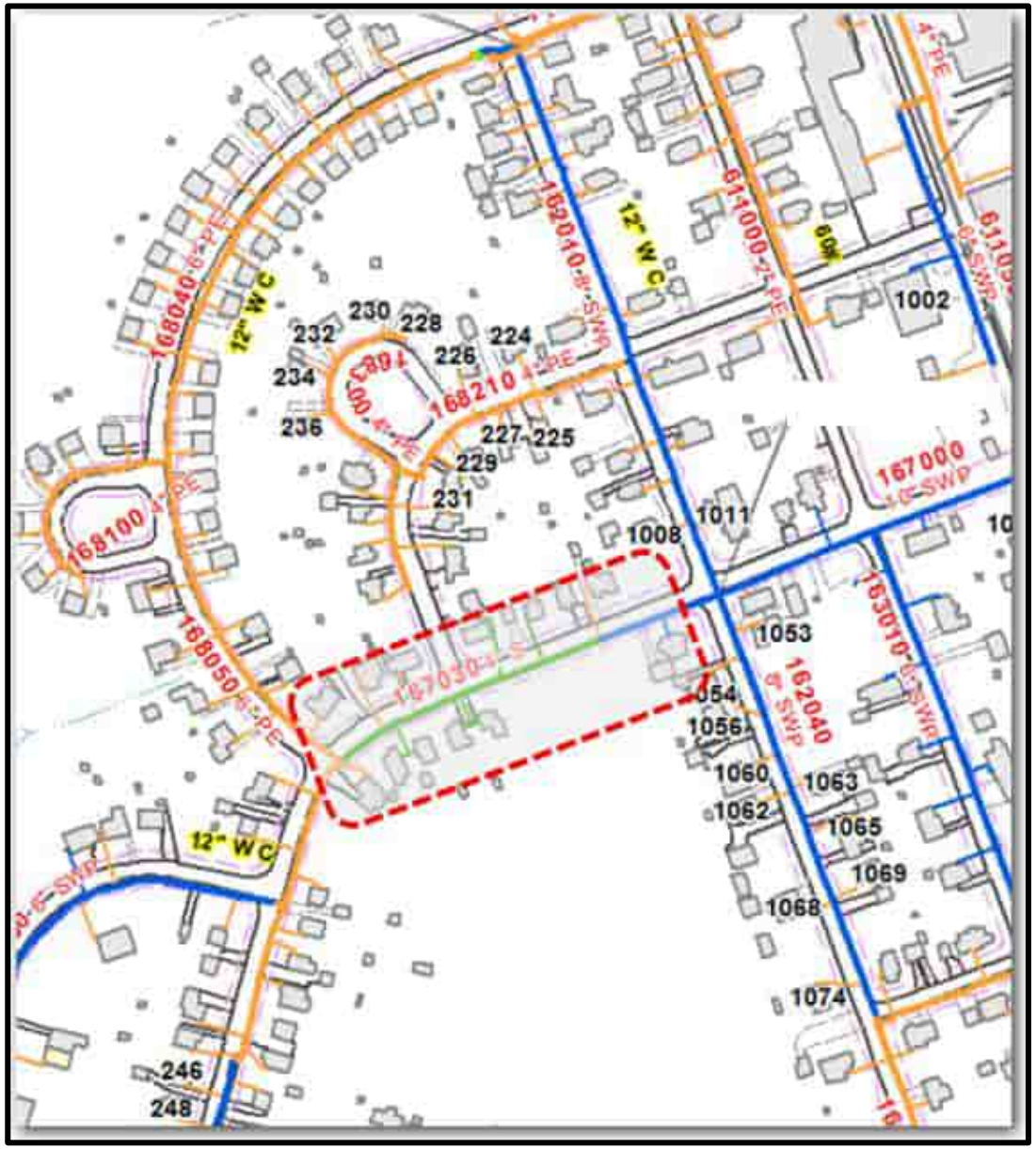
Strategic Decommissioning Criteria – Ideal Segment – Initial Questions

Avangrid
A member of the Iberdrola Group

- *What are options for people if only some customers what to electrify?*
- *What type of customer outreach should be done?*
- *What if some customers just replaced their boiler and are currently paying for a loan?*
- *What if project BCA is under 1?*
- *What if there is no traditional project to compare this project against?*
- *If there are multifamily units on the segment, how do you handle the landlord/tenant dynamic?*
- *What if there are commercial customers on the segment?*
- *How do you handle the increased costs to the customer? For instance, maybe the customer only had the bedrooms cooled with AC and now the customer has central air throughout the house?*
- *What if the area has electrical constraints?*

Challenging Segment

Gas Distribution System Strategic Decommissioning – Challenging Segment

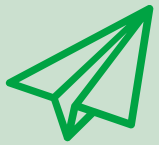


Strategic Decommissioning Criteria – Challenging Segment – Initial Questions

Avangrid
A member of the Iberdrola Group

- *Where do you start with this segment? Not technically feasible.*
- *What if there is no traditional project to compare this project against? Funding for project?*
- *What if project BCA is under 1?*
- *What if the area has electrical constraints?*
- *What type of customer outreach should be done?*
- *What are options for people if only some customers what to electrify?*
- *What if there are commercial customers on the segment?*

Next Steps and Closing Remarks



NYSEG/RGE to take questions/comments through email until 5/9/2025. Send all comments to nyregadmin@avangrid.com

NYSEG/RG&E to file report on Tabletop exercise by 5/29/2025

Meeting Minutes

New York State Electric & Gas and Rochester Gas and Electric Technical Conference Regarding Strategic Decommissioning

Date: April 29, 2025
Meeting Start: 10:00 AM
Meeting End: 12:30 PM

New York State Electric & Gas and Rochester Gas and Electric Presenters

Name	Role
Yvette LaBombard	Senior Director, Gas Engineering
Lawrence Rush	Manager, Non-Pipes and Non-Wires Alternatives

New York State Electric & Gas and Rochester Gas and Electric Note Takers

Name	Role
Janelle Bourgeois	Lead Analyst, Clean Energy Policy, and Strategy

New York Department of Public Service Moderator

Name
Cynthia McCarran

New York Department of Public Service Staff

Name
George Coffin
Brandon Goodrich
Micah Jaffe
Davide Maioriello
Richard Schuler
Shauna Spinosa
Christoper Stolicky

Attendees

Name	Organization		Name	Organization
Micheal Abel	Rochester Gas and Electric		Liz Harridge	National Grid
Hillary Aidun	Earth Justice		Erin Hogan	Avangrid

Name	Organization		Name	Organization
Jessica Azulay	AGREE		Siobhan Margaret Hull	Cornell
Bruch Balch	New York State Electric and Gas		Tessa Kajdi	National Grid
Seth Berkman	NYSERDA		Sayf Merzouk	Avangrid
Josh Berman	Sierra Club		Nathan Pomerhn	Rochester Gas and Electric
Victoria Billups	Rochester Gas and Electric		Olivia Prieto	RMI
Anna Binau	New York Department of State		Pedro Queiroz Dos Santos	New York State Electric and Gas
Janelle Bourgeois	Avangrid		John Rath	NY-GEO
MaryBeth Carroll	National Grid		Thomas Scappaticci	Avangrid
Terry Carroll	Tompkins County		Donna Silva	National Grid
Roman Cefali	IBEW		J Christopher Skawski	Cornell
Carol Chock	Ratepayer and Community Intervenor		Elizabeth Stein	NYU School of Law
Amy Davis	Avangrid		Sarah Steinberg	Advanced Energy United
Hailley Delisle	Tompkins County		Sean Sullivan	Avangrid
Michael Del Negro	Rochester Gas and Electric		Chad Tucker	Scepter Inc
Linda Dent	Rochester Gas and Electric		Irene Weiser	Fossil Free Tompkins
Amanda De Vito Trinsey	Couch White, LLP		Shari Wells	New York State Electric and Gas
John Duchesneau	Rochester District Heating Cooperative		Brian Williams	New York State Electric and Gas
Brian Eden	Cornell		Danni Williams	New York State Electric and Gas
Jeremy Euto	Avangrid		Nicole Williams	New York State Electric and Gas
Rebecca Evans	City of Ithaca		Bob Wyman	N/a
Bess Gorman	National Grid			

Meeting Agenda

- Conduct a tabletop exercise with open discussion.
- Review simple and challenging examples of criteria for strategi decommissioning.
- Flesh out criteria for strategic decommissioning through a consideration of project implementation

Detailed Notes

Introduction and Opening Remarks

Yvette LaBombard started the meeting, confirmed the recording, and went over the agenda. Dial-in attendees identified themselves.

Purpose of the Conference

Ordering Clause 9 of the *Order Regarding Long-Term Natural Gas Plan and Directing Further Actions* issued and effected on January 23, 2025, in the 23-G-0437 proceedings provides that, within sixty days from the Order, the Companies will convene a technical conference to develop criteria for identifying potential segments of infrastructure for strategic decommissioning.

The Companies convened their first technical conference on strategic decommissioning on March 21, 2025. The Companies convened second technical to fully achieve the requirements and objectives of Ordering Clause 9.

Presentation by New York State Electric and Gas and Rochester Gas and Electric Regarding Potential Criteria for Segment Decommissioning

Yvette LaBombard, Senior Manager, Gas Engineering, discussed potential criteria for segment decommissioning.

The goal of the technical conference is for the Companies to listen and receive input from stakeholders around segment decommissioning.

There are three main considerations around decommissioning: engineering feasibility, cost feasibility, and customer choice. The engineering feasibility is straightforward question in

terms of assessing the current gas system and electric system capacity. Cost feasibility and customer choice are more challenging.

Ideal segments for decommissioning align with required leak prone pipe replacement or areas with existing reliability issues, are radial feeds (dead-ends), and involve a manageable number of residential customers. A challenging segment would involve newer gas pipes or projects with a customer contribution, looped and feeder mains, and customers with industrial or hard-to-electrify loads. In either scenario, the challenge increases as the number of customers increases. It may become difficult to get all impacted customers to agree to electrification and for the electric system to provide appropriate capacity.

Larry Rush, Manager, Non-Pipes and Non-Wires Alternatives, provided specific examples of ideal and challenging segments.

The ideal segment contains a smaller number of impacted customers, could potentially have a replacement project in the future, faces no electric capacity restraints, and is a radial feed with no impacts downstream if decommissioned.

The ideal segment raises significant questions. How should the Companies compare a decommissioning project on an ideal segment against a traditional project? What customer outreach should the Companies conduct and when? How should the Companies approach a customer in the proposed project area who has just done costly replacements for their natural gas appliances? What programs, policies, or tariffs will address increased costs of electricity for customers?

Open Discussion

Conference Questions

- ***Developing a Strategic Decommissioning Process***

Carol Chock (Ratepayer and Community Intervenor) suggested the discussion of ideal vs. challenging segments is the first step toward developing a strategic decommissioning process and it is important to focus attention on that process. Carol raised several topics: lowering incremental costs for reluctant customers, allow customers a 2–3-year contract to have dual systems before committing to electrification, and to do a pilot for low-income individuals with capped electricity costs.

Yvette LaBombard clarified that is the intent of the conference, to develop criteria as part of developing a process around decommissioning. The intent is not to develop the entire process, but that all the ideas mentioned are what the Companies are looking for from the Conference.

Technical Clarifications

- ***Length and Color of Service Lines on Company Maps***

Cynthia McCarran (DPS) asked about the relative length of service lines of the segment shown. Larry Rush explained the length of the service lines is a key component of cost feasibility. The costs for replacement offset the costs of electrification, making longer service lines desirable.

Seth Berkman (NYSERDA) asked to clarify the colors of the service lines. Yvette LaBombard clarified that the blue service lines are steel pipe and orange service lines are plastic pipes.

- ***Distinguishing NPA from LPP Processes***

Jessica Azulay (AGREE) clarified that the Companies have separate processes for NPAs and LPP. Larry Rush confirmed that the companies treat NPAs like a portfolio including an RFP whereas LPPs are an internally directed customer program.

Planning Timelines

- ***Planning Timelines in the Long-Term Plan***

Irene Weiser (Fossil Free Tompkins) suggested that the LTP be a vehicle for planning strategic decommissioning over the 20-year planning horizon. Ideally, the next LTP map out the next 15-20 years of planned strategic decommissioning.

- ***Lead Time for Customer Notification***

Seth Berkman (NYSERDA) and Jessica Azulay (AGREE) addressed the concern about a customer that had recently completed costly replacements for natural gas appliances suggesting that the Companies identify segments for replacement with far longer lead time than the 1-2 they currently used. The Companies or by contractors could use that information to conduct outreach encouraging those customers to electrify in the intervening years. It is also possible for that customer to approach electrification on a staged basis, electrifying older equipment.

Larry Rush responded to these suggestions agreeing that it is important to create a roadmap for customers to help with timing.

Irene Weiser (Fossil Free Tompkins) agreed with the suggestions on identifying segments earlier to help the Companies and customers plan for electrification. It is also important to have a way to onboard customers who have an appliance replacement need while they are waiting for electrification. A program where the Companies inspect customer equipment to understand the timeline for replacement may help with that planning.

Larry Rush responded to these suggestions agreeing that it is important to create a roadmap for customers to help with timing.

Customer Choice

- ***Fuel Switching***

Irene Weiser (Fossil Free Tompkins), seconded by Jessica Azulay (AGREE) suggested a compensation structure where the company will cover incremental costs of customers who are not ready to electrify to switch to another fuel source such as propane. This allows the customer access to a preferred fuel while also allowing the decommissioning project to continue.

Cynthia McCarran (DPS) added National Fuel has a similar program that paid natural gas customers on leak prone pipe too expensive to replace to convert to propane.

Cost Considerations

- ***Cost Caps for Low-Income Customers Electrifying***

Irene Weiser (Fossil Free Tompkins) discussed a potential pilot program targeting low-income customers. The program would cap the energy costs of participating customers who fully electrify at 6% of their income. The program is currently in the state budget. Jessica Azulay (AGREE) confirmed the pilot has not reached the implementation stage. EMPOWER Plus and an implementation contractor will run the proposed program.

- ***Upfront Costs for Electrification***

Davide Maioriello (DPS) brought up difficulties low-income customers will face with the upfront costs of electrification, particularly since those customers are already energy burdened. These customers may have bought their property years ago and cannot afford

costly upgrades. Further, low-income customers are often renters, in which case programs will need to target their landlords. There will need to be efforts to bring low-income renters into programs, but also to incentivize building owners.

Bob Wyman proposes that upfront costs should not be part of a future electrification tariff. Rebates and incentives should reduce upfront costs.

Jessica Azulay (AGREE) suggests that NPAs and LPPs are one of the best opportunities for low-income customers to electrify because their programs cover upfront costs of electrification.

John Rath (NY-GEO) added that geothermal heating and cooling could incentivize the bore hole parts of those systems to broaden the appeal of geothermal to customers. Further, ground source heat pumps have the benefit of limiting infrastructure, which could improve the cost analysis of NPAs.

- ***Electrification Tariff***

Josh Berman (Sierra Club) suggested development of a tariff for customers who have fully electrified that may include a seasonal subsidization component, so those customers do not se a significant rise in energy charges during winter months.

Bob Wyman proposes that upfront costs should not be part of a future electrification tariff. Rebates and incentives should reduce upfront costs. One example of this is the Con Edison tariff, SC1 Rate 4, which provides a technology neutral benefit to customers with high load factors, but in doing that, provides a benefit to heat pump users that can translate to $1,000 a year in energy cost savings.

- ***Bill Credits for NPA/LPP Participation***

Jessica Azulay (AGREE) mentioned the Companies should review a proposed bill credit in National Grid's recently filed rate case for customers who participate in NPAs including LPP and electrification.

Strategic Considerations

- ***Required Replacement vs. Pruning Dead Ends***

Irene Weiser (Fossil Free Tompkins) questioned if the Companies imagine the ideal segment shown on the slides as needing replacement in the immediate future, or if the Companies imagine it as a segment for decommissioning regardless of immediate replacement need.

Larry Rush confirms the examples are based on pipes with immediate replacement needs.

Irene encourages the Companies to consider pruning radial segments without immediate replacement needs. This requires a different conversation about cost recovery because the financing does not include the saved cost of pipe replacements. Instead, it needs more focus on reductions of greenhouse gas emissions.

- ***Challenging Segments***

Terry Carroll (Tompkins County, seconded by Irene Weiser (Fossil Free Tompkins) and Bob Wyman, suggested it may be best to focus on the ideal segments first, with challenging segments further down the line. It may also be beneficial to look at the challenging segments and try to isolate loops or dead ends within them.

Order 9 Report

Carol Chock (Ratepayer and Community Intervenor) proposed the Companies add slides reflecting the open discussion to the deck. One slide would be focus on pros and cons of tools discussed. Further, the Companies should include a corresponding page in their report. The Companies should do the same for customer outreach and education, a timeline for decommissioning, energy burden, and low-income customers. A blank slide at the beginning should include metrics to measure progress toward decommissioning such as what a decommissioned grid would look like, or what percentage of decommissioning qualifies as success.

Follow-up Actions

Bob Wyman and Carol Chock (Ratepayer and Community Intervenor) discussed hypothetical situations where the Companies have an obligation to provide service. For example, if a new build wants gas in a decommissioned segment or if a new owner of a previously electrified home requests the gas to be reconnected or if a customer refuses because they want gas for an appliance or generator.

Amy Davis (Avangrid) responded as Counsel for the Companies that this would be a question the Companies would have to follow-up on.

Next Steps

Attendees can provide further feedback, questions, or comments by emailing NYRegAdmin@avangrid.com before May 9, 2025.

The Companies will file their final report by May 29, 2025.

Stakeholder comments on NYSEG's Gas Decommissioning Tabletop Exercise
Case 23-G-0437

May 9, 2025

INTRODUCTION

The undersigned stakeholders submit these comments on NYSEG's tabletop exercise on gas system decommissioning. We applaud the Public Service Commission (PSC) for requiring this innovative exercise. The Climate Action Council's Scoping Plan identifies building electrification as a central strategy for decarbonization, and Building Decarbonization Coalition's *Future of Gas in New York State*[1] study highlights strategic downsizing as the most cost-effective pathway forward. Achieving New York's Climate Leadership and Community Protection Act (CLCPA) goals will be impossible without a plan to retire large portions of the existing gas network.

In the generic gas planning proceeding (20-G-0131), numerous stakeholders submitted white papers calling for the strategic decapitalization of the gas distribution system. In NYSEG's LTP docket (23-G-0437) Fossil Free Tompkins proposed a pilot tabletop planning exercise to test how this concept could be operationalized. The Commission endorsed this proposal and directed NYSEG to work with interested stakeholders to implement the exercise. The Order laid out specific expectations for the process.

In response, NYSEG hosted two technical conferences on March 21 and April 29, 2025. The first session focused on NYSEG's current non-pipe alternatives (NPAs) and full electrification initiatives, as well as initial criteria for identifying segments that are easier or harder to decommission. Due to time constraints, that discussion was limited, and we appreciate NYSEG's responsiveness in scheduling a second session. At the April 29 session, stakeholders had the opportunity to respond to NYSEG's questions and share ideas. These groundbreaking discussions were both productive and thought-provoking.

The strong turnout—nearly 60 participants at each session—reflects the high level of stakeholder interest in advancing gas system decommissioning. There is a clear recognition that to scale this approach statewide, we must first demonstrate how it can work in practice. We share a collective commitment to developing a plan that is safe, reliable, affordable, timely, and grounded in community support.

While these conversations were valuable, the process is not yet complete and the requirements of the Commission's Order[2] have not yet been met. The Order directed NYSEG to:

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[1] March 2023, Building Decarbonization Coalition, *The Future of Gas in New York State* https://buildingdecarb.org/wp-content/uploads/BDC-The-Future-of-Gas-in-NYS.pdf

[2] January, 23, 2025, Public Service Commission Order Regarding Long-Term Natural Gas Plan and Directing Further Action. https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={20049494-0000-C512-B2B0-4C06F07256BF}

- Identify potential decommissioning areas in Tompkins County that do not adversely impact downstream customers
- Develop criteria for selecting suitable segments
- Evaluate non-pipe alternatives
- Assess funding needs
- Plan for customer engagement and education, and
- Submit a report summarizing outcomes and identifying potential NPAs for inclusion in the next rate case.

To date, the most focused discussion has been on segment selection criteria. However, those criteria have not been applied to the actual system to identify candidate segments. Nor have specific decommissioning sections or NPAs been proposed. Funding approaches have only been lightly touched upon, and discussions on customer outreach remain preliminary.

We therefore offer the following stakeholder recommendations for inclusion in NYSEG's forthcoming report.

RECOMMENDATIONS FOR INCLUSION IN NYSEG'S REPORT

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1. NYSEG's Report Should Acknowledge Strong Stakeholder Support for Strategic Decommissioning

The report should highlight the robust attendance and engaged participation by stakeholders—nearly 60 at each session—representing local, state, and national organizations. Their thoughtful input and constructive ideas underscore broad interest and support for advancing strategic decommissioning.

2. NYSEG's Report Should Recommend Continued Stakeholder Collaboration Outside the Rate Case

We urge NYSEG to recommend continued planning discussions outside the rate case. The collaborative tabletop format is far more conducive to exploratory conversations and broad stakeholder participation than the adversarial, confidential structure of rate proceedings.

At the same time, NYSEG should commit to including in their upcoming rate case:

- Funding for independent technical consultants to facilitate and support decommissioning planning
- Funding for customer outreach, education, and data collection, and

- Proposals for updated rate designs that will mitigate cost impacts and support customer adoption of electrification.

3. NYSEG's Report Should Expand and Apply Criteria for Selecting Candidate Segments

Stakeholders broadly agreed with NYSEG's initial criteria and propose these additional criteria to better identify "ideal" segments:

- Disadvantaged communities with high levels of air pollution and associated health outcomes.
- Predominantly owner-occupied single-family or small multi-family homes
- Presence of low-income households eligible for the Empower+ 6% energy cost cap
- Areas with low design-day pressure or where proposed new development could degrade pressure
- Areas with excess winter electric capacity
- Areas with municipal and community support
- Segments with lower net present cost for decommissioning compared to infrastructure replacement

NYSEG should apply these criteria to identify and propose candidate segments for initial decommissioning.

NYSEG noted that technically challenging areas would become easier to decommission as the system is pruned. However, non-technical challenges like decommissioning rental or industrial properties will require further discussion.

4. NYSEG's Report Should Clarify Scope and Goals of the Tabletop Exercise and Recommend Continued Discussions

While identifying ideal segments for decommissioning is important, we urge NYSEG to move beyond "low-hanging fruit" and develop a 20-year plan for full gas system decommissioning in Tompkins County, to be included in its next LTP. Focusing exclusively on the most peripheral elements of the system short-circuits important conversations and assessment of how strategic decommissioning efforts can be sequenced and how key barriers can be addressed. We strongly recommend continued tabletop discussions.

5. NYSEG's Report Should Identify the Following Challenges to Strategic Decommissioning and Proposed Solutions:

A. Policy Challenges

The gas utility obligation to serve is the single largest barrier to strategic decommissioning of the gas system, and modifying or eliminating this obligation is essential to reaching the goals of the CLCPA. Stakeholders urge NYSEG and the PSC to support the NY HEAT Act.

Interim solutions include:

- Propane substitution (per Cindy McCarran, National Fuel)
- Utilize and expand the Empower+ 6% energy cap program
- Trial induction cooktops for hesitant customers
- Public education campaigns
- Protections against re-connection (e.g., deed covenants, franchise adjustments)

B. Planning and Timing Challenges

A challenge for strategic downsizing is that customers along candidate segments may not be homogenous in the age of their gas appliances and readiness for electrification.

Proposed solutions:

- Provide 3–5 years advance notice to customers to prepare for electrification
- Develop mechanisms to support customers who need to replace equipment before decommissioning occurs (e.g., electric appliance incentives, equipment buyback)
- Hire a 3rd party to survey customer gas usage/appliances, building characteristics, points of customer resistance.
    - to identify easiest areas for electrification
    - to educate customers about plans/timeline for electrification

C. NPA Implementation Challenges

The first technical conference provided an overview of customer engagement, education and funding needs for the Lansing NPA and Rochester Full Electrification Project, however we have not yet had any discussion on how the NPA process can be improved.

Proposed solutions:

- Review lessons from the Lansing NPA project

- Improve customer engagement and participation strategies

D. Financial Challenges

There are several significant financial challenges that must be addressed to successfully advance strategic decommissioning: the up-front cost of electrification, the ongoing operating costs, the risks of the "utility negative-feedback-loop spiral" and costly stranded assets, the difficulty of valuing and incentivising projects not associated with an NPA, and the need to develop countywide cost sharing models.

Proposed solutions:

- Evaluate rate designs that lower operating costs for customers that electrify[3]
- Develop countywide, equitable cost-sharing models for all segments
- Model pathways with least stranded assets, least risk of negative feedback loop spiral
- Hire an independent consultant to evaluate proposed models for cost-sharing, stranded asset, and negative feedback loop spiral scenarios.

E. Technical Challenges

NYSEG has not yet determined where gas system decommissioning aligns with electric system capacity, nor identified where electric grid upgrades are needed.

Proposed solutions:

- Outline steps to integrate gas and electric planning and assess where electrification can proceed without upgrades.
- Analyze the relative value of air source, ground source, and district heating (UTEN) solutions to address electric system constraints.
- Develop the most efficient path to reach DACs areas for decommissioning.
- Hire an independent consultant to evaluate proposed solutions for the above.

F. Information Sharing Challenges

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[3] *See, e.g.*, Sanem Sergici et al., *Heat Pump-Friendly Cost-Based Rate Designs: A White Paper from the Energy Systems Integration Group's Retail Pricing Task Force* (Jan. 2023), available at https://www.esig.energy/wp-content/uploads/2023/01/Heat-Pump%E2%80%93Friendly-Cost-Based-Rate-Designs.pdf.
See also ConEdison's SC1-IV Select Rate in downstate NY that demonstrates cost savings.

While security concerns limit full public access to gas and electric infrastructure data, solutions are needed to inform stakeholders about the number and location of potential “ideal” and “challenging” segments to help prioritize decommissioning efforts.

Proposed solutions:

- Identify and share non-sensitive data on promising decommissioning areas
- Hire an independent consultant to provide third-party verification, as was done in DER planning.

RECOMMENDATIONS FOR NEXT STEPS

We look forward to reviewing NYSEG’s report on these stakeholder sessions. As detailed above, the tabletop exercise has made important progress, but has not yet met the requirements of the Commission’s Order in Case 23-G-0437[4].

Much more work needs to be done to apply the technical and social criteria to identify specific segments that are ripe for decommissioning, to develop funding models and determine costs, and to conduct the necessary customer outreach.

We urge that collaborative discussions on these matters continue outside the rate case to develop a robust working model for how decommissioning can proceed. We suggest that NYSEG propose a schedule and agenda for ongoing discussions to be included in their report. It should include:

- how and when they will identify the technically easiest segments to decommission
- how they will overcome the information sharing barrier
- when there will be a review of lessons learned in the Lansing NPA process
- the municipal and customer engagement plan and timeline, including methods to address customers resistant to electrification
- associated costs for implementing the first round of decommissioning, as well as
- a commitment to continued discussion of decommissioning to address more complex scenarios.

Meanwhile, there are several elements that merit support in the upcoming rate case filing. As detailed above, these include (but may not be limited to):

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[4] *Ibid.*

- Hiring independent technical consultant(s) to assist with identifying and evaluating easy segments, modeling equitable cost structures and rate designs, evaluating relative cost benefits of different heat pump technologies to mitigate grid impacts, developing agendas and facilitating meetings.
- Funding for customer outreach and education, including a survey of customer gas uses, building needs, and induction cooktop trials.
- Identification and costs for any proposed easy segments for decommissioning.

In closing, we wish to express our appreciation to the Commission, NYSEG, DPS and NYSERDA staff, and other stakeholders for engaging in this exciting and essential effort to chart a path forward toward decarbonization by strategic downsizing of the gas system.

Respectfully submitted,

Irene Weiser, Fossil Free Tompkins

Carol Chock, Ratepayer and Community Intervenors

Brian Eden, Campaign for Renewable Energy

John Rath, New York Geothermal Energy Organization

Ben Kuebrich, Alliance for a Green Economy

Josh Berman, Sierra Club

Anshul Gupta, New Yorkers for Clean Power

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Tompkins County

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ccetompkins.org

May 9, 2025

Re: PSC Case 23-G-0437 - In the Matter of a Review of the Long-Term Gas System Plan of New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation

To whom it may concern:

Cornell Cooperative Extension Tompkins County (CCE Tompkins) has been contracted by NYSEG since September 2022 to provide outreach and education for the Lansing Non-Pipes Alternatives (NPA) program. We are submitting these comments in regards to the pending NYSEG gas decommissioning plan, which is being co-developed with stakeholder input pursuant to Public Service Commission (PSC) Case 23-G-0437 and in response to the NYSEG-RG&E Presentation from March 21 Technical Conference.

As the educational partner in this project, we gained insight into perceived and actual barriers to electrification by natural gas users in our area. We offer this comment in the hopes of informing NYSEG and the PSC as to the challenges and successes of the Lansing NPA program and incorporation of this information into decommissioning plans.

The Lansing Non-Pipes Alternatives program is a response to reliability concerns stemming from low system pressure amid high development pressure in the Lansing, NY and surrounding areas. Following local opposition to expanded natural gas infrastructure (the proposed "Lansing/Freeville Gas Reinforcement Gas Pipeline Project"), the NPA was developed as a means of stabilizing overall system pressure by supporting Lansing residents and businesses to reduce gas use through the conversion to electric space and water heating. As part of this portfolio of projects, CCETC has conducted extensive community-based outreach and education efforts to connect residents and stakeholders with available incentives and information about this pilot program.

In the course of this work, our office has worked with residents, business and building owners, and municipal officials to enhance the viability of this first-in-the-state solution to the question of natural gas system decommissioning. It has been our observation that opposition to electrification is primarily driven by two major barriers: high upfront cost to convert and uncertainty about energy costs following conversion to electric.

Upfront Costs of Electrification

The primary barrier for participation that we hear from residents who would otherwise be eligible for incentives is that the upfront costs of heat pump installation, even factoring in incentives and rebates, are cost prohibitive. This is a common barrier across all three incentive zones in the program. While the residential financial incentives offered through the Lansing NPA program in Zone 1 are substantially larger than the per-ton Clean Heat incentive for similarly-sized projects, they are capped at 50% of the total project cost. This can result in customers paying thousands of dollars in retrofit costs even after incentives are applied.

Low- and moderate-income households were previously eligible for additional incentives for electrification work through NYSERDA's EmPower+ program. However, a recent rule change has precluded the use of these funds for heat pumps if customers currently utilize natural gas [due to

concerns that it will leave low income customers with higher energy costs.] The result is that installing either air- or ground-source heat pumps is financially infeasible for many residents, particularly or low and moderate income households.

Increased Post-Conversion Energy Costs

In conversations with residents, another frequently cited concern is increased energy costs post-conversion. Although residents will have substantially reduced or entirely eliminated natural gas bills following heat pump conversion, recent increases in electric rates do not assure monthly savings. Indeed, as a result of the 2023 rate case, NYSEG electric customers were projected to pay an average of $30 more for electricity per month, compared to an average increase of only $11 per month for gas. Residents who have converted to heat pumps have seen increased electrical usage, even accounting for the relative efficiency of heat pumps versus electric resistance heating, and therefore increased costs.

In recent months, several residents of Tompkins County have reached out to CCE Tompkins for assistance, including those referred by local elected officials who have fielded similar calls, underscoring the widespread nature of this phenomenon. NYSEG has confirmed the increase in electric supply costs this winter at recent [Community Connections] events held statewide. Ratepayers did, in general, pay much more in recent months for electricity than they have in recent years.

Although we have found that there is community interest in switching from natural gas to electric heat pumps, the upfront installation expenses and ongoing electric utility costs are a significant barrier to many households. It is our observation that the transition away from natural gas would be more strongly facilitated by (1) increased incentive amounts available to customers and (2) post-conversion utility cost relief.

Lansing, New York is among the first municipalities in the state to tackle the transition from natural gas to electric head on, particularly since the declaration of a natural gas moratorium in 2017. The successes and challenges of the Lansing NPA program therefore offer valuable insight into the future gas decommissioning work, and we hope that the concerns raised here will be taken into consideration.

Sincerely,

Chris Skawski
Energy and Climate Change Team Lead

Appendix C: NYSEG and RG&E Customer Outreach Programs

Promotion of the large suite of Energy Efficiency programs is widespread across various channels and outlets. Bill inserts, company websites and customer newsletters *EnergyLines* (included with customer bills) promote the programs, and we continue targeted direct program communications such as direct mail, paid digital ads and email campaigns. In 2024, dozens of targeted email campaigns were deployed throughout the calendar year for both Companies promoting energy efficiency programs, including New York State Clean Heat, Home Insulation and Air Sealing, Retail Products, Residential Rebates, Multifamily, EmPower+, AMEEP, Smart Solutions, Commercial and Industrial Rebates, Small Business, Commercial Instant Discount, Energy Management Partnership and Retrocommissioning.

Energy Efficiency has a team of Programs and Products Managers and Energy Specialists located across the Companies' service area who conduct outreach with customers and vendors on energy efficiency programs, both residential and non-residential. The business area also engages its vendors to support outreach and education of its programs. In 2024, the Companies advanced important community outreach, participating in more than 100 total community events promoting the programs.

The Companies continue to promote programs with strategic measures, focusing outreach and engagement on making buildings heat pump ready as well as continued emphasis on electrification. Geothermal heat pumps have been and continued to be promoted through bill inserts to residential customers, targeted email communications to customers, contractor communications and through our websites.

SL: Go geothermal and lower your heating costs.

PT: Thousands in instant rebates on installation are available now.

RG&E
An Avangrid company

View email in browser.

Stop burning oil – and money – and get ready for lower heating bills

If your furnace is oil-fueled, you know how that monthly energy bill spikes when the weather gets cold.

Going geothermal allows you to tap into useable energy from the ground around your home, eliminating fossil fuel delivery and usage charges. And you can save on your installation too, with thousands in instant rebates when you upgrade your heating and cooling system with a geothermal heat pump.

So, kick off your geothermal project today – before your bills start heating up.

Find a participating contractor

Enroll in eBill

Never misplace a bill, set payment reminders and view up to 13 months of your previous eBills.

Create a My Account

View and pay your bill, report an outage, submit a meter reading, manage your preferences and more.

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180 South Clinton Avenue, Rochester, NY 14604

SL: Go geothermal and lower your heating costs.

PT: Thousands in instant rebates on installation are available now.

NYSEG
An Avangrid company

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Stop burning oil – and money – and get ready for lower heating bills

If your furnace is oil-fueled, you know how that monthly energy bill spikes when the weather gets cold.

Going geothermal allows you to tap into useable energy from the ground around your home, eliminating fossil fuel delivery and usage charges. And you can save on your installation too, with thousands in instant rebates when you upgrade your heating and cooling system with a geothermal heat pump.

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RG&E
An Avangrid company

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The only good drafts occur in the offseason

Upgrade your home to seal in comfort and savings this winter.

Insulation and air sealing play key roles when it comes to increasing your home's energy efficiency. When you weatherize your home, you can:

- Keep drafts out and comfort in.
- Boost the performance of your home heating system.
- **Save up to 75% on total project costs.**

Get more savings and incentives when you replace your furnace or boiler with a high-efficiency heat pump. Geothermal and air-source heat pumps are smart investments that can keep your home warm all winter long.

Start now. Find out how you can receive thousands of dollars toward your projects when you work with a participating contractor.

Visit rge.com/smartenergy to learn more.

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Know the facts

Why insulate and air seal before installing a heat pump?

- Air sealing will help to fill the cracks and gaps in your foundation, walls, and attic to keep the right consistency of air flowing throughout your home.
- Insulation will help to lock in that air, keeping your home warm in the winter and cool in the summer.
- Insulation and air sealing improvements will enable your installer to use smaller, less expensive equipment because your home will hold the conditioned air more efficiently.

Learn more at rge.com/weatherize.

What is a heat pump and how do they work?

- Simply put, a heat pump is a device that uses electricity to move heat from one place to another.
- A heat pump can be used to heat your home in the winter and cool it in the summer.
- Heat pumps are more energy efficient than traditional heating and cooling systems. They come in a variety of sizes and types, so you're sure to find one that is right for your home.

Learn more at rge.com/heatpumps.

APPENDIX C – NYSEG and RG&E CUSTOMER OUTREACH PROGRAMS

Promotion of the large suite of Energy Efficiency programs is widespread across various channels and outlets. Bill inserts, company websites and customer newsletters *EnergyLines* (included with customer bills) promote the programs, and the Companies continue targeted direct program communications such as direct mail, paid digital ads and email campaigns. In 2024, dozens of targeted email campaigns were deployed throughout the calendar year for both Companies promoting energy efficiency programs, including New York State Clean Heat, Home Insulation and Air Sealing, Retail Products, Residential Rebates, Multifamily, EmPower+, AMEEP, Smart Solutions, Commercial and Industrial Rebates, Small Business, Commercial Instant Discount, Energy Management Partnership and Retrocommissioning.

Energy Efficiency has a team of Programs and Products Managers and Energy Specialists located across the Companies' service area who conduct outreach with customers and vendors on energy efficiency programs, both residential and non-residential. The business area also engages its vendors to support outreach and education of its programs. In 2024, the Companies advanced important community outreach, participating in more than 100 total community events promoting the programs.

The Companies continue to promote programs with strategic measures, focusing outreach and engagement on making buildings heat pump ready as well as continued emphasis on electrification. Geothermal heat pumps have been and continued to be promoted through bill inserts to residential customers, targeted email communications to customers, contractor communications and through our websites.

NYSEG
An Avangrid company

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Get cozy this fall with thousands in rebates* for the all-in-one heating and cooling option

Upgrade that old, inefficient furnace or boiler with clean, energy-saving heat pump technology.

There's a fall chill in the air but with efficient heat pump technology warming your home, you'll stay cozy all season long.

Why choose a heat pump?

- Heating and cooling capabilities for year-round comfort
- Sleek, quiet equipment
- No fossil fuel use or storage
- Cleaner, healthier and safer – no carbon monoxide emissions

Now's the time to upgrade your heating and cooling and get thousands back through available rebates!

Visit nyseg.com/HeatPumps to get started.

**Electric and electric/natural gas combination customers only.*

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Burning oil and money? That's cold.

When you warm up to the idea of geothermal heating, you can cut your monthly oil usage and delivery charges. Plus, geothermal heat pumps offer benefits that go beyond your wallet.

Learn More

Enjoy longevity and increased comfort

With proper maintenance, geothermal heat pumps typically have a longer lifespan than the average traditional heating and cooling system. Plus, they provide reliable, efficient heat – even during frigid New York winters.

Get financial incentives

Have concerns about the upfront costs of installing a geothermal heat pump? We can help you cover installation fees when you work with a participating contractor.
Say so long to high oil costs. Learn more about installing a geothermal heat pump today.

Find a participating contractor

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SL: Can your new home stand up to intense summer heat?

PT: Discover the benefits of a geothermal heat pump.

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Believe in cool, quiet comfort this summer

From grilling out to starting a garden, spending your first summer in a new home is a great feeling. Of course, you want to make sure those warm summer memories stay outdoors while you're keeping cool inside.

With a geothermal heat pump, you can be confident in cool home comfort all summer long. And when you work with a participating contractor, you can get instant discounts on installation costs too.

Learn more

When you choose a geothermal heat pump, you can:

- Equip your new home with the most efficient heating and cooling technology.
- Replace two pieces of traditional equipment with just one system.
- Eliminate the hassle and cost of fossil fuel delivery.
- Take advantage of the 25% increase in rebates available for projects as of March 1.

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P.O. Box 5240, Binghamton, NY 13902-5240

SL: Handle summer heat efficiently in your new home

PT: Geothermal heat pumps help you save even on hot days.

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RG&E
An Avangrid company

Believe in cool, quiet comfort this summer

From grilling out to starting a garden, spending your first summer in a new home is a great feeling. Of course, you want to make sure those warm summer memories stay outdoors while you're keeping cool inside.

With a geothermal heat pump, you can be confident in cool home comfort all summer long. And when you work with a participating contractor, you can get instant discounts on installation costs too.

Learn more

When you choose a geothermal heat pump, you can:

- Equip your new home with the most efficient heating and cooling technology.
- Replace two pieces of traditional equipment with just one system.
- Eliminate the hassle and cost of fossil fuel delivery.
- Take advantage of our rebates and incentives on your new energy efficient equipment.

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Appendix D: Stakeholder Input Outside Order Scope

APPENDIX D – STAKEHOLDER INPUT OUTSIDE ORDER SCOPE

Input and suggestions received during the Technical Conferences that are appreciated and better suited for other dockets, are policy related, or beyond the scope for Strategic Decommissioning of Gas Segments relative to this Order are:

- Develop criteria for more UTENs and/or expand existing UTENs, recognizing a role of UTENs in reducing electric load
- Add maps to NYS Integrated Energy Data Resource maps with LPP and electric capacity (critical infrastructure information which cannot be publicly shared)
- Share information with interested parties via NDA
- Removal of obligation to serve and 100' foot rule
- Decommissioned areas be permanently removed from areas authorized to receive gas service
- Non-optional reductions in gas service with 5-10 years notice to customers
- New electric rates for customers that electrify, requested by multiple Stakeholders (i.e. affordability, 6% of income energy price cap, winter rates)
- Pilot of Low-Income Customer cap on maximum electric bill
- Offer bill credits as National Grid's joint proposal does for participants in non-pipe alternatives to reduce electricity costs
- Offer demand-based rates
- Consider a pilot program as Tompkins County has to provide induction cooktops to residents to try induction cooking versus gas
- If segment is not fully depreciated when decommissioned, depreciate it upon decommissioning/abandonment
- 2-3 year contract with people to convert heat pumps and keep gas during transition