

October 31, 2024

Hon. Michelle Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Case No. 20-M-0082 - Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data.

Dear Secretary Phillips:

Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, KeySpan Gas East Corporation d/b/a National Grid, The Brooklyn Union Gas Company d/b/a National Grid NY, Orange and Rockland Utilities, Inc., Rochester Gas and Electric Corporation, and National Fuel Gas Distribution Corporation (collectively, the “Joint Utilities”) respectfully seek clarification on the New York State Public Service Commission’s (“Commission”) Order Approving Integrated Energy Data Resource Phase 2 Budgets, issued on January 19, 2024, in the above referenced proceeding (the “Order”). The Joint Utilities are seeking clarification regarding the specific collection amounts for each utility and the time period over which the collections shall occur for New York State Energy Resource and Development Authority (“NYSERDA”) related costs for Phase 2 of the Integrated Energy Data Resource (“IEDR”). The Joint Utilities hereby request the Commission provide clarification on the items identified below.

Collection Amounts

The Order provided the total collection amount for Phase 2 of the IEDR¹, however, it did not specify the amounts that each utility shall collect from customers to pay NYSERDA for Phase 2 IEDR costs through the existing Bill-As-You-Go (“BAYG”) methodology. Appendix B of the Order specified percentage cost allocations based on calendar year 2022 annual delivery service load in MWh to be used for the allocation of Phase 2 IEDR costs.² For Phase 1, the NYSERDA Amended Implementation Plan, filed September 15, 2021, under the above referenced proceeding, specified the total dollar amounts allocated to each utility, LIPA, and NYPA, for collection.³ The Joint Utilities request that the Commission allow the allocation percentages set forth in the Amended Implementation Plan to continue and provide the allocated dollar amounts by utility, LIPA, and NYPA for the Phase 2 IEDR costs.

Collection Schedule and Timeframe

The Order also did not specify a collection schedule for the Phase 2 IEDR costs or a timeframe for the collection. Without this information, the Joint Utilities would be left to make their own assumptions for the time period over which to collect their allocated amount for IEDR Phase 2. The Joint Utilities request that the Commission provide a collection schedule and timeframe for the IEDR Phase 2 costs, consistent with Phase 1.

Please feel free to contact me at mseeley@nyseg.com if you have any questions.

Respectfully submitted on behalf of the Joint Utilities,



Jeffrey A. Rosenbloom

¹ Order at 6.

² Order at 26.

³ Amended Implementation Plan at 15.