

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

In the Matter of Distributed System	)	Case 16-M-0411
Implementation Plans	)	
Proceeding on Motion of the Commission in	)	Case 14-M-0101
Regard to Reforming the Energy Vision	)	

**PETITION OF THE JOINT UTILITIES OF NEW YORK TO MODIFY THE  
DISTRIBUTED SYSTEM IMPLEMENTATION PLAN FILING CADENCE**

**INTRODUCTION**

The Joint Utilities<sup>1</sup> respectfully petition the New York Public Service Commission (“Commission”) for an order resetting the cadence for their respective Distributed System Implementation Plan (“DSIP”) filings. If approved, this reset will result in the Joint Utilities’ next DSIP filings being due by June 30, 2027, with subsequent updated DSIP filings being due every two years thereafter. As discussed below, this revised filing cadence will allow for more meaningful DSIP updates aligned with the Grid of the Future Proceeding, enhance stakeholder involvement, and avoid unnecessary costs.

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<sup>1</sup> The Joint Utilities are 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, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

## I. BACKGROUND

On April 20, 2016, the Commission issued its Order Adopting Distributed System Implementation Plan Guidance,<sup>2</sup> which directed the Joint Utilities to file individual DSIP updates and Benefit-Cost Analysis Handbook updates on a biennial basis (collectively, “DSIP Updates”). On October 13, 2022, the Secretary to the Commission granted an extension until June 30, 2023, for the Joint Utilities to file their respective 2022 DSIP Updates.<sup>3</sup> On January 19, 2024, the Secretary confirmed that said extension was limited to the due date for the 2022 DSIP Updates and that, pursuant to the schedule established by the Commission in the REV Proceeding, the next DSIP Updates filing date remained June 30, 2024.<sup>4</sup>

On February 5, 2024, the Joint Utilities filed a letter with the Secretary requesting an extension of time so that their next individual DSIP Updates would be due by June 30, 2025. On February 7, 2024, the Secretary granted the Joint Utilities’ extension request (“February 2024 Extension”) but did not modify the filing cadence for future DSIPs and instead, acknowledged that the Joint Utilities would seek a permanent reset of the filing cadence from the Commission following the filing of the DSIP updates.<sup>5</sup> The Joint Utilities then filed their individual DSIP Updates by June 30, 2025 and the next DSIP Updates are due by June 30, 2026.

By this petition, the Joint Utilities request the Commission reset the schedule for the filing of future DSIP Updates. Specifically, the Joint Utilities request that the next DSIP Update

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<sup>2</sup> Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision* (“REV Proceeding”), Order Adopting Distributed System Implementation Plan Guidance (issued April 20, 2016) (“DSIP Order”).

<sup>3</sup> REV Proceeding *et al.*, Ruling on Extension Request (issued October 13, 2022).

<sup>4</sup> REV Proceeding *et al.*, Letter from Secretary Phillips to Nikolai Albert T.M. Wolfe Confirming Filing Date (January 19, 2024).

<sup>5</sup> REV Proceeding *et al.*, Ruling on Extension Request (issued February 7, 2024).

be due by June 30, 2027, rather than June 30, 2026. If approved, subsequent DSIP Updates would be due thereafter on the same two-year cadence as set forth in the DSIP Order.

**II. RESETTING THE CADENCE OF DSIP UPDATES IS CONSISTENT WITH THE GOALS OF THE DSIP ORDER, ALLOWS FOR MORE MEANINGFUL DSIP UPDATES AND ENHANCED STAKEHOLDER INVOLVEMENT, AND AVOIDS UNNECESSARY COSTS**

The DSIP Order addressed the purpose of the Joint Utilities’ individual DSIP-related filings.<sup>6</sup> These DSIP filings require utilities to describe and analyze certain specified processes and data related to distribution system planning and distribution grid operations that account for distributed energy resources (“DERs”). The DSIP filings also report utility progress since the last DSIP filings along with capabilities that will be necessary, both current and planned, to support robust and liquid retail markets. The development of DSIP filings incorporates a robust stakeholder engagement process to facilitate open and effective communication.

Under the current schedule, the next DSIP Update is due by June 30, 2026, one year after the Joint Utilities’ most recent individual DSIP Updates. Requiring individual DSIP Updates within one year, rather than the two-year period contemplated by the DSIP Order, will not allow for the detailed review and analysis and robust stakeholder engagement envisioned by the DSIP Order.

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<sup>6</sup> Rev Proceeding, DSIP Order, p. 3.

This shortened timeline will also preclude thoughtful incorporation of guidance and requirements from the Commission’s Grid of the Future Proceeding.<sup>7</sup> In the Grid of the Future Order, the Commission directed Department of Public Service Staff (“Staff”) to complete a first iteration of the Grid of the Future Plan (“Plan”) and, after considering stakeholder feedback, complete an update to the Plan, which is due no later than June 30, 2026.<sup>8</sup> The Grid of the Future Order requires the Plan to “recommend new and/or revised requirements for future DSIP content and the DSIP process to better align with the grid’s evolving needs”<sup>9</sup> and states that the Plan should “recommend an improved framework for engaging stakeholders in the development and review of future DSIPs.”<sup>10</sup> Resetting the cadence such that the next individual DSIPs are due June 30, 2027, would allow the Joint Utilities to incorporate new guidance and requirements in accordance with the updated Grid of the Future Plan, and accordingly update the individual DSIPs in a manner that fosters meaningful stakeholder input.

Finally, by granting this petition, the Commission will allow the Joint Utilities to avoid the considerable expense of developing individual DSIP Updates that will be largely outdated not long after they are filed. Given the current and very appropriate focus on affordable electric utility rates in New York State, avoiding unnecessary expenses is an important consideration.

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<sup>7</sup> Case 24-E-0165, *Proceeding on Motion of the Commission Regarding the Grid of the Future* (“Grid of the Future Proceeding”), Order Instituting Proceeding (issued April 18, 2024) (“Grid of the Future Order”).

<sup>8</sup> Grid of the Future Proceeding, Grid of the Future Order, p. 14; Grid of the Future Proceeding, Ruling on Extension Request (issued November 19, 2025).

<sup>9</sup> Grid of the Future Proceeding, Grid of the Future Order, p.16.

<sup>10</sup> *Id.*

### **III. CONCLUSION**

The Joint Utilities respectfully request that the Commission reset the DSIP Update filing schedule by issuing an order stating that the next DSIP Update will be due by June 30, 2027, rather than June 30, 2026, and that subsequent DSIP Updates will be due every two years thereafter. This adjustment will facilitate the effective integration of forthcoming regulatory guidance, enhance the quality of stakeholder engagement, and allow DSIP Update filings to provide maximum value to the Commission, stakeholders, and customers.

Dated: December 5, 2025

Respectfully submitted,

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