
Modernized Gas Planning Process: Costs of Extending Service to New Customers

Jointly Filed By:

Central Hudson Gas & Electric Corporation

Consolidated Edison Company of New York, Inc.

Corning Natural Gas Corporation

Liberty Utilities (St. Lawrence Gas) Corp.

The Brooklyn Union Gas Company, KeySpan Gas East Corporation, and Niagara
Mohawk Power Corporation, which together d/b/a National Grid

National Fuel Gas Distribution Corporation

New York State Electric & Gas Corporation

Orange and Rockland Utilities, Inc.

Rochester Gas and Electric Corporation

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Case 20-G-0131

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Proceeding on the Motion of the)
Commission in Regard to Gas)
Planning Procedures)

Case 20-G-0131

**MODERNIZED GAS PLANNING PROCESS: COSTS OF EXTENDING SERVICE TO
NEW CUSTOMERS**

This filing follows the directive set out by the New York Public Service Commission in its May 12 Order¹ in this proceeding calling on each of the New York Local Distribution Companies (LDCs) to provide within 90 days a report on costs of extending service to new customers, pursuant to 16 New York Codes, Rules and Regulations (NYCRR) Part 230². Part 230 sets forth the rights, requirements, and responsibilities of the LDCs and applicants for gas service, including the provision of some amount of main and/or service line extension at no direct cost to the applicant. This requirement, often referred to as the “100-foot rule” provides that residential heating customers are entitled up to 100 feet of natural gas service line and up to 100 feet of main extension, while non-residential customers are entitled up to 100 feet of main any portion of their service line which lies within the public right-of-way.

The Joint LDCs understand that new customers connected in accordance with the 100-foot rule is consistent with each company’s obligation under the Public Service Law³ to provide safe and reliable service to all interested parties within LDC service territory. This responsibility applies specifically to new service line extensions and also aligns with the broad principles of residential gas, electric and steam service policy that continued provision of “*service to all residential customers without unreasonable qualifications or lengthy delays is necessary for the*

¹ State of New York Public Service Commission Order Adopting Gas System Planning Process in Case 20-G-0131, issued and effective May 12, 2022 (the “Order”)

² Order, Ordering Clause No. 16.

³ Public Service Law § 31(4) provides that for “a building which is not supplied with electricity or gas, a utility corporation or municipality shall be obligated to provide service to such a building, provided however, that the commission may require applicants for service to buildings located in excess of one hundred feet from gas or electric transmission lines to pay or agree in writing to pay material and installation costs relating to the applicant's proportion of the pipe, conduit, duct or wire, or other facilities to be installed.”

preservation of health and general welfare and is in the public interest.”⁴ This commitment remains at the forefront of LDC operations and efforts to provide service to new customers.

The Commission Order in this proceeding requests that each LDC file a report on the costs of the 100-foot rule over a five-year historical period, from 2017-2021.⁵ This filing includes the following detail provided individually from each company by year, as requested:

- the number of natural gas service lines installed for new customers
- the average length of new service lines, broken down by residential⁶ and non-residential customers
- the average per foot cost of installation for residential and non-residential natural gas service lines
- the number of new customers attached each year distinguishing between residential and non-residential customers
- the annual dekatherm load represented by customer additions⁷

Responses including this information are provided for each company in Table 1 (a –h) below.

The Joint LDCs are also providing additional information related to customer type and the components of the average cost per foot of installation. To the extent possible, the Joint LDCs have made high-level notations of the components included in their blended costs, footnoted under their respective tables. However, the Joint LDCs are unable to provide detailed information regarding the “average” customer, due to the variables associated with each customer installation and the nature of many of our respective contracts for restoration and materials (*e.g.*, piping) which are not specific to a customer type.

⁴ Public Service Law § 30.

⁵ The LDCs were impacted in varying degrees by the COVID-19 pandemic and related pauses on non-essential work, including certain new customer connections. As a result, the data presented here for 2020 and beyond may include trends that are anomalous with previous company results and should be considered accordingly.

⁶ Most residential service installations are for residential heating customers, though residential non-heating customers are also included.

⁷ Load increase for new customers may not reflect full customer contribution in future years given connections occurred throughout the year.

Table 1.a: Central Hudson Gas & Electric Corporation - Costs of Extending Service to New Customers⁸

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	780	781	697	619	649
Average length of new service lines - services (ft)	77	73	69	70	71
Average length of new service lines - gas main extensions (ft)	209	169	112	204	69
Average per foot cost of installation - services (\$, company)	90	89	96	135	133
Average per foot cost of installation - gas main extensions (\$, company)	144	152	493	149	329
New customers attached	1,136	1,175	1,328	1,053	934
Load increase associated with customer additions (Dth)	734,532	836,885	611,860	434,599	521,120
Non-Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	137	129	134	143	165
Average length of new service lines - services (ft)	103	76	118	76	70
Average length of new service lines - gas main extensions (ft)	184	213	248	161	225
Average per foot cost of installation - services (\$, company)	144	250	202	139	143
Average per foot cost of installation - gas main extensions (\$, company)	250	218	370	287	535
New customers attached	180	152	177	131	106
Load increase associated with customer additions (Dth)	852,729	784,291	832,125	408,268	476,572

⁸ Blended cost components for customer installations. Average cost per foot is not widely impacted by geographic location within the territory. Other localized factors such as rock, state roads, and unforeseen circumstances may alter the cost of the project. Meters and meter installations are not included in the average cost per foot and are reported separately.

Labor (Labor, excavation, restoration and permitting) account for more than 65% of the average cost per foot. The remaining components include Overheads (Engineering, Construction oversight, payroll, pension, taxes, and administrative work), Materials, and Compliance.

Table 1.b: Consolidated Edison Company of New York, Inc. - Costs of Extending Service to New Customers⁹

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	1,690	1,831	1,840	1,243	1,231
Average length of new service lines - services (ft)	50	49	47	49	43
Average length of new service lines - gas main extensions (ft)	27	18	13	18	14
Average per foot cost of installation - services (\$, company)	545	495	502	529	710
Average per foot cost of installation - gas main extensions (\$, company)	644	750	874	810	927
New customers attached ¹⁰	2,743	3,032	2,460	1,604	1,427
Load increase associated with customer additions (Dth)	1,591,976	1,495,266	1,279,613	672,665	749,496
Non-Residential¹¹	2017	2018	2019	2020	2021
Gas service lines installed for new customers	872	869	1003	805	603
Average length of new service lines - services (ft)	--	--	--	--	--
Average length of new service lines - gas main extensions (ft)	--	--	--	--	--
Average per foot cost of installation - services (\$, company)	--	--	--	--	--
Average per foot cost of installation - gas main extensions (\$, company)	--	--	--	--	--
New customers attached	1,487	1,463	1,426	1,040	691
Load increase associated with customer additions (Dth)	6,606,052	6,309,218	4,965,628	2,796,326	2,527,055

⁹ Blended cost components for customer installations. Average cost per foot varies by NYC and Westchester (the average cost per foot is ~60 percent cheaper in Westchester County). Meters and meter installations are not included in the average cost per foot and are reportedly separately.

Labor (Labor, excavation, restoration and permitting) account for more than 60% of the average cost per foot. The remaining components include Overheads (Engineering, Construction oversight, payroll, pension, taxes, and administrative work), Materials, and Compliance.

¹⁰ Count of new customers attached match number of Gas service lines installed and customers who required only new metering

¹¹ Con Edison data for average length and per foot costs does not distinguish residential vs. non-residential customers and there are very few residential non-heating customers attached to the system

Table 1.c: Corning Natural Gas Corporation - Costs of Extending Service to New Customers¹²

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	74	33	50	31	20
Average length of new service lines - services (ft)	79	131	89	134	215
Average length of new service lines - gas main extensions (ft)	-	-	-	67	-
Average per foot cost of installation - services (\$, company)	49	49	49	49	49
Average per foot cost of installation - gas main extensions (\$, company)	39	39	39	39	39
New customers attached	129	44	41	132	60
Load increase associated with customer additions (Dth)	5,911	4,239	8,069	4,809	2,591
Non-Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	17	13	11	13	10
Average length of new service lines - services (ft)	64	105	134	145	258
Average length of new service lines - gas main extensions (ft)	-	-	-	30	-
Average per foot cost of installation - services (\$, company)	49	49	49	49	49
Average per foot cost of installation - gas main extensions (\$, company)	39	39	39	39	39
New customers attached	17	9	27	10	7
Load increase associated with customer additions (Dth)	9,001	15,654	2,151	1,982	978

¹² The costs presented in the attachment include categories such as labor, materials, transportation, and overheads. These costs are inclusive of, but do not separately identify, line items for landscaping, paving, and other costs required to provide gas service because Corning Natural Gas Corporation does not separately track or report on those items. Meters and meter installations are not included in the average cost per foot and are reported separately.

Table 1.d: Liberty Utilities (St. Lawrence Gas) Corp. - Costs of Extending Service to New Customers¹³

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	93	99	84	62	111
Average length of new service lines - services (ft)	297	317	339	387	105
Average length of new service lines - gas main extensions (ft)	179	511	610	1,033	173
Average per foot cost of installation - services (\$, company)	31	47	33	35	86
Average per foot cost of installation - gas main extensions (\$, company)	41	51	201	68	53
New customers attached	93	99	84	62	111
Load increase associated with customer additions (Dth)	10,044	10,692	9,072	6,696	11,988
Non-Residential¹⁴	2017	2018	2019	2020	2021
Gas service lines installed for new customers	20	22	19	25	33
Average length of new service lines - services (ft)	--	--	--	--	--
Average length of new service lines - gas main extensions (ft)	--	--	--	--	--
Average per foot cost of installation - services (\$, company)	--	--	--	--	--
Average per foot cost of installation - gas main extensions (\$, company)	--	--	--	--	--
New customers attached	20	22	19	25	33
Load increase associated with customer additions (Dth)	5,250	7,350	5,500	17,894	16,366

¹³ Blended cost components for customer installations contain both Legacy and Expansion Area costs. Outliers and special projects have been removed from the average cost calculations. Average cost per foot is not widely impacted by geographic location within the territory. Other localized factors such as rock, state roads, and unforeseen circumstances may alter the cost of the project. Meters and meter installations are not included in the average cost per foot and are reported separately. Labor (Labor, excavation, restoration and permitting) account for 12% of the average cost per foot. The remaining components include Overheads (Inventory, Fleet, Labor, Corporate, Supervisory, Time not worked) Contractors, Heavy Work Equipment usage and Materials).

¹⁴ Liberty - SLG does not currently have a cost breakdown for Residential vs. Commercial costs The vast majority is to be assumed Residential.

Count of new customers attached match number of gas service lines installed and customers who required only new metering. Residential annual load represented by heating customers using an average of 108 DTH.

Table 1.e.1: KeySpan Energy Delivery New York (KEDNY) d/b/a National Grid - Costs of Extending Service to New Customers¹⁵

<u>Residential</u>	2017	2018	2019	2020	2021
Gas service lines installed for new customers	1,069	1,312	1,085	1,169	1,356
Average length of new service lines - services (ft)	48	48	46	46	46
Average length of new service lines - gas main extensions (ft)	254	301	207	341	142
Average per foot cost of installation - services (\$, company)	250	306	339	358	370
Average per foot cost of installation - gas main extensions (\$, company)	345	440	518	357	675
New customers attached	6,632	6,924	5,810	4,553	6,111
Load increase associated with customer additions (Dth)	793,850	796,952	684,418	537,709	703,987
<u>Non-Residential</u>	2017	2018	2019	2020	2021
Gas service lines installed for new customers	604	756	599	539	496
Average length of new service lines - services (ft)	40	54	39	53	43
Average length of new service lines - gas main extensions (ft)	346	436	398	382	306
Average per foot cost of installation - services (\$, company)	573	484	590	554	644
Average per foot cost of installation - gas main extensions (\$, company)	505	631	749	739	956
New customers attached	904	856	646	450	913
Load increase associated with customer additions (Dth)	560,668	533,836	430,742	305,082	553,564

¹⁵ The costs presented in the attachment include categories such as labor, materials, transportation, and overheads. These costs are inclusive of, but do not separately identify, line items for landscaping, paving, and other costs required to provide gas service because the Companies do not separately track or report on those items. Meters and meter installations are not included in the average cost per foot and are reported separately.

Table 1.e.2: KeySpan Energy Delivery Long Island (KEDLI) d/b/a National Grid - Costs of Extending Service to New Customers¹⁶

<u>Residential</u>	2017	2018	2019	2020	2021
Gas service lines installed for new customers	4,472	6,171	4,080	4,345	5,417
Average length of new service lines - services (ft)	74	77	78	77	81
Average length of new service lines - gas main extensions (ft)	286	313	318	252	235
Average per foot cost of installation - services (\$, company)	57	56	52	67	67
Average per foot cost of installation - gas main extensions (\$, company)	88	100	103	109	135
New customers attached	7,214	6,498	6,878	4,966	5,189
Load increase associated with customer additions (Dth)	879,386	773,911	833,613	621,246	628,906
<u>Non-Residential</u>	2017	2018	2019	2020	2021
Gas service lines installed for new customers	328	478	373	332	336
Average length of new service lines - services (ft)	142	113	118	110	142
Average length of new service lines - gas main extensions (ft)	726	536	481	518	583
Average per foot cost of installation - services (\$, company)	75	73	72	82	82
Average per foot cost of installation - gas main extensions (\$, company)	189	154	320	189	307
New customers attached	802	722	680	522	391
Load increase associated with customer additions (Dth)	520,603	473,701	448,901	341,337	265,197

¹⁶ The costs presented in the attachment include categories such as labor, materials, transportation, and overheads. These costs are inclusive of, but do not separately identify, line items for landscaping, paving, and other costs required to provide gas service because the Companies do not separately track or report on those items. Meters and meter installations are not included in the average cost per foot and are reported separately.

Table 1.e.3: Niagara Mohawk Power Corporation d/b/a National Grid - Costs of Extending Service to New Customers¹⁷

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	2,798	2,664	2,438	2,254	2,164
Average length of new service lines - services (ft)	75	75	73	75	74
Average length of new service lines - gas main extensions (ft)	1,068	980	995	786	1,079
Average per foot cost of installation - services (\$, company)	45	44	41	47	53
Average per foot cost of installation - gas main extensions (\$, company)	40	35	42	46	51
New customers attached	5,708	5,728	5,120	4,801	4,588
Load increase associated with customer additions (Dth)	555,388	544,732	507,904	470,498	433,566
Non-Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	304	282	243	224	236
Average length of new service lines - services (ft)	111	115	121	142	116
Average length of new service lines - gas main extensions (ft)	458	532	679	785	1,219
Average per foot cost of installation - services (\$, company)	51	58	39	42	54
Average per foot cost of installation - gas main extensions (\$, company)	56	54	50	171	68
New customers attached	620	606	510	477	500
Load increase associated with customer additions (Dth)	361,150	352,025	306,816	276,516	289,300

¹⁷ The costs presented in the attachment include categories such as labor, materials, transportation, and overheads. These costs are inclusive of, but do not separately identify, line items for landscaping, paving, and other costs required to provide gas service because the Companies do not separately track or report on those items. Meters and meter installations are not included in the average cost per foot and are reported separately.

Table 1.f: National Fuel Gas Distribution Corporation - Costs of Extending Service to New Customers¹⁸

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	1,709	1,721	1,728	1,353	1,637
Average length of new service lines - services (ft)	85	75	86	87	84
Average length of new service lines - gas main extensions (ft)	115	117	126	145	151
Average per foot cost of installation - services (\$, company)	17	16	15	21	18
Average per foot cost of installation - gas main extensions (\$, company)	17	18	20	22	28
New customers attached	2,507	2,241	2,269	1,981	2,097
Load increase associated with customer additions (Dth)	43,489	46,619	45,752	41,354	43,784
Non-Residential¹⁹	2017	2018	2019	2020	2021
Gas service lines installed for new customers	198	197	237	163	181
Average length of new service lines - services (ft)	131	125	139	130	139
Average length of new service lines - gas main extensions (ft)	155	79	95	124	98
Average per foot cost of installation - services (\$, company)	-	-	-	-	-
Average per foot cost of installation - gas main extensions (\$, company)	-	-	-	-	-
New customers attached	576	484	564	442	360
Load increase associated with customer additions (Dth)	451,489	29,616	45,005	38,128	70,723

¹⁸ Blended cost components for customer installations. Restoration is not included in the per foot cost of service lines. The customer or applicant is financially responsible for their private property restoration. Labor (excavation, restoration and permitting) accounts for more than 75% of the average cost per foot. The remaining components include Overheads (engineering, construction oversight, payroll, pension, taxes, and administrative work), materials, and compliance.

¹⁹ National Fuel data for per foot costs does not distinguish residential vs. non-residential customers and there are very few residential non-heating customers attached to the system.

Table 1.g.1: New York State Electric & Gas Corporation - Costs of Extending Service to New Customers²⁰

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	911	992	833	764	710
Average length of new service lines - services (ft)	71	86	101	104	98
Average length of new service lines - gas main extensions (ft)	n/a	n/a	n/a	n/a	n/a
Average per foot cost of installation - services (\$, company)	65	61	59	69	89
Average per foot cost of installation - gas main extensions (\$, company)	n/a	n/a	n/a	n/a	n/a
New customers attached	n/a	3,098	3,022	1,915	1,920
Load increase associated with customer additions (Dth)	n/a	805,376	873,404	502,311	55,080
Non-Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	183	176	145	122	133
Average length of new service lines - services (ft)	128	129	188	196	159
Average length of new service lines - gas main extensions (ft)	n/a	n/a	n/a	n/a	n/a
Average per foot cost of installation - services (\$, company)	131	108	60	74	400
Average per foot cost of installation - gas main extensions (\$, company)	n/a	n/a	n/a	n/a	n/a
New customers attached	n/a	624	651	466	316
Load increase associated with customer additions (Dth)	n/a	1,553,725	144,703	1,338,256	1,198,045

²⁰ Average cost per foot varies within the NYSEG gas territory. The data provided is the average across the NYSEG territory. Meters and meter installations are not included in the average cost per foot. Internal labor accounts for an approximate average of 51% of the average cost per foot and external (Contractors, restoration) account for 41% of the average cost per foot. The remaining components include materials and AFUDC/Other. account for 8% of the cost.

New customers are defined by taking a new installation with a new contract for gas.

Table 1.g.2: Rochester Gas and Electric Corporation - Costs of Extending Service to New Customers²¹

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	1,234	1,261	1,060	951	1,138
Average length of new service lines - services (ft)	50	48	82	81	67
Average length of new service lines - gas main extensions (ft)	n/a	n/a	n/a	n/a	n/a
Average per foot cost of installation - services (\$, company)	24	21	24	23	30
Average per foot cost of installation - gas main extensions (\$, company)	n/a	n/a	n/a	n/a	n/a
New customers attached	n/a	2,844	2,847	1,893	2,069
Load increase associated with customer additions (Dth)	n/a	816,160	189,913	566,567	627,861
Non-Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	148	167	129	111	97
Average length of new service lines - services (ft)	50	82	187	199	186
Average length of new service lines - gas main extensions (ft)	n/a	n/a	n/a	n/a	n/a
Average per foot cost of installation - services (\$, company)	47	33	44	49	36
Average per foot cost of installation - gas main extensions (\$, company)	n/a	n/a	n/a	n/a	n/a
New customers attached	n/a	1,641	1,511	1,288	1,511
Load increase associated with customer additions (Dth)	n/a	3,602,926	1,719,103	2,783,634	4,587,337

²¹ Average cost per foot varies within the RGE gas territory. The data provided is the average across the RGE territory. Meters and meter installations are not included in the average cost per foot. Internal labor accounts for an approximate average of 10% of the average cost per foot and external (Contractors, restoration) account for 74% of the average cost per foot. The remaining components include materials and AFUDC/Other. account for approximately 16% of the cost.

New customers are defined by taking a new installation with a new contract for gas.

Table 1.h: Orange and Rockland Utilities, Inc. - Costs of Extending Service to New Customers²²

Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	899	825	1,002	975	1,167
Average length of new service lines - services (ft)	65	65	65	65	65
Average length of new service lines - gas main extensions (ft)	n/a	n/a	n/a	n/a	n/a
Average per foot cost of installation - services (\$, company)	57	58	59	59	59
Average per foot cost of installation - gas main extensions (\$, company)	n/a	n/a	n/a	n/a	n/a
New customers attached	817	1,219	1,196	1,228	1,074
Load increase associated with customer additions (Dth)	1 MDt/day	1 MDt/day	1 MDt/day	1 MDt/day	1 MDt/day
Non-Residential	2017	2018	2019	2020	2021
Gas service lines installed for new customers	179	196	164	181	160
Average length of new service lines - services (ft)	166	142	162	142	146
Average length of new service lines - gas main extensions (ft)	n/a	n/a	n/a	n/a	n/a
Average per foot cost of installation - services (\$, company)	40	41	41	43	48
Average per foot cost of installation - gas main extensions (\$, company)	n/a	n/a	n/a	n/a	n/a
New customers attached	16	43	10	31	34
Load increase associated with customer additions (Dth)	1 MDt/day	1 MDt/day	1 MDt/day	1 MDt/day	1 MDt/day

²² Blended cost components for customer installations. Average cost per foot is not widely impacted by geographic location within the territory. Other localized factors such as rock, state roads, and unforeseen circumstances may alter the cost of the project. Meters and meter installations are not included in the average cost per foot and are reported separately.

Labor (Labor, excavation, restoration and permitting) account for more than 65% of the average cost per foot. The remaining components include Overheads (Engineering, Construction oversight, payroll, pension, taxes, and administrative work), Materials, and Compliance.

Dated: August 10, 2022

Respectfully submitted,

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