

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

Requesting Party: Roger Caiazza

Request No.: NYRC-1053 (RC-1)

Date of Request: August 29, 2025

Response Due Date: September 8, 2025

Date of Reply: September 8, 2025

Witness: Sean Sullivan, Patrick Fox, Brian Jacobs, Scott Bochenek,
Timothy Lynch

Panel: Climate Action Panel

Subject:

Question: GHG Emission Reductions/CLCPA Panel

1. What are the rate year costs associated with the projects, programs and initiatives the Companies are proposing in these rate cases for GHG Emission reduction projects listed in the CLCPA Panel Exhibit___(CAP-2)?
2. On page 30 of the CLCPA Panel Testimony the GHG emission reduction projections are listed as lifetime savings. What are the annual expected GHG emission reductions for each rate year?

The following questions are in regard to the references in CLCPA Panel Exhibit___(CAP-2) tables of Estimated Lifetime Emissions Reduction by Rate Year for the companies.

3. For reference 2 what is the forecasted incremental EV adoption rate and the estimated lifetime emissions savings for each EV.
4. For reference 3 what is the forecasted incremental annual solar PV adoption and the NYS marginal generation emissions factor. Did you use the statewide factor or an Upstate New York that excludes NYCA zones J and K?

Response:

1. From the five identified sources of emission reduction only two have specific rate year costs proposed in this case. These include Gas Capital Project and Gas Procurement.

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The information in Exhibit_CAP-2 is the net impact of all Gas Projects and Programs. Gas Programs and Projects increase or decrease GHG emissions as detailed in Exhibit_(GCE-14). The rate year costs associated with the Projects and Programs contained in NYRC-1055 (RC-3) are the subset of projects from Exhibit_(GCE-14) that reduce GHG emissions. For Gas Capital Projects, the rate year, and subsequent annual costs for projects that reduce GHG emissions are as follows:

NYSEG

RY1: \$51,153,000
RY2: \$53,423,000
RY3: \$66,550,000
RY4: \$74,173,000
RY5: \$77,740,000

RG&E

RY1: \$52,095,000
RY2: \$51,048,000
RY3: \$45,569,000
RY4: \$84,918,000
RY5: \$55,101,000

For Gas Procurement, the proposed GHG emission reduction initiatives include costs split between two procurement functions:

- Certified (Differentiated) Natural Gas Certificates

Outlined in the Electric and Gas Supply and Interconnections Panel, each Operating Company proposes to purchase \$300,000 annually on Certified Natural Gas certificates. These certificates, also known as Differentiated Natural Gas certificates are priced at an average purchase price of \$0.0225 per certificate, corresponding to a total annual procurement volume of approximately 13.33 million dekatherms (Dths) per Operating Company. GHG emission reductions are calculated based on this volume.

- Renewable Natural Gas (RNG) Certificates – NYSEG Only

NYSEG also requested approval to purchase Renewable Natural Gas, or “RNG”, certificates for all rate years, with the following volumes:

- Rate Year 1: 200,000 certificates
- Rate Year 2: 220,000 certificates

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- Rate Year 3: 245,000 certificates
- Rate Year 4: 270,000 certificates
- Rate Year 5: 300,000 certificates

The RNG GHG emission reduction calculations outlined above were based the assumption of one certificate being one dekatherm equivalent. Unlike the Differentiated Natural Gas proposal, NYSEG has requested approval to purchase “up to” the volumes outlined, leaving the costs open ended dependent on the market. Since RG&E does not currently procure any RNG within their portfolio, there is no request for RG&E to procure RNG certificates.

- Cost Recovery:

All costs associated with both Differentiated and the procurement of RNG certificates procurement will be recovered through the Companies’ respective Gas Supply Charge (GSC) mechanism.

2. Annual GHG emissions reduction by rate year was provided in response to NYRC-0402-DPS-377.
3. Forecasted incremental EV adoption rate and lifetime emissions savings for each EV are included in Clean Energy Implementation Panel Exhibit_(CEI-6).
4. Forecasted incremental annual solar PV adoption and the marginal emissions factor are included in Electric and Gas Supply and Interconnections Panel Exhibit_(EGSIP-11). This is a state-wide emissions factor calculated by DPS in 2017 and used in NYSERDA’s August 2022 Whitepaper “Projected Emissions Factors for New York State Grid Electricity”.

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Requesting Party: Roger Caiazza
Request No.: NYRC-1054 (RC-2)
Date of Request: August 29, 2025
Response Due Date: September 8, 2025
Date of Reply: September 8, 2025
Witness: Edward Roedel, Christopher Schramm
Panel: Electric Capital Expenditures Panel
Subject:

Question:

1. Regarding Public Electric Capital Expenditures Panel Exhibits (Part 2), prepare a table listing projects that contain costs required by the CLCPA and for each include the total project costs, the CLCPA component costs, and the notes & assumptions explanation of the CLCPA related costs.

Response:

1. There are no CLCPA costs included in the Electric Capital Expenditures Panel Exhibits that are required by the CLCPA. Instead, the costs associated with the projects listed in the table below are for projects that support the CLCPA and helping New York State meet its clean energy goals.

Notes and Assumptions: The NYPSC issued an order on December 15th, 2022, in Case 20-E-0197, which authorized the continued development of qualified Phase 1 projects which included the projects listed in the table below. Accordingly, all of the costs for the projects listed below are associated with components that support the CLCPA.

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Projects Supporting the CLCPA from Electric Capital Expenditure Exhibits	Total Project Cost (\$000) (Historical + Forecasted Expenditures)
CLCPA Phase-1 Line 962 Rebuild	137,814
CLCPA Phase 1 - Jennison 115/46 kV Substation Upgrades	155,938
CLCPA Phase 1 - 115 kV Line 961 Rebuild	95,707
CLCPA Phase 1 - Trans Line - 949 Rebuild	95,337
CLCPA Phase 1 - Lounsberry 115/12.5 kV Substation Full Rebuild	40,619
CLCPA Phase 1 - Trans Line - 946 Rebuild	74,710
CLCPA Phase 1 - Clarks Corners	42,558
CLCPA Phase 1 - Trans Line - 982 Rebuild	66,084
CLCPA Phase 1 - Oakdale Westover Solution	408,050
CLCPA Phase 1 - Trans Line - 945 Reroute	9,830
Robinson Road 230/115/34.5 kV Substation Upgrades	157,741
Stolle Road 345/230/115/34.5 kV Substation Upgrades	113,184
Coddington 115/34.5 kV Substation Upgrades	50,809
Etna 115/34.5/4.8 kV Substation Full Rebuild	118,944
CLCPA - South Owego Upgrades	6,117

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Requesting Party: Roger Caiazza
Request No.: NYRC-1055 (RC-3)
Date of Request: August 29, 2025
Response Due Date: September 8, 2025
Date of Reply: September 8, 2025
Witness: Brian Jacobs
Panel: Gas Capital Expenditures Panel

Subject:

Question:

1. Regarding Gas Capital Expenditures Panel Exhibits (Part 2), prepare a table listing projects that contain costs required by the CLCPA and for each include the total project costs, the CLCPA component costs, and the notes & assumptions explanation of the CLCPA related costs.

Response:

1. There are no CLCPA costs included in the Gas Capital Expenditures Panel Exhibits that are required by the CLCPA. Instead, the costs associated with the program and projects listed in the tables below are for projects that support the CLCPA and helping New York State meet its clean energy goals. For example, the Leak Prone Pipe Replacement (LPP) Program and stand-alone LPP projects replace infrastructure to help reduce potential fugitive greenhouse gas (GHG) emissions. Exhibit_(GCE-14) contains a listing of all the Programs and Projects and their associated greenhouse gas emissions, determined in accordance with guidelines established by the United States Environmental Protection Agency (“USEPA”) Greenhouse Gas Reporting Program.

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NYSEG Projects Supporting the CLCPA from Gas Capital Expenditure Exhibits	Total Project Cost (\$000)
LPP Replacement Program (2026-2030)	223,231
LPP Slaterville Rd	7,133
Walton Lateral 124 Psig MAOP Replacement	26,473
LPP Services Replacement Program (2026-2030)	39,540
Non-LPP Services Replacement Program (2026-2030)	26,662

RG&E Projects Supporting the CLCPA from Gas Capital Expenditure Exhibits	Total Project Cost (\$000)
LPP Replacement Program (2026-2030)	160,309
LPP Maple St	4,893
LPP Jay St	5,825
LPP Ridgeway Ave Phase 2	7,777
LPP Paul Rd	4,486
LPP Fairport Rd	7,413
LPP Monroe Ave	4,753
LPP Winton Rd S	2,607
LPP Empire Blvd	618
LPP Buffalo Rd	21,119

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LPP East River Rd	10,326
(HIGHWAY) RS369 East Station Rebuild GRMP	5,715
LPP Services Replacement Program (2026-2030)	30,478
Non-LPP Services Replacement Program (2026-2030)	22,412