# Annual Gas System Long-Term Plan Update

**National Grid**
**Case 24-G-0248**
**May 15, 2026**

May 15, 2026

nationalgrid

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# Acronyms and Abbreviations

AGF – American Gas Foundation
AOE – American Organic energy
ASHP – Air-source heat pump
BCA - Benefit-Cost Analysis
BCF – Billion Standard Cubic Feet
BE – Building Electrification
BTU – British Thermal Unit
BYOT – Bring Your Own Thermostat
C&I – Commercial & Industrial
CB1 – Brooklyn Community Board No. 1
CLCPA – Climate Leadership and Community Protection Act
CNG – Compressed Natural Gas
$CO_2$ – Carbon Dioxide
$CO_2e$ – Carbon Dioxide Equivalent
Con Edison – Consolidated Edison Company of New York, Inc.
DAC – Disadvantaged Communities
DEC – Department of Environmental Conservation
Demand-Supply Gap – Gap between peak period gas under the Adjusted Baseline Demand Forecast and Existing Capacity
DI – Direct Installation
DNY – Downstate New York
DOE – U.S. Department of Energy
DPS – Department of Public Service
DR – Demand Response
DSM – Demand-Side Management
Dth – Dekatherms
EAP – Energy Affordability Program
ECM – Energy Conservation Measures
EE – Energy Efficiency
EE/BE – Energy Efficiency/Beneficial Electrification
EEAP – Enhanced Energy Affordability Program
EGTS – Eastern Gas Transmission & Storage
eRIM - Electric Ratepayer Impact Measure
EV – Electric Vehicles
ExC – Enhancement by Compression
Existing Capacity – Total Portfolio of Available Gas Capacity
FBF – Floyd Bennet Field
FERC – Federal Energy Regulatory Commission
FY – Fiscal Year
GAC – Gas Adjustment Clause
GHG – Greenhouse Gas
gRIM - Gas Ratepayer Impact Measure
GSHP – Ground-source heat pump
HDD – Heating Degree Day
HP – High Pressure
IPC – Insulated Polymer Coating
Iroquois/IGTS – Iroquois Gas Transmission System, L.P.
KEDLI – KeySpan Gas East Corporation d/b/a National Grid
KEDNY – The Brooklyn Union Gas Company d/b/a National Grid NY
LCF – Low Carbon Fuels
LDC – Local Distribution Company
LMI – Low- to moderate-income
LNG – Liquefied Natural Gas

LP – Low Pressure
LPP – Leak Prone Pipe
LTP - Long-Term Plan
MDDO – Maximum Daily Delivery Obligation
MDth – thousand Dekatherms
MDQ – Maximum Daily Quantity
NESE – Northeast Supply Enhancement
NMPC – Niagara Mohawk Power Corporation
NOPR – Notice of Proposed Rulemaking
NOx – Nitrogen oxides
NPA – Non-Pipeline Alternative
NYPSC – New York Public Service Commission
NYSERDA – New York State Energy Research and Development Authority
OFO – Operational Flow Order
PSC - Public Service Commission
PTC – Production Tax Credit
R&R – Reliability & Reinforcement
RFP – Request for Proposal
RIM – Ratepayer Impact Measure
RMI – Rocky Mountain Institute
RNG – Renewable Natural Gas
SCT – Societal Cost Test
SEEP – System Energy Efficiency Plans
Tennessee/TGP – Tennessee Gas Pipeline Company
Transco – Transcontinental Gas Pipeline
UCT – Utility Cost Test
UNY – Upstate New York
VGS – Verified Gross Savings
WSR – Winter Supply Review

# 1. Executive Summary

This Annual Long-Term Plan ("LTP") Report ("Annual Report" or "Report") provides required annual updates on gas system planning for National Grid's New York operating companies – The Brooklyn Union Gas Company d/b/a National Grid NY ("KEDNY"), KeySpan Gas East Corporation d/b/a National Grid ("KEDLI"), and Niagara Mohawk Power Corporation d/b/a National Grid ("NMPC") (all three operating companies collectively referred to as "National Grid" or the "Company"). This Annual Report presents current system conditions, observed performance, and planned actions to maintain safe, reliable, and affordable gas service, consistent with the New York State Public Service Commission's (the "Commission" or "PSC") directives and New York State policy objectives. This Annual Report reflects three overarching findings:

First, the gas system is currently reliable but operates with limited margin in certain areas. Recent winter operations, including Winter Storm Fern, demonstrated that National Grid's gas system and supply portfolio were sufficient to serve firm customers when colder-than-normal conditions persisted over roughly two weeks, including two distinct cold snaps.[1] However, these events also highlighted constrained operating margins, particularly in Downstate New York, where limited upstream pipeline capacity increases reliance on higher-cost resources and heightens exposure to market volatility during peak demand periods.

Second, demand is evolving, but peak-day reliability remains a primary system driver. Peak-day demand remains highly weather-dependent and continues to shape system reliability needs. The Annual Report explains how National Grid has updated its forecasting methodologies in compliance with Commission directives and how those forecasts are used to balance the risks of over- and under-investment.

Third, a portfolio-based planning approach is required to manage risk and customer impacts. The Annual Report explains that no single measure—whether infrastructure investment, non-pipeline alternatives ("NPA"), or demand-side programs—can independently ensure reliability and affordability. Instead, National Grid's planning framework combines firm supply, storage and liquified natural gas ("LNG") resources, targeted infrastructure investments, NPAs, demand response, and energy efficiency programs to manage uncertainty and protect customers.

Key elements of this annual update include:

- *Supply and Infrastructure Planning*: This Annual Report summarizes the supply portfolio and ongoing evaluation of firm options to reduce reliance on high-cost, weather-sensitive resources, along with limited on-system upgrades needed to use that supply.
- *System Performance and Risk Management*: This Annual Report draws on recent winter events to show how supply constraints drive price volatility and how added deliverability could reduce customer exposure during extreme weather.

[1] While temperatures were below-normal for the majority of the two-week period, actual weather did not approach National Grid's design criteria for its network and supply portfolio.

- *NPAs and Demand-Side Programs*: This Annual Report updates progress on NPAs, energy efficiency, and demand response, including where they can defer infrastructure and where scale and timing limits require continued core system reliance.
- *Customer Impacts, Equity, and Environment*: This Annual Report summarizes affordability programs, investments benefiting disadvantaged communities, required environmental reporting, and stakeholder engagement with Brooklyn Community Board No. 1 ("CB1").

In summary, this Annual Report provides a comprehensive update on National Grid's gas system planning activities. It demonstrates compliance with the Commission's directives and outlines a balanced, adaptive planning approach designed to maintain reliability, limit customer cost exposure, and support New York State's broader energy and climate objectives.

# 2. Introduction

## 2.1. Overview & Regulatory Context

National Grid submits this Annual Report in accordance with the Commission's "Order Adopting Gas System Planning Process" issued in Case 20-G-0131[2] and the "Order Regarding National Grid's Long-Term Natural Gas Plan" issued on September 18, 2025 in Case 24-G-0248 ("LTP Order").[3] Together, these orders establish a structured, iterative framework requiring gas local distribution companies ("LDCs") to provide annual updates on demand forecasts, supply planning, system reliability, infrastructure needs, NPAs, customer impacts, and environmental performance.

This Annual Report reflects National Grid's ongoing commitment to delivering value for our customers, supporting economic development throughout New York State, and working toward an abundant, affordable, and sustainable energy future consistent with State policy goals.

We appreciate this opportunity to work alongside the Commission, Department of Public Service Staff ("DPS Staff"), policymakers, and stakeholders to address opportunities and challenges for long-term gas system planning.

## 2.2. Overview of the LTP process

New York's LTP process is a structured, recurring gas system planning and stakeholder engagement framework established by the PSC. The process is intended to ensure gas LDCs plan in a way that:

- Maintains safe, adequate, and reliable service for existing customers.
- Minimizes unnecessary infrastructure investment and long-term customer cost risk.

[2] Case 20-G-0131 et al., Proceeding on Motion of the Commission in Regard to Gas Planning Procedures, Order Adopting Gas System Planning Process (issued and effective May 12, 2022).
[3] Case 24-G-0248, In the Matter of a Review of the Long-Term Gas System Plans of The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, and Niagara Mohawk Power Corporation d/b/a National Grid, *Order Regarding Long-Term Natural Gas Plan and Requiring Further Actions* (issued and effective September 18, 2025).

- Explicitly evaluates alternatives (including non-pipe solutions) and planning uncertainty.
- Aligns planning with New York's climate and equity objectives, including the Climate Leadership and Community Protection Act ("CLCPA").

## 2.3. Summary of previous LTP filings and updates

National Grid's current LTP record in this proceeding consists of several iterative filings, culminating in a Final Long-Term Plan and a subsequent Addendum addressing an emergent supply project development.

The Gas System Long-Term Plan (the "Final LTP") (filed March 7, 2025)[4] is a comprehensive plan presenting detailed analyses of demand, supply, system reliability, infrastructure needs, NPAs, customer impacts, and emissions implications over a long-term horizon. The Final LTP evaluates three planning scenarios:

- Reference Case: A "business-as-usual" outlook reflecting existing programs and current policy conditions, serving as a baseline for comparison.
- Clean Energy Vision: National Grid's illustrative pathway for achieving CLCPA-aligned emissions reductions through a balanced portfolio of energy efficiency, electrification, and low-carbon fuels (including Renewable Natural Gas ("RNG") and hydrogen, where feasible).
- Accelerated Electrification: A high-electrification pathway that transitions away from gas more rapidly, illustrating different risk and cost dynamics relative to a balanced approach.

The Final LTP also discusses the role of the Greenpoint LNG facility, including its supply, reliability, and system support functions; potential alternatives; and related customer and community considerations. In addition, the Final LTP describes National Grid's stakeholder engagement process and addresses recommendations from the Department of Public Services' independent consultant (PA Consulting) through a structured response and incorporation of recommended improvements where feasible.

The Company's LTP Addendum (filed July 2, 2025)[5] is an informational supplement to the Final LTP focused on Transcontinental Gas Pipeline Company, LLC's ("Transco's") renewed proposal for the Northeast Supply Enhancement ("NESE") Project. The Addendum evaluates NESE's potential implications for near-term reliability and costs/benefits, including the potential to:

- Increase firm supply deliverability into Downstate New York (up to 400,000 Dth/day, as described in the LTP Addendum);

[4] Case 24-G-0248, In the Matter of a Review of the Long-Term Gas System Plans of The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, and Niagara Mohawk Power Corporation d/b/a National Grid, *Final Gas System Long-Term Plan* (March 7, 2025).

[5] Case 24-G-0248, In the Matter of a Review of the Long-Term Gas System Plans of The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, and Niagara Mohawk Power Corporation d/b/a National Grid, *Final Gas System Long-Term Plan Addendum* (July 2, 2025) (the "LTP Addendum").

- Reduce reliance on less reliable peaking resources (including certain Compressed Natural Gas ("CNG") operations); and
- Provide broader energy-system benefits (including electric-market impacts), while remaining consistent with long-term decarbonization objectives described in the LTP.

In the LTP Order, the Commission addressed National Grid's Final LTP and Addendum and directed additional filings and reporting.[6] Among other things, the LTP Order required the Company to file within 90 days of the Order:

- Demand forecasting methodology report: National Grid must file a report explaining its methodologies and processes for demand forecasting and developing estimates of use per customer on design day and explicitly listing and describing improvements consistent with the body of the Order.
- Updated forecasts: National Grid must file updated design day and annual demand forecasts reflecting those improvements, using data available through the end of November 2025.
- Develop an engagement plan for Brooklyn Community Board No. 1.

The order also requires annual updates to the Company's LTP on May 15, 2026 and May 17, 2027. The table below summarizes the required inclusions for this filing and maps each directive to applicable sections of the Annual Report.

**Figure 2-1: Required Inclusions – May 15, 2026, LTP Annual Report**

| Directive Area | What must be included | Report Section |
|---|---|---|
| LPP Mileage Remaining | Provide information regarding the mileage of LPP remaining. | Section 6 – NPAs and DSM |
| NPA Solicitation Reporting | Provide results of solicitations for NPAs focusing on retiring LPP. | Section 6 – NPAs and DSM |
| Report on Electrification and Service Termination Data | Monitor data related to how many customers decommission their natural gas systems in favor of geothermal applications and how many of those customers terminate gas service completely. | Section 7 – LCFs and Decarbonization Pathways |
| Annual RNG Purchases Reporting | Provide information on the amount of RNG purchased on an annual basis. | Section 7 – LCFs and Decarbonization Pathways |

[6] Case 24-G-0248, In the Matter of a Review of the Long-Term Gas System Plans of The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, and Niagara Mohawk Power Corporation d/b/a National Grid, *Order Regarding Long-Term Natural Gas Plan and Requiring Further Actions* (issued and effective September 18, 2025).

| | | |
|---|---|---|
| Identify programs benefitting Disadvantaged Communities | Identify programs and investments that are intended to benefit DAC. | Section 9 – Customer Impacts and Affordability |
| Greenpoint LNG: Impact to Environment | Provide information regarding the impact to the environment of the local community from operating the Greenpoint LNG facility. | Section 10 – Environmental and Climate Impacts |
| Greenpoint LNG: Cost information LNG vs CNG and delivered services | Provide information comparing the cost of LNG compared to CNG and delivered services. | Section 10 – Environmental and Climate Impacts |

# 3. Demand Forecast

Since the Final LTP was filed, the Company has updated its demand forecasts twice. First, the Company performed an annual update of the demand forecast as part of its standard annual planning process. This update was reflected in the LTP Addendum.[7] Second, the Company incorporated recommendations made by PA Consulting, in compliance with the LTP Order. These improvements and the new forecast results are described in detail in the Company's *Forecasting Report Response to the Commission Order*[8] and include: incorporating the most recent available economic, demographic, commodity price, billing, weather, and usage data; integrating updated energy efficiency, electrification, and clean heat trends; formalizing a three-year trend review and benchmarking process for econometric models; and capturing recent market trends such as fuel conversions and policy-driven electrification.

# 4. Supply Forecast

## 4.1. Current and projected supply portfolio

The Company files its annual Winter Supply Review ("WSR") each July, which includes a list of all transportation and storage contracts in the portfolios.[9] The portfolio includes capacity contracts with Eastern Gas Transmission & Storage ("EGTS"), Tennessee Gas Pipeline ("TGP"), and Iroquois Gas Transmission System ("IGTS"). In Upstate New York, NMPC holds redundant delivery point entitlements under two EGTS transportation contracts (Nos. 100001 and 700001), each of which can deliver to both the East and West Gates in excess of the contract Maximum Daily Quantity ("MDQ"). Accordingly, NMPC allocates the MDQ between the East and West Gates based on Design Day customer requirements.

[7] *Id*., *Final Gas System Long-Term Plan Addendum*, fig. 2-1 (July 2, 2025).
[8] *Id*., *Forecasting Report Response to the Commission Order* (December 17, 2025).
[9] Case 25-M-0183, Report on the New York State Electric & Gas Supply Readiness for 2025-2026 Winter, *National Grid's responses to the request for information from Department of Public Service Staff*, (July 15, 2025).

Aggregate deliveries to the EGTS East and West Gates across all EGTS contracts are constrained by the applicable Maximum Daily Delivery Obligation ("MDDO") for each region.

KEDNY's city gates are Tetco–Goethals (Staten Island), Transco–Narrows (Brooklyn), and Transco–Rockaway (Floyd Bennett Field, Brooklyn). KEDLI's city gates are Transco–Long Beach and Iroquois–South Commack. Both KEDNY and KEDLI receive gas at Con Edison's White Plains gate station, with redelivery occurring via NYF System exchange points. The Greenpoint (KEDNY) and Holtsville (KEDLI) LNG plants provide up to 394,500 Dth/day in combined capacity, and five CNG injection sites operate on Long Island at Glenwood, Inwood, Barrett, Farmingdale, and Riverhead.

Figure 4-1 through

Figure 4-6 detail the Company's supply portfolio as reflected in its latest annual WSR.[10] The NMPC supply portfolio is mostly comprised of pipeline transportation and storage contracts but also includes some city gate delivered supply and on-system CNG. The Downstate NY supply portfolio includes pipeline transportation and storage, city gate delivered supplies, CNG, RNG, and LNG. Section 4.4. provides additional detail regarding the supply diversity in the portfolios.

[10] *Id*. at tables 4 and 5.

## Figure 4-1: KEDNY Winter Supply 2025-2026 Firm Transportation Capacity

Case 25-M-0183 - Winter Supply 2025-2026 Forms

**Table 4a - Firm Transportation Capacity***

(2025-2026 Winter)

Company: The Brooklyn Union Gas Company
Submission Date: 7/15/2025
Version #: 1

| Pipeline Company Name | Contract Number | Rate Schedule | Daily Quanity (Dt) | Winter Quanity (MDT) | Annual Quanity (MDT) | Expiration Date |
|---|---|---|---|---|---|---|
| **Flowing Gas To Citygate** | | | | | | |
| Transco | 1003682 | FT | 245,955 | 37,139 | 89,774 | 6/1/2028 |
| Transco | 9204696 | FT | 115,000 | 17,365 | 41,975 | 10/31/2032 |
| Transco | 9170392 | FT | 100,000 | 15,100 | 36,500 | 5/14/2030 |
| Transco | 1044809 | FT | 13,945 | 2,106 | 2,106 | 4/1/2026 |
| Transco | 1005010 | FT | 4,244 | 382 | 382 | 7/31/2028 |
| Transco | 1003831 | FT (X-285) | 3,970 | 599 | 1,449 | 12/13/2026 |
| Transco | 1000655 | FT (X-266) | 3,250 | 491 | 1,186 | 1/1/2026 |
| Transco | 1002240 | FT | 1,969 | 297 | 719 | 3/19/2029 |
| Transco *(Not in city gate total - link to contracts 9170392, 9204696)* | 9170141 | FDLS | 353,700 | 53,409 | 129,101 | 5/14/2030 |
| Transco | 9247729 | FT | 10,000 | 1,510 | 3,650 | 11/18/2025 |
| Transco | 9250826 | FT | 78,000 | 11,778 | 28,470 | 10/31/2036 |
| Texas Eastern | 800205R2 | CDS | 51,315 | 7,749 | 18,730 | 10/31/2026 |
| Texas Eastern | 910049-R2 | FT-1 | 27,500 | 4,153 | 10,038 | 3/31/2026 |
| Texas Eastern | 008764 | X-130 | 12,161 | 1,836 | 4,439 | 10/31/2026 |
| Texas Eastern | 800100R2 | CDS | 5,403 | 816 | 1,972 | 10/31/2026 |
| Texas Eastern | 330909 | FTS-4 | 5,000 | 755 | 1,825 | 12/1/2026 |
| Texas Eastern | 330835-R2 | FTS | 2,560 | 387 | 934 | 10/31/2027 |
| Texas Eastern *(Not included in total - 16,193 flows from Equitrans storage)* | 330787-R1 | FTS-2 | 17,477 | 2,639 | 6,379 | 3/31/2026 |
| Texas Eastern | 911814 | FT-1 | 50,000 | 7,550 | 18,250 | 10/31/2033 |
| Texas Eastern | 911805 | FT-1 | 25,000 | 3,775 | 9,125 | 10/31/2036 |
| Texas Eastern | 911992 | FT-1 | 12,500 | 1,888 | 4,563 | 6/1/2028 |
| Iroquois | 540-01 | RTS | 80,936 | 12,221 | 29,542 | 11/1/2027 |
| Tennessee | 217 | FT-A | 30,313 | 4,577 | 11,064 | 10/31/2029 |
| | | | | | | |
| **Upstream Pipeline Support** [1] | | | | | | |
| Transco | 1006500 | FT | 10,688 | 1,614 | 3,901 | 10/31/2026 |
| Texas Eastern | 800357R2 | FT-1 | 20,604 | 3,111 | 7,520 | 10/31/2026 |
| Tennessee | 371009 | FT-A | 50,000 | 7,550 | 18,250 | 10/31/2033 |
| Eastern Gas Transmission & Storage | 200721 | FT | 82,000 | 12,382 | 29,930 | 10/31/2032 |
| Eastern Gas Transmission & Storage | 100003 | FTNN | 40,301 | 6,085 | 14,710 | 3/31/2028 |
| Equitrans | 54 | STS-1 | 16,193 | 2,445 | 5,910 | 4/1/2026 |
| Enbridge Gas (Dawn to Parkway) | M12193 | M12 | 40,917 | 6,178 | 14,935 | 10/31/2027 |
| TransCanada (Parkway to Waddington) | 63477 | FT | 40,468 | 6,111 | 14,771 | 10/31/2027 |
| | | | | | | |
| **Deliveries from Storage** | | | | | | |
| Transco | 1000931 | GSS | 180,137 | 11,129 | 65,750 | 3/31/2028 |
| Transco | 1000926 | LSS | 31,940 | 3,354 | 11,658 | 3/31/2028 |
| Transco | 1000930 | S-2 | 22,838 | 2,053 | 8,336 | 4/15/2026 |
| Transco | 1003831 | FT (X-285) | 46,105 | 6,962 | 16,828 | 12/13/2026 |
| Texas Eastern | 400186 | SS-1 | 114,190 | 7,370 | 41,679 | 4/30/2030 |
| Texas Eastern | 330787-R1 | FTS-2 | 16,193 | 2,445 | 5,910 | 3/31/2026 |
| Texas Eastern | 331011 | FTS-8 | 10,340 | 1,561 | 3,774 | 3/31/2027 |
| Texas Eastern | 331719 | FTS-7 | 21,332 | 3,221 | 7,786 | 4/15/2027 |
| Tennessee | 217 | FT-A | 27,509 | 4,154 | 10,041 | 10/31/2029 |
| | | | | | | |
| **Winter Peaking Service** | | | | | | |
| 30-day City Gate Peaking #1 (Nov-Mar) | | Transco | 3,000 | 90 | 90 | 3/31/2032 |
| 30-day City Gate Peaking #2 (Nov-Mar) | | Transco | 6,500 | 195 | 195 | 3/31/2028 |
| | | | | | | |
| **Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)** | | | | | | |
| | | | **1,359,105** | **175,008** | **488,739** | |

* Please highlight any changes from the previous year's report.

[1] Capacity used to deliver gas to pipelines that deliver to the citygate.

Except where noted, contracts with expiration dates before the upcoming winter season are in evergreen status.

## Figure 4-2: KEDLI Winter Supply 2025-2026 Firm Transportation Capacity

Case 25-M-0183 - Winter Supply 2025-2026 Forms

**Table 4b - Firm Transportation Capacity***

(2025-26 Winter)

Company: KeySpan Gas East Corporation
Submission Date: 11/7/2025
Version #: 2 of 2

| Pipeline Company Name | Contract Number | Rate Schedule | Daily Quanity (DT) | Winter Quanity (MDT) | Annual Quanity (MDT) | Expiration Date |
|---|---|---|---|---|---|---|
| **Flowing Gas To Citygate** | | | | | | |
| Transco *(MDQ=154,287 Dt/day, 30,303 Dt/day released to BNY)* | 1003687 | FT | 123,984 | 18,722 | 45,254 | 8/1/2028 |
| Transco | 9014496 | FT | 25,000 | 3,775 | 9,125 | 11/1/2027 |
| Transco | 9014499 | FT | 25,000 | 3,775 | 9,125 | 12/1/2027 |
| Transco *(excess transport after max storage withdrawal)* | 9062488 | FT | 848 | 128 | 310 | 12/12/2027 |
| Transco *(excess transport after max storage withdrawal)* | 9062489 | FT | 848 | 128 | 310 | 12/12/2027 |
| Transco | 1044810 | FT | 17,433 | 2,632 | 2,632 | 4/1/2026 |
| Transco | 1000857 | FT (X-271) | 2,100 | 317 | 767 | 2/1/2027 |
| Transco | 1005015 | FT | 1,863 | 188 | 188 | 7/31/2028 |
| Transco | 1002237 | FT | 1,811 | 273 | 661 | 2/24/2029 |
| Transco | 1003833 | FT (X-287) | 586 | 88 | 214 | 10/31/2026 |
| Transco *(Not in city gate total - link to contracts 9170392, 9204696)* | 9170142 | FDLS | 293,300 | 44,288 | 107,055 | 5/14/2030 |
| Transco | 9250089 | FT | 5,000 | 755 | 1,825 | 10/31/2031 |
| Texas Eastern | 800222-R2 | CDS | 25,001 | 3,775 | 9,125 | 10/31/2026 |
| Texas Eastern | 910050-R2 | FT-1 | 22,500 | 3,398 | 8,213 | 3/31/2026 |
| Texas Eastern | 910094-R2 | CDS | 8,106 | 1,224 | 2,959 | 10/31/2026 |
| Texas Eastern | 330838-R2 | FTS | 1,110 | 168 | 405 | 10/31/2027 |
| Texas Eastern | 911956 | FT-1TME | 40,000 | 6,040 | 14,600 | 10/31/2031 |
| Texas Eastern | 911868 | FT | 3,500 | 529 | 1,278 | 10/31/2031 |
| Iroquois *(contract MDQ = 200,000 dt/day but upstream limits is 196,000)* | 550-14 | RTS | 196,000 | 29,596 | 71,540 | 4/1/2029 |
| Iroquois | 550-01 | RTS | 87,760 | 13,252 | 32,032 | 11/1/2026 |
| Iroquois | 550-16 | RTS | 25,000 | 3,775 | 9,125 | 11/1/2026 |
| Iroquois | 550-18 | RTS | 7,000 | 1,057 | 2,555 | 11/1/2026 |
| Iroquois | 550-63 | RTS | 40,468 | 6,111 | 14,771 | 10/31/2031 |
| Tennessee | 62806 | FT-A | 2,551 | 385 | 931 | 10/31/2029 |
| | | | | | | |
| **Upstream Pipeline Support** [1] | | | | | | |
| Texas Eastern | 910424 | FT-1 | 12,578 | 1,899 | 4,591 | 10/31/2026 |
| Eastern Gas Transmission & Storage | 100004 | FTNN | 26,021 | 3,929 | 9,498 | 3/31/2028 |
| Algonquin | 510369-R1 | AFT-1 | 196,000 | 29,596 | 71,540 | 3/31/2029 |
| Millennium | 5583/FT02-001 | FT-1 | 150,000 | 22,650 | 54,750 | 3/31/2029 |
| Millennium | 132617 | FT-1 | 50,000 | 7,550 | 18,250 | 3/31/2029 |
| Enbridge Gas (Dawn to Parkway) | M12194 | M12 | 37,850 | 5,715 | 13,815 | 10/31/2026 |
| TransCanada (Parkway to Waddington) | 63476 | FT | 37,433 | 5,652 | 13,663 | 10/31/2026 |
| | | | | | | |
| **Deliveries from Storage** | | | | | | |
| Transco | 1000833 | GSS | 112,484 | 6,689 | 41,057 | 3/31/2028 |
| Transco | 9062488 | FT | 49,153 | 7,422 | 17,941 | 12/12/2027 |
| Transco | 9062489 | FT | 49,153 | 7,422 | 17,941 | 12/12/2027 |
| Transco | 1003833 | FT (X-287) | 35,839 | 5,381 | 13,008 | 10/31/2026 |
| Transco | 1003969 | SS-2 | 23,184 | 2,550 | 8,462 | 3/31/2028 |
| Transco | 1000836 | LSS | 19,807 | 2,100 | 7,230 | 3/31/2028 |
| Texas Eastern | 330908 | FTS-5 | 15,000 | 2,265 | 5,475 | 3/31/2027 |
| Texas Eastern | 400117 | SS-1 | 15,572 | 934 | 5,684 | 4/30/2030 |
| Texas Eastern *(subject to fuel)* | 330213 | FTS-5 | 14,819 | 2,238 | 5,409 | 3/31/2027 |
| Texas Eastern *(subject to fuel)* | 330911 | FTS-5 | 20,000 | 3,020 | 7,300 | 3/31/2027 |
| Texas Eastern | 331014 | FTS-8 | 14,771 | 2,230 | 5,391 | 3/31/2027 |
| Texas Eastern | 400236 | SS-1 | 2,076 | 187 | 758 | 4/30/2026 |
| Tennessee | 62806 | FT-A | 5,169 | 781 | 1,887 | 10/31/2029 |
| Eastern Gas Transmission & Storage | 700090 | FT-GSS | 100,000 | 15,100 | 15,100 | 3/31/2027 |
| Eastern Gas Transmission & Storage | 700052 | FT-GSS | 15,000 | 2,265 | 2,265 | 3/31/2027 |
| | | | | | | |
| **Winter Peaking Service** | | | | | | |
| 121-day City Gate Peaking (Dec-Mar) | | Iroquois | 38,000 | 4,598 | 4,598 | 3/31/2032 |
| 30-day City Gate Peaking #1 (Dec-Mar) | | Iroquois | 20,000 | 600 | 600 | 10/31/2031 |
| 30-day City Gate Peaking #2 (Nov-Mar) | | Iroquois | 30,000 | 900 | 900 | 3/31/2026 |
| 30-day City Gate Peaking #3 (Nov-Mar) | | Transco | 500 | 15 | 15 | 3/31/2032 |
| **Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)** | | | | | | |
| | | | **1,128,796** | **149,382** | **381,578** | |

* Please highlight any changes from the previous year's report.

[1] Capacity used to deliver gas to pipelines that deliver to the citygate.

Except where noted, contracts with expiration dates before the upcoming winter season are in evergreen status.

**Figure 4-3: NMPC Winter Supply 2025-2026 Firm Transportation Capacity**

Case 25-M-0183 - Winter Supply 2025-26 Forms

## Table 4c - Firm Transportation Capacity*

(2025-26 Winter)

Company: Niagara Mohawk Power Corporation
Submission Date: 11/7/2025
Version #: 2 of 2

| Pipeline Company Name | Rate Schedule | Daily Quantity (DT) | Winter Quantity (MDT) | Annual Quantity (MDT) | Expiration Date |
|---|---|---|---|---|---|
| **Flowing Gas To Citygate** | | | | | |
| Eastern Gas Transmission & Storage Inc. | FTNN | 340,122 | 51,358 | 117,975 | 3/31/2031 |
| Iroquois Gas Transmission | RTS | 51,596 | 7,791 | 18,833 | 11/1/2026 |
| Eastern Gas Transmission & Storage Inc. | FT | 10,000 | 1,510 | 2,712 | 3/31/2031 |
| Eastern Gas Transmission & Storage Inc. | FT | 17,700 | 2,673 | 6,461 | 10/31/2030 |
| Eastern Gas Transmission & Storage Inc. | FT | 30,000 | 4,530 | 10,950 | 10/31/2032 |
| Eastern Gas Transmission & Storage Inc. | FT | 26,200 | 3,956 | 9,563 | 6/30/2035 |
| Tennessee | FT-A | 20,000 | 3,020 | 7,300 | 10/31/2038 |
| Tennessee | FT-A | 30,000 | 4,530 | 10,950 | 10/31/2037 |
| Tennessee | FT-A | 5,338 | 806 | 1,948 | 10/31/2031 |
| Empire | FT | 2,728 | 412 | 996 | 10/31/2026 |
| **Upstream Pipeline Support** † | | | | | |
| | | | | | |
| Enbridge Gas (Dawn to Parkway) | M12 | 52,247 | 7,889 | 19,070 | 10/31/2026 |
| TransCanada (Parkway to Waddington) | FT | 51,596 | 7,791 | 18,833 | 10/31/2026 |
| | | | | | |
| | | | | | |
| **Deliveries from Storage** | | | | | |
| Eastern Gas Transmission & Storage Inc. | FTNN-GSS | 434,078 | 65,546 | 65,546 | 3/31/2031 |
| Eastern Gas Transmission & Storage Inc. | FT | 4,000 | 604 | 604 | 3/31/2031 |
| | | | | | |
| | | | | | |
| **Winter Peaking Service** | | | | | |
| | | | | | |
| | | | | | |
| **Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)** | | | | | |
| | | **971,762** | **146,736** | **253,837** | |

* Please highlight any changes from the previous year's report.

† Capacity used to deliver gas to pipelines that deliver to the citygate.
Except where noted, contracts with expiration dates before the upcoming winter season are in evergreen status.

**Figure 4-4: KEDNY Winter Supply 2025-2026 Firm Storage Capacity**

**Case 25-M-0183 - Winter Supply 2025-2026 Forms**

## Table 5a - Firm Storage Capacity*

**(2025-26 Winter)**

Company: The Brooklyn Union Gas Company
Submission Date: 11/7/2025
Version #: 2 of 2

| Storage Company Name | Rate Schedule | Daily Quantity (DT) | Winter Quantity (MDT) | Expiration Date |
|---|---|---|---|---|
| **Marcellus/Utica Region** | | | | |
| Transco | GSS | 180,137 | 11,129 | 3/31/2028 |
| Transco | LSS | 31,940 | 3,354 | 3/31/2028 |
| Transco | S-2 | 22,838 | 2,053 | 4/15/2027 |
| Texas Eastern | SS-1 | 114,190 | 7,370 | 4/30/2030 |
| Equitrans-Keystone | SS-3/STS-1 | 16,193 | 1,693 | 4/1/2027 |
| Tennessee | FS-MA | 20,808 | 2,497 | 10/31/2029 |
| Honeoye | SS-NY | 10,220 | 1,226 | 4/1/2027 |
| Eastern Gas Transmission & Storage | GSS | 46,351 | 2,874 | 3/31/2028 |
| Eastern Gas Transmission & Storage | GSS-TE | 32,267 | 3,098 | 3/31/2027 |
| | | | | |
| **Total** | | 474,944 | 35,294 | |
| | | | | |
| **Gulf Coast Region** | | | | |
| Transco[1] | WSS | 78,947 | 7,500 | 4/1/2026 |
| | | | | |
| **Total** | | 78,947 | 7,500 | |
| | | | | |
| **Canadian** | | | | |
| | | | | |
| | | | | |
| **Total** | 0 | 0 | | |

* Please highlight any changes from the previous year's report.

[1] Capacity will be decreasing to 5,000 MDT effective 4/1/2026

Except where noted, contracts with expiration dates before the upcoming winter season are in evergreen status.

**Figure 4-5: KEDLI Winter Supply 2025-2026 Firm Storage Capacity**

Case 25-M-0183 - Winter Supply 2025-2026 Forms

## Table 5b - Firm Storage Capacity*

(2025-2026 Winter)

Company: KeySpan Gas East Corporation
Submission Date: 7/15/2025
Version #: 1

| Storage Company Name | Rate Schedule | Daily Quantity (DT) | Winter Quantity (MDT) | Expiration Date |
|---|---|---|---|---|
| **Marcellus/Utica Region** | | | | |
| Transco | GSS | 112,484 | 6,669 | 3/31/2028 |
| Transco | LSS | 19,807 | 2,100 | 3/31/2028 |
| Transco | SS-2 | 23,184 | 2,550 | 3/31/2028 |
| Texas Eastern | SS-1 | 15,572 | 934 | 4/30/2030 |
| Texas Eastern | SS-1 | 2,076 | 187 | 4/30/2026 |
| Tennessee | FS-MA | 5,202 | 468 | 10/31/2029 |
| Eastern Gas Transmission & Storage | GSS | 100,000 | 6,000 | 3/31/2027 |
| Eastern Gas Transmission & Storage | GSS | 35,814 | 2,164 | 3/31/2028 |
| Eastern Gas Transmission & Storage | GSS-N Summit | 35,000 | 3,500 | 3/31/2027 |
| Eastern Gas Transmission & Storage | GSS-TE | 15,000 | 1,443 | 3/31/2027 |
| Eastern Gas Transmission & Storage | GSS-APEC | 15,000 | 1,500 | 3/31/2027 |
| | | | | |
| **Total** | | 379,139 | 27,515 | |
| | | | | |
| **Gulf Coast Region** | | | | |
| Transco | WSS | 46,939 | 4,459 | 4/1/2032 |
| | | | | |
| **Total** | | 46,939 | 4,459 | |
| | | | | |
| **Canadian** | | | | |
| | | | | |
| | | | | |
| **Total** | 0 | 0 | | |

* Please highlight any changes from the previous year's report.

**Figure 4-6: NMPC Winter Supply 2025-2026 Firm Storage Capacity**

Case 25-M-0183 - Winter Supply 2025-26 Forms

**Table 5c - Firm Storage Capacity***

(2025-2026 Winter)

Company: Niagara Mohawk Power Corporation
Submission Date: 7/15/2025
Version #: 1

| Storage Company Name | Rate Schedule | Daily Quantity (DT) | Winter Quantity (MDT) | Expiration Date |
|---|---|---|---|---|
| **Marcellus/Utica Region** | | | | |
| Eastern Gas Transmission & Storage Inc. | GSS | 438,078 | 22,917 | 3/31/2031 |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| **Total** | | 438,078 | 22,917 | |
| | | | | |
| **Gulf Coast Region** | | | | |
| | | | | |
| | | | | |
| **Total** | | 0 | 0 | |
| | | | | |
| **Canadian** | | | | |
| | | | | |
| | | | | |
| **Total** | | 0 | 0 | |

* Please highlight any changes from the previous year's report.

The projected design day capacities for Upstate and Downstate New York are shown below (Figures 4-7 and 4-8). Pipeline firm transportation and storage contracts have Evergreen and/or Right of First Refusal rights allowing for extensions as needed. City gate and cogeneration supplies without extension options are assumed to expire at contract end dates. Downstate NY CNG supply reductions are based on the assumption that pipeline projects (NESE and ExC) will allow for three out of five of the CNG supplies to expire.

**Figure 4-7: Downstate Projected Supply Portfolio[11]**

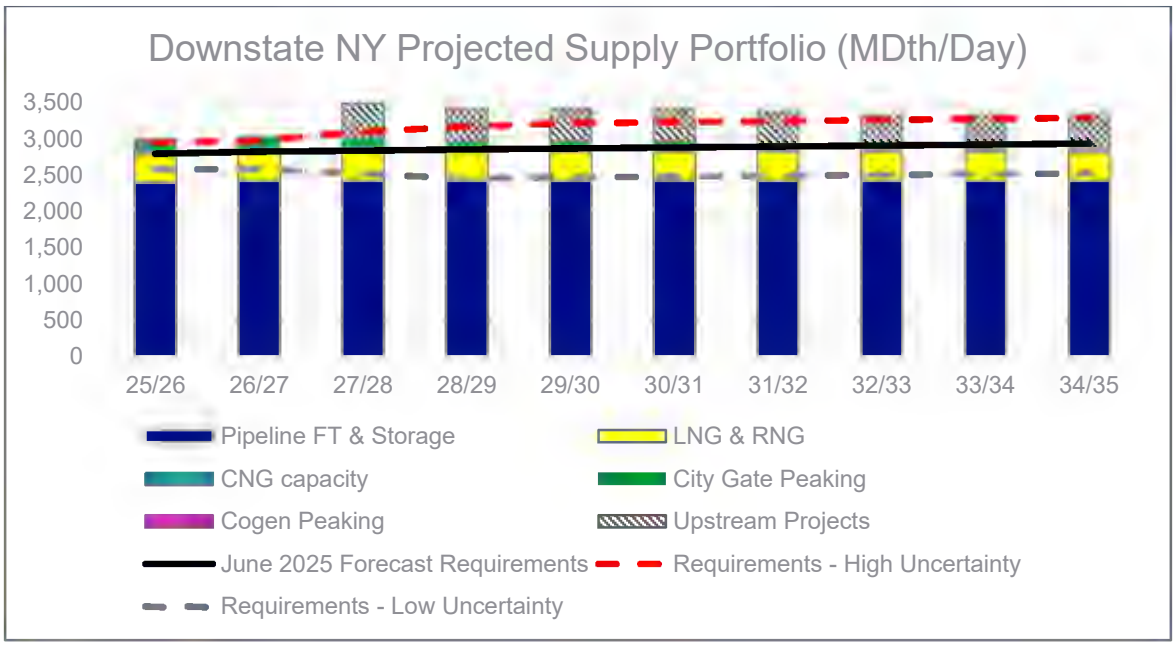
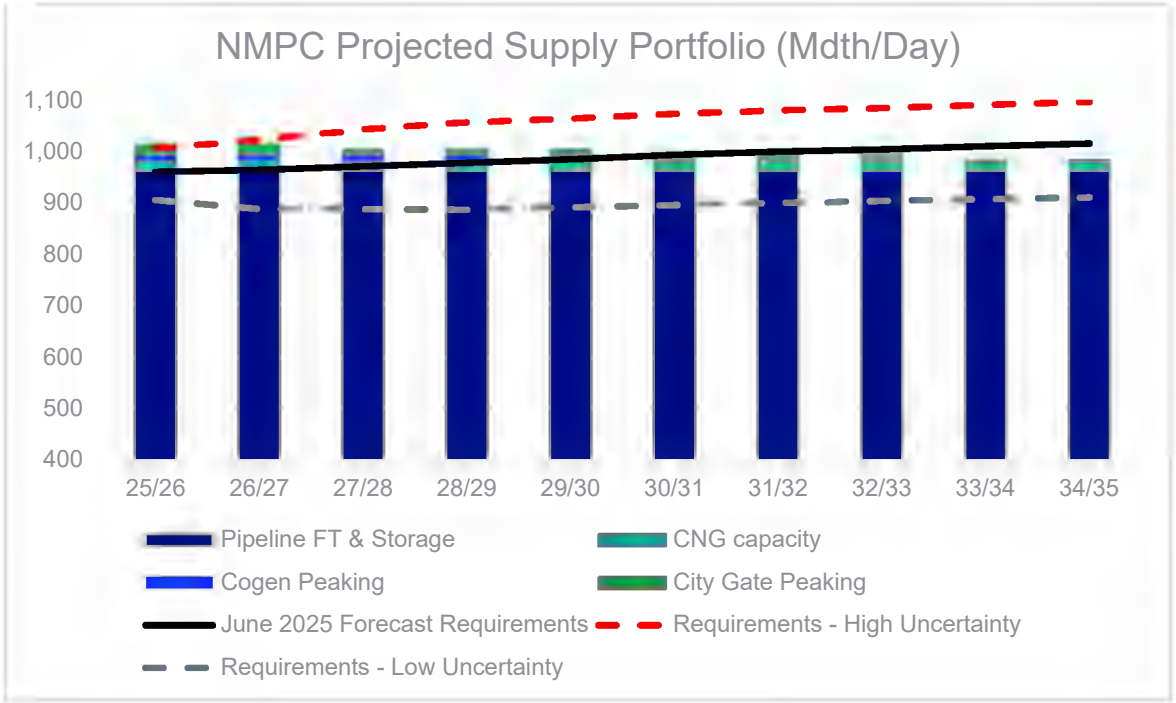



**Figure 4-8: NMPC Projected Supply Portfolio**




[11] RNG shown in Figure 4-7 refers to biogas generated and injected into the Company's distribution system.

## 4.2. Status of major supply projects

KEDNY and KEDLI are parties to precedent agreements with Transco for the NESE project that, once constructed, will deliver, in aggregate, an additional 400,000 Dth/day into the existing Rockaway Lateral. In addition to NESE, KEDLI is also party to a precedent agreement with Iroquois for service on its proposed Enhancement by Compression ("ExC") project, which will deliver a total of 125,000 Dth/day into the pipeline's Zone 2 region. KEDLI will receive 62,500 Dth/day of the ExC capacity and the remaining 62,500 Dth/day will be delivered to Con Edison.

Transco has commenced construction of certain facilities for NESE and will be filing weekly construction status reports with the Federal Energy Regulatory Commission ("FERC") for the project.

Iroquois has received the necessary authorization from FERC and the New York State Department of Environmental Conservation ("DEC") and is awaiting a permit from the Connecticut Department of Energy and Environmental Protection before the project may commence construction.

Both projects are expected to be in service for November 2027.

The Greenpoint LNG project to increase vaporization capability to 350,000 Dth/day is not being pursued.

## 4.3. Alignment of supply with demand forecast

As stated in the LTP Addendum, National Grid is obligated to evaluate any proposal to remediate any imbalance between the demand for energy and the supply of natural gas into our distribution network. The Company will continue to evaluate contracts in the portfolio for extension and termination/expiration as contracts come up for renewal and as demand evolves on the system.

## 4.4. Risk assessment (contract expirations, supply diversity, contingency planning)

Most contracts in the Upstate and Downstate New York supply portfolios have provisions that allow the Company to extend as needed. Cogen peaking, city gate peaking and CNG supplies require the Company to issue Request for Proposals ("RFP") to retain volumes. The Company is allowing the following contracts to expire:

**Figure 4-9: Contracts to Expire**

| LDC | Volume (Dth/Day) | Delivery Point | Expiration Date |
|---|---|---|---|
| NMPC | 10,000 | NMPC West Gate | 3/31/2027 |
| KEDNY | 25,253 | Iroquois S. Commack | 9/30/2026 |

The decision to allow the NMPC West Gate contract to expire was based on a review of the most recent requirements forecast as well as design day and design hour hydraulic modeling. The Company pursued extending the KEDNY volume

with the supplier but was unable to negotiate a new contract. Alternative supplies were secured on a short-term basis that will provide similar location-specific supply at the Iroquois S. Commack city gate. The Company will continue to review annual forecast requirements to ensure that the portfolios are adequate to meet demand in future years.

The Company has utilized underground storage in the supply portfolios as a physical hedge against market volatility. Retention of these longstanding assets is essential to maintain supply diversity. Pipelines typically charge cost of service rates that are favorable to market-based rates where market participants can bid on the asset during an open season. Transco recently converted the Gulf coast WSS storage service to market-based rates. To retain the asset, KEDNY was required to bid on the 7.5 Bcf field shown in Section 4.1. The Company was awarded 5 Bcf of WSS storage in the Transco open season. The change from 7.5 Bcf to 5 Bcf capacity became effective on April 1, 2026.

KEDNY and KEDLI have a diverse portfolio of assets allowing for sourcing supply from many liquid supply points such as Marcellus, Canada, and Gulf coast. NESE will source supply from Transco Non-NY points such as Station 195 and Station 210. ExC will source supply from Canada at Waddington.

The NMPC portfolio is reliant on EGTS for most of its supplies but does also source supply from Canada (via Iroquois pipeline), Dracut (via Tennessee pipeline) and Empire pipeline. Should NMPC West gate requirements increase, the Upstate NY portfolio may increase its capacity from Empire pipeline, which would allow for additional diversification.

The Company will secure short-term contracts when needed for on-system reliability concerns. Planned tank maintenance at the Holtsville LNG facility is currently underway. The Company is planning to complete the tank work by the end of the summer of 2026 and begin refill immediately after. In the event that the tank refill is delayed, the Company has secured 20,000 Dth/day of city gate peaking delivering to the Iroquois S. Commack city gate. Additionally, all five CNG injection sites on Long Island will be fully supplied. The city gate and CNG contracts provide peak day supply if Holtsville LNG is unavailable for winter 2026/27. The CNG injection sites can provide up to 88,000 Dth/day of on-system supply. The incremental 20,000 Dth/day of city gate peaking secured for 2026/27 will expire March 31, 2028. In addition to 2026/27 winter, the Company also plans to ensure that all five CNG injection supplies are fully supplied for 2027/28 winter as well. This will provide supply contingency for possible delays associated with the NESE and ExC projects expected in service by November 2027.

With the current Upstate NY long-term city gate peaking set to expire after next winter, the Company issued an RFP looking to extend city gate supply through 2032/2033. The Company has accepted a proposal for 10,000 Dth/day at the Company’s East Gate beginning December 2027 through March 2033, essentially extending the Company’s current deal at the East Gate for another six years. With the extension of this city gate supply, the Company was able to pause construction of a second CNG site to investigate possible alternatives. This will help safeguard against any possible future supply deficits.

## 4.5. Polar Vortex (Winter Storm Fern) 2026

The 2026 Polar Vortex, including Winter Storm Fern, was an extreme stress test that validated the Company's gas supply portfolio, providing supply for over 1.9 million firm customers in New York City and Long Island and over 0.6 million in Upstate New York during a period of record demand and market volatility.

The gas supply plans for January 2026 included baseload volumes, priced at first-of-the-month market indices, with underground storage and daily purchases planned to meet normal demand above and beyond baseload quantities. This strategy minimizes over supplying the gas system on warmer than normal days as well as providing pricing diversity. As demand increased, additional daily supplies, including higher priced pipeline "peaking" supplies, were dispatched as needed for operational requirements and to meet forecasted firm demand. In Downstate New York, LNG was also dispatched, providing additional supply and gas system pressure support. Where applicable, non-firm customers were interrupted as allowed by tariffs.

In Downstate New York, the Company's diverse supply portfolio ensured reliability despite multiple reported upstream gas system freeze-offs impacting various US supply basins. Pipelines and suppliers were reliable with minimal supplier underperformance. Downstate New York LNG plants operated as designed and provided additional supplies during the coldest days. LNG was called on six days during the storm from both the Greenpoint and Holtsville LNG plants. During the subsequent cold-snap on February 7th and February 8th, LNG was called on both days. CNG facilities were on standby and ready to inject supply if there were system issues, but no CNG was required in Upstate or Downstate New York because the systems performed well. CNG injection under non-contingency conditions is only expected to occur when average temperatures are within 5°F of Design Day conditions.

## 4.6. Previous winter data

Winter 2025-2026 throughput and sendout data are summarized below, including the actual peak day data for Upstate and Downstate New York. While the weather was very cold for an extended period of time, it should be noted that the peak day experienced this winter was warmer than design day conditions in both UNY and DNY.

**Figure 4-10: Winter 2025-2026 Throughput and Sendout**

*Data In Dekatherms*

| DNY | Nov-25 | Dec-25 | Jan-26 | Feb-26 | Mar-26 | Peak Day - 2-7-26 |
|---|---|---|---|---|---|---|
| Throughput | 38,869,898 | 57,343,228 | 61,656,800 | 56,798,427 | 42,331,648 | 2,633,740 |
| Sendout | 27,817,960 | 46,699,294 | 51,412,370 | 45,751,302 | 33,049,650 | 2,412,164 |

| UNY | Nov-25 | Dec-25 | Jan-26 | Feb-26 | Mar-26 | Peak Day - 2-7-26 |
|---|---|---|---|---|---|---|
| Throughput | 18,154,970 | 26,073,762 | 27,683,434 | 24,083,950 | 19,667,565 | 1,149,696 |
| Sendout | 12,461,324 | 18,706,379 | 20,511,931 | 17,901,609 | 13,694,880 | 924,572 |

# 5. System Reliability and Resilience

## 5.1. Reliability standards and recent performance

The gas networks performed well during the recent Polar Vortex (including Winter Storm Fern) of the 2025/2026 winter season. The number of heating degree days this winter for both Downstate and Upstate NY is higher than normal, but lower than design. This indicates a colder than normal winter, but it is important to note that design day conditions did not occur this winter season.

The storm kicked off a streak of nine consecutive days beginning January 24, 2026, during which temperatures in New York City did not exceed freezing. Another cold snap followed less than a week later, resulting in record throughputs and sendouts on February 7-8, 2026. In summary for Winter 2025/26:

- New York City set three of the top 30 throughput records
- New York City set five of the top 30 sendout records
- Long Island set ten of the top 30 throughput records
- Long Island set seven of the top 30 sendout records
- Upstate New York set two of the top 30 throughput records
- Upstate New York set two of the top 30 sendout records

Winter Storm Fern also validated our system's design and reliability assets, providing reliable service to firm customers. LNG in DNY operated as expected, facilitated reliable system performance and helped avoid the need for contingent operations. Non-firm interruptible customers and demand response were activated multiple times in both UNY and DNY to ensure reliability to firm customers. Continued reliability and system performance reflects the importance of cumulative prior investments, ongoing risk assessment, and future system investments.

## 5.2. Identification of system constraints and vulnerable locations

The Downstate system is forecasted to face a supply shortfall, described in detail in the LTP Addendum. The Company intends to address this shortfall through the NESE and ExC supply projects.

System constraints in UNY include a forecasted East Gate supply shortfall, as well as localized gate imbalances where projected demand is forecasted to exceed the MDDO (i.e. maximum daily supply). The project to construct a second CNG site in UNY is currently paused to allow the Company time to investigate potential alternative solutions to address the East Gate supply constraint. Given the evolving nature of customer demand, upstream supply conditions, and operational requirements at constrained gates, the Company may identify a need for incremental resources in UNY over the planning horizon. Accordingly, National Grid intends to continue monitoring and periodically re-evaluating both demand-side options (including targeted efficiency, demand response, and other non-pipe alternatives) and supply-side options (including incremental city-gate deliveries, storage and peaking arrangements, and other operational measures) as updated information becomes available. As part of this ongoing evaluation, the Company may consider a more formal assessment or study within the next year to help

confirm the magnitude, timing, and potential portfolio of solutions needed to maintain reliable service, including the implications of proceeding with, modifying, or further deferring the second CNG site.

# 6. Non-Pipe Alternatives & Demand-Side Management

## 6.1. Non-Pipe Alternatives ("NPA")

### *6.1.1. Overview of NPAs*

The term NPA refers to any targeted investment or activity that aims to defer, reduce, or remove the need to construct or upgrade components of the natural gas distribution system. Put more simply, NPAs aim to avoid either: (a) the upgrading or replacement of existing gas infrastructure, or (b) the installation of new gas infrastructure. NPAs seek to achieve that goal via the elimination or reduction of gas demand in the geographic area that is served, or would be served, by the infrastructure in question. That elimination or reduction of demand is typically achieved via energy efficiency (which reduces gas demand) and/or the electrification of existing gas equipment and appliances (which reduces and/or eliminates gas demand). Under the Joint Proposals for KEDNY, KEDLI and NMPC, the Company commits to incorporating an evaluation of non-pipeline alternatives as a routine consideration when planning new or replacement gas infrastructure, where feasible, while preserving their ability to make investments necessary to meet legal and regulatory obligations and to respond to safety risks or emergencies.[12]

In its previous Long-Term Plan, National Grid described three types of NPAs: New Connection, Reliability & Reinforcement ("R&R"), and Leak-Prone Pipe ("LPP"). Those descriptions, with small updates made to improve clarity and based on current best practices, are included below for completeness. In addition, National Grid now has a fourth category of NPAs, Service Line NPAs, which is described below as well.

### *6.1.2. NPA Progress Updates*

National Grid has made meaningful progress to develop and evolve its NPA programs and processes. Additionally, it has onboarded Implementation Contractors for both the upstate territory and the downstate territories, begun outreach to customers across the state on more than 30 segments of pipe comprising 176 gas customers, made two awards for NPA RFPs (one in New York City and one on Long Island), issued RFPs for three additional Reliability & Reinforcement NPAs, and helped to lead the establishment of a cross-functional utility working group to support NPA program standardization across gas utilities in New York. National Grid expects to accelerate its rate of assessing NPAs,

[12] *See*, Cases 23-G-0225 and 23-G-0226, Proceeding on Motion of the Commission as to the Rates, Charges, Riles and Regulations of The Brooklyn Union Gas Co. d/b/a National Grid NY and KeySpan Gas East Corp. d/b/a National Grid, *Joint Proposal*, at 7.1 (Apr. 9, 2024); Case 24-G-0323, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corp. d/b/a National Grid, *Joint Proposal*, at 16.1 (Apr. 25, 2025).

continuing the commitment made in its previous Long-Term Plan to “aggressively explore, advocate for, and, when feasible, implement NPAs.”

**Leak-Prone Pipe NPAs**

All LPP NPAs are being facilitated by the Company’s Implementation Contractors, which were chosen via competitive solicitation.[13] Utilizing these Implementation Contractors to address LPP NPAs holistically enables a more streamlined and more cost-effective execution model, reduces duplicative procurement efforts, and supports timely deployment consistent with system and customer needs.

As reported in the Final LTP, the Company is currently in active NPA discussions with a community center located in a Disadvantaged Community (“DAC”) in Brooklyn that is served by a segment of LPP. The net avoided cost of upgrading almost 900 feet of LPP would be offered to the customer to be put toward electrification. This NPA still has not reached the deployment stage, but the Company continues to provide support to the customer and anticipates that it will reach deployment. Additional updates will be provided in future LTP reports.

**Leak-Prone Pipe Mileage Remaining**

As of CY26, the Company has approximately 4,129 miles of LPP remaining across its New York service territories, consisting of approximately 2,683 miles in KEDLI, 1,160 miles in KEDNY, and 286 miles in NMPC. The LPP replacement program will continue to be executed through a disciplined, risk-based planning framework (ENG04030) that prioritizes the remaining higher-risk segments. In addition, LPP replacement that does not qualify for NPAs will continue to be accomplished through other capital and reliability programs, which together align annual replacement targets with demonstrated system risk and constructability. Future replacement levels will be periodically reassessed based on observed leak performance, updated risk modeling, and rate-case review to ensure continued progress toward long-term LPP elimination objectives while maintaining public safety and system reliability.

[13] In this Annual Report, the Company is required to address “results of solicitations for NPAs issued by each company focused on retiring LPP.” Because many LPP NPAs involve few customers – typically fewer than ten, and often as few as one – issuing a separate solicitation for each NPA project would introduce significant cost and administrative burden that could impede the Company’s ability to expeditiously address and implement NPAs. Moreover, the Company is required by its Joint Proposals to retain the services of Implementation Contractors “with the necessary planning, engineering, and marketing expertise needed to execute the Companies’ commitments to NPAs.” The Company will issue individual solicitations for R&R NPAs (a) as required by the KEDNY-KEDLI Joint Proposal and/or (b) for larger R&R NPAs where the Company believes a competitive process will produce innovative and/or cost-effective solutions within a timeframe that will allow sufficient time to market and implement that NPA.

Figure 6-1: LPP Remaining Mileage

| Region | LPP Targets CY26 | LPP Remaining Miles |
|---|---|---|
| KEDLI | 132 | 2,683 |
| KEDNY | 54 | 1,160 |
| NMPC | 38 | 286 |
| **Total** | **224** | **4,129** |

## Reliability & Reinforcement ("R&R") NPAs

The Company has issued several RFPs for R&R NPAs over the past five years. The most recent was issued in March 2026 and addressed three areas of the downstate systems including two projects on Long Island and one in New York City. The Company is currently moving through the procurement process and, if valid bids are received, expects to contract with the selected vendor(s) later in 2026. Additionally, the Company issued an RFP in March 2025 that addressed two projects in the downstate New York system, including one project on Long Island and another in New York City. The Company received one technically feasible bid in response to both projects. The Company made an award to the bidder in 2025, who began customer outreach in April 2026. Details on progress on these NPAs will be included in future updates to the LTP and in the Company's annual NPA Opportunities and Programmatic Successes Reports (which, per the terms of the Niagara Mohawk and KEDNY-KEDLI Joint Proposals, will be filed by July 31st of each year).

Additionally, as reported in the previous LTP, the Company completed three NPAs in Saratoga County, each of which serves one customer. These farm tap NPAs involved customers served by and connected directly to a transmission line. Twenty customers served by transmission services requiring upgrades were contacted about pursuing an NPA in lieu of continuing their gas service. Out of the twenty eligible customers, five expressed interest in learning more. Of those five, one customer did not elect to move forward with the NPA, and another was determined not to be feasible due to legal concerns and operational concerns with the site. The remaining three customers were fully electrified with a geothermal system serving as the primary source of heating and cooling. The design of the customer homes required extensive customization, including integrating both ground source heat pump and air source heat pump systems to deliver heating and cooling as required throughout the property. The Company worked with these customers for more than two years to ensure that they were satisfied with the final state of the installation. The gas services were disconnected in May 2024, enabling 586 feet of gas service piping to be retired. The Company is in the process of surveying these customers and determining the net impacts of their switch to all-electric equipment, including both energy usage impacts and cost impacts.

## New Connection NPAs

The Company continues to assess new connection requests that meet the threshold criteria for consideration as an NPA. This has resulted in one

implemented NPA, in which a developer of a residential development of more than 100 homes elected to receive an NPA incentive in exchange for modifying its plan to bring gas to the residences. The development is partially constructed, with 10 homes complete and 40 more under construction. All of the existing homes have ground-source heat pump systems, which facilitated the avoidance of a significant portion of gas piping on the property that would have been needed to serve the residences. If all homes are eventually served by electric appliances, as the developer indicated when the NPA was being discussed, the NPA will avoid the construction of approximately 21,000 feet of gas main and service lines.

PA Consulting's recommendation #21 speaks to a desire for National Grid to seek to avoid extensions of the gas distribution system by implementing NPAs. As described more fully in KEDNY and KEDLI's NPA Implementation Plan, National Grid will actively seek to offer an NPA incentive to all parties that request a new connection to the gas system when that connection meets the criteria listed above. If the requester elects to utilize that incentive toward alternatives to gas-fired appliances and equipment, that will enable an avoidance of the extension of the gas system to their home/property.

**Service Line NPAs**

The Company is working with its Implementation Contractors to finalize process steps relating to outreach to customers who may be eligible for Service Line NPAs. Due to the overlap with LPP NPAs and New Connection NPAs, it will be critical to be clear with customers about their potential incentives and at what point that process will be finalized. Additionally, there will need to be a clear process for identifying LPP service lines that will be eligible for NPA incentives and then refining that list to determine which ones should be contacted immediately vs. delaying until a point in the future when additional incentive information may be known.

**Benefit Cost Analysis and Cost-Effectiveness Determinations**

All NPAs are typically required to be cost-effective (i.e., the net benefits of the NPA solution, including the avoided cost of the alternative infrastructure solution, must be greater than the net costs of the solution). This cost-effectiveness is evaluated using a Societal Cost Test ("SCT") Benefit Cost Analysis ("BCA"), which incorporates costs and benefits that accrue to all residents of New York (and potentially outside the borders of New York), not merely those that are customers of National Grid. NPAs that have a SCT BCA greater than or equal to 1.0 are ones that National Grid will present to eligible NPA participants for their consideration.

When determining cost-effectiveness, the Company runs three BCA tests: SCT, Utility Cost Test ("UCT"), and gas Ratepayer Impact Measure ("gRIM"). For completeness, the Company also calculates the electric Ratepayer Impact Measure ("eRIM"), though it is not used at this point to screen or select NPAs. These tests are run using a BCA calculator tool developed for the Company by Guidehouse in 2025, and which was developed in accordance with existing New York BCA framework guidance.

### 6.1.3. Barriers to NPA adoption and strategies for scaling

Despite their potential benefits, NPAs continue to face several barriers to broader adoption and scalability. Certain NPA types require unanimous participation among eligible customers within a limited timeframe; given differing customer needs, financial situations, and risk tolerance, such unanimous timebound participation can be difficult to achieve. Customer sentiment also presents a challenge, particularly for projects involving full electrification, as some customers express strong preferences for natural gas service, concerns about stranded gas appliances, potential bill impacts, and perceived electric system reliability. In addition, NPAs must meet cost-effectiveness thresholds typically required by DPS Staff, and the developing market for third-party NPA providers has resulted in limited participation in RFP-based solicitations.

The Company has undertaken several strategies to address these barriers. These include increased and targeted customer outreach, prioritization of NPA opportunities involving a small number of customers and high avoided capital costs, use of a newly developed BCA calculator to assess feasibility early in the planning process, and reliance on implementation contractors to reduce exposure to third-party market constraints. The Company also plans to incorporate customer testimonials to address reluctance through social proof. More broadly, the Company continues to collaborate with peer utilities, DPS Staff, and other stakeholders and has engaged with RMI (formerly known as Rocky Mountain Institute) to study domestic and international NPA case studies and participate in an accelerator program, reflecting an ongoing commitment to refining and scaling viable NPA approaches.

Prior to the previous LTP, the Company partnered with environmental think-tank RMI to better understand the emerging landscape of targeted electrification, NPAs, and gas-networking “rightsizing” in order to inform utility planning and policy underway in our territories. The resulting paper examined nine case studies in the US and Europe to draw out potential insights for further exploration of the opportunities for NPAs, as well as potential policy changes that could further enable their development. Building on this collaboration, representatives of the Company participated in an accelerator that was facilitated by RMI in December 2025. Several intervenors in recent rate cases also participated in the accelerator, representing collaboration on developing NPA approaches.

## 6.2. Demand-Side Management

### 6.2.1. Energy efficiency programs updates

The Company’s Energy Efficiency (“EE”) gas portfolios consist of a variety of programs within the commercial & industrial (“C&I”), multifamily, residential, and low- and moderate-income (“LMI”) sectors that are aimed at reducing annual and lifetime energy consumption, lowering customer costs, increasing customer comfort, and addressing the region’s gas system constraint by reducing peak gas demand.

Throughout 2025, the Company has successfully delivered on its commitment to support customer adoption of energy efficiency and building electrification. The Company recently provided an in-depth overview of its EE programs and performance in their System Energy Efficiency Plan ("SEEP") 2025 Annual Reports filed in Cases 15-M-0252 and 18-M-0084. Please refer to the discussions in those filings for current and thorough program descriptions.[14]

**Figure 6-2: Downstate NY Annual Energy Savings**

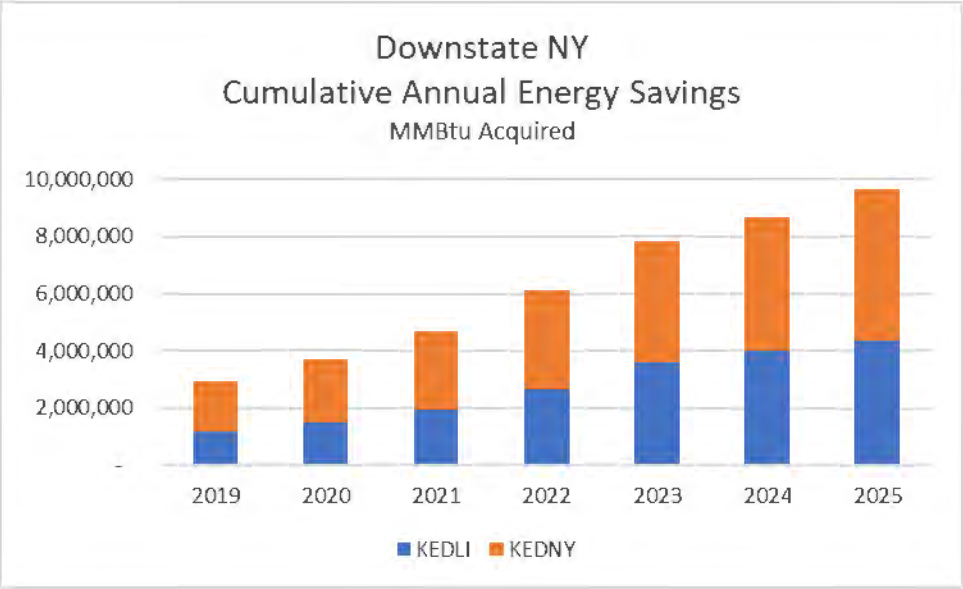
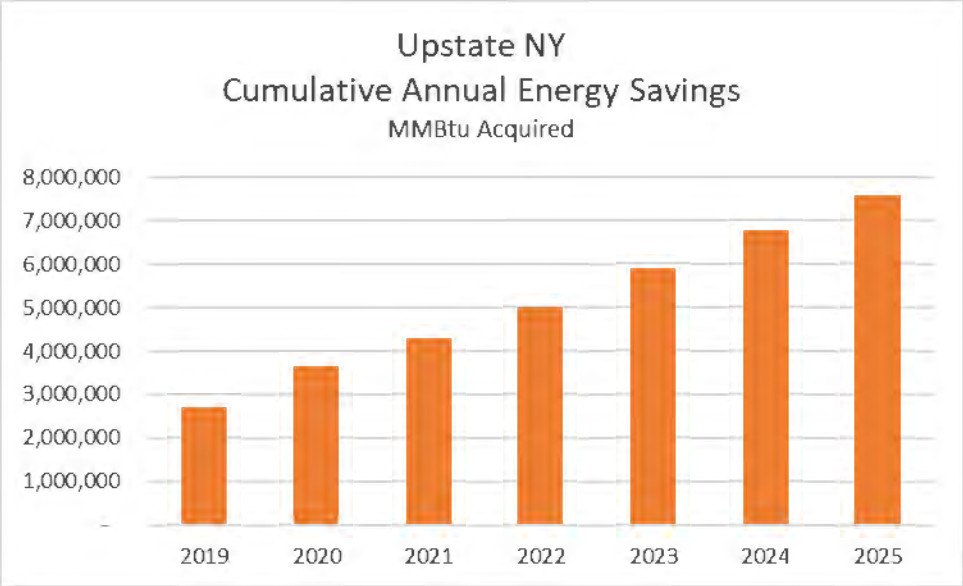



**Figure 6-3: Upstate NY Annual Energy Savings**



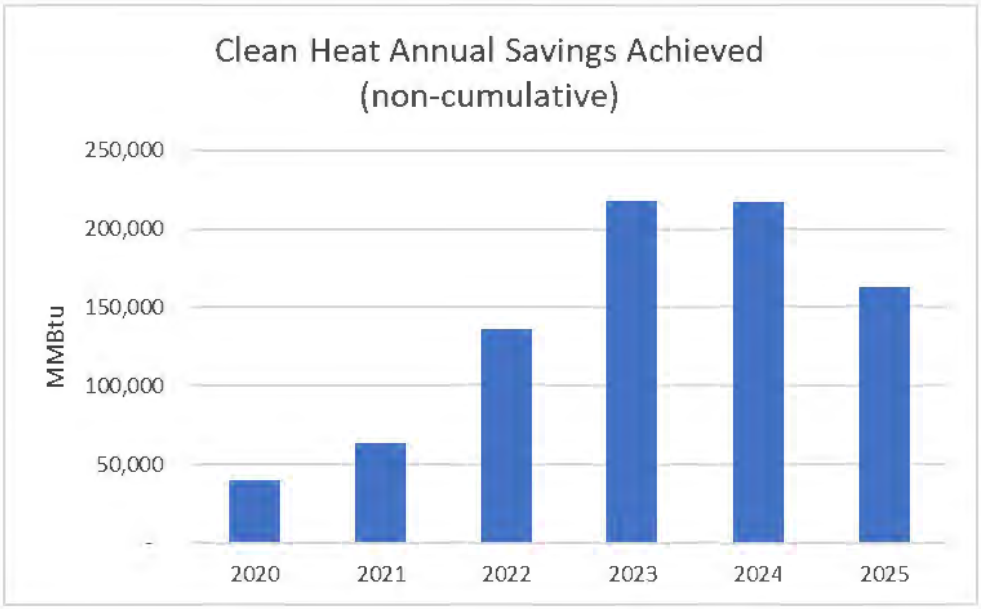

[14] Case 18-M-0084, In the Matter of a Comprehensive Energy Efficiency Initiative, and Case 15-M-0252, In the Matter of Utility Energy Efficiency Programs, The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid, *System Energy Efficiency Plan 2025 Annual Reports* (filed April 1, 2026), and Niagara Mohawk Power Corporation d/b/a National Grid, *System Energy Efficiency Plan 2025 Annual Report* (filed March 31, 2026).

**New York State ("NYS") Clean Heat:**

National Grid's heat pump programs are offered to electric customers in its NMPC service territory in Upstate New York. In May 2025, the Commission issued an Order that provided direction and authorized funding for the Clean Heat Program for 2026-2030 ("Non-LMI EE/BE Order").[15] The Non-LMI EE/BE Order changes the focus of the NYS Clean Heat Program. From 2020-2025, the NYS Clean Heat Program encompassed heat pump and building electrification programs across all customer sectors. In contrast, the Non-LMI EE/BE Order directed that the NYS Clean Heat Program support building electrification, including heat pumps, only for customers in residential one- to four-family homes for 2026-2030.[16] Larger customers, those in the multifamily and commercial sectors, which includes small businesses and nonprofits, will receive incentives for heat pumps and other building electrification technologies through the Utilities' programs targeting those sectors in 2026-2030.[17]

Between its launch in 2020 through 2025, the National Grid Clean Heat Program achieved over 830,000 MMBtu in annual energy savings. The Company recently provided an in-depth overview of its Clean Heat program and performance in the New York State Clean Heat Program 2025 Annual Report filed in Case 18-M-0084. Please refer to the discussions in this filing for current and thorough program details.[18]

**Figure 6-4: NY Heat Pump Program Performance**




[15] Case 14-M-0094 et al., Proceeding on Motion of the Commission to Consider a Clean Energy Fund, *Order Authorizing Non-Low- to Moderate-Income Energy Efficiency and Building Electrification Portfolios for 2026-2030* (issued May 15, 2025) ("Non-LMI EE/BE Order").
[16] A project serving 1-4 dwelling units in a building with split unit ownership that has 5 or more dwelling units (i.e., typically defined as a "multifamily" building) is eligible for the NYS Clean Heat Program.
[17] Non-LMI EE/BE Order at 33.
[18] Case 18-M-0084, *New York State Clean Heat Program 2025 Annual Report*, jointly filed by Central Hudson Gas & Electric Corp.; Consolidated Edison Company of New York, Inc.; Niagara Mohawk Power Corporation d/b/a National Grid; New York State Electric & Gas Corp.; Orange and Rockland Utilities, Inc.; and Rochester Gas and Electric Corp.; and NYSERDA (filed April 1, 2026).

### *6.2.2. Firm Demand Response program updates*

The Company's firm gas demand response ("DR") programs play a critical role in reducing peak gas usage in the Company's New York service areas by incentivizing or encouraging customers to reduce or curtail gas usage during the coldest days of the winter. By doing so, they enable the Company to provide safe and reliable service on the coldest days of the winter, support system resiliency under emergency conditions, lower customer bills by reducing gas commodity costs, provide incentives to customers that can offset gas bills or be reinvested in energy efficiency projects, and help avoid increases in peak demand that might result in the need to upgrade existing gas infrastructure or construct additional infrastructure.

National Grid first began exploring the potential of gas DR through an innovative pilot program launched in its Downstate NY service territories in 2017; it was one of the first instances in the country of applying demand response program principles to firm service gas customers. The Company then built upon that pilot's success by launching a portfolio of gas DR programs in the winter of 2019-2020 and expanded those programs to the Upstate NY service territories in the winter of 2022-2023.

The following programs make up the Company's Gas DR portfolio:

- Load Shedding Demand Response: A program for large commercial, industrial, and multifamily firm service customers capable of reducing peak day gas load over a 4- or 8-hour period on event days.
- Load Shifting Demand Response: A program for large commercial, industrial, and multifamily firm service customers capable of reducing peak hour gas load over a 4-hour period on event days.
- Bring Your Own Thermostat ("BYOT"): A residential and small commercial customer-focused program which utilizes Wi-Fi connected thermostats to remotely lower temperature set points and shift peak hour gas loads on event days.

The programs continue to see considerable increases in customer adoption. At the start of the 2025/26 winter season, combined program enrollments across the Company's Upstate and Downstate NY service territories totaled over 620 medium-to-large commercial, industrial, and multifamily accounts and over 64,000 Wi-Fi connected thermostats.

**Figure 6-5: Gas Demand Response Program Enrollment – Load Shedding**

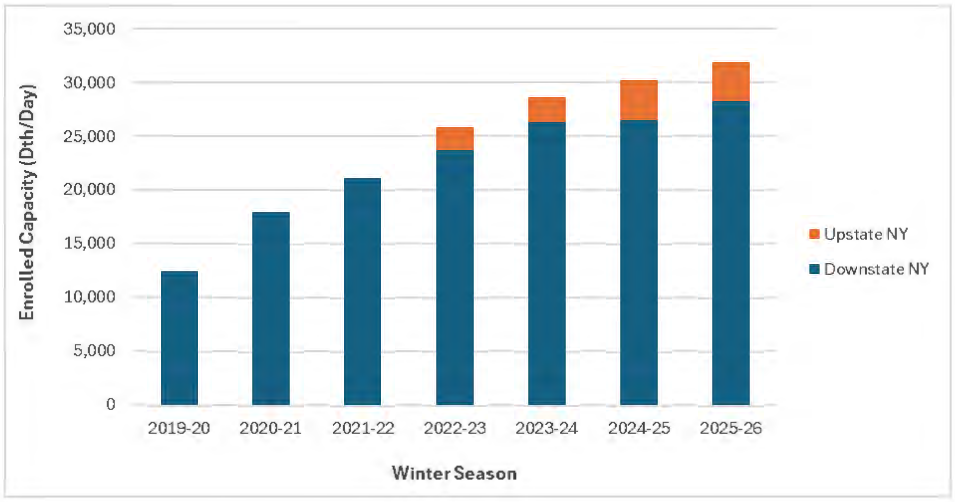
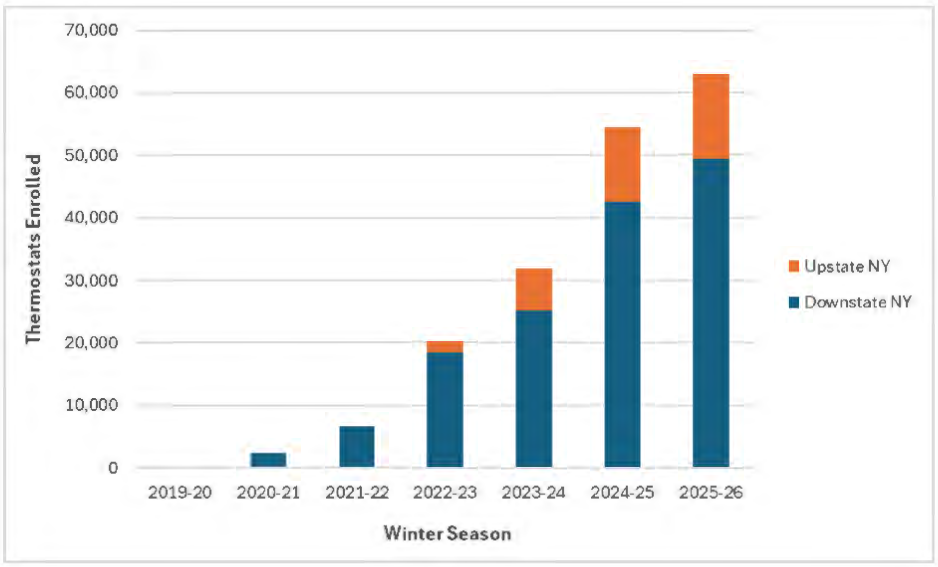



**Figure 6-6: Gas Demand Response Program Enrollment – BYOT**




### *6.2.3. Winter 2025-26 Demand Response Performance*

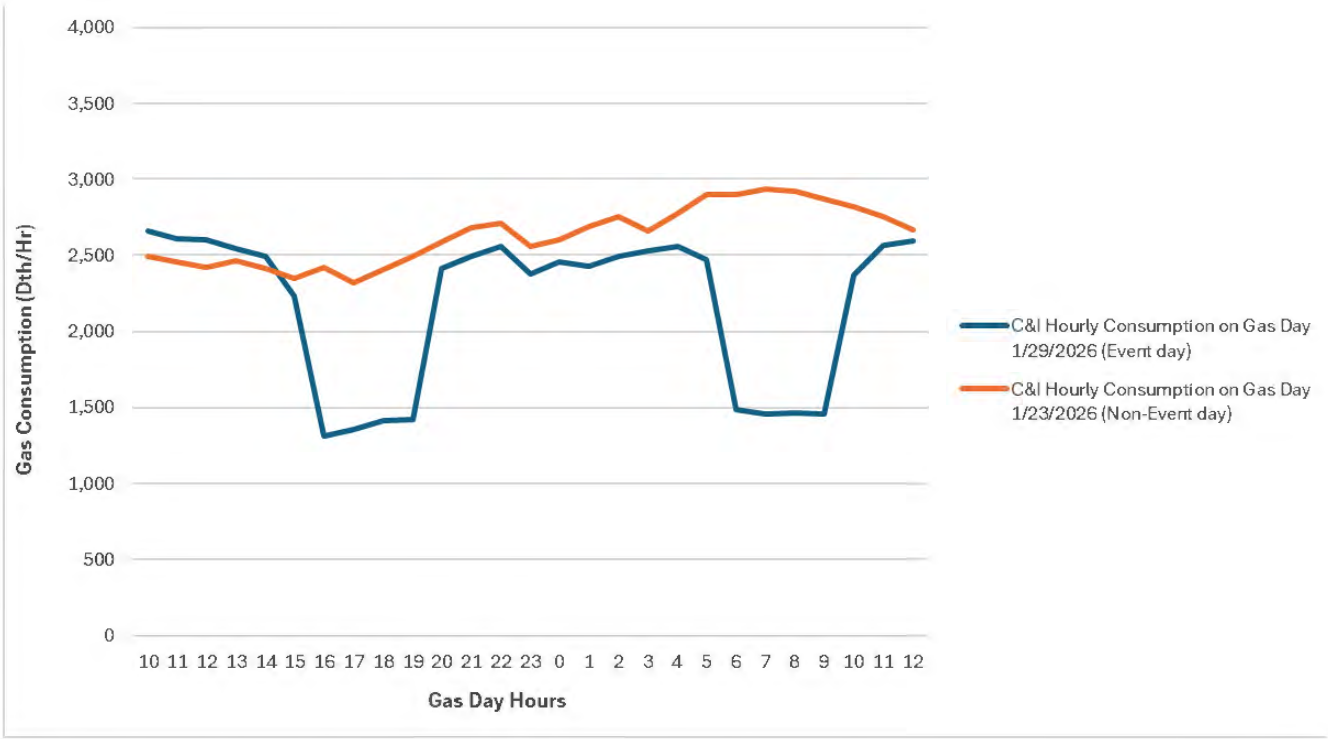
The Company's gas DR programs have been successful in proving the reliability of customers' demand reductions and have delivered consistent results over the course of the programs' lifespan. Although early seasons limited evaluation of gas DR to milder conditions, more challenging circumstances, such as the emergency event during Winter Storm Elliot in December 2022 and subsequent seasons with multiple weather-driven gas DR events, have demonstrated that DR is a flexible and reliable resource that improves the overall resiliency of the gas system during peak times.

During the 2025-26 winter, New York was subjected to the coldest weather in recent years, as well as significant snowfall, due to severe polar-vortex events.

Correspondingly, the number and duration of gas DR events were the highest to date: the Company called four DR events in DNY - spanning across two consecutive full gas days on two occasions (January and February) - and eight events in Upstate NY, with three of them spanning across consecutive full gas days (from January 29th to February 1st), notably the longest gas DR event period registered by the Company so far.

Despite record low temperatures, several multi-day events (activated for two or more consecutive days), and the fact that over half of event windows were called during weekends, customer performance remained high and aligned with historical values.

**Figure 6-7: Gas Demand Response – C&I Participants Consumption on a DR Event Day vs. a Non-DR Event Day**




# 7. Low Carbon Fuels ("LCF") and Decarbonization Pathways

## 7.1. Availability and emission analysis

Since National Grid's LTP was filed in March 2025, the American Gas Foundation ("AGF") published a study in July of 2025, conducted by ICF that serves as an update to their 2019 study assessing the supply and emissions reduction potential of RNG in the US. The full report is available online.[19] The primary source of data for the study is Department of Energy's latest Billion Ton Report that was released

[19] American Gas Foundation, *Renewable Natural Gas Supply Assessment*, available at AGF-RNG-Study_FINAL-09022025.pdf.

in 2023. The new study finds that the estimated pool of biomass available for bioenergy has increased by 17% relative to the 2019 study.

Key findings in the 2025 AGF study include:

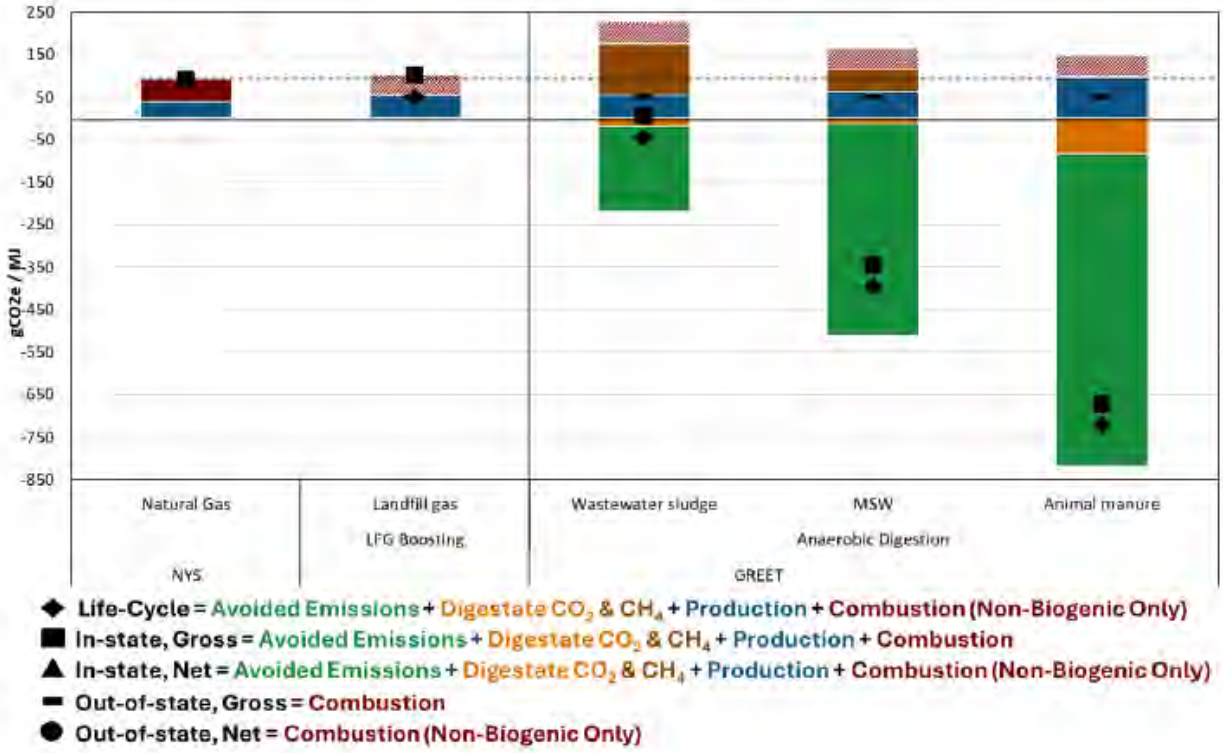
- RNG supply potential from biogenic sources is higher than previously estimated, ranging from 1,628 tBTU/y in a low scenario to 7,061 tBTU/y in an ambitious emission reduction scenario. For context, the annual 10-year average residential demand for natural gas in the U.S. is approximately 4,840 tBTU.
- RNG production from other innovative technologies could add an incremental annual supply of 118 – 472 tBTU.
- RNG has the potential to be a cost-effective pathway for significant Greenhouse Gas ("GHG") emissions abatement in the future, with the potential to deliver between 80 million to more than 330 million metric tons of GHG reductions in the US annually by 2050.

## 7.2. Policy and stakeholder perspectives on the role of low-carbon fuels

As noted in National Grid's March 2025 LTP filing, accurate GHG accounting is essential to facilitate the deployment of alternative fuels. The New York State Energy Plan, approved in December 2025, introduces important updates to the State's approach to GHG accounting materially improving the outlook for RNG project development in New York. The Plan recognizes that *"*low-carbon alternative fuels are an important complement to electrification in the State's clean energy transition strategy.*"*[20] It further recommends that "life-cycle analysis should be used in policy development to evaluate and compare GHG emissions reductions associated with different feedstocks, fuels, and end uses, to calculate emissions reductions relative to a business-as-usual scenario.*"*[21] The figure below from the State Energy Plan reflects these changes and shows the benefits of RNG under the new accounting method.

[20] 2025 New York State Energy Plan – Volume II, Chapter 5 – Low-Carbon Alternative Fuels.
[21] *Id*. at 5.

**Figure 7-1: RNG Carbon Intensity by Production Pathway**




Source: 2025 NY State Energy Plan

With this change, the State has aligned its methodology with federal practices, leading states such as California, and international frameworks that incorporate avoided emissions when determining the emission factor—or carbon intensity—of low-carbon fuels. This shift makes New York's accounting protocols consistent with widely accepted life-cycle assessment standards and has significant implications for the valuation, eligibility, and overall feasibility of future RNG and other low-carbon fuel projects developed in the State.

In February 2026, the U.S. Department of the Treasury issued a Notice of Proposed Rulemaking ("NOPR") for the Clean Fuel Production Credit under Section 45Z of the federal tax reform law of 2025. The proposed regulations represent a significant opportunity for investment in New York, particularly for RNG projects utilizing livestock manure as a feedstock. Based on Treasury's use of an updated Greenhouse gases, Regulated Emissions, and Energy use in Technologies model, the Production Tax Credit ("PTC") for manure-derived RNG is expected to range from approximately $45 to $60 per MMBtu.

The 45Z credit is currently authorized through 2029. As is common with federal production tax credits, industry stakeholders are already urging Congress to extend the credit beyond its current sunset date. A final rule is anticipated in June, following the ongoing 60-day public comment period.

The NOPR also provides important clarity regarding the interpretation of "suitable for use" — language that previously created uncertainty about which end-use sectors would qualify for the credit. Treasury's proposal makes clear that RNG is eligible for the PTC when produced to a standard that renders it interchangeable

with fossil natural gas, regardless of the sector in which it is ultimately consumed. The NOPR states that "[t]o be considered suitable for use, a fuel need not actually be used as a fuel in a highway vehicle or aircraft," and RNG "is suitable for use once it is produced so that it is interchangeable with fossil natural gas and would require only minimal processing (for example, further compression or liquefaction)."[22]

## 7.3. Annual RNG Purchases Reporting

### *7.3.1. Renewable Natural Gas in our Current Portfolio*

In March 2023, National Grid, in partnership with the New York City Department of Environmental Protection, commissioned the Newtown Creek biogas facility. In the first year of operation (April 2023 through March 2024) the Company's conditioning system produced 116,717 Dth of RNG; the biogas was injected into the local distribution network. The Company did not retain the environmental attributes and, therefore, does not claim the supply as procured RNG in its portfolio.[23] For FY2025, the system injected approximately 270,000 Dth. The Company forecasts annual production between 250,000Dth/year and 320,000 Dth/year.

In addition to supplies generated by Newtown Creek, the Company is also awaiting the completion of an anaerobic digestion waste-to-energy facility on Long Island that will be owned and operated by American Organic Energy, LLC ("AOE"). Under the agreement with AOE, the Company will purchase a portion of the gas supply generated by the facility but will not purchase the environmental attributes. AOE is expected to inject approximately 1,824 Dth/day.

### *7.3.2. RNG Procurement Strategy*

National Grid has a vast network of pipeline transportation capacity throughout the country, with transportation rights on pipelines originating in liquid basins as far as the Gulf Coast and Ontario to our service territories in the Eastern United States. Through market analysis, National Grid has identified RNG feedstocks that could interconnect directly with National Grid's transportation capacity. National Grid also understands that certain feed stocks will not be located near these transportation networks, resulting in supplies that cannot be physically transported to its service territories.

Under current regulations, National Grid does not purchase RNG as part of its supply portfolio, including for calendar year 2025. However, the company would be supportive of working with New York policymakers in developing new policy frameworks that would allow the natural gas utilities to purchase RNG on behalf of its customers with the associated environmental attributes.

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[22] U.S. Dep't of the Treasury, Clean Fuel Production Credit Under Section 45Z; Notice of Proposed Rulemaking, 91 Fed. Reg. 5160, 5168–69 (Feb. 4, 2026) (proposed 26 C.F.R. § 1.45Z-1(b)(34)(ii)(A)–(B)) (at 121).

[23] The Company's filings may use the terms "RNG" and "biogas" interchangeably; any reference to RNG in the Company's gas supply portfolio as it relates to Newtown Creek is biogas.

## 7.4. Report on Electrification and Service Termination Data

National Grid tracks customer requests for disconnection from the gas distribution system across its three New York operating companies: KEDNY, KEDLI, and NMPC. A total of 2,014 customer-initiated disconnections were processed during the calendar year. Figure 7-2 summarizes the disconnections by operating company.

**Figure 7-2: Customer Requested Gas Disconnections – Calendar Year 2025**

| Customer Requested Gas Disconnections (Calendar Year 2025) | |
|---|---|
| Operating Company | Total Disconnections |
| KEDNY | 606 |
| KEDLI | 799 |
| NMPC | 609 |

The Company notes that these customer requests were submitted for a variety of reasons, which may include electrification, demolition, conversion to alternative fuels, or other changes in customer premises or service needs. The available 2025 data does not distinguish which customers disconnected for the purpose of electrification.

This limitation is particularly relevant in the Downstate New York service territory (KEDNY and KEDLI), where National Grid is not the electric distribution company. As a result, the Company does not have complete or direct visibility into whether the customers who disconnected from the gas system subsequently electrified, nor can it identify the specific type of electric heating technology deployed (e.g., air-source heat pumps, ground-source heat pumps, or other electric alternatives).

To improve data quality and support State electrification and decarbonization tracking requirements, beginning January 1, 2026, National Grid implemented a new internal process to capture information from customers regarding their intention to electrify at the time of gas service disconnection. This process enhancement is designed to:

- Better differentiate between disconnections due to electrification and those due to non-electrification reasons
- Improve coordination with electric distribution companies where feasible
- Provide more accurate information for future reporting, planning, and regulatory filings.

As this new data collection process was not in place during 2025, the Company is unable to retroactively determine the electrification status of customers in the 2025 dataset. Future reports will include this additional information as it becomes available.

# 8. Infrastructure Planning and Investment

## 8.1. Leak-prone pipe replacement progress and targets

Figure 8-1 demonstrates continued progress in the Company's LPP replacement program across all operating companies. In CY25, total LPP replacements exceeded the combined annual target, with each operating company meeting or surpassing its respective goal. This performance reflects effective planning, execution, and coordination across programs. For CY26, LPP replacement targets increase modestly in aggregate, reflecting the Company's continued commitment to systematically reducing remaining LPP while aligning annual replacement levels with demonstrated system risk, constructability, and resource availability.

**Figure 8-1: LPP replacement progress and targets**

| Region | LPP Targets CY25 | LPP Completed CY25 | LPP Targets CY26 |
|---|---|---|---|
| **KEDLI** | 121 | 128 | 132 |
| **KEDNY** | 46 | 53 | 54 |
| **NMPC** | 33 | 39 | 38 |
| **Total** | **200** | **220** | **224** |

## 8.2. Capital Investment Plans

National Grid continues to identify and advance capital projects to preserve reliability and reduce supply risks for the gas system in general and at the Greenpoint and Holtsville LNG plants in particular. NESE and ExC address supply concerns in DNY, while UNY continues to be investigated to determine the path forward that best balances customer needs. Reinforcement and Reliability projects are identified to address more localized concerns, and potential NPAs are considered in lieu of these capital projects. These plans are reviewed and revised annually to align with system changes as well as energy demands. These projects illustrate National Grid's efforts to strengthen system resilience, maintain regulatory compliance, and secure LNG supply to meet demand.

### *8.2.1. Greenpoint LNG Plant*

Projects at the Greenpoint LNG Plant address corrosion mitigation, flood and storm hardening, control and fire-protection upgrades, and equipment reliability. Major scopes include an LNG tank painting and recoating program (extensive surface preparation and non-destructive evaluation), insulated polymer coating ("IPC") replacement on dikes, LNG Tank 2 foundation heater replacement and control modernization, tail gas compressor replacement with new auxiliaries and remote monitoring, saltwater pump house relocation and storm-hardening, LNG Tank 1 pump replacement, ongoing cryogenic piping insulation upgrades, nitrogen system modernization with flood mitigation, a new maintenance and control building with redundant communications and power, hydrant and deluge piping

replacement to address corrosion, auxiliary backup generation (~6 MW natural-gas generators) for fire systems, flare header refurbishment, control system modernization, and boiloff/steam boiler replacements to improve reliability and emissions control.

National Grid is also including the Greenpoint LNG Vaporizer Refurbishment Project, which will replace older vaporizer units (9 & 10) commissioned in 1970 with two submerged-combustion, low-pressure vaporizers. Work includes new stainless-steel piping, updated control systems, fire alarm and suppression upgrades, emergency shutdown equipment, and site improvements such as better access and safety barriers. The new units are expected to provide improved combustion efficiency and emissions controls. National Grid plans this work to replace aging vaporizers and maintain safe, reliable operation; and will not increase send-out supply capacity.

### *8.2.2. Holtsville LNG Plant*

Projects at the Holtsville LNG Plant address the replacement of aging equipment, improving fire protection, and increasing automation and reliability. Key scopes include a control room upgrade (building repairs, HVAC, ergonomic and electrical protection), replacement of the original dry powder fire suppression system, a fuel cell using boil-off gas to offset plant power use, hydrant system piping replacement with High-Density Polyethylene and upgrades to pumps and fire pumps to meet NFPA 20, IPC renewal for the containment dike, liquefaction system refurbishment, LNG pump overhauls, nitrogen system replacement and onsite generation, ongoing piping insulation inspection/upgrade, and replacement of the manual raw gas makeup system with an automated, larger-diameter system. Collectively these projects target corrosion, flooding and confined-space risk reduction, improved maintainability, and restored operational flexibility.

One of our critical projects, already in construction, is the Holtsville LNG Plant Modernization Project, which addresses code compliance and key safety and electrical vulnerabilities. Major items include OSHA/ANSI/NFPA-compliant stairs, handrails, emergency egress ladder and tie-off anchors; replacement of tank heater cables/controls and removal of outdated blowers/compressors; installation of 480V arc-resistant switchgear, motor control centers, battery banks and transformers; reinforcement of tank shell stiffeners to API 620 standards and improved grounding per NFPA 780; LED lighting; added redundant relief valves and upgraded main/internal isolation valves; nitrogen breather bladder replacement; internal weld inspections and repairs; instrumentation upgrades to NFPA 59A standards; and installation of a dry chemical extinguisher system for relief valves. These specific upgrades are intended to remediate aging infrastructure, improve safety and maintainability, and ensure code compliance.

### *8.2.3. On system capacity projects*

As stated in the LTP Addendum, the Transco NESE project is expected to bring an additional 400,000 Dth/day into the existing Rockaway Lateral supply point. KEDNY and KEDLI can accept some additional volumes expected through the NESE project at the Rockaway Lateral supply point without any on-system infrastructure, but in order to accept the full volumes expected through the project

and to enhance supply flexibility and reliability, National Grid is pursuing two on-system capital projects: (i) the Marine Park Regulator Station project in KEDNY and (ii) the Additional Flow Control at the Lake Success Metering Facility project in KEDLI.

The Marine Park Regulator Station project proposes to build a regulator station north of the existing Floyd Bennet Field ("FBF") facility to enable the Brooklyn Queens Interconnect to operate at the higher pressures needed to accept all incremental NESE gas and move it closer to the distribution system. The existing FBF facility will be modified to increase the outlet pressure and flow metering capability to accommodate NESE by Transco. These modifications will enable the full incremental gas volumes to flow, improving overall throughput, reliability, and system efficiency. These upgrades are expected to be in-service the year following the in-service date for the pipeline and are currently expected to cost ~$35 million.

The Additional Flow Control at Lake Success Metering Facility project will facilitate deliverability of incremental NESE gas and is critical to ensuring National Grid can comply with the New York Facilities Agreement flow limitations. This upgrade is expected to be in-service two years following the in-service date for NESE and is currently expected to cost ~$9 million.

# 9. Customer Impacts and Affordability

## 9.1. Programs and investments benefiting disadvantaged communities

The Energy Affordability Program ("EAP") delivers substantial benefits to DACs, ensuring access to discounts that reduce household energy burdens and expanding enrollment in assistance programs. The Company conducted targeted engagement with customers at community-based organizations to boost awareness and enrollment in 2025. Customers residing in DACs received $23,044,715 in EAP credits within the KEDNY service territory, $4,289,228 in EAP credits within the KEDLI service territory, and $4,585,370 in EAP credits within the NMPC gas service territory. Annual CLCPA/DAC reporting demonstrates significant participation and investment in DACs through tracked enrollment, expenditures, arrears, and service restoration data.[24]

The Enhanced Energy Affordability Program ("EEAP") expands support to moderate-income households, many of whom reside in DACs. These efforts, combined with strengthened customer advocacy, improved data tracking, and compliance with §7(3) of the CLCPA, ensure that energy affordability policy continues to equitably reduce energy burden and improve customer outcomes in the most vulnerable communities. From the time the program commenced in January 2026, through February 2026, KEDLI provided 488 credits totaling $15,770.88, KEDNY has provided 829 credits totaling $25,638.18, and NMPC has provided 536 credits totaling $2,294.72.

[24] *See*, Matter 23-02017, In the Matter of Reporting Investments and Benefits to Disadvantaged Communities; *see*, Cases 23-G-0225 and 23-G-0226*; see also*, Case 24-G0323.

The Company also offers several bill-assistance programs, such as budget billing, deferred payment agreements, and specialized payment arrangements. The Company supports fuel funds programs for low-income customers to receive one-time grants towards their heating cost in the winter. KEDNY administers the Neighborhood Heating Fund program, and NMPC administers the Care and Share program, both through HeartShare Human Services. KEDLI supports the United Way of Long Island's Project Warmth. The Company also partners with HeartShare Human Services to administer the Hope and Warmth Energy Fund, which provides moderate-income customers who qualify with between a $100 and $500 grant during the winter heating season. Between February 9, 2026, when the funds opened for the season, and March 20, 2026, the Company distributed a total of $892,870 in fuel fund grants to customers across its service territories, including $153,784 through the Neighborhood Heating Fund, $699,396 through Care and Share, and $39,690 through Hope and Warmth.

To further assist customers with their energy bills, the Company has a Consumer Advocacy program where customers can meet directly with an advocate who will help them navigate their energy bills and available assistance programs.

The Company also makes referrals of high usage EAP customers to New York State Energy Research and Development Authority ("NYSERDA") for participation in the EmPower+ program, which is an energy efficiency and weatherization program for LMI customers. To compliment the EmPower+ program, National Grid offers a Weatherization Health and Safety program throughout the state that provides funding to remove health and safety barriers in customers' homes that prevent them from receiving weatherization services for low-income customers and moderate-income customers who reside in DACs. This program will run in KEDNY and KEDLI through March 2027 and in NMPC through March 2028. The Weatherization Health and Safety program has had 166 participants to date, and the total spending from April 2025-February 2026 is $1.9M.

In 2024, National Grid allocated 47% of its energy efficiency spending in the KEDNY territory and 40% in the KEDLI territory to DAC customers. KEDNY and KEDLI's Energy Efficiency program portfolio empowers customers to manage their energy use effectively, offering rebates for building controls, HVAC equipment, and insulation measures. These efforts not only support the State's climate goals but also alleviate gas consumption constraints, benefiting DAC customers by lowering costs and improving quality of life.

Also in 2024, National Grid's marketing and outreach efforts, detailed below, resulted in 1,406 completed home energy assessments. Additionally, from July 2023 to August 2024, National Grid exclusively offered the Copper Labs device to DAC customers through this program, enabling 36 DAC customers to monitor their energy usage in real-time and access energy-saving tips via the Copper Labs app.

The Company also recognizes language access as an important component of effectively reaching customers. The language access plan identifies counties with high concentrations of Limited English Proficient populations, many of which overlap with Disadvantaged Communities. The impacted counties include Queens, Brooklyn, Staten Island, Nassau, and Suffolk, where over 20% of

residents speak a language other than English. Program information including for Home Energy Affordability Team and Affordable Multifamily Energy Efficiency Program have materials translated into multiple languages to improve accessibility. The Company has also pursued bilingual marketing campaigns, radio ads, and community events in Disadvantaged Communities.

**Figure 9-1: KEDNY Incentive Dollars Spent in 2024[25]**

| KEDNY Incentive Dollars Spent (in Total and in DACs) in 2024 | | | |
|---|---|---|---|
| Program | Total Incentive | Incentives to DAC Customers | % in DAC |
| Gas Commercial & Industrial Program | $3,778,547 | $1,237,373 | 33% |
| Gas LMI - Existing 1-4 Family Homes Program | $165,014 | $165,014 | 100% |
| Gas LMI - Existing Affordable Multifamily Program | $5,954,146 | $3,832,913 | 64% |
| Gas Multifamily Program | $1,819,679 | $640,959 | 35% |
| Gas Non-Residential Online Marketplace Program | $3,825 | $2,175 | 57% |
| Gas Non-Residential Weatherization Program | $1,009,452 | $523,025 | 52% |
| Gas Residential Engagement Program | $228,540 | $0 | 0%[26] |
| Gas Residential Online MarketPlace Program | $175 | $18 | 10%[27] |
| Gas Residential Program | $1,059,207 | $243,710 | 23% |
| **Total** | **$14,018,585** | **$6,645,187** | **47%** |

[25] 2023 KEDNY and KEDLI Rate Cases, *2024 KEDNY-KEDLI CLCPA and DAC Report* (July 29, 2025).

[26] To redirect funds to programs that support the portfolio's transition to Strategic measures, Home Energy Reports ("HERs"), Video Home Energy Reports ("vHERs"), and High Usage Alerts ("HUAs") offered by KEDNY's and KEDLI's Gas Residential Engagement Programs were discontinued in Q4 2023. In 2024, the Company continued to offer residential customers access to energy usage information provided by HERs and HUAs on the National Grid website when customers sign into their accounts. Due to these changes, the Gas Residential Engagement Program has a minimal budget in 2024 and will not claim energy savings. More information on this program can be found in the most recent SEEP.

[27] This program closed in 2023. Incentive spend and savings in 2024 are associated with administrative tasks and final payments related to final program activities.

**Figure 9-2: KEDLI Incentive Dollars Spent in 2024[28]**

| KEDLI Incentive Dollars Spent (in Total and in DACs) in 2024 | | | |
|---|---|---|---|
| Program | Total Incentive | Incentives to DAC Customers | % in DAC |
| Gas Commercial & Industrial Program | $3,477,541 | $468,104 | 13% |
| Gas LMI - Customer Awareness, Outreach, & Engagement Program | $198,892 | $41,391 | 21% |
| Gas LMI - Existing 1-4 Family Homes Program | $5,191,691 | $3,058,612 | 59% |
| Gas LMI - Existing Affordable Multifamily Program | $496,011 | $400,421 | 81% |
| Gas Multifamily Program | $126,879 | $25,022 | 20% |
| Gas Non-Residential Online MarketPlace Program | $4,383 | $1,250 | 29% |
| Gas Non-Residential Weatherization Program | $795,810 | $165,633 | 21% |
| Gas Residential Engagement Program | $110,140 | $0 | 0% |
| Gas Residential Online MarketPlace Program | $855 | $182 | 21% |
| Gas Residential Program | $640,257 | $268,104 | 42% |
| **Total** | **$11,042,458** | **$4,428,719** | **40%** |

**Figure 9-3: KEDNY Energy Efficiency Savings Achieved in 2024[29]**

| KEDNY Energy Efficiency Savings Achieved (in Total and in DACs) in 2024 | | | |
|---|---|---|---|
| Program | Total Savings (Annual MMBtu) | Savings (Annual MMBtu) to DAC Customers | % in DAC |
| Gas Commercial & Industrial Program | 169,197 | 69,190 | 41% |
| Gas LMI - Existing 1-4 Family Homes Program | 724 | 724 | 100% |
| Gas LMI - Existing Affordable Multifamily Program | 59,254 | 43,388 | 73% |
| Gas Multifamily Program | 115,266 | 40,595 | 35% |
| Gas Non-Residential Online MarketPlace Program | 343 | 195 | 57% |
| Gas Non-Residential Weatherization Program | 6,144 | 3,154 | 51% |
| Gas Residential Online MarketPlace Program | 25 | 3 | 10% |
| Gas Residential Program | 93,769 | 37,128 | 40% |
| **Total** | **444,723** | **194,378** | **44%** |

[28] 2023 KEDNY and KEDLI Rate Cases, *2024 KEDNY-KEDLI CLCPA and DAC Report* (July 29, 2025).
[29] *Id.*

**Figure 9-4: KEDLI Energy Efficiency Savings Achieved in 2024[30]**

| KEDLI Energy Efficiency Savings Achieved (in Total and in DACs) in 2024 | | | |
|---|---|---|---|
| Program | Total Savings (Annual MMBtu) | Savings (Annual MMBtu) to DAC Customers | % in DAC |
| Gas Commercial & Industrial Program | 187,462 | 28,017 | 15% |
| Gas LMI - Customer Awareness, Outreach, & Engagement Program | 1,428 | 294 | 21% |
| Gas LMI - Existing 1-4 Family Homes Program | 12,483 | 9,221 | 74% |
| Gas LMI - Existing Affordable Multifamily Program | 1,888 | 1,312 | 70% |
| Gas Multifamily Program | 6,023 | 976 | 16% |
| Gas Non-Residential Online MarketPlace Program | 407 | 114 | 28% |
| Gas Non-Residential Weatherization Program | 7,148 | 993 | 14% |
| Gas Residential Online MarketPlace Program | 71 | 15 | 21% |
| Gas Residential Program | 188,401 | 76,557 | 41% |
| **Total** | **405,311** | **117,499** | **29%** |

**Figure 9-5: KEDNY Total Number of Participants and Average Savings and Incentives[31]**

| KEDNY Total Number of Participants and Average Savings and Incentives by Participant in 2024 | | | |
|---|---|---|---|
| Program | Participants | Avg. Incentives by Participant | Avg. Energy Savings by Participant (MMBtu) |
| Gas Commercial & Industrial Program | 1,081 | $1,145 | 157 |
| Gas LMI - Existing 1-4 Family Homes Program | 40 | $4,125 | 18 |
| Gas LMI - Existing Affordable Multifamily Program | 22,110 | $173 | 3 |
| Gas Multifamily Program | 1,168 | $549 | 99 |
| Gas Non-Residential Online MarketPlace Program | 12 | $181 | 29 |
| Gas Non-Residential Weatherization Program | 207 | $2,527 | 30 |
| Gas Residential Engagement Program[32] | - | - | - |
| Gas Residential Online MarketPlace Program | 10 | $2 | 3 |
| Gas Residential Program | 2,249 | $108 | 42 |
| **Total** | **26,877** | **$247** | **17** |

[30] *Id.*
[31] *Id.*
[32] To redirect funds to programs that support the portfolio's transition to Strategic measures, HERs, vHERs, and HUAs offered by KEDNY's Gas Residential Engagement Program were discontinued in Q4 2023. In 2024, the Company continued to offer residential customers access to energy usage information provided by HERs and HUAs on the National Grid website when customers sign into their accounts. Due to these changes, this program does not provide incentives directly to customers.

**Figure 9-6: KEDNY Total Number of Participants and Average Savings and Incentives in DACs[33]**

| KEDNY Total Number of Participants and Average Savings and Incentives by Participant in DACs in 2024 | | | |
|---|---|---|---|
| Program | Participants in DACs | Avg. Incentives by Participant | Avg. Energy Savings by Participant (MMBtu) |
| Gas Commercial & Industrial Program | 383 | $3,231 | 181 |
| Gas LMI - Existing 1-4 Family Homes Program | 14 | $11,787 | 52 |
| Gas LMI - Existing Affordable Multifamily Program | 15,500 | $247 | 3 |
| Gas Multifamily Program | 850 | $754 | 48 |
| Gas Non-Residential Online MarketPlace Program | 7 | $311 | 28 |
| Gas Non-Residential Weatherization Program | 102 | $5,128 | 31 |
| Gas Residential Engagement Program | - | - | - |
| Gas Residential Online MarketPlace Program | 1 | $18 | 3 |
| Gas Residential Program | 645 | $378 | 58 |
| **Total** | **17,502** | **$380** | **11** |

**Figure 9-7: KEDLI Total Number of Participants and Average Savings and Incentives[34]**

| KEDLI Total Number of Participants and Average Savings and Incentives by Participant in 2024 | | | |
|---|---|---|---|
| Program | Participants | Avg. Incentives by Participant | Avg. Energy Savings by Participant (MMBtu) |
| Gas Commercial & Industrial Program | 931 | $3,735 | 201 |
| Gas LMI - Customer Awareness, Outreach, & Engagement Program | 630 | $316 | 2 |
| Gas LMI - Existing 1-4 Family Homes Program | 836 | $6,210 | 15 |
| Gas LMI - Existing Affordable Multifamily Program | 935 | $530 | 2 |
| Gas Multifamily Program | 47 | $2,700 | 128 |
| Gas Non-Residential Online MarketPlace Program | 27 | $162 | 15 |
| Gas Non-Residential Weatherization Program | 39 | $20,405 | 183 |
| Gas Residential Engagement Program | - | - | - |
| Gas Residential Online MarketPlace Program | 29 | $29 | 6,497 |
| Gas Residential Program | 32 | $20,008 | 12,666 |
| **Total** | **3506** | **$3,150** | **116** |

[33] *Id.*
[34] *Id.*

**Figure 9-8: KEDLI Total Number of Participants and Average Savings and Incentives in DACs[35]**

| KEDLI Total Number of Participants and Average Savings and Incentives by Participant in DACs in 2024 | | | |
|---|---|---|---|
| Program | Participants in DACs | Avg. Incentives by Participant | Avg. Energy Savings by Participant (MMBtu) |
| Gas Commercial & Industrial Program | 134 | $3,493 | 209 |
| Gas LMI - Customer Awareness, Outreach, & Engagement Program | 95 | $436 | 3 |
| Gas LMI - Existing 1-4 Family Homes Program | 588 | $5,202 | 16 |
| Gas LMI - Existing Affordable Multifamily Program | 1,003 | $399 | 1 |
| Gas Multifamily Program | 11 | $2,275 | 89 |
| Gas Non-Residential Online MarketPlace Program | 7 | $179 | 16 |
| Gas Non-Residential Weatherization Program | 11 | $15,058 | 90 |
| Gas Residential Engagement Program | - | - | - |
| Gas Residential Online MarketPlace Program | 6 | $30 | 3 |
| Gas Residential Program | 13 | $20,623 | 5,889 |
| **Total** | **1,868** | $2,371 | 63 |

## 9.2. Polar Vortex (Winter Storm Fern) Non-Firm Customers

During the recent polar vortex, the region experienced sustained, extreme cold conditions, resulting in one of the most challenging winter operating periods in recent years. In response, National Grid implemented service interruptions for non-firm customers in accordance with tariff requirements, which mandate curtailments when system temperatures fall below established thresholds.

Throughout the event, there were a significant number of interruptions, consistent with their elected service classification, which provides discounted gas rates in exchange for interruptibility during peak conditions. While interruptions were tariff driven, the event was further compounded by external factors affecting customers' ability to fully transition to alternate fuel sources.

Specifically, a higher than typical number of customers were identified as violators. This was attributed to a combination of factors, including challenges securing timely oil deliveries, limited priority status for dual fuel customers during regional supply constraints, snow and access issues that impeded fuel deliveries, and equipment related limitations such as pump or system failures. In several cases, violations were partial or temporary, as some customers initially ran out of alternate fuel but later secured deliveries and returned to compliance. In addition, as the duration of the interruption went on, customers began to run out of their alternate fuel.

[35] 2023 KEDNY and KEDLI Rate Cases, *2024 KEDNY-KEDLI CLCPA and DAC Report* (July 29, 2025).

Historical data indicates that while non-firm interruptions and violations occur during cold weather events, the severity and convergence of conditions during this winter contributed to an elevated impact compared to prior years. The data is presented to provide context on the scale of the event and customer impacts, not to suggest that system expansions or alternative operating scenarios would have altered the need for tariff mandated interruptions.

This summary reflects a factual look back at the event, the operating conditions, and customer outcomes, consistent with prior reporting provided to regulators.

**Figure 9-9: KDNY Non-Firm Demand Response Events**

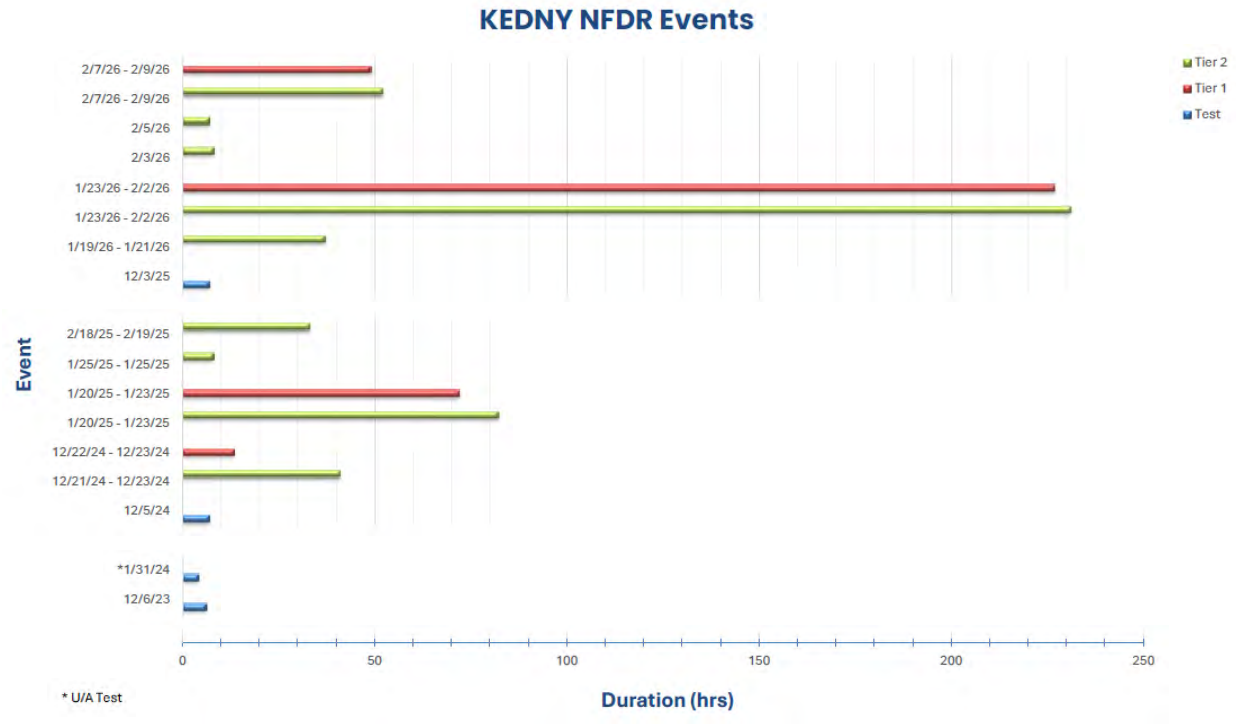
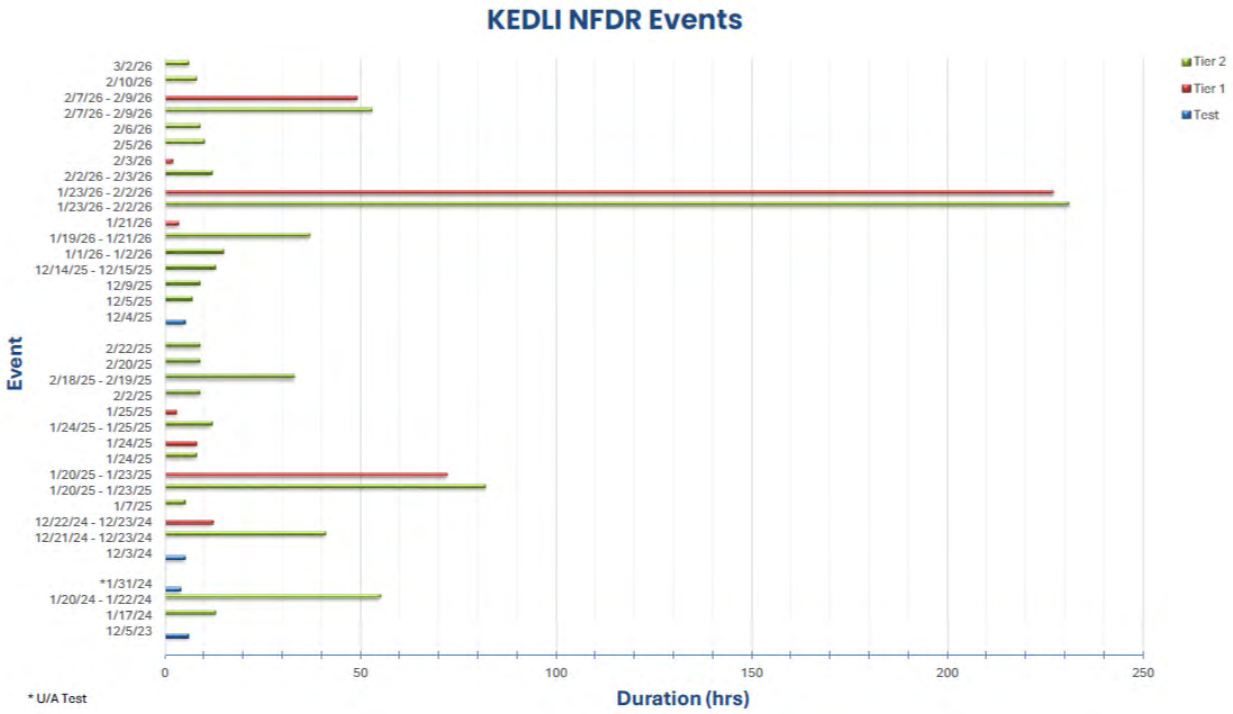


Figure 9-10: KEDLI Non-Firm Demand Response Events




## 9.3. Polar Vortex (Winter Storm Fern) – Residential Heat Customer Impacts

The NY gas operating companies (KEDNY, KEDLI, and NMPC,) set gas prices for the month of January based on the December 29 NYMEX Prices of the prior calendar year. Toward the end of January 2026, the daily prices started to increase significantly as compared to the actual prices earlier in the month and compared to the forecasted rates that were included on customer bills in January. Because the Company must forecast rates for customers prior to the next billing month, those increased prices did not impact customers in the month of January, but created a large supply under recovery when compared to actual prices for January. Gas cost reconciliations are done on an annual basis for the Gas Adjustment Clause (“GAC”) year (12 months ending 8/31) and any imbalances are surcharged or credited to customers beginning Jan 1 of the following year. In addition, the tariffs allow for a monthly imbalance surcharge during the GAC year to allow the Company to mitigate annual imbalances that need to be surcharged or credited to customers at the end of the GAC year.

The Company recognized that there would be a significant under-recovery of supply costs due to the significant gas supply price increases at the end of January. Therefore, the Company implemented higher monthly imbalance surcharges in the months of February and March (as compared to those that were implemented in December and January) that were intended to reduce the end of year imbalance as much as possible while balancing the need for customer affordability and mitigating month-over-month bill increases. For the month of January, the Company estimated a gas supply cost under recovery of approximately $290 million for all three NY gas operating companies. Due to the

magnitude of this under recovery, it was imperative that the Company do as much as possible in the remaining winter months to try to reduce that amount to avoid a significant annual imbalance factor that would impact customers beginning January 1, 2027, which would also include a carrying charge impact. It is important to manage the balances as much as possible during the winter months because once the gas volumes drop in the spring and summer, the ability to manage significant imbalances becomes more difficult.

Throughout these cold-weather events, the NY gas operating companies proactively managed system operations, supply resources, and customer communications to ensure uninterrupted service. In balancing the significant late-January cost spikes with the need to protect customers from abrupt bill impacts, the Company minimized short-term volatility while responsibly managing longer-term impacts under the GAC framework.

At the same time, these events underscored the material value that additional incremental gas supply would have provided in mitigating the severity of customer bill impacts. As detailed in the Company's LTP Addendum, Downstate New York currently operates with no upstream contingency margin and faces acute exposure to winter price spikes when regional pipeline constraints tighten. Incremental supply—such as the approximately 13% increase in firm deliverability evaluated in the Addendum—would have reduced reliance on high-cost spot market purchases, lessened vulnerability to gas price surges, and provided greater operational flexibility during periods of extreme weather–driven demand. During Winter Storm Fern and the 2026 Polar Vortex, this additional supply would likely have helped moderate price volatility during peak-demand events, eased operational pressures on constrained parts of the system, and thereby produce direct customer bill benefits under similar conditions in the future.

The Company's assessment also shows that incremental gas capacity would structurally reduce exposure to emergency measures—such as heightened CNG reliance—and improve line pack and system pressure stability during prolonged cold weather. These benefits translate directly into cost mitigation for customers, both in the form of avoided high-priced procurements and reduced dependence on expensive, weather-sensitive peaking resources.

Taken together, these events illustrate not only the effectiveness of the Company's response under constrained conditions, but also the customer benefits of enhancing supply deliverability in Downstate NY. Incremental supply would have strengthened price stability, supported system reliability, and helped shield customers from the sharp bill impacts associated with Winter Storm Fern and the 2026 Polar Vortex. These efforts, combined with the Company's prudent operational management, demonstrate a continued commitment to maintaining system reliability, safeguarding customers during extreme weather events, and ensuring affordability even under challenging and rapidly changing market conditions.

An overview of the bill impacts based on typical usage for Residential Heat customers from December 2025 through March 2026 are shown in the table below.

**Figure 9-11: Residential Heat – based on forecast typical usage**

**Residential Heat - based on forecast typical usage**

**Average Bills**

**KEDNY**

| *Avg Usage* | *145* | *211* | | *206* | | *182* | |
|---|---|---|---|---|---|---|---|
| | Dec-25 | Jan-26 | *Dec vs Jan* | Feb-26 | *Jan vs Feb* | Mar-26 | *Feb vs Mar* |
| Delivery | $ 227.21 | $ 294.96 | *29.8%* | $ 289.95 | *-1.7%* | $ 265.90 | *-8%* |
| Supply | $ 108.27 | $ 164.15 | *51.6%* | $ 211.26 | *28.7%* | $ 187.34 | *-11%* |
| Total | $ 335.48 | $ 459.11 | *36.9%* | $ 501.21 | *9.2%* | $ 453.24 | *-10%* |

**KEDLI**

| *Avg Usage* | *148* | *225* | | *210* | | *182* | |
|---|---|---|---|---|---|---|---|
| | Dec-25 | Jan-26 | *Dec vs Jan* | Feb-26 | *Jan vs Feb* | Mar-26 | *Feb vs Mar* |
| Delivery | $ 185.09 | $ 228.10 | *23.2%* | $ 219.69 | *-3.7%* | $ 204.01 | *-7%* |
| Supply | $ 105.99 | $ 164.26 | *55.0%* | $ 204.50 | *24.5%* | $ 177.85 | *-13%* |
| Total | $ 291.08 | $ 392.36 | *34.8%* | $ 424.19 | *8.1%* | $ 381.86 | *-10%* |

**NMPC**

| *Avg Usage* | *145* | *211* | | *180* | | *132* | |
|---|---|---|---|---|---|---|---|
| | Dec-25 | Jan-26 | *Dec vs Jan* | Feb-26 | *Jan vs Feb* | Mar-26 | *Feb vs Mar* |
| Delivery | $ 227.21 | $ 294.96 | *29.8%* | $ 91.74 | *-68.9%* | $ 81.62 | *-11%* |
| Supply | $ 108.27 | $ 164.15 | *51.6%* | $ 125.27 | *-23.7%* | $ 89.44 | *-29%* |
| Total | $ 335.48 | $ 459.11 | *36.9%* | $ 217.01 | *-52.7%* | $ 171.06 | *-21%* |

# 10. Environmental and Climate Impacts

## 10.1. Greenpoint LNG: Environmental Impacts

As a Title V facility permit holder National Grid reports emissions associated with the Greenpoint Energy Center annually through NYDEC's Air Compliance and Emissions website[36] in compliance with 6 NYCRR Part 202. Reports are publicly accessible through the Open NY database.[37]

**Figure 10-1: Greenpoint Energy Center Title V Emissions Inventory - 2025**

**Greenpoint Energy Center Title V Emissions Inventory – 2025**

| Facility Name | VOC (tons) | NOx (tons) | CO (tons) | CO2 (tons) | Particulates (tons) | PM10 (tons) | PM2.5 (tons) | HAPS (tons) | SO2 (tons) |
|---|---|---|---|---|---|---|---|---|---|
| Greenpoint Energy Center | 0.24 | 2.12 | 0.78 | 228.99 | 0.03 | 0.03 | | 0.00 | 0.00 |

[36] *See*, N.Y. State Dep't of Env't Conservation, Air Compliance & Emissions ("ACE") Reporting, https://dec.ny.gov/air/air-compliance-emissions-reporting.
[37] *See*, N.Y. State Dep't of Env't Conservation, Title V Emissions Inventory: Beginning 2010, https://dec.ny.gov/environmental-protection/air-quality/title-v-emissions-inventor.

The larger Greenpoint facility serves an important role supporting operations and maintenance in the KEDNY service territory. As part of the Company's ongoing efforts to reduce our GHG emissions – including impacts on the surrounding community – the facility currently operates 18 electric vehicles ("EVs") at the Greenpoint facility, with an additional four vehicles in the procurement process. Integrating EVs into the fleet provides emissions reductions, lower noise levels, and improved local air quality in the surrounding neighborhood.[38]

## 10.2. Greenpoint LNG: Cost information comparing the cost of LNG per dekatherm compared to CNG and delivered services

The table below summarizes demand and commodity costs of Greenpoint LNG, CNG and city gate peaking services. All CNG and city gate demand and commodity costs are based on winter 2027/28 projections. LNG fixed costs are based on FY2025 revenue requirements used in base rates paid by customers in the delivery portion of their bill. Design day commodity costs were estimated for the winter 2027/28 period using proprietary forward curves. LNG commodity cost is based on refilling the tanks during the summer period.

**Figure 10-2: Demand and Commodity Costs of CNG, CG Peaking and LNG**

| Comparison of Demand & Commodity Costs | CNG | CG Peaking | LNG |
|---|---|---|---|
| **[A] Annual Demand Costs ($)** | $49,396,874 | $13,931,095 | $28,014,123 |
| **[B] Annual Volumes (dt)** | 1,320,000 | 6,773,000 | 1,525,000 |
| **Annual Unitized Demand Costs ($/dt) [A / B]** | $37.42 | $2.06 | $18.37 |
| **[C] Maximum Daily Quantity (dt/day)** | 88,000 | 110,500 | 291,200 |
| **Design Day Capacity Cost ($/dt) [A / C]** | $561.33 | $126.07 | $96.20 |
| **Design Day Commodity Costs ($/dt)** | $19.03 | $13.05 | $3.50 |

Because LNG tank refill occurs during the summer months, the resulting LNG inventory price is much lower than pipeline and CNG supplies priced at daily market indices subject to volatility. This market volatility was evidenced during Winter Storm Fern, when city gate indices exceeded $100/dt on many days when city gate peaking supplies were dispatched. Like underground storage, LNG storage provides a similar physical hedge against these winter price spikes. In order for CNG to provide the same design day quantity as Greenpoint LNG, the fixed costs of CNG would more than triple based on the unit costs summarized above. Similarly, city gate peaking costs would be nearly three times greater if those contracts were required to provide 291,000 Dth/day on a design day.

## 10.3. Compliance with CLCPA

National Grid is committed to advancing New York's CLCPA targets and delivering the benefits of clean energy to disadvantaged communities, and undertakes efforts in furtherance of the CLCPA goals. Such efforts include the implementation of programs and outreach strategies focused on energy efficiency, Capacity Demand Metrics, demand response, Main Replacement and Leak Repair programs, Customer Operations Data, and Clean

[38] *See generally*, U.S. Dep't of Energy, GREET Life-Cycle Assessment Model, https://www.energy.gov/cmei/rd-greet-life-cycle-assessment-mo (regarding greenhouse gas emission impacts between gasoline and EVs).

Energy jobs. The Company's compliance with the CLCPA is evaluated and documented through several Commission proceedings, including the Company's rate cases, as well as other Commission proceedings and required filings where the Commission makes formal determinations under CLCPA §§7(2) and 7(3). National Grid's Joint Proposals include comprehensive reporting requirements addressing the Company's efforts to advance the goals of the CLCPA, with particular emphasis on initiatives supporting customers in disadvantaged communities. The Joint Proposals approved by the Commission include CLCPA-related commitments, reporting requirements, and findings that approved actions are not inconsistent with statewide emissions limits and do not disproportionately burden disadvantaged communities. [39]

KEDNY and KEDLI have demonstrated achievement of commitments from the 2023 KEDNY/KEDLI Joint Proposal approved in the 2023 KEDNY and KEDLI Rate Cases (Cases 23-G-0225 and 23-G-0226)[40], including CLCPA-related reporting and other requirements in accordance with Section 7(2) and 7(3). Similarly, in the Company's most recent NMPC Rate Case (Case 24-E-0322 and Case 24-G-0323), the Commission found the approved Joint Proposal to be consistent with the CLCPA, including its requirements relating to emissions reductions, environmental justice considerations, and reporting on programs and investments benefiting LMI customers and DACs.

Pursuant to these Joint Proposals, the Company files annual CLCPA and DAC reports for KEDNY and KEDLI, and NMPC, describing progress made during the prior year in advancing these initiatives, with a specific focus on benefits delivered to low- and moderate-income customers and customers residing in DACs.[41] These reports provide a comprehensive accounting of program performance, customer participation, and targeted outreach efforts, and serve as a principal mechanism through which the Company demonstrates alignment with the CLCPA. The Company also files a DAC Investment and Benefits Report.[42]

## 10.4. Emissions impacts of supply and demand-side measures

Pursuant to the requirements described above, as well the requirements established in the Commission's "Order on Implementation of the Climate Leadership and Community Protection Act" (Issued and Effective May 12, 2022), the Company provides estimated impacts of its investments and programs in its rate case filings. For NMPC, these estimates can be found in its most recent rate

[39] Under Section 7(2), the Commission is to determine whether any administrative approvals issued regarding rate cases would be "inconsistent with or will interfere with the attainment of the statewide GHG emissions limits established" in the CLCPA. Under Section 7(3), the Commission is to determine whether administrative approvals issued in these cases would "disproportionately burden disadvantaged communities" and shall also "prioritize reductions of greenhouse gas emissions and co-pollutants in disadvantaged communities . . ."

[40] Cases 23-G-0225 and 23-G-0226, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid for Gas Service, *Order Approving Terms of Joint Proposal and Establishing Gas Rate Plans, with Minor Modification and Corrections* (issued and effective August 15, 2024).

[41] *See*, Cases 23-G-0225 and 23-G-0226; *see also*, Case 24-G0323.

[42] *See*, Matter 23-02017, In the Matter of Reporting Investments and Benefits to Disadvantaged Communities.

case (Case 24-E-0322 and Case 24-G-0323 in the CLCPA Panel Testimony. For KEDNY and KEDLI, estimated emissions impacts can be found in their most recent rate cases (Case 23-G-0225 and Case 23-G-0226).

While the Company does not directly report the GHG emissions impact from its Energy Efficiency programs, GHG reductions are estimated by NYSERDA and available on NYSERDA's Clean Energy Dashboard.[43]

# 11. Stakeholder Engagement: Brooklyn Community Board No. 1

In response to directives in the LTP Order, National Grid initiated and formalized engagement with CB1, representing the Greenpoint and Williamsburg communities surrounding the Greenpoint Energy Center. The engagement plan was designed to provide a structured forum for ongoing dialogue, increase transparency around facility operations and long-term planning, and ensure community concerns are understood and appropriately considered as part of the LTP process.

National Grid has undertaken sustained outreach to CB1 leadership and committees, participated in Environmental Committee meetings, and committed to regular attendance and information sharing. Engagement has focused on explaining the role of the Greenpoint Energy Center in maintaining system reliability, particularly during peak winter conditions, while also acknowledging the community's environmental legacy and broader climate and equity concerns. These efforts align with the Commission's direction that CB1 serve as a conduit for community feedback on long-term gas system planning.

Recent CB1 engagement, including the March 31, 2026, NPA-focused meeting, highlighted community aspirations for accelerated decarbonization and the current scale and pace of NPA deployment. Community members expressed support for NPAs in principle, but raised concerns regarding transparency into infrastructure planning, the limited proportion of NPAs relative to traditional pipe replacement activity, and whether pilot efforts in environmental justice communities will translate into broader, long-term system benefits.

Additional themes included questions about customer incentives, skepticism that current NPA levels will materially contribute to statewide gas reduction goals, and concerns regarding the use of third-party contractors for NPA implementation. Stakeholders also emphasized the importance of advance notice of planned pipe replacement projects to allow meaningful consideration of alternatives before ratepayer funding decisions are made through the rate case process.

National Grid acknowledged that NPAs currently represent a relatively small share of overall system activity and outlined key constraints affecting scale-up, including technical feasibility, customer willingness to electrify, and alignment with infrastructure replacement timelines. The Company emphasized that NPAs are supported through Commission-approved rate mechanisms, including shareholder

[43] *See*, N.Y. State Energy Research & Development Authority, Clean Energy Dashboard, https://www.nyserda.ny.gov/About/Clean-Energy-Dashboard/View-the-Dashboard.

incentives, and that regulatory requirements establish minimum annual NPA thresholds, which National Grid has exceeded.

As part of ongoing engagement, National Grid committed to improving transparency by providing follow-up information on pipe replacement mileage and customer participation in NPAs, including publicly available NPA location information on its website. The Company also highlighted efforts to pursue NPA opportunities in publicly owned buildings within CB1, such as City-managed facilities, where customer decision-making barriers may be reduced.

National Grid noted that NPA funding and scale are ultimately determined through rate proceedings and acknowledged increasing stakeholder interest in linking NPAs to affordability outcomes by avoiding or deferring long-term infrastructure investments. The Company expects continued dialogue with CB1 and other stakeholders to inform future rate cases, particularly around potential increases in NPA targets, incentives, and geographic transparency requirements.

National Grid's engagement with CB1 reflects an evolving, iterative process consistent with the Commission's gas planning framework. While community stakeholders continue to advocate for accelerated deployment of NPAs to meet climate mandates, National Grid maintains that current NPA implementation must balance decarbonization objectives with reliability obligations, customer adoption realities, and regulatory constructs. Ongoing engagement with CB1 will remain a core component of National Grid's stakeholder outreach as the Company advances subsequent annual updates and future LTP filings.

# 12. Future Outlook

National Grid's long-term gas system planning is informed by an evolving energy landscape characterized by changing customer demand, constrained supply conditions, and evolving energy policies. As reflected in the 2025 New York State Energy Plan, natural gas is expected to remain a necessary component of New York's energy system for the foreseeable future, supporting affordability, system reliability, and resilience—particularly during peak demand and extreme weather events. Within this context, National Grid continues to plan for the safe and reliable delivery of gas service while integrating demand-side solutions, emissions considerations, and stakeholder input consistent with Commission guidance.

Looking ahead, the Company's planning approach will continue to balance near-term reliability obligations with longer-term energy policy considerations. This includes maintaining a diverse and resilient supply portfolio, monitoring system risks as electrification progresses, and evaluating alternatives that can mitigate customer costs without compromising service. National Grid's forward-looking planning framework remains adaptive and data-driven, reflecting updated system performance, market conditions, and policy developments as they emerge.

## 12.1. Key risks and uncertainties

Several key uncertainties will continue to influence gas system planning. Peak-day demand remains sensitive to weather variability and increasing

interdependencies between the gas and electric systems, particularly during prolonged cold periods. At the same time, New York's limited upstream infrastructure constrains the ability to access incremental supply during periods of system stress, heightening exposure to market volatility. While non-pipe alternatives and demand-side measures remain important planning tools, their scalability and timing are subject to customer, market, and implementation constraints. National Grid will continue to monitor these factors and incorporate updated information into future planning cycles.

### 12.2. Roadmap for next steps and future LTP filings

National Grid's next Long-Term Plan will be filed in 2028. Until that time, the Company will continue to comply with all applicable requirements established in the Commission's gas planning orders, including the submission of annual Long-Term Plan updates, demand and design-day forecasts, and Winter Supply Reviews. These filings will document changes in system conditions, risks, and planning assumptions, and will provide updates on non-pipe alternatives, capital investments, emissions reporting, affordability programs, and stakeholder engagement.

Through these ongoing annual filings, National Grid will incorporate updated data, policy developments, and Commission guidance to ensure that gas system planning remains transparent, responsive to change, and focused on delivering reliable and affordable service for customers while supporting New York State's broader energy objectives.

## 13. Conclusion

This Annual LTP report provides a comprehensive update on National Grid's gas system planning activities in accordance with the Commission's directives. The report demonstrates continued progress in maintaining safe and reliable service for customers across New York while advancing a disciplined, transparent planning framework that accounts for evolving demand, constrained supply conditions, customer affordability, and the State's climate and equity objectives.

As documented throughout this filing, recent system performance – including during Winter Storm Fern – underscored both the resilience of the existing gas system and the importance of prudent planning to manage risk during extreme weather and market volatility. National Grid continues to balance near-term reliability obligations with long-term planning through a portfolio approach that includes targeted infrastructure investments, expanded consideration of NPAs, demand-side programs, and ongoing evaluation of low-carbon fuels.

Consistent with Commission guidance, National Grid remains committed to iterative planning and stakeholder engagement, including continued coordination with community representatives, customers, and policy makers. Through annual updates and future LTP filings, the Company will continue to refine forecasts, evaluate uncertainties, and provide transparency into how gas system planning supports reliability, affordability, and New York State's broader energy climate goals.

# 14. Appendix

## 14.1. Summary of Commission Directives from the LTP Order

| Directive Area | What must be included | LTP Section |
|---|---|---|
| LPP Mileage Remaining | Provide information regarding the mileage of LPP remaining. | Section 6 – NPAs and DSM |
| NPA Solicitation Reporting | Provide results of solicitations for NPAs focusing on retiring LPP. | Section 6 – NPAs and DSM |
| Report Electrification and Service Termination Data | Monitor data related to how many customers decommission their natural gas systems in favor of geothermal applications and how many of those customers terminate gas service completely. | Section 7 – LCFs and Decarbonization Pathways |
| Annual RNG Purchases Reporting | Provide information on the amount of RNG purchased on an annual basis. | Section 7 – LCFs and Decarbonization Pathways |
| Identify programs benefitting DAC | Identify programs and investments that are intended to benefit DAC. | Section 9 – Customer Impacts and Affordability |
| Greenpoint LNG: Cost information LNG vs CNG and delivered services | Provide information comparing the cost of LNG compared to CNG and delivered services. | Section 10 – Environmental and Climate Impacts |
| Greenpoint LNG: Impact to Environment | Provide information regarding the impact to the environment of the local community from operating Greenpoint LNG facility. | Section 10 – Environmental and Climate Impacts |