

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Proceeding on Motion of the Commission)
As to the Rates, Charges, Rules and) Docket No. [24-G-0323](#)
Regulations of Niagara Mohawk Power)
Corporation d/b/a National Grid for)
Gas Service)

COMMENTS OF NRG ENERGY, INC.

NRG submits the following comments in response to the Notice Soliciting Comments - Partially Interruptible Service Class Pilot (“Pilot”) requested by Niagara Mohawk Power Corporation d/b/a National Grid (“NIMO”) issued on 3/9/26. NRG is a leading national integrated power company. With over six million customers, NRG is nationally the third largest provider of residential electricity and natural gas services. NRG’s retail energy subsidiaries include multiple Energy Services Companies (“ESCO”) brands active in New York that supply power and natural gas to tens of thousands of New York residential, commercial, and industrial retail customers.¹ NRG creates value through best-in-class operations, reliable and efficient electric generation, and a retail platform serving residential, commercial, and industrial customers. NRG is also the leading essential home services company offering a unique whole-home experience to millions of North American customers.

¹ Reliant Energy Northeast LLC d/b/a NRG Home and d/b/a NRG Business Solutions, Green Mountain Energy Company, Energy Plus Holdings LLC, Energy Plus Natural Gas LLC, Independence Energy Group LLC d/b/a Cirro Energy, XOOM Energy New York, LLC, Stream Energy New York, LLC, Direct Energy Business, LLC, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, and Gateway Energy Services Company.

NRG is generally supportive of NIMO's Pilot proposal. Although as an ESCO supplying customers who take service under Large Volume Interruptible Transportation Service ("SC-6"), Gas Transportation Service with Standby Sales Service ("SC-8"), and customers who elect Standby Sales Service ("D1 Election"), NRG recommends some changes to the Pilot that will help improve the program and provide a better customer experience.

If D1 Elections Exceed 50% of the Maximum Peak Day Quantity; a 50% Interruption Is Not Feasible

NIMO proposes that SC-8 customers participating in the program curtail their daily usage to 50% of their Maximum Peak Day Quantity ("MDPQ") during interruptible events. Customers who opted to take a D1 Election are allowed to participate in the Pilot as per the proposal; however, they need only prove primary point capacity (PPC") for 50% of the MPDQ less the D1 election.

The proposal, however, does not account for SC-8 customers who have a D1 Election that is greater than 50% of their MDPQ. Under the SC-8 service classification, customers that have a D1 Election pay a monthly Standby Sales D1 Contract Demand Charge to reserve PPC to the Company's distribution system up to the D1 Election. If a participating customer has a D1 Election greater than 50% of their MPDQ, NIMO should limit the customer's usage reduction to the D1 Election amount. Customers may be unduly harmed if they are already paying for a greater amount of PPC in the demand charge but are not allowed to utilize a number higher than 50% of the MDPQ.

NIMO’s Treatment of Participating Customers at the Time of Program Expiration Should Follow the Gas Transportation Operating Manual Guidelines

NRG opposes the Post-Pilot Treatment proposed by NIMO and urges NIMO to treat these customers in accordance with the guidelines of the Gas Transportation Operating Manual (“GTOP”). The Pilot states that a return to fully firm utility service at the conclusion of the Pilot is contingent upon NIMO’s confirmation that the distribution system can provide the reinstated level of firm service. Specifically, the Pilot states:

“If a customer participating in the pilot program requests firm sales or transportation service at the end of the pilot, the Company will conduct an engineering review to determine whether sufficient system capacity is available to serve the requested firm load. If the Company determines that the customer may not return to firm service based on the engineering analysis and the customer cannot secure Primary Point Capacity to its full MPDQ, the customer would be advised that it may take service under SC-6 interruptible service. This approach parallels how the Company handles transitions between firm and interruptible service classifications and ensures transparent and orderly customer transitions.”

NRG proposes that NIMO allow participants currently being served by an ESCO to return to firm transportation service by following the steps in the Daily Balancing Service Section G – Primary Point Capacity (PPC) Determination Procedure as per Case 24-G-0323 of the GTOP manual.² The PPC Determination Procedure was already established in this case and states that if an ESCO is serving customers without PPC, those customers must be added to the ESCO’s curtailment list and may be interrupted during a Daily Balanced Pool Alert.

² Niagara Mohawk Power Corp. d/b/a National Grid, *Gas Transportation Operating Procedures Manual*, Daily Balancing Service § g (rev. Nov. 2025), pp. 33 – 34.
https://www.nationalgridus.com/media/pdfs/microsites/energy-service-companies/upstate-ny/gtop_nimo.pdf.

Furthermore, if NIMO requires a SC-8 customer to take service under SC-6 at the end of the Pilot, the customer's D1 Election may be jeopardized. The SC-6 interruptible service does not have a D1 Election option. In addition, the SC-6 interruptible service requires customers to have alternate fuel capability which is currently not required for SC-8 customers nor the Pilot.

ESCOs Must Receive Cost Recovery for any PPC that was Required to be Purchased

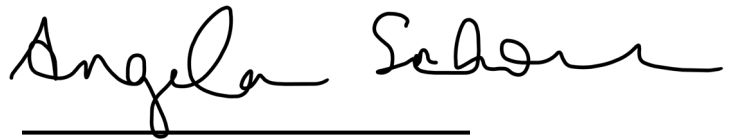
ESCOs serving SC-8 customers are required to demonstrate PPC to serve these customers. The Pilot program will reduce the ESCO's PPC and consequently cause the ESCO to have excess PPC to NIMO's city gate. It is likely that ESCOs will 1. Not have ample time to unwind any existing capacity contracts, or 2. Will need to keep the existing PPC in the event the customers return to firm SC-8 service at the end of the Pilot. In either case, the ESCO should be kept whole for any purchases they have made that cannot be disposed of. Since there is no guarantee as to what will happen after the Pilot, an ESCO may choose to keep the PPC as it may be difficult to get it back again in the event the customer returns to firm SC-8 service. In the Joint Proposal filed in NIMO's recent rate proceeding (Cases 24-E-0322 and 24-G-0323), the parties recognized that the available quantity of PPC is less than the forecast MPDQs of the Company's existing Daily Balanced Customers.³ NRG proposes that a cost recovery or reimbursement mechanism be provided to ensure the ESCOs aren't bearing the extra costs associated with a PPC requirement that is no longer necessary. NRG is available to collaborate on such a process to help determine best practices.

³ Order Adopting Terms of Joint Proposal and Establishing Rate Plans, Case 24-G-0323, p. 62.

Conclusion

NRG appreciates the opportunity to comment on this Pilot proposal. As an ESCO currently serving these large load customers, we bring unique insights to the table. We are happy to provide any further information or answer any specific questions that may arise as this process proceeds.

Respectfully submitted,

A handwritten signature in black ink that reads "Angela Schorr". The signature is written in a cursive style. Below the signature is a solid black horizontal line.

Angela Schorr
Director, Regulatory Affairs
804 Carnegie Center Dr.
Princeton, NJ 08540

April 1, 2026