

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 24-M-0586 - Proceeding on Motion of the Commission for the
Establishment of Extreme Heat Protections,
Practices and Procedures.

ORDER ADOPTING UTILITY CUSTOMER PROTECTIONS
DURING PERIODS OF EXTREME HEAT AND DIRECTING UTILITY FILINGS

Issued and Effective: March 19, 2026

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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on March 19, 2026

COMMISSIONERS PRESENT:

Rory M. Christian, Chair
James S. Alesi
David J. Valesky
John B. Maggiore
Uchenna S. Bright
Denise M. Sheehan
Radina R. Valova

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BY THE COMMISSION:

INTRODUCTION

On January 23, 2025, the New York State Public Service
Commission (Commission) issued an order commencing this
proceeding with the goal of establishing uniform standards and

procedures related to extreme heat events¹ amongst the State's largest investor-owned electric utilities and water utilities.²

On May 20, 2025, Department of Public Service staff (Staff) issued a report that provided an overview of existing practices and protections implemented by the major New York electric utilities, which had been established as part of individual rate cases for each utility.³ The Staff Report also contained recommendations to standardize these protections and procedures across the Utilities.

By this Order, the Commission addresses Staff's recommendations on topics related to utilities' policies, practices, and procedures during extreme heat, and adopts uniform protections for residential electric and water customers and customers with residential end-users during periods of extreme heat. The Commission also adopts data collection and reporting requirements to inform future policy refinements. Further, the Commission directs the Utilities to file tariff amendments to reflect the adopted extreme heat protections, policies and procedures, as discussed in the body of this Order, to become effective on June 1, 2026.

¹ Case 24-M-0586, Order Instituting Proceeding (issued January 23, 2025) (Initiating Order).

² The largest investor-owned electric and water utilities means the following utilities: Central Hudson Gas & Electric Corporation (Central Hudson); Consolidated Edison Company of New York, Inc. (Con Edison); Liberty Utilities (New York Water) Corporation (Liberty Water); New York State Electric & Gas Corporation (NYSEG); Niagara Mohawk Power Corporation d/b/a National Grid (National Grid); Orange and Rockland Utilities, Inc. (Orange & Rockland); Rochester Gas and Electric Corporation (RG&E); and, Veolia Water New York, Inc. (Veolia) (collectively, the Utilities).

³ Case 24-M-0586, Department of Public Service Staff Report and Recommendations Regarding Utility Customer Protections During Extreme Heat Events (filed May 20, 2025) (Staff Report).

BACKGROUND

As detailed within the Initiating Order, Staff and 20 other state agencies were tasked with convening and creating a plan to investigate methods of reducing the impacts of extreme heat across New York.⁴ This Extreme Heat Action Plan Working Group filed an Interim Recommendation Report with the Governor in 2022, which highlighted the need for investigating the affordability of housing and cooling for New York residents and provided extreme weather-related recommendations. That report provided that Staff would “develop uniform utility hot weather provisions” surrounding utility company terminations during extreme heat events.⁵ The Initiating Order commenced the process for Staff to examine and submit a report on the Utilities’ extreme heat practices, protections, policies, and procedures, which fulfills the recommendation in the Interim Recommendation Report. The Initiating Order directed Staff to conduct an examination and file a report with recommendations concerning uniform utility extreme heat protections and practices.

The Staff Report describes the impact that extreme heat has on the health of residential customers, especially more vulnerable customers, and the protections established by other states to protect customers during similar extreme heat events. The Staff Report also presents 16 recommendations to refine and standardize existing extreme heat protections for major electric utility customers and to establish new extreme heat protections for water customers obtaining service from Liberty Water and

⁴ Initiating Order, pp. 2-3.

⁵ New York State Department of Environmental Conservation (DEC) and New York State Energy Research and Development Authority, Interim Recommendations: Preparing for Extreme Heat (2022), p. 18, available at: https://extapps.dec.ny.gov/docs/administration_pdf/ehapinterimrecommendationsreport.pdf.

Veolia.⁶ These recommendations include, but are not limited to: establishing extreme heat-related protections for all residential customers and residential end-users, including those within multi-unit buildings that a utility may serve as a non-residential customer, when the outdoor heat index reaches or exceeds 90 degrees; improving processes and procedures for the utilities during extreme heat events; extending the suspension of terminations for heat islands on high temperature days; bolstering outreach and education by developing an internal and external communication plan; and that the Long Island Power Authority (LIPA) consider implementing consistent protections for customers served by PSEG Long Island (PSEG LI).⁷

NOTICE OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), a Notice of Proposed Rulemaking (Notice) regarding the Staff Report was published in the State Register on June 4, 2025 [SAPA No. 24-M-0586SP1]. The time for submission of comments pursuant to the Notice expired on August 4, 2025.

⁶ Staff Report, Appendix A. During Staff's review of the various utilities' existing procedures, Liberty Water and Veolia confirmed they do not currently have extreme heat-related protections for water customers within their service territories.

⁷ Staff's review of the New York utility practices confirmed that PSEG LI has protections in place for residential customers during extreme heat events, although the Long Island Power Authority tariff does not currently specify those protections.

COMMENTS

The Commission received comments from the following stakeholders: Public Utility Law Project of New York, Inc. (PULP); the City of New York (the City); joint comments of several of the electric utilities (collectively, the Electric Utilities);⁸ National Grid; Liberty Water; Columbia University (Columbia); Waterfront Alliance (Waterfront); and a joint filing by WE ACT for Environmental Justice, Earthjustice, Natural Resources Defense Council, Local Nature Lab, and Waterfront Alliance (collectively, "the Joint Commenters"). On August 19, 2025, the Electric Utilities submitted reply comments in response to PULP's and the City's recommendations. The written comments are addressed in the discussion below and a summary is included in Appendix A.

LEGAL AUTHORITY

The Public Service Law (PSL) grants the Commission broad legal authority to prescribe regulatory requirements necessary to carry out the provisions contained therein. PSL §5(1) grants the Commission jurisdiction over the sale or distribution of electricity, natural gas, and water. Furthermore, pursuant to PSL §65(1), every electric corporation must safely and adequately "furnish and provide [electric] service, instrumentalities, and facilities as shall be safe and adequate and in all respects just and reasonable." Similarly, pursuant to PSL §89-b(1), "[e]very water-works corporation shall furnish and provide such service ... as shall be safe and adequate and in all respects just and reasonable."

⁸ The Electric Utilities that provided joint comments are Central Hudson, Con Edison, NYSEG, Orange & Rockland, RG&E, and PSEG LI on behalf of LIPA.

DISCUSSION

Extreme heat is a growing public health concern. New York's average temperature for July 2025 was the fourth warmest on record since 1895.⁹ The effects of extreme heat on an individual's health can consist of dizziness, confusion, heat stroke, and such effects can even lead to death.¹⁰ Consequently, residents rely on more air conditioning to combat higher temperatures for longer periods. Additionally, low-income customers, customers with incomes below the area median income, and medically vulnerable populations, may be disproportionately affected by extreme heat events due to their inability to access cooling services because of high financial costs. Further, those living in heat islands experience heightened and prolonged heat effects compared to surrounding areas. Thus, these customers depend on continued utility services in their homes to mitigate potential health impacts. The U.S. Centers for Disease Control and Prevention provide methods for customers to reduce their indoor heat and lessen potential health impacts.¹¹ However, buildings absorb heat more than natural landscapes, such as forests, which may result in continued effects of high heat beyond the day of an extreme heat event.¹²

⁹ NOAA National Centers for Environmental Information, Climate at a Glance: Statewide Rankings, published August 2025, retrieved on January 13, 2026, from: <https://www.ncei.noaa.gov/access/monitoring/climate-at-a-glance/statewide/rankings>.

¹⁰ New York State Department of Health, Keep Your Cool During Summer Heat, retrieved on January 13, 2026, from: <https://www.health.ny.gov/publications/1243/>.

¹¹ U.S. Centers for Disease Control and Prevention, About Heat and Your Health, retrieved on January 16, 2026, from: <https://www.cdc.gov/heat-health/about/index.html>.

¹² Environmental Protection Agency, What are Heat islands, retrieved on January 16, 2026, from: <https://www.epa.gov/heat-islands/what-are-heat-islands>.

To safeguard customers and establish uniform protections, practices, and processes, the Commission adopts uniform protections against service termination that will apply during periods of extreme heat across the large investor-owned New York electric and water utilities. Specifically, and as discussed in more detail below, the Utilities shall not terminate electric or water service to a residential customer or a non-residential customer with residential end-users for non-payment of bills whenever an extreme heat event occurs or is forecasted to occur. The Utilities shall halt such service terminations or disconnections on days for which the forecast predicts a heat index of 90 degrees or greater and on days when, regardless of the forecast, the heat index actually reaches or exceeds 90 degrees.¹³ To mitigate the lingering effects of extreme heat on utility customers' health, the Utilities shall continue to pause service terminations for the two days following an extreme heat event if the residential customer or customer with residential end-users is located within a heat island, as we will discuss later within this Order.

Halting service terminations maintains a customer's access to electricity and water during periods of extreme heat to ensure they can cool themselves at home. These pauses in service terminations balance the interest of customers and utilities by creating consistent and predictable protections aimed at reducing the impact that extreme heat can have on utility customers' health while preserving the Utilities' interest in ensuring customers pay for the service they receive.

¹³ For the purposes of this Order, the terms disconnection and termination are used interchangeably to mean the cessation of utility service in accordance with the Home Energy Fair Practices Act (HEFPA), PSL Article 2.

Customers Afforded Protections

Staff recommends protections apply to all residential customers and accounts with residential end-users, including accounts serving multi-family dwellings, regardless of the customer's service classification.¹⁴ The Electric Utilities and National Grid recommend that the protections apply to residential electric customers. The Electric Utilities and National Grid express concerns related to detailing whether the protections adopted within this Order would be applicable if a utility were unaware of the residential end-user, such as for non-residential accounts with residential end-users.

PULP recommends extending protections to include residents who receive submetered electric service from their building owner and requiring the entities providing submetering services to create and file outreach, education, and contingency plans.

The Commission adopts Staff's recommendation to apply the extreme heat protections to all residential customers and customers with residential end-users regardless of the customer's service classification. With regard to the Utilities' concern that they may not know a non-residential customer has residential end-users, we find this risk to be minimal. We note that the utilities must already provide special protections to multiple dwelling buildings.¹⁵ Moreover, the utilities' field representatives effectuating service terminations can ascertain whether a building has residential end-users through on-site observations. Should a utility identify a residential end-user obtaining service from the utility through a non-residential account, the utility shall

¹⁴ Staff Recommendation No. 1.

¹⁵ PSL §§33 and 34.

immediately halt the planned disconnection or expeditiously reconnect service to the customer, and make an appropriate notation on the customer account.

Regarding PULP's proposal to apply extreme heat protections to submetered residents, since submetered residents are residential end-users, the extreme heat protections we adopt by this Order already preclude the Utilities from terminating service to customers with such end-users. However, we decline to adopt PULP's recommendation to require specific action and outreach from those providing submetered residential electric service at this time, as applicability of this proceeding is limited to the previously identified electric and water utilities. Thus, the Staff Report did not specifically contemplate addressing a submeterer's ability to terminate service to submetered residents and submetered building owners did not have notice that this proceeding could affect their submetering of residents.

Applicability of Protections Throughout the Year

The Staff Report recommended that the Utilities apply the protections between June 1 and September 30 each year due to the higher number of extreme heat events during those months.¹⁶

The Electric Utilities, the City, Waterfront Alliance, PULP, and the Joint Commenters recommend the Commission require the Utilities to provide protections during extreme heat events regardless of when they occur during the year. These commenters cite to the ongoing impacts of climate change, as well as the historical record of temperatures meeting or exceeding the threshold outside of the Staff Report's proposed June 1 through

¹⁶ Staff Recommendation No. 1.

September 30 window demonstrating a need for year-round extreme heat protections.

The Commission shares the concerns raised by the various stakeholders regarding increasing temperatures outside of the summer months and year over year. As discussed throughout the Staff Report, New York State continues to see high temperatures throughout the year. For example, Albany experienced several days with over 95-degree temperatures in May 2025.¹⁷ Additionally, NOAA reported that spring 2025 was the second warmest on record, behind spring 2024.¹⁸ Therefore, the Commission directs the Utilities to apply the protections adopted within this Order any time during the year when the heat index reaches the threshold discussed herein. The year-round applicability of these protections will mitigate the impacts of extreme heat events that occur outside the summer months while accounting for the future effects of climate change, increasing annual temperatures, and the variability in weather patterns within New York.

Threshold for Extreme Heat Events

Staff recommends using a heat index of 90 degrees as the threshold to trigger the pause for residential service terminations due to the non-payment of bills.¹⁹ The Staff Report provided a thorough evaluation of alternative weather

¹⁷ The National Weather Service, Albany N.Y.: Records, Extremes, Holidays & more, Daily/Monthly Records/Normals June, retrieved on January 13, 2026, from: https://www.weather.gov/media/aly/Climate/REF_Files/REFJUN.pdf.

¹⁸ NOAA National Centers for Environmental Information, Monthly National Climate Report for May 2025, published online June 2025, retrieved on January 13, 2026, from: <https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202505>.

¹⁹ Staff Recommendation No. 2.

measurements and temperatures that would consider New York's weather-related variables, such as humidity. The Staff Report also detailed the health effects on customers as well as the potential effect on customer arrears for different thresholds.²⁰

The Electric Utilities, Liberty Water, National Grid, and the City submitted comments agreeing with a 90-degree heat index threshold for triggering protections. Meanwhile, Waterfront Alliance and the Joint Commenters urge the Commission to use a straight temperature of 85 degrees. PULP suggests using an 85-degree heat index or air temperature threshold, for non-heat island areas, and for the Utilities to round up when determining if the forecasted heat index is within 0.5 degrees of the accepted threshold.²¹ PULP asserts that establishing a heat index temperature threshold of 90-degrees may reduce the protections that are already established at various utilities across New York State.²²

In reply comments, the Electric Utilities oppose establishing an 85-degree heat index threshold, stating that terminations are already "an absolute last resort" and reducing the temperature threshold further to 85 degrees will increase the potential financial impacts to all customers, as there will be "higher utility interest expenses and higher uncollectible arrears balances."²³ The Electric Utilities state that PULP's proposal is a significant deviation from the thresholds that have been continually approved by the Commission. Further, the Electric Utilities assert that Staff's proposed threshold is

²⁰ Staff Report, p. 26.

²¹ Case 24-M-0586, PULP Extreme Heat Comments (filed August 4, 2025) (PULP comments), p. 3.

²² PULP comments, p. 2.

²³ Electric Utilities' reply comments, pp. 3-4.

"far more protective" than some utility protections currently in place.²⁴ The Electric Utilities also disagree with PULP's proposal to round the heat index temperature to the nearest degree because the National Weather Service currently reports the information to the nearest whole-number degree.

Based on the analysis provided in the Staff Report and the stakeholders' comments, we find that the use of the 90-degree heat index is the most appropriate threshold for extreme heat events at this time. The Commission is persuaded by Staff's explanation that humidity, in conjunction with high temperatures, can significantly worsen health impacts to residential customers, particularly vulnerable populations with health issues. The straight temperature methodology proposed by Waterfront Alliance, PULP, and the Joint Commenters does not incorporate the relative humidity that would amplify the effect of high temperatures on New York residents.

Further, a heat index of 90 degrees, as opposed to 85 degrees, strikes the appropriate balance between affording sufficient protections to customers and the potential financial impacts to all ratepayers through increases in arrears. As discussed within the Staff Report, the National Weather Service cautions against ongoing exposure or physical activity when the heat index is between 90 and 103 degrees.²⁵ Within this range, people may experience more heat-related illness symptoms, such as heat cramps, heat exhaustion, and heat stroke, which can exacerbate any underlying health conditions. Establishing uniform utility protections suspending service terminations using a 90-degree heat index threshold will mitigate a significant number of individuals' symptoms, as customers will

²⁴ Electric Utilities' reply comments, pp. 4-5.

²⁵ Staff Report, pp. 26-27.

be able to maintain the use of electric fans or air conditioning to regulate the temperature in their homes during these higher degree days to prevent such exposure. Thus, setting the threshold at a heat index of 90 degrees is appropriate to maintain residential New Yorkers' safety during extreme heat days.

The Commission disagrees that setting the threshold at a heat index of 90 degrees would degrade existing customer protections, as argued by PULP. As the Staff Report summarized and as shown in Appendix A of the Initiating Order, the majority of the electric utilities currently have a threshold at, or greater than, a heat index of 90 degrees. In addition, only two utilities, NYSEG and RG&E, use a straight temperature of 85 degrees for their extreme heat protections. However, when factoring in the humidity that New York residents would likely experience at a temperature of 85 degrees, the resulting heat index would frequently reach or exceed 90 degrees. As shown in the Staff Report, even New York's lowest average relative humidity of 59 percent when combined with a straight temperature of 86 degrees results in a heat index of approximately 91 degrees. Increasing relative humidity to 70 percent, a straight temperature of 84 degrees is enough to result in a similar heat index, making a 90-degree heat index just as, or more, protective than an 85-degree straight temperature threshold in typical circumstances. Therefore, setting a heat index threshold of 90 degrees will maintain or enhance protections at most utilities.

Based on the information provided in the Staff Report and made available by NOAA, the heat index is generally provided in whole number increments. Therefore, we agree with the Electric Utilities that it is not necessary to require rounding of heat index temperatures.

For the reasons above, the Commission adopts a heat index of 90 degrees as the threshold for an extreme heat event. We direct the Utilities to provide the protections required by this Order when the forecast or actual weather conditions meet or exceed that threshold.

Weather Data Sources

Staff recommends the Commission require the Utilities to use the National Weather Service website for the weather forecasts and actual updates to determine if a utility should commence the temporary suspension of terminations.²⁶ Currently, all of the Utilities, with the exception of Orange & Rockland, use the National Weather Service. The Staff Report stated that the National Weather Service is readily available and easy to access without any experience or specialized training. If the National Weather Service becomes unavailable, Staff recommends the Utilities use either the Weather Channel, AccuWeather, or a local meteorologist to determine their regional temperatures for extreme heat events.²⁷ In addition, Staff recommended that each utility identify, within its respective tariff, the weather stations that it will use to determine the daily heat index.²⁸

The Electric Utilities, National Grid, and Liberty Water agree with the use of the National Weather Service for the heat index forecasts and to identify the National Weather Service-specific weather stations they will use throughout their respective territories. However, the Electric Utilities propose including this information in their annual Outreach and Education Plan, rather than within their tariffs for the sake of

²⁶ Staff Recommendation No. 4.

²⁷ Staff Recommendation No. 4.

²⁸ Staff Recommendation No. 3.

consistency, transparency, ease, and flexibility if the information needs to be updated. The Electric Utilities state that it is not necessary to identify back-up weather services at this time and stated that if it becomes necessary, the Electric Utilities will coordinate with Staff to establish an alternative. The Electric Utilities oppose including weather station information within their respective tariffs, and would rather post that information on their websites so that they can provide updates on an as-needed basis.

The City agrees with Staff's recommendation to use the National Weather Service for utilizing the forecasted heat index. PULP also agrees with using the National Weather Service as the main source for weather forecasts and heat index monitoring but recommends a stronger backup option in the event the National Weather Service is unavailable or inaccessible and for the Commission to treat SUNY Albany's Mesonet as an equal source to the National Weather Service. PULP states that the Mesonet provides the "daily maximum apparent temperatures (AKA heat index value) by county," so the New York City Micronet, a sub-network that can be accessed through the Mesonet site, should also be utilized.²⁹ Additionally, PULP recommends the Utilities develop and file a uniform, tiered contingency plan that will: (1) identify the specific weather station data source(s); (2) outline exactly when and how to switch to it; and, (3) keep track of all of the decisions made so everyone knows exactly why a particular choice was made. Further, PULP suggests the Utilities solicit at least one Department of Public Service-selected application programming interface to serve as a secondary feed.³⁰

²⁹ PULP comments, p. 6.

³⁰ PULP comments, p. 4.

The Electric Utilities assert that the National Weather Service information is "standardized" and "based on well-developed tools" that afford substantive and accurate information for forecasts. The Electric Utilities state that using the Mesonet may reduce the standardization of the forecasts and result in inaccurate predictions and protections not being applied when they should.

Certain commenters take issue with specific weather stations identified by certain utilities, specifically Con Edison. The City proposes that Con Edison and other utilities serving New York City use data from LaGuardia Airport instead of Central Park, as it would better reflect the temperatures experienced by the rest of the city as opposed to the verdant landscape of Central Park, which, they argue, can be cooler. The Waterfront Alliance and PULP recommend Con Edison use either the hottest forecast from four weather stations (Central Park, LaGuardia Airport, John F. Kennedy Airport, or the Downtown-Manhattan/Wall Street heliport station) or for Con Edison to rely solely on the Downtown-Manhattan/Wall Street heliport station because, they assert, these four weather stations reflect the heat island conditions experienced by most residential customers. In its comments, PULP provides an analysis to demonstrate that the Central Park weather station currently used by Con Edison understates the heat experienced by New York City residents. The Joint Commenters argue that the four New York City-based weather stations have varying readings, three of which are impacted by nature-based cooling effects, and do not factor in the heat island effect. Therefore, they assert using the weather station with the highest forecasted heat index will provide the most protective option to customers. PULP supports Staff's recommendation for the Utilities to document the weather stations that would be utilized when determining the

thresholds within their respective tariffs and also recommends this information be included on each utility's website to improve customer transparency.

While the Electric Utilities oppose establishing backup, or contingency, options, the Commission finds that establishing contingencies will allow for a smoother operation of extreme heat protections if the National Weather Service becomes inaccessible. Therefore, the Commission directs the Utilities to use the National Weather Service for obtaining heat-related information. However, if forecasts or data from the National Weather Service becomes unavailable, inaccessible, or issues arise with relying on the National Weather Service for obtaining forecasted and actual heat index information, the Commission directs the Utilities to use the Weather Channel, AccuWeather, or local meteorologist(s) to obtain this information. We find PULP's recommendation for the Utilities to document their use of either the National Weather Service or a contingency option, such as AccuWeather, or the Weather Channel, to be reasonable and will ensure transparency in the Utilities' procedures. As such, the Utilities are directed to include this information on their websites where they provide information regarding extreme heat protections, as we will discuss in more detail below. However, as there are multiple options available to obtain actual and forecasted heat index information, such as the National Weather Service, AccuWeather, or the Weather Channel, we are not convinced that the use of an application programming interface as an additional option, as PULP suggests, is necessary at this time.

We adopt PULP's recommendation to utilize the Mesonet or Micronet, with modifications. The Utilities may utilize the Mesonet or Micronet when obtaining heat index, or apparent temperature, information within the respective utility's regions

to monitor actual temperatures, should that region not contain a NOAA weather station, or the NOAA weather station becomes unavailable. The New York State Mesonet utilizes approximately 126 weather stations throughout the State, so this weather station data may be beneficial for utility application and use. However, given that the Mesonet or Micronet do not provide forecast information, these sources are unable to be used to determine whether the forecasted heat index would trigger an extreme heat event.

We agree with the Electric Utilities that specifying weather stations within their respective tariffs can unnecessarily limit flexibility for changes if a station is unavailable. However, we must ensure transparency regarding the weather stations. Therefore, we require the Utilities to identify the weather station(s) they use to obtain forecast and actual heat index temperatures for each of their respective regions or divisions on their websites by June 1, 2026, and review and update this information at least once annually by April 1 beginning in 2027. Reflecting the need for flexibility, the Utilities shall state on their website that they will use an alternative weather station only if the primary station is unavailable at the time a utility obtains its forecast for that specific division or region.

Regarding the comments from PULP, the Joint Commenters, and the City about alternative weather stations for New York City, we find that the three weather stations located at LaGuardia Airport, John F. Kennedy Airport, and Wall Street Heliport, present varying environmental factors that could also affect forecasts and actual heat index temperatures, such as all three weather stations being in close proximity to bodies of water and air traffic. In contrast, Central Park, though in a more wooded area, is surrounded by concrete buildings, and is

away from a significant portion of the ocean, river, or bay breezes found throughout much of New York City.³¹ Instead of relying on a single weather station, it makes sense to use the highest forecasted or actual heat index available from any of the National Weather Service weather stations in New York City. Similarly, it makes sense for all of the Utilities to rely on the highest forecasted or actual heat index available for determining if there is an extreme heat event in a region of their respective service territories. Accordingly, we require that, if a region within the Utilities' service territories contains more than one National Weather Service weather station, the Utilities shall utilize the weather station with the highest forecast or actual heat index to determine whether the heat index has reached or exceeded the threshold for an extreme heat event, which will ensure that residents are sufficiently safeguarded.

1. Timeframe to Obtain Forecasts

The Staff Report recommends that the Utilities obtain forecast heat-related information prior to 8:00 a.m. each day.³² Further, the Staff Report states the Utilities should monitor the temperatures throughout the day and, in the event the actual heat index reaches or exceeds the threshold, the Utilities would pause terminations thereafter. Staff stated that this would afford the Utilities time to adjust their daily operations and

³¹ NOAA Ocean Exploration, How does the ocean affect climate and weather on land?, retrieved on January 23, 2026, from: <https://oceanexplorer.noaa.gov/ocean-fact/climate/>; NYC Environmental Protection, NYC Waterways, retrieved on December 23, 2025, from: <https://www.nyc.gov/site/dep/water/nyc-waterways.page#>.

³² Staff Recommendation No. 4.

inform the relevant departments to halt terminations on a day where the heat index reaches or exceeds 90 degrees.

In their comments, the Electric Utilities and National Grid propose basing the termination suspension on the forecasted heat index no earlier than 8:00 a.m. the day prior to, and no later than 8:00 a.m. the day of, the potential terminations are set to occur. PULP agreed with Staff's recommendation that the Electric Utilities maintain the 8:00 a.m. forecast check but further recommends requiring the Utilities to confirm the forecast as of noon, as forecasts can change, and the weather may shift.

We find the Electric Utilities' and National Grid's proposal regarding the timing of accessing forecasts persuasive but share Staff's and PULP's concerns about conditions changing over the course of the day. Therefore, we adopt the Electric Utilities and National Grid's proposal regarding the timing for acquiring the forecasts used to determine whether to halt terminations scheduled for a given day, as detailed above. We will not require the Utilities to halt terminations on a given day due to a change in the forecast after 8:00 a.m. on that day. However, as forecasts are merely predictions and the actual heat index may exceed expectations, we direct the Utilities to periodically monitor the actual heat index temperature throughout the day and halt service terminations once the actual heat index on a given day reaches or exceeds 90 degrees.

Relying on the heat index forecast available prior to the utilities' approximate daily start time will enable each utility to make alternative work arrangements for field representatives, conduct any necessary outreach to customers, community groups, and municipal officials, and inform the utilities' internal staffing, thus minimizing potential disruptions to utility operations. However, we recognize that

if the actual heat index does reach or exceed the threshold, regardless of the forecast, customers will rely on continued electric and water service. Thus, it is appropriate that we require the Utilities to immediately halt terminations if the actual heat index threshold is reached after 8:00 a.m. on the day of a scheduled termination.

To further safeguard customers, the Utilities are directed to amend their procedural and training manuals to include a contingency plan with clear processes that shall be followed in the event of unexpected weather shifts. Their contingency plan shall include, but not be limited to, automated operational safeguards where possible that can trigger halting termination orders, coordination with internal staff and external stakeholders, and customer and municipal communication plans. While this protection requires the Utilities to monitor actual heat index temperatures throughout the day and adjust their operations accordingly, it is an additional safeguard to ensure customers are protected should the actual heat index exceed the forecast.

2. Documenting and Maintaining Temperature Logs

In its review, Staff found that many of the Utilities do not track and log the daily temperatures, which limited Staff's ability to evaluate the number of days the Utilities experienced various extreme heat conditions throughout the year. This raises potential issues should proof be needed for auditing the Utilities' temporary suspension of disconnections. The Staff Report recommended the Utilities document the daily heat index within their service territories and any applicable regions, and to retain these logs for at least five years.³³

³³ Staff Recommendation No. 11.

Liberty Water, the Electric Utilities, National Grid, Waterfront Alliance, PULP, and the Joint Commenters agree with Staff's recommendation to maintain a record of the heat index temperatures and to retain these logs for five years. However, the Electric Utilities and National Grid proposed limiting this requirement to the forecasted heat index value used in determining the suspension of terminations. Waterfront Alliance proposes that these records be made available to the public in a centralized and accessible format. PULP proposes the Utilities report the temperatures on their websites, and that the Utilities update their websites within 24 hours of an extreme heat event being triggered or lifted with timestamps and archived for three years, so that they can be audited.³⁴ The Joint Commenters propose that the Utilities submit these logs along with details of their service terminations, similar to the requirements of the Commission's Order Adopting Low Income Program Modifications and Directing Utility Findings in Case 14-M-0565, and for these extreme heat logs and reports to be made public.³⁵

The Electric Utilities' reply comments state that implementing PULP's significant list of website-oriented recommendations would result in material operational costs and technology changes. The Electric Utilities reiterate the need for enhanced communication strategies to align with their existing staffing resources, so as to mitigate costs on extreme heat days. The Electric Utilities' reply comments agree with

³⁴ PULP comments, pp. 3, 11.

³⁵ Joint Commenters, p. 7; Case 14-M-0565, Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Customers, Order Adopting Low Income Program Modifications and Directing Utility Findings, (issued May 20, 2016), pp. 39-40.

Staff's recommendation to continue to maintain and update their current webpages, but urge the Commission to reject PULP's additional enhanced website proposals. The Electric Utilities assert that PULP has not provided sufficient justification for posting temperature logs on the Utilities' websites and states that, if the Commission adopts PULP's recommendation, that the Commission require that the Utilities file this information with the Commission no more than once a year. They state this would avoid the costs of website updates.

The Commission directs the Utilities to document and maintain a five-year record of the highest daily forecast and actual heat indexes for each respective region in their service territories. However, we modify Staff's recommended information for these logs and direct the Utilities to include, at a minimum: the actual maximum heat index temperature for the day, the specific utility region, which weather station the forecast was taken from, the time the forecast was taken, the source of the forecast (i.e., National Weather Service, AccuWeather, Mesonet, Micronet, the Weather Channel), the date of the forecast, and the utility employee who obtained and added the data to the log. While more detailed than what the Electric Utilities and National Grid had proposed, the additional information will aid with the verification of the Utilities' records and future consideration of any potential modifications to the extreme heat protections.

The Commission appreciates the stakeholders' proposals to improve the transparency on whether a utility has suspended terminations during high heat days by publicly filing these logs. However, as stated earlier in this Order, heat index data gathered from the Utilities will be obtained from the National Weather Service, a site that customers can easily access via online, mobile application, printed newspapers, or through other

weather services that rely on the National Weather Service for their weather data. Additionally, the Commission is concerned that posting heat index information on utility websites, as PULP proposes, may increase the potential costs to all ratepayers, as discussed by the Electric Utilities. Further, it may create customer confusion, since certain parts of the utility's service territory may be experiencing an extreme heat event resulting in the temporary suspension of disconnections while other regions may not. Thus, we will not require the Utilities to post daily heat index information on their websites.

However, to provide transparency and public access to the utilities' logs, we require each utility to file copies of their logs annually. Specifically, we direct the Utilities to file their heat index logs for each calendar year with the Secretary to the Commission in this proceeding within 90 days following the end of that calendar year.

The implementation of daily heat index logs will streamline future review of potential refinements to these protections and will ensure the Utilities maintain adequate information to allow Staff to audit their respective processes and procedures.

Disconnection Suspension Period

According to the Staff Report, many, but not all of the Utilities have established practices and procedures in relation to the timeframe for the suspension of terminations during extreme heat events. To provide consistency between the Utilities, the Staff Report recommends the Commission direct the Utilities to halt their electric or water service terminations due to the non-payment of bills when the forecast predicts, or the actual outdoor heat index reaches or exceeds, 90 degrees for

the day of the scheduled termination and the day after a day on which the actual heat index reaches 90 degrees.³⁶

Liberty Water and National Grid disagreed with the recommendation to suspend terminations the day following an extreme heat event, citing that temperatures vary greatly from day to day. PULP, Waterfront Alliance, and the Joint Commenters propose extending the protection to the day prior to and the two days following an extreme heat event. Meanwhile, the City argues that adopting Staff's recommendation would weaken the protections that are currently in place.

In their reply comments, the Electric Utilities opposed the commenters' proposals to extend the temporary suspension of terminations to the day before and two days following the heat index meeting, or exceeding, 90 degrees. The Electric Utilities argue that there is no data to support halting disconnections on days when the heat index temperature threshold has not been met. To mitigate potential cost increases, the Electric Utilities recommend suspending terminations only on the day after an extreme heat event, if that second day, separately, meets the heat index threshold. Additionally, the Electric Utilities state that expanding the suspension period proposal could increase arrears, uncollectibles, and interest expenses as it could prevent any service collection for more lengthy periods. We discuss the potential costs of extreme heat protections later in this Order.

The Commission requires that the Utilities halt terminations for the non-payment of bills on a day for which the forecast predicts the heat index will reach or exceed 90 degrees or the actual heat index throughout the day reaches or exceeds 90 degrees.

³⁶ Staff Recommendation No. 2.

We note that the Staff Report proposed extending the suspension of terminations to the day following a day when the heat index actually meets or exceeds 90 degrees. Further, PULP, Waterfront Alliance, and the Joint Commenters recommended that we extend the protections to the day before a forecasted extreme heat day and two days following an extreme heat day. We find suspending terminations the day on which the heat index is forecasted to or actually does exceed 90 degrees provides an adequate safeguard against extreme heat. We understand the impetus for proposing to suspend terminations in advance of a forecasted extreme heat event and that the impacts of extreme heat can linger even though the forecast for that subsequent day may reflect a heat index below 90 degrees. However, as detailed within the Initiating Order, only one utility, Con Edison, currently has established protections for customers on the days following an extreme heat event, and only three utilities have protections starting the day prior to a forecasted extreme heat event.³⁷

For customers not located within heat islands, we find the suspension of terminations on the day or days on which the forecasted or actual heat index meets or exceeds 90 degrees generally enhances the protections established within individual rate plans. Additionally, we are mindful of the potential impacts increases in arrears and/or uncollectibles may have on all ratepayers if the Utilities were to halt terminations on additional days when the actual heat index does not reach, or exceed, 90 degrees and so would not pose the same health risks as those that exceed that threshold. Further, we note that, as we discuss in the next section of this Order, we adopt enhanced protections for customers within heat islands, which should

³⁷ Initiating Order, Appendix A.

alleviate the concerns about modifying existing utility protections.

Concerning the City's statement that this would decrease the protections that are already in place within New York City, we acknowledge this would be a modification to existing protections for Con Edison, however, we find it to be an overall enhancement of customer protections across the State. Moreover, portions of New York City will qualify as heat islands, and thus customers in those areas will receive additional protections as discussed below.

1. Enhanced Protections for Heat Islands

As discussed within the Staff Report, heat islands occur when pockets of concentrated urban development such as concrete structures, roadways, and thoroughfares, absorb, retain, and radiate heat to a greater extent than less developed areas; this creates pockets or "islands" of higher temperatures and concentrated heat. When heat waves occur, this may result in urban areas retaining heat longer than other geographic regions. Additionally, according to the Environmental Protection Agency (EPA) these areas can be one to seven degrees hotter during extreme heat events than their suburban and rural counterparts.³⁸

The Staff Report recommends that, for any locations susceptible to the heat island effect, that the Commission require the Utilities to temporarily suspend electric and water terminations for residential customers and customers with residential end-users on any day where the outdoor heat index is

³⁸ Environmental Protection Agency, What are Heat islands, retrieved on January 16, 2026, from: <https://www.epa.gov/heat-islands/what-are-heat-islands>.

forecast to or actually meets or exceeds 90 degrees, as well as on the two days following a day that the heat index actually reaches or exceeds 90 degrees.³⁹ Staff also recommends the Commission direct the Utilities to conduct a historical analysis, on the most recent five-year temperatures, for the major cities within their service territories and require the Utilities to identify any potential heat islands.⁴⁰ The Utilities would submit this information in a list, which includes a description of the heat island location and criteria the Utilities used to classify these locations as heat islands, within 30 days of the issuance of this Order and update that list every five years thereafter.⁴¹

The Electric Utilities recommend against extending the temporary suspension of terminations beyond the day or days with a forecasted or actual heat index above the selected threshold, even in heat islands.⁴² The Electric Utilities state that further suspensions on terminations were not necessary and emphasized a need to balance the financial costs to all utility customers with halting terminations to improve customer protections. Liberty Water and National Grid disagree with extending the suspension of terminations during extreme heat events to the two days following a heat event for heat islands.

Regarding the designation of such heat islands, the Electric Utilities recommend working with Staff to clarify the heat island analysis before commencing any studies to inform the "statewide framework" and stated they will need additional time

³⁹ Staff Recommendation No. 7.

⁴⁰ Staff Recommendation No. 6.

⁴¹ Staff Recommendation No. 6.

⁴² Electric Utilities' comments, pp. 5-6.

to conduct any analysis.⁴³ National Grid also expresses interest in consulting with Staff regarding the expectations and outcomes of the heat island analysis and recommends the Commission direct the Utilities to meet with Staff to discuss this recommendation further. Liberty Water stated that the costs for any extreme heat-related analysis are not, at present, recoverable in rates, and instead recommends that a cost-effective approach could be using the information already gathered on vulnerable customer areas, then incorporating targeted outreach with the weather thresholds.

The Joint Commenters agree with Staff's recommendation to temporarily halt terminations in heat islands for the day of and two days after an extreme heat event. The Joint Commenters also agree with the intent behind Staff's recommendation to conduct an analysis of the heat islands but assert that Staff should define and identify the potential heat islands by using maps from the Department of Environmental Conservation in conjunction with the Department of Health's Heat Vulnerability Index data.

The City stated that Staff's recommendation would weaken the current policy in place for New York City as set forth in Con Edison's rate plan, which prohibits disconnections the day before, the day of, and the two days following a forecasted heat index of 90 degrees. In regard to the heat island analysis, the City urged caution regarding allowing the Utilities to determine heat islands, as they are not experts in climatology. The City further recommends the Commission direct the Utilities to use the EPA definition of heat islands with no additional criteria, as it will ensure the areas are identified correctly. The City also recommends that New York City, in its

⁴³ Electric Utilities' reply comments, pp. 9-10.

entirety, be designated as a heat island, rather than individual neighborhoods or boroughs.

PULP recommends halting service terminations on the day before a forecasted heat event, the day of the event, and the two days following the event in a heat island. PULP supports the recommendation of mapping heat islands but opposes allowing the Utilities to conduct this analysis, as the information can be found through existing datasets. These datasets, PULP asserts, are the Department of Health's Heat Vulnerability Index, census data, and other heat-related risks. PULP also argues that the census tracts used for such analysis should include a "moderate" heat risk or higher, in order to capture areas with customers who can have increased heat-related risks during an extreme heat event.

In their reply comments, the Electric Utilities oppose PULP's proposal to extend the temporary suspension of terminations for heat islands to the day before the heat index meets, or exceeds, 90 degrees. The Electric Utilities argue that there is no data to support halting disconnections on days when the threshold is not met and that PULP's recommendation would limit the days that the Utilities could pursue disconnections as a collections measure, potentially increasing customer arrears, uncollectibles, and interest expenses, thus burdening all ratepayers with more costs.

While remaining cognizant of potential costs to all ratepayers, the Commission observes that heat islands retain heat for longer durations of time, requiring additional protections for customers living within these areas. Thus, the Commission adopts Staff's recommendation to halt utility terminations due to the nonpayment of service for residential customers and customers with residential end-users when the outdoor heat index is forecast to, or actually reaches or

exceeds 90 degrees and on the two days following a day that the heat index actually reached or exceeded 90 degrees in an area designated as a potential heat island.

Stakeholders proposed a number of criteria and potential sources that could be used to determine what classifies a heat island within the Utilities' respective service territories. However, based on the record before the Commission at this time, we cannot determine the appropriate criteria to be used. To ensure the Utilities develop lists of heat islands in their respective service territories based on appropriate criteria, the Commission directs the Utilities to collaborate with Staff, through a technical conference open to interested stakeholders, to develop heat island criteria, a list of the potential heat islands, and a description of the bounds of each heat island within the Utilities' respective service territories. The Utilities shall submit the details of the heat islands within their respective service territories, together with the criteria used to identify the heat islands, to the Secretary to the Commission by June 1, 2026, for immediate implementation during summer 2026 on an interim basis. However, stakeholders will have the opportunity to submit comments on the Utilities' interim heat island filings and the Commission will consider the Utilities' proposed heat island criteria and locations and adopt them, with any appropriate modifications if needed, at a later date. The Utilities shall include the criteria used (interim or any subsequently modified criteria) and a list of the heat islands in their respective service territories, with any necessary details, as part of their extreme heat Outreach and Education Plans, discussed later in this Order.

The Commission observes that the Staff Report recommended the utilities be required to update the list of heat

islands in their service territories every five years. We conclude that updating the list of heat islands at that interval is not sufficient, considering the rise in global temperatures, as discussed earlier in this Order and within Staff's Report, and increases in the number of heat islands around the country.⁴⁴ Therefore, we direct the utilities to conduct annual reviews of their heat island lists to ensure all heat islands within their service territory have been identified. If a utility determines, based on the ultimately adopted criteria, that an update to the list, such as the inclusion of a new heat island, is warranted, then that utility must submit this updated list within their extreme heat-related Outreach and Education Plan, which is discussed later in this Order.

Additionally, to inform future discussions regarding the impacts of extreme heat on customers within disadvantaged communities,⁴⁵ the Utilities shall identify disadvantaged communities within or adjacent to the heat islands in the Utilities' respective service territories.

2. Reconnection of Service During Extreme Heat

The Utilities' tariffs state that the Utilities will reconnect within 24-hours of receiving the residential

⁴⁴ United States Environmental Protection Agency, Heat Island Trends, retrieved on January 13, 2026, from: <https://www.epa.gov/heatislands/heat-island-trends#ref3>.

⁴⁵ Pursuant to Environmental Conservation Law (ECL) §75-0101(5), "Disadvantaged communities" is defined as "communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low-and-moderate-income households, as identified pursuant to" ECL §75-0111. The adopted disadvantaged communities criteria and a map of such communities is available at: <https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria>.

customer's required documents or payments.⁴⁶ As stated within the Staff Report and the Electric Utilities' reply comments, most utility customers are reconnected within 24 hours once customers provide the required documents or payments. Staff recommends that the Utilities work expeditiously to restore customers' service prior to a forecasted heat event.⁴⁷ Staff also recommends that the Utilities perform additional outreach to those customers at risk for service disconnection to offer financial assistance or a deferred payment agreement (DPA) as well as offering them the information for cooling centers and emergency services.⁴⁸

Columbia states the Utilities should be required to identify and reconnect households currently disconnected for any upcoming extreme heat events with all reconnection fees waived. PULP recommends that if the extreme heat threshold is reached, customers who have already been disconnected and contact the utility for reconnection should be placed on a minimum DPA automatically, if they wish, without submitting a financial statement form or financial documentation.

The Commission adopts Staff's recommendation and requires the Utilities to expand outreach to customers who are at risk of being terminated for the non-payment of service prior

⁴⁶ Central Hudson tariff schedule P.S.C. No. 15 - Electricity, leaf 93; Con Edison tariff schedule P.S.C. No 10. - Electricity, leaf 118; Liberty Water tariff schedule P.S.C. No. 1 - Water, leaf 34; NYSEG tariff schedule P.S.C. No. 119 - Electricity, leaf 80; National Grid tariff schedule P.S.C. No. 220 - Electricity, leaves 83-85; Orange & Rockland tariff schedule P.S.C. No. 3 - Electricity, leaves 136-137; RG&E tariff schedule P.S.C. No. 19 - Electricity, leaves 92-94; and Veolia tariff schedule P.S.C. No. 1 - Water, leaf 37.

⁴⁷ Staff Recommendation No. 9.

⁴⁸ Staff Recommendation No. 9.

to and during an extreme heat event. We find this expanded outreach sufficient, as it would aid in providing residential customers with additional information on payment assistance programs, bill discount programs, and DPAs, and as such, find PULP's recommendation to automatically enroll customers onto a minimum DPA unnecessary. As identified in the Staff Report, there are safety risks with reconnecting service without a customer's knowledge.⁴⁹ Therefore, the Commission does not adopt Columbia's proposal to identify and reconnect customers prior to a heat event, and instead direct the Utilities to maintain their same-day reconnection policies should a customer be disconnected prior to a heat event.

Service Territory or Regional/Division Temperatures

The Staff Report explained that some of the Utilities temporarily suspend terminations due to the non-payment of service for their whole service territory, while some use a regional approach. Central Hudson and Con Edison were the only two utilities that paused terminations across their entire respective service territories based on the heat index obtained from one location. The Staff Report evaluates the Utilities' current practices related to the location of where the heat index should be obtained and whether suspensions of service terminations should apply across the entire service territory, or in specific regions or divisions. The Staff Report recommends the Utilities suspend terminations during times of extreme heat based on geographic regions.⁵⁰

Specifically, Staff recommends Central Hudson use five regions that would align with its divisions: Region 1/Catskill

⁴⁹ Staff Report, pp. 35-37.

⁵⁰ Staff Recommendation No. 5.

Division, Region 2/Poughkeepsie Division, Region 3/Kingston Division, Region 4/Newburgh Division, and Region 5/Fishkill Division; and Con Edison use two regions: New York City and Westchester.⁵¹ For Liberty Water and Veolia, Staff recommends a regional approach that aligns with their water districts.⁵² For the remaining utilities, National Grid, NYSEG, Orange & Rockland, and RG&E, the Staff Report recommends these utilities continue to use their preestablished regions when determining whether to halt terminations in times of extreme heat. The Staff Report invited the Utilities to provide comments that would address the regions that may be used, whether they are in use or a new region, why the regions should be utilized, and the location or weather station(s) that could be used for the forecasted and actual heat index information in that region.⁵³

The Electric Utilities' comments disagree with Staff's recommended divisions for Central Hudson and Orange & Rockland. The Electric Utilities stated there is no evidence supporting applying five regions to Central Hudson's "compact" service territory.⁵⁴ Rather, Central Hudson proposes to continue to use its entire service territory as one region to avoid potential complications with the process or utility operations and to mitigate customer confusion throughout its service territory. Additionally, Orange & Rockland proposes to use two regions, Orange County (Middletown) and Rockland County (Spring Valley), rather than the three regions currently specified in its tariff (i.e., the Eastern Division (Spring Valley), Central Division (Blooming Grove), and Western Division (Middletown)), that it

⁵¹ Staff Recommendation No. 5.

⁵² Staff Recommendation No. 5.

⁵³ Staff Recommendation No. 5.

⁵⁴ Electric Utilities' comments, p. 8.

currently uses. The remaining electric utilities, Con Edison, NYSEG, RG&E, and National Grid, as well as Liberty Water, support Staff's recommendation to use regions during times of extreme heat.

PULP argues there is a need for more detailed, region-specific criteria related to the temporary suspension of terminations due to extreme heat. In the Electric Utilities' reply comments, they state that PULP's more granular approach on when and where the Utilities should halt terminations does not align with the operating areas that the Utilities use to staff field personnel.

The Commission understands Central Hudson's reticence to establish a new procedure and use several regions when determining whether to temporarily suspend disconnections due to the nonpayment of service. However, the Commission reiterates that one of this proceeding's goals is to establish uniform protections amongst the major electric and water utilities. Allowing Central Hudson to use one region for its entire service territory would result in this utility acting as an outlier when all other major electric and water utilities are using multiple regions. Furthermore, although compact, Central Hudson's service territory comprises significantly varied locations, including the Catskill mountains and low-lying areas in the Hudson Valley. We direct Central Hudson to work with Staff and interested stakeholders to determine the appropriate regional boundaries for Central Hudson's service territory within 45 days of the issuance of this Order. Following the collaborative meetings with Staff and interested stakeholders, the Commission directs Central Hudson to include the determined regions in its tariff filing required within 90 days of this Order, as discussed below.

Orange & Rockland did not include information regarding Sullivan County within its comments, nor do the proposed counties, Orange County and Rockland County, align completely with the service territory detailed within Orange & Rockland's tariffs. Therefore, we direct Orange & Rockland to utilize the three territories presently included within its tariff, Orange County, Rockland County, and Sullivan County, for the purposes of establishing regional extreme heat protections. We find that establishing these regions, rather than those Staff proposed in its report or detailed by the utility in its comments, will provide Orange & Rockland with enough flexibility to establish updated and uniform extreme heat protections for residential and residential end-use customers, while minimizing potential disruptions to the utility's operations.

For the remaining utilities, the Commission adopts Staff's recommendation to establish multiple regions for the electric and water utilities when determining whether to temporarily suspend residential service disconnections. The Utilities shall identify the applicable regions in their tariffs. Regarding PULP's comment, we conclude that the detailed processes, reports, and procedures outlined within this Order are sufficient in detailing extreme heat-related data for the Utilities' respective regions and service territories.

Costs Associated with Extreme Heat Protections

The Staff Report indicates that extending the suspension of service terminations may increase utility arrearages and/or uncollectible expenses over time. According to the Staff Report, because the Utilities conduct collection activities in conjunction with service terminations, delaying terminations could also result in the Utilities not collecting arrears balances, which have the potential to turn into

uncollectibles. These uncollectible costs would then be reflected in base rates charged to all ratepayers. Accordingly, the Staff Report recommended the Utilities investigate ways for mitigating residential customer arrears and uncollectible expenses when implementing extreme heat protections.⁵⁵

The Electric Utilities support Staff's attempt to strike a balance between the need for extreme heat protections and associated costs so as not to burden ratepayers. The Electric Utilities request the Commission allow the recovery of incremental costs associated with the implementation and administration of any new extreme heat protection requirements. Further, the Electric Utilities also recommend the Commission authorize deferring incremental costs, citing that addressing the recovery of these balances should be done quickly and appropriately. The Electric Utilities state that they have started to work on mitigating the impacts of implementing heat-related protections and limiting collection activities by initiating more outreach and education, which includes posting notices, "soft" collections, and full commercial collection activities on the days when terminations are suspended due to extreme heat.

Liberty Water agrees with the goal of decreasing customer arrears. Further, Liberty Water states that it has already begun to deploy measures that would aid in the reduction of customer arrears, increase customer participation of DPAs, and increase customer outreach and education.

National Grid states it has begun a multi-outreach approach to engaging customers and managing their arrears, which comprises of texts and emails to customers including the vulnerable customer populations, such as those who are

⁵⁵ Staff Recommendation No. 8.

classified as elderly, blind, disabled; medical emergency; or as relying on life-support equipment. Accordingly, National Grid has also hired more personnel for their Collections Residential Account Management team that directly contact "high risk" customers. National Grid argues that additional outreach may be accomplished with cost recovery in rates.

Waterfront Alliance urged the Commission to restructure Staff's recommendation and look at equity and access, rather than shifting the timing of shut offs or investigating collections. Waterfront Alliance recommends the Commission take a "customer-centered approach," which could remove the barriers related to assistance program participation, thus preventing arrears from accruing. Waterfront Alliance suggests potential automatic enrollments in energy affordability programs, an equitable rate design so the energy burden is no greater than six percent of a household's income, increased outreach, and performance-based incentives that would tie with reducing terminations and increasing energy affordability program participation/enrollment that aid in reducing potential terminations.

PULP supports Staff's recommendations but reiterates that arrearages and uncollectible expenses should not take a higher priority over the implementation of extreme heat customer protections.

The Joint Commenters express concerns with Staff's recommendations related to reducing customer arrearages and uncollectible expense. They state that they cannot support any recommendations that do not promote genuine bill affordability. According to the Joint Commenters, a customer-centered arrearage reduction program would be the only true solution to the ongoing arrearage issue, stating bills should be more affordable and repayment methods need to be realistic. The Joint Commenters,

therefore, propose modifying Staff's recommendation, by adding the language in brackets as follows "direct the Utilities to develop methods for decreasing residential customer arrears and residential customer uncollectible expense that results from implementing extreme heat protections [in a manner that reduce the incidence, depth, and duration of arrears through comprehensive affordability measures]." ⁵⁶ According to the Joint Commenters, Staff's recommendation could be "misread" as endorsing increasing earlier terminations to reduce uncollectibles, which could urge the Utilities to ramp up disconnections on cooler days. The Commission does not agree with the Joint Commenters' supposition, as the Staff Report also discusses collection activity, such as posting notices, engaging customers, establishing DPAs, and conducting outreach. Therefore, we interpret the recommendation as conducting additional methods of outreach and communication to mitigate customer arrears and residential customer uncollectibles.

Columbia suggests "embedding principles of equity" in the implementation of protections and framing it as a strategy for advancing energy access and affordability. Columbia urges the Commission to use the extreme heat protection framework as a proactive equity and affordability measure centered on long-term energy access, rather than merely managing terminations. Columbia states that disconnection protections should be one component of a plan to ensure energy access throughout the year. Further, Columbia proposes to include income-based rate classes, improved bill assistance programs that would aid in cooling and essential services costs during extreme heat and expanding automatic enrollment into energy affordability programs to

⁵⁶ Joint Comments, p. 10.

include other eligible groups, not just recipients of a Home Energy Assistance Program grant.

In January 2015, the Commission established an ongoing proceeding to address affordability and equity concerns.⁵⁷ In 2016, the Commission established an Energy Affordability Policy to achieve a target energy burden, or the amount of a household's income spent on energy costs, that is no more than six percent for low-income customers.⁵⁸ In addition, on July 17, 2025, the Commission approved an Enhanced Energy Affordability Policy for moderate-income customers who are below the area median income but not eligible for a utility's monthly low income bill discount program.⁵⁹ The Commission remains concerned about energy affordability and equity and encourages stakeholders in this proceeding to participate in the Energy Affordability Policy Working Group to continue discussions on mitigating affordability concerns for New York's residential utility customers.

As stated in the Staff Report, definitive costs of implementing these extreme heat practices and procedures could not be verified at that time.⁶⁰ Since then, the Utilities have not provided updated calculations for determining costs that provide realistic estimates on the total impact of extreme heat-

⁵⁷ Case 14-M-0565, Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers, Order Instituting Proceeding (issued January 9, 2015).

⁵⁸ Case 14-M-0565, supra, Order Adopting Low Income Program Modifications and Directing Utility Filings (issued May 20, 2016).

⁵⁹ Cases 14-M-0565 et al., supra, Order Adopting Enhanced Energy Affordability Policy and Directing Utility Filings (issued July 17, 2025).

⁶⁰ Staff Report, pp. 33-35.

related protections and procedures. Therefore, the Commission adopts Staff's recommendation that the Utilities investigate ways to mitigate any costs, such as residential customer arrears and uncollectible expenses, when implementing the extreme heat protections adopted in this Order. Additionally, the Commission authorizes the Utilities to defer necessary costs for the implementation of these extreme procedures and protections. Any costs deferred must be incremental to current rates, material to earnings, and the Utilities must demonstrate why these costs were necessary.⁶¹ The Utilities should include these costs and a proposed recovery methodology in their next rate case filings, for Commission consideration. The Utilities are expected to use cost-effective measures when implementing extreme heat-related protections and procedures.

Internal Communication and Customer Outreach

The Staff Report explains that the Utilities have documented nominal or no communications to residential customers regarding existing extreme heat protections. Staff recommends that the Utilities establish a communication plan that includes both internal and external communications regarding extreme heat events.⁶² The Staff Report recommends the Commission require the Utilities to inform customers of DPAs, same day reconnection policies, and the policies regarding the temporary pause in service terminations due to extreme heat events. Staff further recommends the Utilities use the template provided at the end of the Staff Report in Appendix B, titled "Outreach & Education Plan Template," to identify information related to utility heat

⁶¹ Material to earnings means five percent of net income available to shareholders.

⁶² Staff Recommendation No. 12.

related protections and communications to customers.⁶³ The Utilities would include details on disconnection notices, their webpages, outreach to vulnerable populations, communication on energy assistance programs, and cooling centers.

The largest electric utilities already have webpages that detail information related to extreme weather, such as extreme heat, so the Staff Report also recommended Liberty Water and Veolia develop and maintain similar webpages and provide information on these webpages about residential customers protections during extreme heat events.⁶⁴

Liberty Water, the Electric Utilities, and National Grid agree to update and/or maintain extreme weather webpages to include information about extreme heat protections. The Electric Utilities and National Grid currently conduct customer outreach for those at risk of termination and have stated they will work with their municipal partners to inform customers of available cooling centers. While the Electric Utilities support increasing customer awareness, they expressed concerns about the feasibility of increased outreach prior to and during heat events. Particularly of concern was the potential for customer communication fatigue, especially when customer communications do not require customer action, and possible reduced effectiveness of incremental communications. The Electric Utilities request flexibility in increasing outreach so they can follow their current processes and use their best judgement to avoid customer confusion without additional operational strain.

In its comments, National Grid details its monthly outreach during the summer months, informing customers of payment assistance, bill assistance, and energy assistance

⁶³ Staff Recommendation No. 12.

⁶⁴ Staff Recommendation No. 13.

programs. Further, National Grid states that it conducts this monthly outreach through several channels, such as its call center, interactive voice response messages, enhanced website content, and in-person events. National Grid also states that it has developed brochures and materials for distribution to customers via email, mail, or at events to inform them of the Company's Energy Assistance Program and Special Protections. We find that National Grid's use of varying methods for contacting residential customers to inform them of different assistance programs is highly beneficial to reach the most customers possible and may be, potentially, replicable at other utilities.

Waterfront Alliance recommends requiring the Utilities to maintain an extreme weather webpage that is user-friendly, multilingual, and accessible from their homepages and mobile devices. These webpages would be designed with community input and consistent updating based on feedback.

PULP supports the outreach framework overall, but states that allowing the Utilities the freedom to decide their outreach efforts could result in "disjointed outreach efforts statewide."⁶⁵ PULP provides a series of recommendations to enhance the outreach utilities conduct regarding extreme heat and related consumer protections. PULP asserts these outreach efforts should include options for financial assistance, so customers are not pressured into DPAs they cannot afford; coordinated outreach efforts amongst the Utilities prior to heat events; adjustments to search functions on the utility websites; additional outreach to local senior centers, home health agencies, pediatric clinics, vulnerable customer groups and other organizations that aid vulnerable groups; and various reporting requirements that would monitor the Utilities' efforts

⁶⁵ PULP comments, p. 9.

to assist customers with mitigating arrears, enrolling in assistance programs, and informing them of extreme heat protections. PULP recommends that the Commission require the Utilities to allow customers to have an opt-in self-enrollment for all-year alerts, file quarterly metrics on these alerts, and conduct in-person outreach to disadvantaged communities and heat island customers in the spring and summer times. Further, PULP suggests the Commission direct the Utilities to use search-engine optimization for the web titles, metadata tags, and schema markup, so that search terms related to heat protections will pop up on their website. PULP also recommends that the Commission require the Utilities to translate the extreme heat pages on their websites into six of the most spoken languages in the Utilities' respective service territories. The Electric Utilities argue that PULP's recommendations do not provide justification for the costs that would be incurred to implement the reporting requirements related to heat-related outreach and so should not be adopted.

The Joint Commenters agree with Staff's recommendation that the Utilities create, maintain and update a dedicated extreme weather webpage but request that the Commission establish a more detailed set of requirements. They recommend that all webpages be user-friendly and provide all relevant information. The Joint Commenters assert that if there is a "carousel" on its utility homepage, then it should feature extreme heat protections from April 1 through September 30, at a minimum. The Joint Commenters also suggest that the Utilities utilize the Department of Energy's strategies to improve the accessibility of information when designing their extreme heat pages.⁶⁶

⁶⁶ The Joint Comments, pp. 7-8.

The Commission adopts Staff's recommendation for the major electric utilities to develop, maintain, and update their webpages for information on extreme heat protections and practices. The Commission also directs Veolia and Liberty Water to either establish or update their websites to detail their extreme heat practices and procedures by May 1, 2026, and include screenshots of these webpages within their Outreach and Education Plan related to extreme heat. The Commission appreciates PULP and Waterfront Alliance's proposals for the utility webpages to be multilingual. However, the potential costs to translate utility webpages must be considered and we do not believe this is the appropriate proceeding to implement multi-lingual outreach for utility webpages. The Commission supports PULP and Waterfront Alliance's recommendation that extreme heat information be more accessible to customers and recommends the Utilities consider Extreme Heat-related webpages be made available to customers who access the utility's website through their mobile device, if they are not already. The Commission supports the Joint Commenters' recommendation for the Utilities to use the DOE's methods for improving accessibility to information and urges the Utilities to use these steps to improve customers' experience and accessibility when interfacing with the Utilities' webpages.

We agree with PULP's assessment that allowing each utility to develop its own outreach plan could lead to disjointed outreach efforts. Therefore, the Commission adopts Staff's recommendation to establish an Outreach and Education Plan, with modifications, which the Utilities shall individually provide for Staff review within 60 days of this Order, then submit their Plans with the Secretary to the Commission within 120 days of this Order. As several of the commenters provided suggestions and recommendations for enhanced communications with

customers and stakeholders, we provide a guidance template that the utilities shall use when developing this Outreach and Education Plan in Appendix B to this Order. As certain electric utilities already conduct outreach to residential customers who may be disconnected and inform customers of available cooling centers, those utilities shall document this existing information in their respective Outreach and Education Plans. We are mindful of the potential increases to costs for implementing a significantly robust outreach program, therefore, we grant the Electric Utilities' request for flexibility when determining outreach efforts based on their respective service territories. However, the Utilities must, if they are not already doing so, conduct an extreme heat outreach campaign, whether via email, calls, or bill inserts, at least once a month from May through October, as recommended by National Grid.

Under PULP's proposal for "opt-in" text alerts for extreme heat updates, we are concerned customers may experience fatigue with multiple alerts, so we decline to require such a proposal at this time. However, the Utilities should consider all available methods to implement outreach and education during extreme heat events, including mobile applications. As stated throughout this Order, we are cognizant of the potential costs to all ratepayers for the implementation of extreme heat-related protections and practices. Therefore, we are not inclined to adopt PULP's recommended enhancements for the Utilities' search functions and website translation or the Joint Commenters' recommendation that the Utilities include a dedicated extreme heat banner on their respective homepages from April 1 through September 30, as we do not know the potential costs for such changes at this time.

1. Vulnerable Customer Population Outreach

As stated in the Staff Report, HEFPA and state regulations provide residential customers with additional protections against service disconnections. However, Staff explains its concerns with the Utilities' outreach efforts to these customers during extreme heat events. Staff recommends the Utilities develop a minimum of one alternative method to communicate with vulnerable customers, including those who are elderly, blind, or disabled; medical emergency; or on life-support equipment during times of extreme heat.⁶⁷ Staff recommends the Utilities' communications should inform these customers of the forecasted extreme heat event in which terminations would be temporarily suspended within 24 hours.

Liberty Water agrees with Staff's recommendation to conduct additional outreach to New York's vulnerable customers, but disagrees with the method, citing that the overuse of automated phone calls has the potential to lead to additional increases in customer complaints. However, Liberty Water did not provide an alternative for how it would conform with the recommendation. Liberty Water also disagrees with establishing an alternative method for communicating with vulnerable customers because these customers are already afforded additional protections under HEFPA. Liberty Water suggests that water utilities are not directly related to indoor temperatures or cooling capabilities, so additional notifications may result in increased expenses that are not proportionate to the benefit of informing these customers.

National Grid supports amending its customer outreach plan to include extreme heat related communications but expresses concern that overcommunications and daily

⁶⁷ Staff Recommendation No. 10.

notifications could increase customer confusion. National Grid recommends, instead, to conduct outreach once a month during the summer months and stated that the utility will also provide further extreme heat related information in their email blasts and on the utility's website.

PULP recommends the Utilities establish a hotline dedicated to disconnections that become extreme heat emergencies and including the number of the hotline on outreach materials. Further, PULP urges the tracking of calls to this hotline. Additionally, PULP agrees with requiring the Utilities to have alternative contact for vulnerable customers and adds that these alternative methods of communication should be approved and verified annually. This would result in vulnerable customers receiving either a text, email, or caregiver call within 24 hours of an extreme heat event.

The Electric Utilities' reply comments assert that PULP's recommendations for the expanded outreach would be repetitive as they already conduct outreach campaigns, which are detailed within their Annual Outreach and Education Plan. The Electric Utilities' reply comments also state that messages may be limited due to the technology being used, would provide little to no customer benefits, and would be costly. The Electric Utilities state they would need to set up new lines, with dedicated staffing, in addition to their currently used customer service lines, which would result in more staffing and increased costs. Meanwhile, the Electric Utilities state that customers can already call their utility if they need reconnection of service during emergencies. The Electric Utilities argue several of PULP's recommendations would go beyond the scope of this proceeding, as they would not be limited to extreme heat days, but extend beyond those timeframes. The Electric Utilities also assert that some

customers' preferred communication methods may not align with the current processes or could slow time-sensitive communications during heat events and other emergencies.

We adopt Staff's recommendation to conduct additional outreach, including the Utilities informing vulnerable customers of the forecasted extreme heat event in which terminations would be temporarily suspended within 24 hours of said event, with the modification that the Utilities conduct the outreach, at least once a month, during the summer months, as outlined by National Grid, and maintain at least two contact methods (i.e., a primary method and at least one backup method of communication) for vulnerable customers in the event these customers may not be reachable by their primary preferred communication method. While commenters expressed concern that additional outreach efforts could result in incremental costs, they did not present alternatives that would address this concern while also addressing benefit of additional outreach to vulnerable customers. Considering this, we find expanding outreach efforts to vulnerable customers, but limiting it to seasonal efforts, to be appropriate.

Further, the Utilities are required to file their annual Outreach and Education Plans on April 1 in Case 17-M-0475. We direct the Utilities to submit their extreme heat-related Outreach and Education Plan, which includes the information detailed within this Order, as a supplemental filing in Case 17-M-0475 for Staff review and feedback, by May 1, 2026. Each year thereafter, the Utilities shall include this information as part of their annual Outreach and Education Plans, under the "Mandated Outreach and Education" section, and file them with the Secretary to the Commission in Case 17-M-0475.

We observe that PULP's suggestion of a hotline dedicated to extreme heat could be beneficial as it would provide an opportunity for utilities to identify customers that need additional assistance. However, we are mindful that should a customer be in an emergency situation and in need of assistance, they should be directed to call emergency services, rather than their utility company. Therefore, to prevent customer confusion and mitigate the potential risk to customers in emergency events, we decline to adopt PULP's recommendation that the Utilities establish a dedicated heat emergency hotline.

Utility Tariff Schedules

The Staff Report explains that while some utilities document their extreme heat protections within their tariffs, others do not. As such, Staff recommends that each of the Utilities include within their respective tariffs extreme heat information such as which weather station(s) the heat index data would be retrieved from in each of the Utilities' designated region(s) or division(s).⁶⁸ Also, the Initiating Order and Staff Report explain that the current protections at each major electric utility varies, depending on their respective rate plans. As the goal of this proceeding is to establish uniform protections for the largest electric and water utilities, the Staff Report recommends that any Commission action within this proceeding supersede the protections that have been established within the Utilities' respective rate plans as of 90 days following Commission Action.⁶⁹ To effectuate this, Staff recommends the Utilities update their respective tariffs with the extreme heat protections within 90 days of the issuance of a

⁶⁸ Staff Recommendation No. 3.

⁶⁹ Staff Recommendation No. 14.

Commission order.⁷⁰ Additionally, Staff recommends the Commission find that any future changes to the extreme heat protections should be addressed within this proceeding and not within individual utility rate cases.⁷¹

Liberty Water comments that it agrees with Staff's recommendation to update its tariffs within 90 days of Commission action. National Grid agrees with Staff's recommendation to update its tariff, but requested the Commission allow additional time of a minimum of 180 days to complete these revisions. National Grid states that it needs to conduct an in-depth analysis of the recommendations, which it states could be reviewed by Staff, then develop an implementation plan.

PULP supports including weather station information in the tariffs, but recommends this information also be included on the Utilities' websites. PULP was also supportive of Staff's recommendation to require updates to the Utilities' tariffs.⁷²

The Joint Commenters support Staff's recommendation to update the Utilities' tariffs within 90 days of Commission action in this proceeding, but recommend the Commission ensure the protections for extreme heat would be established, and in place, prior to the 2026 extreme heat season.

The Commission agrees with Staff's recommendation that the Utilities should detail the extreme heat protections within their tariffs. For the reasons discussed previously in this Order, we do not adopt PULP's recommendation to update the Utilities tariffs to include weather station information. We understand National Grid's concerns regarding the timing of

⁷⁰ Staff Recommendation No. 15.

⁷¹ Staff Recommendation No. 14.

⁷² PULP's Comments, p. 12.

tariff revisions. To establish these uniform protections prior to summer 2026, we direct the Utilities to amend their tariffs with the standardized language shown in Appendix C, and to file tariff amendments on not less than five days' notice, to become effective on June 1, 2026.

Additionally, Central Hudson, Con Edison, Liberty Water, National Grid, NYSEG, Orange & Rockland, RG&E, and Veolia are directed to provide customers with notification of the Commission's determination in this proceeding, no later than 30 days prior to the effective date of the amendments, by newspaper publication once a week for four consecutive weeks, consistent with the requirements of PSL §§66(12)(b) and 89-c(10)(b), and Title 16 of the New York Codes, Rules and Regulations §720-8.1, and provide a copy of the newspaper publication and an affidavit demonstrating that the Utilities have provided this notification within 30 days after publication has been completed.

Utility Implementation

In accordance with the Initiating Order, the Staff Report recommends the Commission adopt protections for certain customers of the Utilities. Staff recommends that LIPA file and present tariff amendments to its Board of Trustees for approval regarding extreme heat protections, policies, and procedures consistent with those the Commission adopts in this Order.⁷³

All commenters support establishing uniform heat protections; however, PULP, Waterfront Alliance, the City, the Joint Commenters, and Columbia recommend strengthening these protections and taking steps to ensure the proposed recommendations do not decrease customer protections already in place. PULP supports Staff's recommendation but states the

⁷³ Staff Recommendation No. 16.

current processes and procedures that are more protective should remain until the end of a utility's rate term. PULP argues this would preserve negotiated provisions with greater protections while aligning less protective terms with the provisions adopted in this proceeding.

PSEG LI proposes to continue its current practice of monitoring heat index and temperature from a central location to determine the implementation of heat protections for all customers within its service territory. PULP and the Joint Commenters support Staff's recommendation to include PSEG LI and LIPA in the extreme heat protections. Liberty Water states that, while the recommendation for PSEG LI does not directly apply to Liberty Water, it supports the concept of consistent protections across the State.

The Electric Utilities' reply comments opposed PULP's recommendation that the protections in the Utilities' current rate plans should continue until they expire. The Electric Utilities urge the Commission to apply uniform and concurrent extreme heat recommendations, as Staff recommends, to the Utilities, which will aid in spreading customer awareness, mitigate confusion, and encourage uniform adoption of extreme heat protections. Liberty Water stated it agrees with Staff's recommendation that any future changes to extreme heat protections should be addressed within this proceeding.

The Commission directs the Utilities to apply the extreme heat protections, process, and procedures adopted in this Order, superseding any different protections included in the Utilities' current rate plans, effective June 1, 2026. To this end, the Utilities are directed to develop procedural and/or training manuals that include the procedures and processes outlined within this Order, at a minimum, and file these procedural or training manuals with the Secretary to the

Commission by June 1, 2026. Additionally, the Utilities shall abide by the procedural and training manuals submitted in this proceeding. Should the Utilities need to adjust their procedural and/or training manuals, they shall submit the documents for Staff review and feedback, before the updated documents are submitted within this proceeding.

We appreciate the positions of PULP and other commenters that the extreme heat protections adopted in this Order should not supersede any protections incorporated into existing rate plans that some may consider more expansive. However, the protections adopted within this Order are robust and intended to develop uniformity amongst the Utilities. Continuing disparate protections established in individual rate plans counters our intent to provide "more consistent and uniform electric and water utility customer protections statewide during extreme heat events."⁷⁴

In addition, the Commission notes the existing extreme heat protections were implemented over several years throughout rate cases and result from joint proposals negotiated between the Utilities, Staff, and parties to those proceedings. Adjustments to these protections through the rate case process depart from our goal of standardization of these protections across the Utilities. Therefore, to promote continued consistency among the Utilities' extreme heat protections, the Commission adopts Staff's recommendation to only consider and address further adjustments to these protections within this generic proceeding, rather than in individual rate proceedings.

Further, the Commission anticipates that the LIPA Board of Trustees will adopt similar extreme heat protections for its customers. Also, the Commission anticipates that LIPA

⁷⁴ Initiating Order, p. 11.

and PSEG LI will convene with the Department of Public Service's Office of Consumer Services Staff to develop a list of heat islands within its service territory, as well as the locations where the temperature will be obtained for the purpose of suspending terminations due to extreme heat, list this information on their websites, and include this list each year with the annual Outreach and Education Plan submitted to the Department of Public Service's Long Island Office.⁷⁵

Other Comments

PULP recommends that the Utilities suspend terminations when the National Weather Service forecasts high winds or the risk of tornadoes and recommended a review of halting terminations on the days before a forecasted severe storm. The Electric Utilities' reply comments acknowledged appreciation for PULP's concerns but stated that these protections have been included and addressed within the New York emergency response framework⁷⁶ and do not require further modification in this proceeding. We agree with the Electric Utilities, as this proceeding is focused on extreme heat events and the need for continued electric and water service during such events to allow for cooling. The issue of customer protections during other types of weather events is outside this scope. Therefore, we decline to adopt PULP's recommendation at this time.

⁷⁵ Staff Recommendation No. 6; Staff Recommendation No. 5.

⁷⁶ Case 13-M-0061, In the Matter of Customer Outage Credit Policies and Other Consumer Protection Policies Relating to Prolonged Electric or Natural Gas Service Outages, Order Establishing Policies (issued November 18, 2013).

CONCLUSION

Extreme heat events have detrimental health impacts, and individuals need access to electric and water service to mitigate these impacts. Halting service terminations during extreme heat events maintains a customer's access to electricity and water during these critical periods. By this Order the Commission adopts and requires the Utilities to implement uniform extreme heat protections for residential electric and water customers and customers with residential end users.

The Commission orders:

1. Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc. shall update their respective tariffs, as described within the body of this Order, to reflect the modified extreme heat protections, policies, and procedures to be filed on not less than five days' notice, to become effective on June 1, 2026, as discussed in the body of this Order.

2. Central Hudson Gas & Electric Corporation shall update its tariff, as described within the body of this Order, to reflect the modified extreme heat protections, policies, and procedures to be filed on not less than five days' notice, to become effective on June 1, 2026, on a temporary basis. The tariff amendments shall not become effective on a permanent basis until approved by the Commission.

3. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National

Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc. shall implement the extreme heat protections, policies, and procedures, as described and adopted within the body of this Order by June 1, 2026.

4. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc. shall notify customers of the Commission's determination in this proceeding, by newspaper publication once a week for four consecutive weeks at least 30 days prior to the amendment's effective date, consistent with the requirements of Public Service Law §§66(12)(b) and 89-c(10)(b), and the New York Codes, Rules and Regulations §720-8.1.

5. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc. shall file with the Secretary to the Commission, no later than 30 days after newspaper publication has been completed, a copy of the newspaper publication, and an affidavit demonstrating that it has complied with Ordering Clause 4.

6. Central Hudson Gas & Electric Corporation shall work with Office of Consumer Services staff and interested stakeholders to identify the number of regions within its service territory for extreme heat protection purposes and

specify these regions within its tariff filing required in Ordering Clause 2.

7. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc., shall convene a technical conference with Department of Public Service staff and interested stakeholders to develop criteria for identifying heat islands, a list of potential heat islands, and details regarding the boundaries of the potential heat islands within their service territories. These aforementioned utilities shall submit the details of the criteria for identifying heat islands, a list of potential heat islands, and details regarding the boundaries of the potential heat islands within their service territories to the Secretary to the Commission by June 1, 2026, for immediate implementation on an interim basis. This Commission will consider whether to adopt, modify, or reject, in whole or in part, the filed heat island list and criteria on a permanent basis following a comment period for stakeholders to provide feedback and input. Following Commission adoption, the aforementioned utilities shall include the finalized criteria and a list and details of the heat islands within their respective service territories, as part of their Outreach and Education Plans related to extreme heat.

8. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and

Electric Corporation; and Veolia Water New York, Inc., shall review their heat island list at least once annually to ensure all heat islands within their service territories have been identified. If one of the aforementioned utilities identifies an additional location as a heat island, based on the criteria, it shall submit an amended list with the newest identified heat island(s) within its Outreach and Education Plans related to extreme heat, as discussed within the body of this Order.

9. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc., shall each develop and submit for Department of Public Service staff review and feedback an Outreach and Education Plan related to extreme heat by May 1, 2026, which includes the information detailed within this Order, as a supplemental filing to its annual Outreach and Education Plan in Case 17-M-0475. Each year thereafter, the aforementioned utilities shall file these extreme heat-related Outreach and Education Plans as part of the "Mandated Outreach and Education" section of each aforementioned utilities' annual Outreach and Education Plan submitted in Case 17-M-0475.

10. Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; and Veolia Water New York, Inc., shall develop procedural and/or training manuals that include the procedures and processes outlined within this Order, at a

minimum, and file these materials with the Secretary to the Commission by June 1, 2026. The aforementioned utilities shall abide by the procedural and training materials submitted within this proceeding, as described in the body of this Order.

11. Effective June 1, 2026, any existing practices, procedures, or policies that were approved, and instituted, during any respective rate proceedings for Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Liberty Utilities (New York Water) Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; Rochester Gas and Electric Corporation; or Veolia Water New York, Inc. are superseded by the protections, procedures, and policies adopted within this Order, as described within the body of this Order.

12. In the Secretary's sole discretion, the deadlines set forth in this Order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least three days prior to the affected deadline.

13. This proceeding is continued.

By the Commission,

(SIGNED)

MICHELLE L. PHILLIPS
Secretary

SUMMARY OF COMMENTSLiberty Utilities (New York Water) Corp. (Liberty Water)

Liberty Water supports the recommendation to establish uniform heat protections and agrees with several of Staff's recommendations: (1) to use the heat index as a temperature measurement to halt service terminations; (2) with using a regional approach when applying heat protections; (3) to use the National Weather Service as the primary forecast source; (4) with the goal of decreasing customer arrears; (5) to maintain and retain a temperature log for five years; (6) to update and enhance their existing extreme weather page to include the information about protections; and (7) to update its tariffs within 90 days and to have any future changes relating to extreme heat protections addressed through the generic proceeding.

Liberty Water agrees with the halting of service terminations on days where the heat index reaches 90 degrees but disagrees with halting service terminations on the following day.

Liberty Water agrees with using a regional approach when applying heat protections.

Liberty Water disagrees with the recommendation to conduct an analysis to identify heat islands with its service territory and suggests using previous information submitted on vulnerable customer areas with targeted outreach and data-driven weather thresholds.

Liberty Water also disagrees with the extension of the suspension of service terminations to the two subsequent days after an extreme heat event in heat islands.

Liberty Water agrees with the recommendation to conduct additional outreach to vulnerable customers but

disagrees with the use of additional automated phone calls and with the recommendation to establish at least one alternate communication method for contacting vulnerable customer classes. Liberty Water also supports the development of a communications plan but suggests using Appendix C as a guide to adapt and customize its own plan that it would submit to Staff for review.

Liberty Water states that the recommendation for the Long Island Power Authority and PSEG LI does not apply to it, but it supports the concept of consistent protections across the State.

The Electric Utilities

The Electric Utilities filing joint comments are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Rochester Gas and Electric Corporation (RG&E), Orange and Rockland Utilities, Inc. (Orange & Rockland), and PSEG Long Island LLC (PSEG).

The Electric Utilities support the protection of customers during extreme heat events while also balancing the costs of these protections so as not to burden ratepayers. They also agree that any action taken by the Commission in this proceeding should supersede the protections within their respective rate plans and that further changes regarding these protections will be addressed within this generic proceeding.

The Electric Utilities propose implementing these protections year-round, rather than limiting them to the June through September period identified in the Staff Report, in order to simplify implementation.

The Electric Utilities agree with Staff's proposal of the 90-degree threshold, however, they disagree with the continuous monitoring of the heat index throughout the day as

they state it is less feasible and reasonable to implement and could cause customer confusion, leading to increased complaints, as well as require dedicated staff for monitoring. Instead, they propose basing termination suspension on the forecasted heat index no earlier than 8:00 a.m. the day prior and no later than 8:00 a.m. the day of affected terminations.

Con Edison, NYSEG, and RG&E agree with Staff's recommendations regarding implementing protections by region. However, Orange & Rockland proposes two regions, Orange and Rockland Counties, as opposed to having three. Central Hudson disagrees with Staff's recommendation for five regions and proposes implementing the extreme heat protections across its territory as one region.

The Electric Utilities recommend working with Staff to clarify all aspects of analyses regarding heat islands prior to beginning their studies and require the Commission allow for more than 30 days to conduct these analyses. Once analyses are completed, they recommend further discussion as to whether protections need to be adjusted in these areas.

The Electric Utilities agree to use the National Weather Service (NWS) for weather and heat index forecasts, as well as identify the NWS-specific stations to be used in their respective territories. However, they propose including this information in their annual Outreach and Education filings rather than their tariffs and do not agree that it is necessary to identify back-up weather services at this time. If it becomes necessary to establish an alternative, the Electric Utilities propose coordinating with Staff to establish one.

In order to mitigate cost impacts, the Electric Utilities recommend only suspending terminations on the day following when the heat index actually meets the established threshold.

The Electric Utilities agree with the recommendation to record the heat index within their service territories and retain the logs for a minimum of five years; however, they propose limiting this requirement to the forecasted heat index value used in determining suspension of terminations.

The Electric Utilities agree with establishing communication plans that incorporate both internal and external outreach for customers and municipal officials and propose including these elements in their current Outreach and Education plans.

While the Electric Utilities support increasing customer awareness, they are concerned about the feasibility of the increased outreach, as well as the potential for customer fatigue and reduced effectiveness. The Electric Utilities request flexibility in increased outreach that would allow them to follow current protocols and use best judgement to avoid customer confusion and added operational strain.

The Electric Utilities support the recommendation to maintain webpages dedicated to extreme heat events.

The Electric Utilities request the Commission permit them to recover the incremental costs associated with implementing and administering the new extreme heat requirements. They also recommend the Commission authorize deferring the revenue requirement effect of incremental costs and that addressing the recovery of these balances be done promptly and appropriately.

PSEG LI proposes to continue its current practice of monitoring heat index and temperature from a central location to determine the implementation of heat protections for all customers within its service territory.

Niagara Mohawk Power Corporation d/b/a National Grid (National Grid)

National Grid agrees with: (1) implementing Uniform Extreme Heat Protections; (2) the use of the 90-degree heat index threshold; (3) the recommendation to halt terminations based on regional geographic areas; (4) the use of the National Weather Service; (5) the recommendation to maintain a log documenting the daily heat index across its service territories; and 5) including additional extreme heat-related information in its summer emails, as well as updating the information it shares on its website.

National Grid agrees with the halting of terminations but recommends using the forecasted heat index no earlier than 8:00 a.m. the day prior and no later than 8:00 a.m. the day of as the basis to determine whether to suspend terminations that day. The Company disagrees with the recommendation to halt terminations the day after an extreme heat event.

National Grid proposes the Commission not adopt Staff Recommendation 6, regarding the identification of heat islands, and instead recommends the Utilities meet with Staff for further discussion of the issue.

National Grid explains that it currently has a multi-outreach approach to engage with customers and manage arrears that uses text and email campaigns which are inclusive of their protected customer population. National Grid also states that it has expanded its Collections Residential Account Management team, and feels that further outreach could be accomplished with appropriate cost-recovery through rates.

National Grid agrees with amending and enhancing its current customer outreach plan for both internal and external audiences, but it is concerned that daily notifications could result in overcommunication and confusion. National Grid

recommends conducting outreach once a month during the summer months and intend to provide additional information in their emails and website content. National Grid agrees to leverage the recommended Outreach and Education Template.

National Grid agrees to update its tariffs but requests the Commission allow for a minimum of 180 days to complete the filing. National Grid recommends that this extended period of time would allow it to conduct a comprehensive analysis, development of an implementation plan, and consultation with Staff.

Waterfront Alliance

Waterfront Alliance generally supports Staff's recommendations and supports the Staff Report's direction but urges enhanced protections.

Waterfront Alliance opposes Staff's recommendation to set the threshold for an extreme heat event at a 90-degree heat index and suggests the Commission adopt a statewide shutoff protection of 85-degree straight temperature, as lowering the threshold would better protect vulnerable residents. Waterfront Alliance recommends extending the protection period to begin one day before a forecasted heat event and continue for two days after.

Waterfront Alliance recommends that, for New York City, Con Edison use either the hottest forecast from the NWS Automated Surface Observing System weather stations or solely the Wall Street station.

Waterfront Alliance urges the Commission to restructure the recommendation regarding costs associated with halting terminations to look at equity and access, and urges the

Commission to require the Utilities to adopt an approach that is customer-centered.

Waterfront Alliance strongly supports the recommendation to maintain a log of daily temperature heat index and shut off records that are public and put in a centralized and accessible format.

Waterfront alliance recommends that the Utilities be required to maintain an extreme weather webpage that is user-friendly, multi-lingual, and accessible from their homepages and mobile devices.

Waterfront Alliance recommends removing the proposed window of June 1 to September 30 for halting service terminations due to extreme heat events and instead applying protections year-round.

The Public Utility Law Project of New York (PULP)

PULP generally supports Staff's recommendations but feels not all of them address the inequitable impacts of heat across the state and some recommendations may decrease customer protections. It asserts that suspending service terminations during the June 1 through September 30 timeframe is insufficient, and customers should be protected any day that meets the threshold for an extreme heat event.

PULP agrees with using NWS as the main source for weather forecasts and heat index monitoring but wants a stronger backup option, and recommends the Commission treat the State University of New York (SUNY) Albany's Mesonet, which provides the maximum heat index by county daily as an equal source to the NWS. PULP also recommends incorporating the NYC Micronet into the weather sources.

PULP recommends the Commission require the Utilities develop and file a uniform, tiered contingency plan. PULP also recommends soliciting at least one Department of Public Service-selected Application Programming Interface (API) as an additional option if the National Weather Service is unavailable or inaccessible and retain the 8:00 a.m. forecast check with a confirmation at 12:00 p.m.

PULP opposes establishing a 90-degree heat index threshold, as it would weaken the current protections in place at utilities in some parts of the State that have lower temperatures or heat indices as thresholds.

PULP recommends suspending service terminations in non-heat island areas on days when the heat index or air temperature is at 85 degrees and the following day. PULP also recommends that if the forecasted heat index is 0.5 degrees within the temperature threshold, the Utilities should round up and halt terminations. PULP recommends that a two-tiered framework approach be established for designated heat islands versus non-heat islands. In non-heat islands a moratorium on residential service terminations for one day following the heat event. In designated heat islands a service termination moratorium would consist of two days after a heat event.

PULP generally supports Staff's recommendation establishing extreme heat events on a regional basis within a utility's service territory, but urges further analysis and action focused on addressing the limitations of the current weather stations and their coverages, as several factors should be taken into account that justify the need for granular, region-specific suspensions of disconnections for extreme heat events.

For heat islands, PULP recommends suspending terminations when the heat index or air temperature is 85

degrees, with a two-day moratorium thereafter. PULP supports the heat island mapping but strongly opposes having the Utilities do the mapping.

PULP supports Staff Recommendation that the Commission should direct the Utilities to develop methods for decreasing residential customer arrears and uncollectibles that may result from implementing the extreme heat protections, but reiterates that addressing arrears and uncollectibles cannot take a higher priority over the implementation of extreme heat protections.

PULP also recommends that if the extreme heat threshold is reached, customers who have already been disconnected and contact the utility for reconnection should be placed on the minimum DPA automatically, if they wish, without submitting a financial statement form or financial documentation.

PULP recommends creating a hotline for disconnections that become extreme heat emergencies and that the Commission make an alternative contact rule, so that the Utilities can ensure that vulnerable customers receive a text, email, or caregiver-call within 24 hours of a forecasted extreme heat event. PULP states that the Utilities should be required to use "diligent effort," meaning using every contact channel provided with annual verification of the information to reach vulnerable customers. The Utilities should also identify how vulnerable customers want to be reached in an extreme heat emergency and sent materials about their specific protections that clearly state when they are active, with additional materials related to DPAs, cooling centers, EAP, elderly, blind, and disabled customers, and medical emergency procedures, so that vulnerable customers can sign up for notifications during extreme heat events. Programs that warrant outreach for avoiding terminations should have the same outreach during extreme heat

events, and when a vulnerable customer opens an account, PULP proposes that they should be able to designate an emergency contact. Utilities should also coordinate notifications to customers prior to extreme heat events, and this information should be posted on the Utilities' websites, social media platforms, and sent to local organizations that assist or work with vulnerable groups.

PULP supports Staff's recommendation that Utilities log the daily heat index and retain these logs for five years. PULP also recommends the Utilities report the data on their websites.

PULP recommends the Commission require the Utilities to use localized weather data and that they report the weather data used on the Utilities' websites. PULP supports the outreach framework, but states that leaving the decisions to the Utilities could result in efforts that are disjointed and recommends the Utilities be required to add an opt-in SMS keyword "Heat" for customers to self-enroll in all-year alerts and require the Utilities to file quarterly metrics.

PULP further recommends requiring the Utilities to conduct in-person outreach to disadvantaged community and heat island customers in the spring and summertime.

PULP supports Staff's recommendation to externalize communications that include options for financial assistance, but it should include other information so customers do not feel pressured into DPAs they cannot afford.

PULP supports Staff's recommendation to require the Utilities to maintain dedicated extreme heat webpages, and states that the Utilities should be required to update such pages within 24 hours of a heat moratorium being activated or lifted and archived for three years. Furthermore, PULP suggests the Commission direct the Utilities to use search-engine

optimization so that search terms related to heat protections will pop up and recommends the Utilities also embed a link at customer touch-points on their websites.

Regarding Recommendation 14, that the extreme heat protections the Commission adopts in this proceeding should supersede any different protections within the Utilities' existing rate plans 90 days after Commission action in this proceeding, PULP supports Staff's recommendation, but states that if a utility's current processes and procedures are more protective, these protections should remain until the end of the term of the utility's currently effective rate plan. Staff should also distinguish the rules that will be remaining in place from those which will be superseded.

PULP supports requiring the Utilities to update their tariffs within 90 days of Commission action in this proceeding, including adding weather station locations to their respective tariffs. PULP further recommends requiring the Utilities to include this information on their respective websites.

Additionally, PULP supports Staff's recommendation that PSEG LI and LIPA extend consistent extreme heat protections to their customers.

PULP recommends that buildings and building owners who submeter their residents' electricity, and submetering companies operating on behalf of such building owners should be required to extend the same extreme heat protections to submetered residents. Further, PULP recommends that the submetering companies should be required to file similar outreach, education, and contingency plans as the Utilities.

The City of New York (the City)

The City agrees with Staff's recommendation to implement uniform extreme heat protections, but urges the

Commission to strengthen them. The City agrees with the 90-degree heat index threshold recommendation.

The City states the Staff recommendation regarding heat islands would weaken the current policies in place at Con Edison, which prohibit disconnections the day before, the day of, and for the two days following a forecasted heat index of 90 degrees.

The City disagrees with the Utilities that expanding protections to days where the extreme heat threshold is not met is unsupported or that it would be burdensome.

The City proposes eliminating the window of June 1 to September 30 for suspending service terminations due to extreme heat events and instead apply protections year-round as the heat index can exceed the 90-degree threshold at other times of the year.

The City states that the current language of the Staff Report gives the Utilities too much discretion and authority regarding the identification of heat islands. The City requests the Commission direct the Utilities to use only the EPA definition of heat islands to identify these areas within their territories with no additional criteria permitted, the Commission and Utilities ensure areas are identified correctly by working with the Department of Environmental Conservation, and that Con Edison include New York City as whole in its list of identified heat islands.

The City agrees with Staff's recommendation for utilizing the forecasted heat index, however, it proposes the Utilities use data from LaGuardia Airport instead of Central Park.

The City states that more must be done to strengthen the policies in order to protect customers and avoid unintended reductions in protections afforded through existing rate plans.

The City suggests "heat islands" should not be defined by Utilities, and the definition of "heat island" should be expanded to include all cities. It also suggests the existing protections in place in New York City should not be weakened by new statewide policies.

The Joint Commenters

The Joint Commenters are: WE ACT for Environmental Justice, Earth Justice, Natural Resources Defense Council, Local Nature Lab, and Waterfront Alliance.

The Joint Commenters generally support Staff's recommendations but provide recommendations they argue would strengthen protections for customers.

The Joint Commenters disagree with Staff's recommendation to use the 90-degree heat index as a temperature threshold and recommends using an 85-degree straight temperature. The Joint Commenters argue that the 90-degree heat index threshold does not take into consideration the relative humidity indoors, therefore failing to protect completely against the adverse effects of the extreme heat.

The Joint Commenters also propose suspending terminations on the day before a forecasted heat event, as well as two days after the day for which meeting or exceeding threshold is forecasted. They argue that suspending terminations the day before the extreme heat event would protect customers from getting shut off during a potential heat dome on a long weekend, and suspending terminations for the two days after would account for the lag in health impacts, which can manifest one or two days after initial exposure.

The Joint Commenters recommend removing the proposed window of June 1 to September 30 for suspending service

terminations due to extreme heat events and instead apply protections year-round.

The Joint Commenters propose that Con Edison must either use the highest temperature forecast for the four New York City weather stations or only use the temperature forecast from the Wall Street weather station, as they assert this is the most protective option.

The Joint Commenters agree that urban heat islands should be identified throughout the State and recommend that Staff define and identify heat islands.

The Joint Commenters expressed concerns with Staff's recommendations that the Utilities develop means for reducing arrearages and uncollectibles and stated they cannot support any recommendation that does not promote genuine bill affordability. To that end, the Joint Commenters proposed language adjusting Staff's recommendation to incorporate their affordability concerns.

The Joint Commenters strongly support Staff's recommendation to require the Utilities to document and log the daily heat index and air temperature in the service territories. Further, they state that the Commission should require the Utilities to submit the log data with the Utilities' respective reports of shut offs, similar to the requirements in Case 14-M-0565, and made available for the public.

The Joint Commenters assert that if the Utilities use the Department of Environmental Conservation's maps in conjunction with the Department of Health's Heat Vulnerability Index data, the Utilities can identify the community-based organizations that can be used to convey messages to residents. Outreach for these programs should begin no later than April 1 of each year to allow enough time to elapse for the application opening for programs like Cooling Assistance Benefit.

The Joint Commenters agree with Staff's recommendation that the Utilities create, maintain, and update a dedicated extreme weather webpage but request that a more detailed set of requirements be established. The Joint Commenters suggest the Commission require that the Utilities utilize the Department of Energy strategies to improve accessibility to information when designing their extreme heat pages.

The Joint Commenters agree with Staff's recommendation that the Commission require the Utilities to update their tariffs within 90 days and urge the Commission to ensure that the Utilities be required to have the extreme heat protections in place prior to potential extreme heat events in 2026.

The Joint Commenters agree that PSEG LI should implement consistent extreme heat protections.

Columbia

Columbia supports the proposed implementation of uniform extreme heat protections but encourages strengthening it "by embedding principles of equity" and framing it as a strategy for advancing energy access and affordability.

Columbia urges the Commission to position this framework explicitly as part of a proactive equity and affordability strategy that focuses on long-term energy access as opposed to managing disconnections in the short-term.

Columbia states the Commission should require the Utilities to identify and reconnect households currently disconnected for any upcoming extreme heat events with all reconnection fees waived.

Columbia supports the Staff Report in its recognition of the need to address extreme heat and for proposing a framework intended to protect New Yorkers as it is imperative to public health to protect access to electricity.

OUTREACH AND EDUCATION PLAN LANGUAGE
(GUIDANCE DOCUMENT)

1. Outline of Utility-Specific Heat-Related Protections
 - a. Summary of Heat-Related Protections
 - b. Summary of the Internal Utility Procedures for Determining Terminations are halted on Specific Days
2. Communications to Customers
 - a. Disconnection Notices
 - i. Sample Disconnection Notices
 - a. Language regarding Pause in Terminations During Heat Events
 - b. Heat-Related Webpages
 - i. Screenshots of the Heat-Related Protection Webpage
 - c. Outreach to Vulnerable customers, Elderly, Blind or Disabled customers, Customers with Medical Emergencies, and customers with Life Support Equipment
 - i. Wellness Calls to Vulnerable Customers Prior to Heat Events
 1. Scripts to these Customers to Inform them of Impending Heat Events and Reiterate Open Cooling Center Locations
 2. Scripts for if Customers Need Bill Payment Assistance Information.
 - d. Communication on Assistance Programs
 - i. Details on the Company's Current Outreach for Energy Assistance Programs, Financial Assistance Programs, Payment Arrangements, and Payment Options and How the Utility Will Increase Outreach and Awareness
 1. Sample Bill Messages
 2. Sample Brochures
 3. Sample Text Pushes/Notifications
 4. Sample Emails
 5. Sample Scripts
 6. Sample Deferred Payment Agreements

- ii. Details on the Documents Provided to Customers During Soft Collection Activities (during normal operations and during an extreme heat event)
 - 1. Sample Bill Messages
 - 2. Sample Brochures
 - 3. Sample Text Pushes/Notifications
 - 4. Sample Emails
- iii. Details on Company Outreach Efforts that Coordinate Extreme Heat, Financial Assistance, and Energy Affordability Programs
 - 1. Sample Bill Messages
 - 2. Sample Brochures
 - 3. Sample Text Pushes/Notifications
 - 4. Sample Emails
- e. Cooling Centers
 - i. Information on open cooling centers in the utility's service territory.
 - 1. Information to be included on their websites and social media.
 - 2. The frequency of these communications with the public for the duration of the heat event, particularly when the heat days are longer than forecasted or if there are outage events.
- 3. Communications to Elected Officials
 - a. Details on communications to Municipal and Elected Officials
 - 1. Sample Bill Messages
 - 2. Sample Brochures
 - 3. Sample Text Pushes/Notifications
 - 4. Sample Emails
- 4. Communications to Community Groups
 - a. Details on communications to local senior centers, pediatric clinics, and home health agencies
 - 1. Sample Bill Messages
 - 2. Sample Brochures
 - 3. Sample Text Pushes/Notifications
 - 4. Sample Emails

b. Details on communications to State Agencies
(Department of Public Service, Department of
State, etc.)

1. Sample Bill Messages
2. Sample Brochures
3. Sample Text Pushes/Notifications
4. Sample Emails

EXTREME HEAT TARIFF LEAVES EXAMPLE LANGUAGE

- * Please note that following the inclusion of any extreme heat-related tariff provisions, individual utility tariff Table of Contents will need to be updated accordingly.
- Section Title - Special Emergency Procedures
 - Extreme Heat Protection

The Extreme Heat Protection is pursuant to the Public Service Commission's Order in Case 24-M-0568, issued March XX, 2026, and supersedes related protections established in prior Public Service Commission orders. The Company's procedure(s) regarding Extreme Heat Protection are available to the public upon request at the Company's office(s) where application for [insert electric or water] service can be obtained.
 - Applicability and Eligibility
 - This protection shall apply throughout the year to all [insert electric or water] Residential and Residential End-Use Customers taking service under [insert service classification(s)], whose [insert electric or water] service can be terminated due to the non-payment of bills rendered as specified in [insert section(s) of tariff that discuss termination due to non-payment].
 - Definitions
 - "Residential Customer" is defined in [insert section of tariff residential customer is defined].
 - "Residential End-Use Customer" is a customer account for a premise where [insert electric or water] service is provided to a customer in a building for which there is one or more residences, such as two-family, multi-family, submetered, or multi-unit dwellings, regardless of service classification.
 - "Heat Index" is the apparent temperature, indicating what the temperature feels like based on the air temperature and relative humidity.
 - "Extreme Heat Event" is any day when the Heat Index is forecast to be or actually is 90 degrees Fahrenheit or higher.
 - "Heat Island" is a developed area with limited natural landscape, such as cities or a subset of a city, that experiences higher temperatures than nearby surrounding areas due to concentrated buildings, roads, and other infrastructure that absorb and re-emit the sun's heat. The Heat

Island(s) in the Company's service territory are identified in the "Mandated Outreach and Education" section of the Company's Outreach and Education Plan filed in Case 17-M-0475.

- The Company's "Geographic Regions" as pertain to the Extreme Heat Protection are [insert and define the different regions of the utility's service territory].
 - The Company shall primarily use the "National Weather Service", or NWS, for meteorological information. NWS provides weather, water and climate data, forecasts, warnings, and impact-based decision support services. The National Weather Service's website is operated by the National Oceanic and Atmospheric Administration, a United States governmental entity. Should the National Weather Service become unavailable, the Company will utilize an alternate source.
 - A "Weather Station" obtains, records, and reports meteorological observations. The Company shall obtain weather information from the Weather Stations in the Company's Geographic Regions. The weather station(s) used by the Company is/are identified on the Company's website; if the weather station(s) become(s) unavailable at the time the Company seeks forecasted or current weather conditions, the Company may use an alternative weather station in the same Geographic Region.
- o Protection
- The Company will temporarily halt service terminations for Residential Customers and Residential End-Use Customers in a Geographic Region experiencing an Extreme Heat Event based on forecasts obtained between 8:00 a.m. the calendar day before and 8:00 a.m. the day of, or based on the actual heat index obtained throughout the day.
 - The Company will continue to suspend service terminations for the two days after the end of an Extreme Heat Event for impacted Residential and Residential End-Use Customers located within a Heat Island.
 - When the Company resumes service termination, the Company shall adhere to [insert applicable tariff section on termination process] of this tariff.