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BY DMM

Honorable Michelle Phillips
Secretary
State of New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

***Re: In the Matter of Eligibility Criteria for Energy Services Companies (Case 15-M-0127);
Proceeding on Motion of the Commission to Assess Certain Aspects of the Residential and
Small Non-residential Retail Energy Markets in New York State (Case 12-M-0476); In the
Matter of Retail Access Business Rules (Case 98-M-1343); In the Matter of Electronic
Data Interchange (Case 98-M-0667)***

***Supplemental Appendix A to Joint Utilities' Reply to Comments Related to the Joint
Utilities' Petition for Cost Recovery and Other Relief Related to GBL § 349-d(9) and (10)***

Dear Secretary Phillips:

On behalf of the Joint Utilities,¹ Con Edison hereby encloses a supplemental Appendix A (titled "Bill Comparison Implementation plan CH 1" in the filing on the docket) to Joint Utilities' Reply to Comments, filed on September 22, 2026. This supplement adds the implementation plans of Con Edison, Orange and Rockland, National Grid, and National Fuel to the appendix. Please advise if any questions related to this filing arise.

Respectfully submitted,

/s/ Rebecca Ahdoot

Rebecca Ahdoot, Esq.

¹ Collectively, Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc. (Con Edison), National Fuel Gas Distribution Corporation, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, KeySpan Gas East Corporation d/b/a National Grid, and The Brooklyn Union Gas Company d/b/a National Grid NY (Niagara Mohawk, KEDLI, and KEDNY, are collectively, National Grid), Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

Appendix A

Central Hudson Gas & Electric Corp. Side-by-Side Bill Comparison Implementation and Cost Estimate

The following summarizes the primary system and process changes required by Central Hudson Gas & Electric (Central Hudson or the Company) to comply with legislation amending the New York General Business Law, which enhances billing transparency for customers served by Energy Service Companies (ESCOs). The law requires utilities or ESCOs to provide clear, side-by-side price comparisons on customer billing statements, as well as an annual 12-month billing comparison statement issued by ESCOs.

In response to these new obligations, Central Hudson has conducted a preliminary assessment of the operational, system and data integration changes necessary to achieve compliance. These enhancements are intended to improve transparency and ensure customers have clear visibility into ESCO pricing relative to the otherwise-applicable utility pricing.

The implementation costs provided herein represent the Company's best estimate based on existing system capabilities, identified software requirements, and the necessary implementation timeline. All implementation costs are therefore preliminary and subject to change as implementation progresses.

Side-by-Side Billing Requirement

Under the new requirements, utilities or ESCOs are required to provide side-by-side comparisons on customer billing statements. The billing party is also required to provide residential and small commercial customers¹ with billing statements with a side-by-side comparison of prices charged by ESCOs versus the price the customer would have paid had the customer solely taken commodity and delivery service from their local utility corporation.

Central Hudson currently provides a billing comparison for electric customers. The comparison of what the customer would have paid under utility electric supply service is on the first bill page where ESCO charges are shown. This amount includes charges for delivery and supply of electricity and includes the supply rate.

For gas customers, billing comparison functionality will require additional development. Central Hudson is actively evaluating system changes, bill presentation requirements, and data delivery enhancements necessary to support compliant side-by-side gas bill comparisons. Central Hudson is targeting implementation of this functionality by end of 2026, following completion of development and testing.

For customers receiving service under dual billing, where customers are billed directly by their ESCO for supply charges, Central Hudson will support the billing comparison requirement utilizing an existing standardized data file known as the 503B pricing history. This file will include: 1) a line item for the combined total of utility supply and delivery charges; and 2) a separate line item that contains utility

¹ The bill defines "Customer" as "a person receiving residential utility service from an ESCO or a small non-residential customer, as that term is defined in section sixty-six-w of the public service law, receiving utility service from an ESCO."

supply charges. With these two line items, the ESCO will be able to provide a comparison of supply and delivery charges that would have been charged if the customer was with Central Hudson.

ESCO 12-Month Billing Statement Comparison Requirement

Under the law, ESCOs are required to provide an annual 12-month billing comparison statement. The new requirements also indicate: ESCOs provide an annual statement to the customer comparing the ESCO's prices with the utilities over the prior 12-month period.

To support ESCO compliance with the 12-month billing statement requirement for customers, Central Hudson has identified the need to provide ESCOs with access to historical pricing information covering the prior 12 months for customer accounts. This information allows ESCOs to prepare a clear summary showing what the customer paid for ESCO supply service over the past year, as well as what the customer would have paid if they took service from Central Hudson over the same period.

This information is provided through the standardized data file 503B pricing history, which gives ESCOs access to up to 24 months of detailed billing and pricing data. The file includes a segment with utility total charges, a separate line item with actual total charges from the ESCO, and line items that include the ESCO supply charges and Central Hudson supply charges. ESCOs may use this data to create the required 12-month billing statement and comparative cost summary for customers. Central Hudson has completed development and testing and is projected to move to implementation by end of 2026.

Cost Recovery

To support compliance with the side-by-side billing comparison and 12-month billing statement disclosure requirements, Central Hudson will implement necessary system enhancements and undertake associated development activities as described above. The Company intends to recover these costs from participating ESCOs through a structured allocation approach. This will be invoiced as a one-time charge to the suppliers for costs of implementation. Charges will be based on the number of residential and small non-residential customers each ESCO serves within Central Hudson's service territory, ensuring that costs are aligned with each ESCO's level of participation.

Estimated Implementation Costs

Estimated costs are based on projected development and system testing hours.

- Total estimated cost: Approximately \$15,000
- Approximate per-customer cost: \$1.09, based on 13,700 customers

NYSEG/RG&E Side-by-Side Bill Comparison Implementation and Cost Estimate

New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (“RG&E”) (collectively, the “Companies”) utilize the bill ready consolidated utility bill model, where Energy Services Companies (“ESCOs”) calculate and send supply charges for their customers via Electronic Data Interchange (“EDI”) to the utility.

1. Side-by-Side Bill Comparison

To support the side-by-side bill comparisons as required pursuant to New York General Business Law (“GBL”) § 349-D(9)(a), all billable ESCO amounts shown on the consolidated utility bill will be used for the ESCO supply amount comparison. A comparison will not be made when ESCO supply charges are not included on the utility bill, *i.e.*, an ESCO does not submit or have accepted charges within the two-day bill window, because NYSEG and RG&E do not have ESCO per unit pricing, as the Companies utilize the bill ready utility consolidated billing model.

The side-by-side comparison will be available on NYSEG and RG&E consolidated utility bills created after system modifications are implemented. The comparison will include a comparison of billed utility delivery and ESCO supply amounts, inclusive of taxes compared to billed utility delivery and hypothetical supply amounts, inclusive of taxes had the customer taken commodity service from the utility. The amounts exclude all utility miscellaneous charges and adjustments, such as late payment charges, cancelled charges, etc. Thus, customers will be able to confirm the delivery and ESCO supply charges on the bill comparison match their billed delivery and supply amounts. The side-by-side comparison will appear on the first page of the ESCO’s portion of consolidated NYSEG and RG&E utility bills. The following is an illustration of a NYSEG electric bill comparison message. Messaging for RG&E Electric, NYSEG and RG&E natural gas and NYSEG and RG&E dual service customers is based on the same template. An electricity and natural gas customer served by the same ESCO will have separate comparison boxes displayed next to each other.

Bill Comparison

NYSEG charges delivery regardless of supplier. NYSEG supply reflects what you would have paid under NYSEG supply, while ESCO supply may include prior-period adjustments. Amounts are for reference only and exclude NYSEG miscellaneous charges and adjustments.

	Electricity	ESCO	NYSEG
Delivery		\$xx.xx	\$xx.xx
Supply		\$xx.xx	\$xx.xx

2. 12-Month Statement and Dual Billed Customers

For dual billed customers and for the ESCO's 12-month comparison statements required pursuant to GBL § 349-D(10), NYSEG and RG&E will provide billed delivery amounts and hypothetical supply amounts to ESCOs to support ESCO comparisons for residential and small commercial customers. ESCOs can request consumption history for up to 500 Point-of-Delivery Identifiers per request, via NYSEG's and RG&E's Secured Services website portal. For each ESCO request, a flat file is posted to the ESCO's secure web login page. The file provides up to 24 months of the most recent data by bill period. NYSEG and RG&E will append four new fields at the end of the flat file for residential and small commercial bill periods for customers receiving commodity service from an ESCO. The additional fields will be available for NYSEG and RG&E bill periods ending after the date system modifications are implemented. The four new fields are defined as follows: (1) billed delivery amounts without tax; (2) billed delivery tax amounts; (3) hypothetical utility supply amount without tax; and (4) hypothetical utility supply tax amounts. Prior to implementation, NYSEG and RG&E will provide ESCOs with additional details. The Secured Services website portal is generally available 24 hours 7 days a week except for periodic scheduled outages; for example, routine maintenance or system implementations. Scheduled outages typically occur during the weekend or weekdays after 10 pm.

3. System Enhancements

NYSEG and RG&E require several system enhancements because of the new legal requirements under GBL 349-D. Enhancements include the following:

- A new automated process to identify small commercial gas customers on an annual basis. NYSEG and RG&E's gas service classifications are not sufficient to delineate commercial customers using 750 dekatherms or less on an annual basis. This functionality will be used in processes to identify customers requiring a bill comparison and to determine the population of small non-residential gas accounts subject to the proposed cost recovery allocation. Although NYSEG and RG&E perform manual reviews of consumption data for limited situations, a manual process is not operationally feasible for generating bill comparisons on a recurring basis for all affected customers. NYSEG and RG&E bill

customers at the account-service level and, accordingly, will apply the 750-dekatherm threshold at the individual account-service level. This approach is more inclusive than applying the threshold based on aggregated consumption across multiple accounts associated with a single customer. As a result, it ensures that, at a minimum, bill comparisons are provided to all residential and eligible small non-residential customers as required by GBL 349-D(9).

- Hypothetical supply and tax calculations for 22 different electric and gas service classifications and sub-provisions applicable to residential and small non-residential customers. The informational calculations are being added to billing when a service is supplied by an ESCO. Bill print processes will use the information to create the comparison message to appear on customer bills. The data will also be used by processes fulfilling consumption history file requests noted below.
- Bill print modifications to present the side-by-side comparison on the consolidated utility bill.
- Addition of four new comparison amount fields on the consumption history file provided to ESCOs via NYSEG's and RG&E's Secured Services website portal.

NYSEG and RG&E will also provide a letter for affected customers explaining the side-by-side comparison prior to implementation. The letter will be shared with ESCOs before letters are mailed to customers.

4. Estimated Costs

The Companies' revised estimates for the incremental costs associated with implementation are \$1,002,000 for NYSEG and \$460,000 for RG&E, resulting in an approximate cost of \$14.14 per NYSEG residential or small non-residential ESCO account and \$ 12.63 per comparable RG&E account. The estimates include vendor costs associated with the development, testing, and implementation of the proposed changes. The increase in estimated costs is attributable to the additional vendor resources required to deliver the system enhancements.

A 69%/31% allocation of costs between NYSEG and RG&E has been applied. This allocation is based on each utility's proportion of total customer accounts and reflects the approximate distribution of customers between the two utilities. This cost-allocation methodology is used consistently across NYSEG and RG&E.

The estimated cost per customer is based on the following account counts as of June 17, 2026:

- 57,206 NYSEG electric residential and small non-residential accounts with ESCO supply
- 13,654 NYSEG gas residential and estimated² small non-residential accounts with ESCO supply
- 24,486 RG&E electric residential and small non-residential accounts with ESCO supply
- 11,927 RG&E gas residential and estimated³ small non-residential accounts with ESCO supply.

The associated costs are subject to change based on unexpected complexities encountered during development, resourcing constraints, priorities of other regulated mandates, and any further changes the Commission may require in implementing these new requirements.

² The estimate for small non-residential gas accounts with ESCO supply is derived from the number of active small non-residential gas accounts taking service under service classifications applicable to small non-residential customers, minus 2,000, representing an estimate of customers with annual consumption exceeding 750 dekatherms. System enhancements are required for NYSEG and RG&E to be consistent in identifying small non-residential gas accounts with annual consumption greater than 750 dekatherms. Consequently, the current estimates rely on the methodology described above until the necessary system capabilities are implemented. Once NYSEG and RG&E have revised the customer counts related to the number of small non-residential gas customers, the proposed reconciliation process can account for the change and credit or charge ESCOs where appropriate.

³ See footnote 1 above.

Implementation Activities and Cost – Con Edison and Orange and Rockland

The following implementation activities are required to modify the Companies' billing systems and RAIS and TCIS web portals,¹ and the EDI implementation guide (810), for the side-by-side bill comparison and the 12-month billing statement obligations in GBL § 349(d)(9) and (10). This implementation plan supersedes the plan filed by the Companies along with the original petition.² Note that this plan is subject to change in both work scope and costs, as planning is ongoing.

Where ESCOs are responsible for compliance with the Legislation, the Companies will transmit required information daily through the EDI (810) and RAIS and TCIS web portals. For the side-by-side requirement, as the billing party (under consolidated billing), the Companies will program changes to the bill on the ESCO billing page.

Unless specified, activities detailed below apply to both Con Edison and Orange and Rockland.

I. Summary of Updates

1. Billing System Updates

The Companies' billing system is used to generate price and usage information for EDI transactions, the RAIS and TCIS web portals, and billing statements. Scope of work includes:

- Enable calculation in the Companies' billing system of hypothetical full-service delivery charge (Phase 1);³ and (Phase 2) update calculation in the Companies' billing system of hypothetical full-service delivery charge to be tailored to each customer.

¹ Orange and Rockland uses RAIS for ESCOs providing electric and/or gas service, whereas Con Edison uses RAIS for ESCOs providing electric service and TCIS for ESCOs providing gas service.

² Case 15-M-0127 et. al., *In the Matter of Eligibility Criteria for Energy Service Companies*, Petition of the Joint Utilities for Cost Recovery and Other Relief Related to GBL § 349-d(9) and (10) (filed June 15, 2026), Appendix, pp.1-2.

³ Hypothetical full-service delivery refers to the full-service delivery charge that the customer would have been responsible for had it taken both commodity delivery and supply from the utility. *See* sample bill for consolidated billing customers, below for this update, Phase 1 of which has already been integrated.

- Update integrations between Companies' billing system and RAIS and TCIS web portals.
- Enable bill history export in RAIS and TCIS web portals.
- Update integrations between Companies' billing system and EDI system.
- Update bill design and messaging on the consolidated bill on the ESCO billing page to show hypothetical full-service supply charge⁴ and delivery charges, as depicted in sample consolidated bill page.
- Update bill design and messaging on the consolidated bill on the ESCO billing page to replace hypothetical delivery charge with customer-specific hypothetical delivery charge.
- Create an account characteristic in the Companies' billing system to automate the process of identifying small non-residential gas customers.

2. RAIS and TCIS Web Portals Updates

ESCOs use the RAIS and TCIS web portals to research prospective customers, view billing histories of their current customers, and access their sync list to ensure the Companies' systems are in sync with each ESCO's active customer list. The changes in the RAIS and TCIS web portals are necessary to enable ESCOs to view and export information for the side-by-side billing and 12-month billing statement. The billing history on the RAIS and TCIS web portals will reflect any cancels and rebills on an account. Updates include:

- Add information columns to the existing billing history tool on Con Edison's RAIS and TCIS web portals to include the hypothetical full-service supply and delivery charges and as-billed delivery charges⁵ (Con Edison only).

⁴ Hypothetical full-service supply charge refers to the full-service supply charge that the customer would have been responsible for had it taken both commodity delivery and supply from the utility. This information is currently available to ESCO customers through My Account on the Con Edison and Orange and Rockland websites.

⁵ As-billed delivery refers to the as-billed delivery cost for the utility's delivery while the customer is enrolled with the ESCO for supply, to allow the ESCOs access to this data.

As a practical point, hypothetical full-service delivery charge (Phase 2) will replace the as-billed delivery charge in the billing history tool once that calculation is enabled in the billing system. For dual billed customers, the total bill amount provided in the tool is equivalent to the as-billed delivery charge. For consolidated customers, ESCOs will be able to calculate the as-billed delivery charge for the 12-month bill comparison based on the total bill amount provided in the billing history tool and as billed customer supply charge.

- Develop a new billing history tool on the Orange and Rockland RAIS web portal which will include hypothetical full-service supply and delivery charges and as-bill delivery information (Orange and Rockland only).⁶
- Update RAIS and TCIS web portals to enable ESCOs to submit a bulk data request and download requested data through new export function once data becomes available.⁷
- Update the ESCO sync lists on the RAIS and TCIS web portals to contain additional information, including hypothetical supply and delivery charges.
- Configure RAIS and TCIS web portals to allow ESCOs access to required information for ESCO 12-month billing statement for 24 months.⁸

3. EDI Implementation Guide # 810 URR-Invoice Transaction – Utility Rate Ready Updates

The EDI Implementation Guide (# 810) is used by the Companies to transmit information daily for customers receiving a utility consolidated bill. The changes in the 810 transactions are necessary to enable ESCOs to receive information for the ESCO 12-month billing statement for these customers, and through the RAIS and TCIS web portals. The EDI (810) will also reflect any cancels and rebills on an account.

- Update EDI Implementation Guide #810, including new charge codes to the existing “810 URR-Invoice Transaction – Utility Rate Ready,” specifically, hypothetical full-service supply and as-billed delivery.
- Test new hypothetical full-service supply and as-billed delivery charge codes on EDI (810) with EDI provider prior to implementation.

⁶ As indicated above, the hypothetical full-service delivery charge will replace the as-billed delivery charge in the billing history tool once that information becomes available.

⁷ The Companies currently expect the turnaround time for bulk data requests to be between 2-3 business days from the initial request. The processing time will be dependent on the amount of information requested and number of other requests. ESCOs will still be able to view individual customer account information from the RAIS and TCIS web portals.

⁸ Historical information is currently unavailable on Orange and Rockland’s RAIS web portal. Historical information on Con Edison’s RAIS and TCIS web portals is limited to usage and bill amount.

- Test changes new hypothetical full-service delivery charge on EDI (810) with EDI provider before implementation.
- Replace as-billed delivery charge with new hypothetical full-service delivery charge to EDI (810) once calculation is enabled in the Companies' billing system.

II. Estimated Costs

Table 1. GBL § 349(d)(9) and (10) Implementation Cost Estimate⁹

Cost Category	Con Edison	Orange and Rockland
Billing System Updates ^{10*}	\$1,080,259	\$84,441
RAIS and TCIS Web Portals ¹¹	\$193,398	\$184,422
EDI (810)*	\$4,267	\$334
Total	\$1,277,924	\$269,197

* Shared cost between Companies which will be split with ninety-three (93) percent of the costs covered by Con Edison and seven (7) percent of the costs covered by Orange and Rockland, as shown in the table.

The upfront per-customer charge is calculated based on the total estimated implementation costs, divided by the total number of residential and small non-residential customers served by ESCOs in each of Con Edison and Orange and Rockland service territories, respectively. Customers are identified based on applicable service class.¹²

⁹ Capital costs include overheads.

¹⁰ Revised cost estimates now also include costs for calculation and bill presentment of hypothetical delivery charges, bill history export, and small non-residential gas customer account characteristic, as detailed above.

¹¹ Revised cost estimates now include the cost associated with the new export function on the RAIS and TCIS web portals, as detailed above.

¹² Small non-residential gas customers are further limited for annual usage less than 750 dekatherms based on the previous calendar year's consumption.

Count of Customers Served by ESCOs as of June 17, 2026	Con Edison	Orange and Rockland
Residential Electric	196,712	15,862
Small Non-Residential Electric	79,459	1,129
Residential Gas	40,305	8,879
Small Non-Residential Gas	16,490	1,717
Total	332,966	27,587

As such, estimated initial per-customer charges for each Company are as follows:

- Con Edison: \$3.84
- Orange and Rockland: \$9.76

III. Sample Consolidated Bill

Con Edison

Your Supply Charges

Customer charge	\$0.00
Supply 303.00 kWh @11.990¢ per kWh	\$36.33
Sales tax @ 4.5%	\$1.63
Total electricity supply charges	\$37.96

Your electricity supplier:

Supplier account number:

Address:

Phone:

Messages from Con Edison:

Login to My Account at coned.com to use our ESCO bill comparison tool.

Con Edison delivers your energy, but where that energy comes from is up to you.

To shop for an energy supplier, go to conEd.com/esco. On this bill, if you had chosen Con Edison as your energy supplier, your supply charge would have been \$55.57 and your delivery charge would have been about \$2 more.

Your Delivery Charges

Basic service charge	\$20.30
Delivery 303.00 kWh @19.162¢/kWh	\$58.06
System Benefit Charge @0.799¢/kWh	\$2.42
GRT & other tax surcharges	\$3.92
Sales tax @4.5%	\$3.81

Total electricity delivery charges \$88.51

Your electricity total \$126.47

Orange and Rockland

Your Supply Charges

Supply 39.00 CCF @103.897¢ per CCF	\$40.52
Sales Tax	\$0.00
Total gas supply charges	\$40.52

Your gas supplier: [REDACTED]

Supplier account number: [REDACTED]

Address: [REDACTED]

Phone: [REDACTED]

Messages from Orange & Rockland:

Login to My Account at oru.com to use our ESCO bill comparison tool.

Orange & Rockland delivers your energy, but where that energy comes from is up to you. To shop for an energy supplier, go to oru.com/esco. On this bill, if you had chosen Orange & Rockland as your energy supplier, your supply charge would have been \$22.16 and your delivery charge would have been about \$2 more.

Your Delivery Charges

Basic Service Charge - Includes first 3.00 ccf	\$22.50
Next 36.00 CCF @ 87.639¢ each	\$31.55
Adjustment charge @ 8.333 ¢	\$3.25
RDM Adjustment 39.00 CCF @ 5.359¢	\$2.09
DRS 39.00 CCF	\$0.00
SBC 39.00 CCF @0.410 ¢	\$0.16
Billing Charge	\$0.00
Government Surcharge - Delivery	\$1.96
Total gas delivery charges	\$61.51
Your gas total	\$102.03

*Note: the delivery message will be revised to a customer-specific dollar value upon completion of implementation of phase 2 mentioned above.

Niagara Mohawk Power Corporation d/b/a National Grid
KeySpan Gas East Corporation d/b/a National Grid
The Brooklyn Union Gas Company d/b/a National Grid NY

**Updated Implementation Plan for System and
Operational Changes Required by General
Business Law §§ 349-d(9) and (10)**

SUBMITTED TO:
NEW YORK PUBLIC SERVICE COMMISSION

September 30, 2026



Background

This implementation plan sets forth the modifications and operational steps Niagara Mohawk Power Corporation d/b/a National Grid (“Niagara Mohawk”), KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”), and The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”) (collectively, “National Grid” or the “Companies”) will undertake to implement system and operational changes necessitated by General Business Law (“GBL”) §§ 349-d(9) and (10), as amended, and new subdivision 10-a, as added, by Chapter 8 of the Laws of 2026 (A. 9438), approved February 13, 2026, and effective as provided in Section 3 thereof.

Niagara Mohawk utilizes the utility rate ready (“URR”) consolidated utility bill model for both electric and gas service. For electric service, customers are served under the Retail Access Program (PSC No. 220, Rule 39). For gas service, Niagara Mohawk participates in gas retail access through its Supplier Select Program under Service Classification No. 11 – Load Aggregation (PSC No. 219). Under the URR model, the utility calculates supply charges for ESCO customers. KEDLI and KEDNY, by contrast, utilize the bill ready consolidated utility bill model for gas service, under which ESCOs calculate and transmit supply charges to the utility through Electronic Data Interchange (“EDI”) for inclusion on the consolidated utility bill. Because Niagara Mohawk operates under the URR model for both electric and gas, the implementation approach described below distinguishes between Niagara Mohawk’s direct billing implementation and the EMW-supported data exchange needed for KEDLI and KEDNY.

National Grid intends to implement the changes required by GBL § 349-d through its existing Energy Market Web (“EMW”) platform. EMW is a secure web platform that currently supports ESCO operational functions for Niagara Mohawk, including historical usage data, pricing maintenance, and monthly UFE/line loss and ancillary service charge reporting. National Grid’s implementation plan includes leveraging this existing infrastructure to deliver ESCOs the new comparison-data sharing required by GBL § 349-d. EMW is well suited for enhancement to provide the data necessary for side-by-side bill comparisons on dual-billed accounts and for annual 12-month comparison statements. The costs associated with these modifications are compliance-driven, arising from the system and operational changes necessary to meet the requirements of the statute; National Grid is not seeking recovery for discretionary enhancements.

As noted in the Petition filed June 15, 2026 in Case 98-M-1343 *et al.*, the Uniform Business Practices permit web-based access to customer history information, and the Public Service Commission (“Commission”) has recognized that a web-based solution is appropriate where it provides the most cost-effective and timely means of communicating necessary information to ESCOs. Implementing this capability on a single existing platform that serves all Companies is more efficient and less costly than revising the 503 pricing-history EDI transaction or building a new system. A unified EMW solution can serve both the GBL § 349-d(9) bill-presentation requirement and the GBL § 349-d(10) annual-statement requirement, enabling the Companies to support both requirements through one platform rather than developing separate solutions for each.

Implementation Plan

Rather than building separate mechanisms for each statutory mandate, National Grid’s approach

uses a single EMW comparison-data mechanism to serve both the GBL § 349-d(9) bill-presentation requirement and the GBL § 349-d(10) annual-statement requirement. This EMW-based solution is supplemental to, and is not intended to replace or otherwise alter, existing EDI processes; National Grid will continue to use consolidated bill presentation, with EMW serving as a supplemental data-delivery channel when comparison data is needed. This approach is distinct from Niagara Mohawk's URR implementation, under which National Grid can calculate the comparison directly within the billing process.

While implementation is underway, National Grid will continue supporting its existing online customer-facing comparison display. When updated bills that include the comparison are issued, National Grid will provide customer communications explaining the comparison to help reduce customer confusion and call center impacts.

Side-by-Side Bill Comparison (GBL § 349-d(9))

National Grid plans to implement the customer-facing side-by-side bill comparison through the billing channel that presents the customer's ESCO charges. Where National Grid presents the ESCO charge on a consolidated bill, the bill would compare the customer's actual billed charges (utility delivery plus ESCO supply, inclusive of applicable taxes) against the corresponding full-service utility charges the customer would have incurred for the same period. Consistent with the Companies' billing systems, the comparison would be shown as total billed amounts rather than price-per-unit figures. The bill comparison will reflect both commodity and delivery components, presented in a manner consistent with National Grid's bill format.

For rate ready, bill ready, and dual-billed arrangements, National Grid intends to use EMW to provide ESCOs with the monthly comparison data needed to support ESCO bill presentation under GBL § 349-d(9). Where National Grid does not present the supply charges, such as in dual-billed arrangements, the ESCO remains responsible for presenting any required comparison on its bill. EMW will include a dedicated comparison-data view or tab from which ESCOs can retrieve current-period comparison data for inclusion on their bills.

To implement this comparison, National Grid will require the following system and process enhancements:

- Incorporate KEDNY and KEDLI bill ready gas account data into EMW and onboard affected ESCOs so EMW can serve as the comparison-data channel for bill ready gas and dual-billed accounts, while preserving existing EDI processes.
- Create a dedicated comparison-data view, tab, or extract in EMW for each ESCO customer, refreshed monthly.
- Configure the EMW data set to include the data elements needed for accurate comparisons for hypothetical total bill charges.
- Establish a process to identify small commercial gas customers where service classification alone may not distinguish customers using 750 dekatherms or less per year.

- Program National Grid's billing systems to calculate the hypothetical full-service utility comparison amount, inclusive of applicable taxes, for applicable Niagara Mohawk electric and gas service classifications and for any KEDLI and KEDNY inputs needed for bill ready gas accounts.
- Modify the bill print functionality to display the side-by-side comparison on the first page of the consolidated utility bill that includes ESCO charges, immediately following the ESCO bill section of the invoice. For budget-billed customers, National Grid expects to present the ESCO cost provided in the ESCO's 810 transaction without adjustment.
- For dual-billed accounts, make EMW comparison data available to ESCOs so they can support any required bill presentation on their own bills, while National Grid avoids adding an ESCO-supply comparison to a utility bill that does not present the ESCO charge.

Support for the 12-Month ESCO Comparison Statement (GBL § 349-d(10))

GBL § 349-d(10) requires ESCOs, not the utility, to provide each customer with an annual 12-month comparison statement. National Grid's role is to support ESCOs' statutory obligation by making comparison data available through the same EMW comparison-data view or tab described above. In addition to the enhancements identified above, the following are required to support this requirement:

- Configure the EMW comparison-data view to retain a rolling fourteen (14) months of data per ESCO customer, refreshed monthly, providing a two-month buffer for delayed ESCO retrieval while ensuring at least twelve consecutive months of data remain available at any point during a billing cycle.
- Configure EMW so each ESCO can retrieve the 12-month data set necessary for its annual customer comparison statement without requiring separate EDI push/pull transactions to assemble the same information.
- Develop related ESCO onboarding, testing, and data-validation procedures to confirm that refreshed EMW data can be used consistently for annual statement preparation.

Cost Estimates and Recovery

National Grid's original implementation plan, included in Appendix A to the Petition, estimated National Grid's total initial up-front charge at approximately \$833,690.00. As implementation has progressed, National Grid has refined that estimate based on its current understanding of project scope and costs. As noted above, these costs relate solely to the system and operational changes required to implement GBL §§ 349-d(9) and (10), including modifications to National Grid's existing EMW platform as described above. An updated, itemized breakdown of estimated costs is set forth in Attachment 1 to this Updated Implementation Plan.

Under the recovery method described in the Petition, the estimated costs of implementation set

forth in each utility’s implementation plan are divided by the total residential and small non-residential customers served by ESCOs in that utility’s service territory to derive a per-customer charge. Each company will then apply the per-customer charge to the ESCOs operating in its service territory, ensuring implementation costs are all equally distributed among all ESCOs.

For National Grid, the costs related to implementation are being incurred by National Grid USA Service Company, Inc. (“Service Company”), which implements and owns all information technology and digital projects and investments on behalf of Niagara Mohawk, KEDNY, and KEDLI (together, the “Operating Companies”). The total costs incurred by the Service Company will then be allocated across the benefiting Operating Companies based on the total number of residential and small non-residential customers served by ESCOs in each Operating Company’s service territory.

The approximate customer count in the original implementation plan has been refined in two respects. First, National Grid has established the process contemplated by the original plan to identify small commercial gas customers where service classification alone may not distinguish customers using 750 dekatherms or less per year, the threshold separating small and large non-residential gas customers under GBL §§ 349-d(9) and (10). National Grid first uses the customer’s service classification to identify non-residential gas customers, and then reviews the customer’s historical annual usage; any such customer using 750 dekatherms or less annually is treated as a small non-residential customer. Because that process was not yet in place when the original plan was filed, the original customer count included large non-residential gas customers, who have now been excluded. Second, the customer counts have been updated to reflect the number of residential and small non-residential customers served by ESCOs as of June 2026, the effective date of the Legislation, replacing the May 2026 figures used in the original plan.

Based on the updated customer counts and the cost-recovery methodology described in the Petition, the resulting per-Operating Company cost allocations and per-customer charges are as follows:

Operating Company		Residential Customers	Small Non-Residential Customers*	Total Residential and Small Non-Residential	Allocated Cost to Operating Company	Approximate Per-Customer Charge
Niagara Mohawk	<i>Electric</i>	44,786	26,790	71,576	\$440,910.12	\$6.16
	<i>Gas</i>	15,131	8,926	24,057	\$148,191.78	\$6.16
	Total	59,917	35,716	95,633	\$589,101.90	\$6.16
KEDNY		32,701	7,047	39,748	\$244,848.77	\$6.16
KEDLI		4,659	4,379	9,038	\$55,674.33	\$6.16
Total		97,277	47,142	144,419	\$889,625	\$6.16

Tariff Statement

National Grid will file any tariff revisions necessary to implement or recover the costs of this proposal within the timeframe directed by the Commission’s order in this proceeding.

Estimate Level	PRJ-11539 Preliminary point of time estimate						
ITEM #	DESCRIPTION	Customers	MATERIAL		LABOR		TOTAL
			\$/CUST MATERIAL	COST OF MATERIAL	\$/CUST LABOR	COST OF LABOR	
1	WIPRO LLC / GoAnywhere (External Labor): Secure file transfer services to facilitate encrypted data transmission from National Grid's Customer Service System ("CSS") to the Energy Market Web ("EMW") portal. This new transmission point requires dedicated architecture support and a secure endpoint configuration to enable comparison-data sharing with ESCOs.	144,419			\$0.24	\$35,144	\$35,144
2	Hardware – Server Recharge: Costs associated with server CPU time and storage utilization required to support the CSS platform enhancements and related system modifications.	144,419	\$0.03	\$4,004			\$4,004
3	Hardware – Mainframe Recharge: Costs associated with mainframe processing time and resources required to support the CSS platform enhancements and related system modifications.	144,419	\$0.52	\$75,268			\$75,268
4	Application Maintenance Support: Technical support activities required to migrate development code through the project lifecycle, including development, testing, staging, validation, and production deployment.	144,419			\$0.07	\$10,000	\$10,000
5	DevOps / JIRA Setup (External Labor): Configuration and setup of JIRA project management tools to support project tracking, dashboards, and status reporting for implementation activities.	144,419			\$0.02	\$3,000	\$3,000
6	EMW .NET Developer (External Labor): Development of the EMW portal interface to receive, validate, and display comparison data. Includes building the dedicated comparison-data view, database integration, and user-facing screens for ESCO data retrieval.	144,419			\$0.04	\$6,000	\$6,000
7	IT&D CSS Labor: National Grid internal labor costs for CSS modifications, including new module development, system updates, validation routines, special calculations for hypothetical full-service utility charges, and system	144,419			\$5.14	\$742,776	\$742,776
8	RRD (External Application Cost): Print vendor services to update consolidated utility bill formatting to display the side-by-side comparison on customer invoices, as required by GBL § 349-d(9).	144,419			\$0.09	\$13,433	\$13,433
Total			\$0.55	\$79,272	\$5.61	\$810,353	\$889,625

National Fuel Gas Distribution Corporation

GBL §§ 349-d(9) and (10)

Implementation Plan

September 30, 2026

The following is an overview of National Fuel Gas Distribution Corporation's ("National Fuel") plan to implement a customer-facing bill enhancement designed to provide information regarding Energy Service Company ("ESCO") supplied energy charges compared to National Fuel utility charges in compliance with General Business Law ("GBL") §§ 349-d(9) and (10). This approach is intended to provide affected customers with a clear, bill-based comparison between ESCO charges and comparable utility charges, while leveraging existing billing and comparison tool functionality where feasible.

1. On-Bill Comparison

The primary feature of this solution is the addition of a new front-page insert for Utility Consolidated Billing ("UCB") customers enrolled with an ESCO. The front page will include a comparison of the customer's current billing-period ESCO charge against the amount National Fuel would have charged for the same billing period, together with up to twelve months of available historical comparison information. The proposed front page will prominently display: (1) an explanation of why the customer is receiving the page; (2) the name of the ESCO that serves the customer; and (3) the side-by-side comparison of the customer's current month charge, and up to twelve months of historical comparison information, from their ESCO versus National Fuel. Since National Fuel currently utilizes a single bill page, this change will require it to add a new page to the bill, which will impact ongoing maintenance costs.

The side-by-side comparison will be modeled on the logic currently used in National Fuel's existing online bill comparison tool, and it will display up to twelve months of ESCO and utility charges. If less than twelve months of charge data is available, only the months with ESCO charge information will be shown in the comparison. Additionally, the comparison will only reflect the current supplier. If a customer changed ESCOs during the prior twelve-month period, the comparison will include only those months for which charge information is available for the customer's current ESCO. Any information presently available within National Fuel's existing online bill comparison tool, including data presented across its various tabs, may be evaluated for

inclusion on the front-page display to ensure consistency and accuracy in the customer-facing comparison. National Fuel intends to leverage existing bill print fields (including ESCO information and ESCO charges), supplemented by available or configurable filler space for any additional data elements. The final presentation and included data elements will depend on bill print design constraints, available billing data, and system configuration requirements.

2. MCB and Dual Bill Customers

For Marketer Consolidated Billing (“MCB”) and dual-billed customers, National Fuel expects that ESCOs will utilize existing reporting capabilities available through the marketer web portal. This approach aligns with internal investigations and avoids duplicative system development for ESCO-facing reporting.

3. System Enhancements

Implementation of the proposed solution is expected to require the following system enhancements:

- Bill print modifications to create and display the new front-page comparison.
- Bill print logic to check front page eligibility, determine twelve-month comparison amounts, and generate the applicable bill print output file.
- Development of a mechanism to turn the front page on and off as needed when there is a change in eligibility.
- Integration or replication of comparison logic from the existing online bill comparison tool.
- Data validation to ensure alignment between ESCO-provided charges and National Fuel billing records.
- Potential updates to data storage structures depending on final requirements.
- Development of a custom program to determine small versus large commercial accounts and exclude large accounts from receiving the front page, consistent with the applicable statutory scope.
- One-time and recurring cost recovery and tracking mechanism.

4. Cost Recovery

The incremental costs associated with initial implementation are estimated to be \$26,050 or approximately \$0.86 per UCB customer. National Fuel also anticipates ongoing annual maintenance and administration costs of \$22,176 (or \$1,848 per month), which includes a \$0.0616 per page charge for the cost of the new page that is to be added to the bill. National Fuel will include all bill-related charges on its monthly ESCO bills. These preliminary cost estimates are subject to change based on unexpected complexities encountered during development and any further changes that may be required to implement these new requirements.