

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

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

Requesting Party: Multiple Intervenors

Request No.: NYRC-0266 (MI-3)

Date of Request: July 3, 2025

Response Due Date: July 14, 2025

Date of Reply: July 11, 2025

Witness: Marlene Cronin

Panel: Revenue Requirements

Subject:

Question:

Provide the approximate electric revenue requirement impact for NYSEG associated with increasing or decreasing the return on equity by 10 basis points.

Response:

The approximate electric revenue requirement impact for NYSEG associated with:
Increasing the return on equity by 10 basis points is approximately: \$ 4.0 million.
Decreasing the return on equity by 10 basis points is approximately: \$ (4.0) million.

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

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

Requesting Party: Multiple Intervenors

Request No.: NYRC-0268 (MI-5)

Date of Request: July 3, 2025

Response Due Date: July 14, 2025

Date of Reply: July 11, 2025

Witness: Marlene Cronin

Panel: Revenue Requirements

Subject:

Question:

Provide the approximate electric revenue requirement impact for RG&E associated with increasing or decreasing the return on equity by 10 basis points.

Response:

The approximate electric revenue requirement impact for RG&E associated with:

Increasing the return on equity by 10 basis points is approximately: \$ 2 million.

Decreasing the return on equity by 10 basis points is approximately: \$ (2) million.

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

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

Requesting Party: Multiple Intervenors

Request No.: NYRC-1014 (MI-21-26)

Date of Request: August 25, 2025

Response Due Date: September 4, 2025

Date of Reply: September 2, 2025

Witness: Scott Bochenek, Timothy Lynch, Andrew Leja

Panel: EAM Panel

Subject:

Question:

The following information requests are directed to the New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (“RG&E”; collectively, the “Companies”) Earnings Adjustment Panel.

21. Provide the performance targets, results, and amounts earned for each of the four earnings adjustment mechanisms (“EAMs”) for the Companies' current electric and gas rate plans, as established by the *Order Adopting Joint Proposal* issued by the New York State Public Service Commission (“Commission”) on October 12, 2023 in Cases 22-E-0317 *et seq.* Provide the requested information by Rate Year, for each of the NYSEG and RG&E electric and gas businesses.
22. Explain how lowering the targets set for the Demand Response EAM would encourage the Companies to increase annual demand reduction.
23. With respect to the regression analysis discussed on page 32 of the Pre-Filed Direct Testimony of the Earnings Adjustment Panel, does this analysis take into consideration State policy changes that may impact forecasts compared to historic trends?
24. With respect to the regression analysis discussed on page 32 of the Pre-Filed Direct Testimony of the Earnings Adjustment Panel, does this analysis take into consideration Federal policy changes that may impact forecasts compared to historic trends?
25. Explain how lowering the targets for the Storage Distributed Energy Resource (“DER”) EAM would encourage the Companies to increase the interconnection of electric storage DERs.
26. Explain the distinction between the actions taken in pursuit of the Electric Vehicle (“EV”) CO2 Reduction EAM and the actions taken in pursuit of the EV Make-Ready Program Share the Savings EAM.

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

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

Response:

21. Please see NYRC-1014 (MI-21) Attachment 1. Rate Year 3 is currently in progress and no EAMs have been earned to date.
22. NYSEG-RGE are not decreasing the Demand Response Earnings Adjustment Mechanism (EAM) targets. The Companies are committed to achieving greater demand reduction in the years ahead. The Companies are eliminating the SCR program and corresponding targets from the DR EAM. The targets for the remaining four demand response programs were developed by escalating historical targets less SCR data. See NYRC-0519-DPS-493.

The SCR program has been removed from the proposed targets, as it is anticipated that the program may be sunsetted within the next two years. Additionally, the Companies serve as the Responsible Interface Party (RIP) for two resources, a role that is limited to facilitating communications and submitting performance results to the New York Independent System Operator (NYISO). The Companies do not manage dispatch or program design for these RIP resources.

By focusing the EAM targets on utility-administered Demand Response programs, where the Companies oversee program design, customer engagement, and performance tracking, the revised targets better align with areas where the Companies can drive measurable and scalable demand reduction.

To promote progress towards the identified goal, EAM targets should be set at a level that is achievable but requires incremental effort by the utility to attain.

23. State policy for DER targets over the past five years has been relatively constant. Much of the DPS efforts to support the DER market has focused on process strategies to increase the interconnection of DER. Many of these process changes have been incremental and therefore many are endogenous in the regression analysis.
24. The regression analysis was based on the past five years – a period of strong Federal support for renewable systems. While our regression has not taken into account recent policy changes, it is likely to be more difficult to achieve the proposed targets.
25. Deployment of energy storage DER has had limited interest by developers to date. The objective of the Storage EAMs is to provide challenging but achievable targets to incentivize the Companies to manage the interconnection of electric storage DERs with priority and a high level of customer service. Examining market trends and adjusting

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

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

EAM targets up or down to establish aggressive and achievable goals is appropriate. As shown in the recent actual data, Electric storage DER project interconnections fell off sharply supporting a reduction in aggressive but achievable minimum target.

26. NYSEG-RG&E is not proposing an EV Make-Ready Share the Savings EAM in this rate case. The EV Make-Ready Share the Savings EAM targets and budgets were established in 18-E-0138 to encourage cost-effective deployment of charging stations by incentivizing the Companies to implement the programs under the established budgets - thereby achieving the number of plugs deployed at the lowest cost. Actions taken in pursuit of the EV Make-Ready Share the Savings EAM include providing effective communications and programmatic support to participating trade allies and customers, building trade ally relationships, ensuring smooth processing of applications, as well as monitoring and evaluating incentive levels to ensure appropriate balance between volume and incentive level. While not being sought in this rate case, we provided the background in testimony to give a holistic view of the EV related incentives.

The EV CO2 Reduction EAM is measuring overall customer adoption of EVs within the Companies service territory and the resulting CO2 reduction. Effective implementation of the EV Make-Ready Programs is a contributing factor toward overall EV adoption by helping to ensure sufficient charging infrastructure and alleviate range anxiety. Additional actions taken by the Company in addition to implementation of the EV Make-Ready Program include implementation of the EV Managed Charging Program, the Demand Charge Rebate program, the EV Phase-In-Rate, the EV Time-of-Use Rate, interconnecting new and upgraded services for EV charging, expanding system capacity to accommodate increased loads from EV charging, and maintaining reliability so customers view electricity as a viable transportation fuel source.

NYRC-1014-MI-21 (25-E-0375 et. al.)
Attachment 1, Page 1 of 2

NYRC-1014-MI-21 (25-E-0375 et. al.)
Attachment 1, Page 2 of 2

NYSEG						RGE							
	Performance Target	Target MW	EAM	Actual MW	EAM Earned		Performance Target	MW	EAM	Actual MW	Actual EAM		
Solar DER Utilization MW	Rate Year 1	Minimum	54.71	\$250,000		Solar DER Utilization MW	Rate Year 1	Minimum	24.39	\$148,000			
		Midpoint	59.93	\$875,000	115.4			\$3,000,000	Midpoint	26.71	\$518,000	12.71	\$0
		Maximum	73.86	\$3,000,000				Maximum	31.36	\$1,776,000			
	Rate Year 2	Minimum	60.18	\$278,000			Rate Year 2	Minimum	26.83	\$158,000			
		Midpoint	65.91	\$973,000	192.2		\$3,336,000	Midpoint	29.38	\$553,000	10.37	\$0	
		Maximum	77.37	\$3,336,000			Maximum	34.49	\$1,896,000				
Total Earned					\$6,336,000	Total Earned					\$0		
Storage DER Utilization MW	Rate Year 1	Performance Target	Target MW	EAM	Actual MW	EAM Earned	Storage DER Utilization MW	Rate Year 1	Performance Target	MW	EAM	Actual MW	Actual EAM
		Minimum	10.61	\$250,000		Minimum			6.72	\$148,000			
		Midpoint	12.63	\$875,000	2.37	\$0			Midpoint	8.00	\$518,000	0.14	\$0
	Maximum	15.15	\$3,000,000			Maximum		9.60	\$1,776,000				
	Rate Year 2	Minimum	15.44	\$578,000				Rate Year 2	Minimum	9.45	\$158,000		
		Midpoint	18.38	\$973,000	1.83	\$0		Midpoint	11.25	\$553,000	0.36	\$0	
Maximum		22.05	\$3,336,000			Maximum	13.50	\$1,896,000					
Total Earned					\$0	Total Earned					\$0		
EV CO ₂ Reduction	Rate Year 1	Performance Target	CO ₂ Savings	EAM	Actual MW	EAM Earned	EV CO ₂ Reduction	Rate Year 1	Performance Target	CO ₂ Savings	EAM	Actual MW	Actual EAM
		Minimum	298,419	\$500,000					Minimum	96,733	\$296,000		
		Midpoint	364,281	\$1,000,000	197,760	\$0			Midpoint	146,773	\$592,000	107,432	\$296,000
	Maximum	663,669	\$3,000,000			Maximum		290,981	\$1,776,000				
	Rate Year 2	Minimum	596,843	\$556,000				Rate Year 2	Minimum	193,465	\$316,000		
		Midpoint	886,828	\$1,112,000	226,495	\$0		Midpoint	377,011	\$632,000	147,815	\$0	
Maximum		1,176,818	\$3,336,000			Maximum	560,520	\$1,896,000					
Total Earned					\$0	Total Earned					\$296,000		
Demand Response (Combined NYSEG/RG&E)													
Demand Response	Rate Year 1	Performance Target	Target MW	EAM	Actual MW	EAM Earned	Demand Response	Rate Year 1	Performance Target	Target MW	EAM	Actual MW	EAM Earned
		Minimum	116.6	\$108,000					Minimum	116.6	\$108,000		
		Midpoint	119.5	\$1,512,000	120.01	\$1,512,000			Midpoint	119.5	\$1,512,000	120.01	\$1,512,000
	Maximum	131.1	\$2,592,000			Maximum		131.1	\$2,592,000				
	Rate Year 2	Minimum	121.9	\$1,190,000				Rate Year 2	Minimum	121.9	\$1,190,000		
		Midpoint	132.6	\$1,666,000	134.16	\$1,660,000		Midpoint	132.6	\$1,666,000	134.16	\$1,660,000	
Maximum		150.3	\$2,856,000			Maximum	150.3	\$2,856,000					
Total Earned					\$3,172,000								

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

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

Requesting Party: Multiple Intervenors

Request No.: NYRC-1777 (MI-125-128)

Date of Request: October 21, 2025

Response Due Date: October 31, 2025

Date of Reply: October 30, 2025

Witness: Timothy Lynch/Scott Bochenek

Panel: EAM Panel

Subject:

Question:

125. With respect to the Panel’s response to MI-22 and the data provided in Attachment 21, explain why there is a continued need for incentives for Solar Distributed Energy Resource (“DER”) development when NYSEG has regularly surpassed applicable targets.

126. With respect to the Panel’s response to MI-23, explain how the Commission’s Orders issued on solar programs since the filing of this rate case will impact the Companies’ DER forecasts.

127. With respect to the Panel’s response to MI-24, explain why shareholder incentives are necessary if the Companies do not believe the proposed targets will be met.

128. With respect to the Panel’s response to MI-26, explain how the actions discussed have a direct impact on customers choosing to purchase electric vehicles (“EVs”) within the Companies’ service territories.

Response:

125. As stated in Panel testimony at pages 29-31, there is a continued need for incentives for Solar DER development to incentivize employees to continue to make extraordinary efforts in managing the volume of interconnection requests, accommodating the multitude of developer

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

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

requests for exceptions and special treatment, and seeking innovative ways to accelerate the pace of DER interconnection.

126. The Companies have not performed an analysis of the impact of recent Commission orders on DER interconnection. As stated in Panel testimony, the Companies have generated a forecast of DER interconnection through a regression analysis of recent actual data on DER interconnections. The DER interconnections achieved reflect the incremental effects of the ongoing Commission strategies and other State policies to increase interconnection. Therefore, the regression analysis is taking into account the effect of these strategies going forward.

127. The Companies have proposed challenging yet achievable targets which the Companies will endeavor to meet and believe can be met. The need for incentives and the benefits are explained in Panel testimony and in response to MI-125 above. To the extent that changes in Federal support for renewables may make it more difficult to interconnect DER, the incentives provided by these EAMs will play a more important role in achieving the State's renewable goals. The Companies accept the challenge.

128. The actions discussed in response to MI-26 all have an indirect impact on customers choosing to purchase electric vehicles within the Companies' service territories.

The EV Make-Ready Program, interconnecting new and upgraded services for EV charging, and expanding system capacity supports growth of EV charging infrastructure. Availability of charging infrastructure is an important consideration when deciding to purchase an EV. The EV Managed Charging Program provides an option that reduces the cost of charging for participating customers helping the overall affordability of electric vehicles. The Demand Charge Rebate Program and the EV Phase-In-Rate reduce the cost of operating EV chargers which may lead to lower charging cost for drivers and may help encourage charging station owners to invest in additional chargers.

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

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

Requesting Party: Multiple Intervenors

Request No.: NYRC-1846 (MI-150)

Date of Request: December 4, 2025

Response Due Date: December 15, 2025

Date of Reply: December 11, 2025

Witness: Timothy Lynch

Panel: Electric and Gas Supply Panel

Subject:

Question:

150. With reference to the Companies' responses to MI-136 and MI-137, explain why the Companies did not calculate their respective pro rate share of the statewide solar generation deployment target.

Response:

The Companies did not calculate their respective pro rata share of the statewide solar generation deployment because any calculation would be speculative and likely not reflect the external factors that influence the siting decisions of solar developers.