

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
New York on October 16, 2025

COMMISSIONERS PRESENT:

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

CASE 20-G-0086 - Tariff filing by The Brooklyn Union Gas Company d/b/a National Grid NY to Modify its Gas Tariff Schedule, P.S.C. No. 12 - Gas, to Establish a Firm Demand Response Program.

CASE 20-G-0087 - Tariff filing by KeySpan Gas East Corp. d/b/a National Grid to Modify its Gas Tariff Schedule, P.S.C. No. 1 - Gas, to Establish a Firm Demand Response Program.

CASE 20-G-0381 - Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Gas Service.

ORDER AUTHORIZING TARIFF AMENDMENTS REGARDING GAS DEMAND
RESPONSE PROGRAMS FOR FIRM CUSTOMERS

(Issued and Effective October 17, 2025)

BY THE COMMISSION:

INTRODUCTION

On June 16, 2025, The Brooklyn Union Gas Company d/b/a National Grid NY (KEDNY), KeySpan Gas East Corp. d/b/a National Grid (KEDLI), and Niagara Mohawk Power Corporation d/b/a National Grid (NMPC) (collectively, the Companies) filed a combined Annual Report and a separate combined Petition

requesting two modifications to improve their respective gas demand response (DR) programs for firm customers (Firm DR Programs). In their Petition, the Companies first request authorization to eliminate the early-season Test Event from their Load Shedding and Load Shifting program options, reducing the maximum number of Test Events from two to one per season. Second, KEDNY and KEDLI propose to revise the eligibility criteria for the Load Shedding Direct Load Control option in three respects: (a) lowering the minimum enrollment threshold from 3 dekatherms per hour (Dth/hr) to 2 Dth/hr; (b) advancing the enrollment deadline from September 30 to September 1; and (c) establishing a two-week window for customers to complete any required work following a site visit.

By this Order, the Commission approves the Companies' proposals to improve the Firm DR Programs and directs the Companies to make tariff filings in compliance with this Order to effectuate the programs as approved herein on a permanent basis effective November 1, 2025.

BACKGROUND

In 2020, the Commission authorized Firm Demand Response Programs for KEDNY and KEDLI in Cases 20-G-0086 and 20-G-0087, followed by approval of NMPC's program in 2022 in Case 20-G-0381.¹ Pursuant to the Implementation Orders in these proceedings, the Companies are required to submit annual reports following the conclusion of each winter capability period, along

¹ Cases 20-G-0086 and 20-G-0087, KEDNY and KEDLI Tariff Filings to Establish a Firm Demand Response Program, Order Directing Implementation Plan Filing, Annual Reporting, and Tariff Modifications (issued October 15, 2020); Case 20-G-0381, NMPC - Rates, Order Authorizing Tariff Amendments Regarding Gas Demand Response Programs for Firm Gas Customers (issued October 13, 2022) (collectively, the Implementation Orders).

with any proposals for program modifications.² KEDNY, KEDLI, and NMPC each administer three common DR programs: the Load Shedding Program, the Load Shifting Program, and the Bring-Your-Own-Thermostat (BYOT) Program. In addition, KEDNY and KEDLI operate a Behavioral DR program.

The Load Shedding Program focuses on commercial, industrial, and multi-family firm service customers capable of reducing their peak gas load for up to an eight-hour period on a day for which the Companies call one of three types of "events," as described below. Though focused on providing load relief over the course of a peak day, the Load Shedding Program Event windows correspond to the Companies' typical system peak hours to ensure that load reductions on that peak day occur during the gas system's most critical periods. For KEDNY and KEDLI, participants must choose whether to participate with or without Direct Load Control, whereas for NMPC the program operates without Direct Load Control for all participants. The Direct Load Control option allows customers to accept direct utility control of specific pieces of customer equipment during events.³ Participants in the Load Shedding Program may switch to an alternate fuel source during events.

The Load Shifting Program focuses on commercial, industrial, and multi-family firm service customers capable of

² The winter capability period runs from November 1 of each year through March 31 of the subsequent year. The Companies then file their Annual Report describing the operations, benefit-cost analysis results, and other pertinent information related to the Firm DR Programs, as well as any requests for program modifications if needed, by June 15 of each year.

³ The Direct Load Control option requires installation of particular equipment to implement Direct Load Control capability, which is commonplace in the KEDNY and KEDLI service territories but uncommon in the NMPC service territory.

reducing intra-day gas load over a four-hour period on event days during specified peak hours. The primary goal of the Load Shifting DR Program is to reduce demand during peak hour usage in the early morning hours, which is the period in which the Companies' systems typically experience the highest customer demand. To participate in the Load Shifting DR Program, participants must shift load to alternate hours prior to or following the event window and are not allowed to switch to an alternate fuel source to achieve such load relief except for use of specified exempt resources.⁴

The three types of events in both the Load Shedding and Load Shifting Programs that the Companies can call are: (1) a Planned Event, called on a day-ahead basis when specified temperature thresholds are forecast; (2) an Emergency Event, called on an immediate basis or less-than-day-ahead basis; or (3) a Test Event, called on a day-ahead basis with a shortened performance duration to test participants' readiness to respond to future events. Participant response to Planned and Test Events is mandatory, whereas response to Emergency Events is optional.

Both the Load Shedding and Load Shifting Programs use a baselining methodology to measure participant performance during events. This baselining methodology compares each participant's gas usage during event days to the participant's gas usage during a number of recent similar days, plus a weather adjustment to account for differences in weather between the event day and the comparison days. The number of days used to

⁴ Exempt resources include: electricity-based technologies, including heat pumps; biodiesel/biofuel blends that contain twenty percent or more biodiesel by volume; solid biomass fuels; alcohols; hydrogen; renewable natural gas; or any combination of resources listed as a Renewable Energy System under the Climate Leadership and Community Protection Act.

determine the baseline differs depending on whether the event day falls on a weekday or weekend day. For weekday events, the Companies compare each participant's average gas usage during the event period to the average of the participant's five highest usage days within 10 days of the event (i.e., five like-days within 10, or 5-of-10). For weekend or holiday events, the Companies compare each participant's average gas usage during the event period to the average of the participant's four highest usage weekend or holiday days within the last six weekend or holiday days (i.e., four like-days within six, or 4-of-6). The Companies base the weather adjustment on a comparison of the number of heating degree days (HDD) during the event day relative to the weekday or weekend/holiday days used to establish the baseline. The Companies cap the weather adjustment at 35 percent of the unadjusted baseline.⁵

The Load Shedding and Load Shifting Programs each have two types of performance-based incentives - a monthly Reservation Payment and a Performance Payment. The monthly Reservation Payment is in exchange for the commitment to reduce a pre-set quantity of gas in dekatherms (Dth) during events, and, like an insurance premium, is paid to program participants regardless of whether an event is called during a given month. Reservation Payments are subject to an adjustment based on customers' average performance rating (Performance Factor) established during events, with the Companies providing payments

⁵ That is, the weather-adjusted baseline cannot be modified further than the unadjusted baseline plus or minus 35 percent, even if the comparison of an event day's actual weather to the baseline weather would result in a greater adjustment factor.

at the end of the capability period.⁶ The Companies provide participants enrolled in a Direct Load Control option a higher Reservation Payment rate in return for them giving the utility greater control over their equipment. The Companies make Performance Payments only for measured Dth load relief provided during called events - if no events are called, the Companies will not provide a Performance Payment to participants. The Performance Payment Rate in dollars per Dth of load relief provided is the same for all events, regardless of whether such event is a Planned Event, an Emergency Event, or a Test Event.

Customers participating in either the Load Shedding or Load Shifting programs must have functional hourly gas metering equipment during the winter capability period. New participants receive free metering equipment and installation.

The BYOT Program is a load shifting program focusing on residential and small commercial customers, which uses Wi-Fi-connected thermostats that enable the Companies to remotely lower temperature set points, thus shifting peak hour gas loads on event days. Under the BYOT Program, customers are asked to shift part of their gas use out of peak morning or evening periods into other times of the gas day.⁷ BYOT customers are eligible for two types of incentives: a one-time instant incentive after the customer has had the Wi-Fi-connected thermostat installed and after the Companies have confirmed the

⁶ The Performance Factor is a rolling average, calculated as the average of the participant's last three event performances. The event performance is a percentage value based on an account's actual event consumption when compared to the baseline usage amount. The Companies do not change a participant's performance factor as a result of the participant's response to an Emergency Event to avoid disincentivizing them from performing during Emergency Events.

⁷ A gas day runs from 10:00 a.m. to 10:00 a.m. the following morning.

ability to communicate with the device, and an annual incentive beginning in the second year of participation in the program and continuing through subsequent years. A customer may override the automatic thermostat controls at any point prior to or during an event, however doing so may impact the customer's ability to continue to receive annual incentives. To receive the additional annual incentives starting in the customer's second winter of enrollment, a customer must participate in at least 70 percent of the program's event hours for that capability period. The Companies issue the annual incentives following the close of each winter capability period.

The Behavioral DR Program is a non-incentivized program for residential and small-commercial customers whereby KEDNY and KEDLI request that customers decrease their gas usage during peak days. The Behavioral DR Program uses e-mail messaging to notify customers of impending cold weather and suggests methods to lower gas consumption during peak hours.

PETITION

On June 16, 2025, the Companies filed the Petition regarding Firm Gas DR Programs for the 2025/2026 winter capability period.⁸ The Petition contains a summary of the Companies' proposals and draft tariff leaves to implement them, while the Companies provide their observations and rationale supporting each proposal in their 2025 Annual Report.⁹

Removal of Early-Season Test

The Companies propose to reduce the maximum number of Test Events from two to one per winter capability period,

⁸ Cases 20-G-0086 et al., 2025 Petition for Tariff Modifications (filed June 16, 2025) (Petition).

⁹ Cases 20-G-0086 et al., Firm Gas Demand Response 2024-2025 Annual Report (filed June 16, 2025) (2025 Annual Report).

eliminating the early-season Test Event typically held in late November or early December.¹⁰ Under this proposal, a single Test Event would be conducted if no actual events have occurred or are forecast to occur. This modification is intended to avoid testing during mild weather conditions, which can result in unrealistic load reduction requirements and lower performance.

Revision of Load Shedding DLC option

KEDNY and KEDLI propose to modify the eligibility criteria for the Load Shedding Direct Load Control (DLC) program option by (1) lowering the minimum enrollment threshold from 3 Dth/hr to 2 Dth/hr, (2) advancing the enrollment deadline from September 30 to September 1, and (3) requiring customers to complete any necessary site work within two weeks of a Company visit, with failure to do so potentially affecting incentive eligibility if DLC connectivity or metering is not operational.¹¹ KEDNY and KEDLI maintain that these revisions would expand participation, improve season readiness, and ensure that program resources are directed toward customers who complete the preparations needed for DLC connectivity and metering prior to demand response events.¹²

NOTICE OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), a Notice of Proposed Rulemaking was published in the State Register on July 9, 2025 [SAPA No. 20-G-0086SP7]. The time for submission of comments pursuant to the Notice expired on September 8, 2025. No comments were received.

¹⁰ Petition, p. 5.

¹¹ Petition, pp. 5-6.

¹² 2025 Annual Report, p. 45.

LEGAL AUTHORITY

Pursuant to Public Service Law §§5, 65, and 66, the Commission has broad authority over electric and gas corporations, including the responsibility to ensure that all services provided by such corporations are safe and adequate and that all charges are just and reasonable. Accordingly, the Commission has the authority to review the Companies' filings and approve, reject, or modify the Companies' proposed changes to their Firm DR Programs.

DISCUSSION AND CONCLUSION

The primary objectives of the Firm DR Programs are to maintain system reliability during peak demand periods, reduce costs related to distribution system upgrades, and avoid the need for incremental upstream capacity and supply. These programs play a central role in the Companies' long-term system planning. Reductions in peak day and hour usage strengthen system reliability during peak winter heating events and enable the Companies to continue serving customer demand while limiting the need for costly new infrastructure.

KEDNY and KEDLI have now completed six winter seasons of their Firm DR Programs, while NMPC has completed three. As reflected in the Companies' annual report, they have administered the programs in a cost-effective manner, and the Companies anticipate continuing this performance in the upcoming capability period.

NMPC reported that its Load Shedding Program had an enrollment of 3,687 Dth/day in the 2024/2025 winter season.¹³ This is an increase compared to 2022/2023, in which NMPC's

¹³ 2025 Annual Report, p. 9.

enrollment was 2,151 Dth/day.¹⁴ NMPC reported that its Load Shifting Program had an enrollment of 105 Dth/hr in the 2024/2025 winter season.¹⁵ This is a substantial increase compared to NMPC's first season of offering the Load Shifting Program the prior year, which had an enrollment of 12 Dth/hr.¹⁶ NMPC's BYOT Program, first launched in the 2022/2023 season, has also grown substantially. Enrollments rose from 1,786 thermostats in the 2022/2023 season to 9,818 in the 2024/2025 season.¹⁷ In the 2025 Annual Report, NMPC attributes this growth to expanded outreach by the Companies and their partners, including their Distributed Energy Resource Management System vendor and thermostat manufacturers.¹⁸

KEDNY and KEDLI's Load Shedding Program, which they initiated in the 2019/2020 winter season, has demonstrated growth. Enrollments in the 2024/2025 winter season were at 26,500 Dth/day. This represents an annual net growth of 280 Dth/day compared to the 2023/2024 winter season,¹⁹ which is modest growth compared to previous years. KEDNY and KEDLI attribute this modest growth to the loss of three large participants for non-program reasons.²⁰ The Load Shifting Program, which KEDNY and KEDLI initiated in the 2021/2022 winter season, had an enrollment of 203 Dth/hr in the 2024/2025 season

¹⁴ Case 20-G-0381, NMPC Firm Gas Demand Response 2022-2023 Annual Report (filed June 15, 2023) (NMPC 2023 Annual Report), p. 7.

¹⁵ 2025 Annual Report, p. 14.

¹⁶ Case 20-G-0381, NMPC Firm Gas Demand Response 2023-2024 Annual Report (filed June 14, 2024), p. 12.

¹⁷ NMPC 2023 Annual Report, p. 12; 2025 Annual Report, p. 22.

¹⁸ 2025 Annual Report, p. 22.

¹⁹ Case 20-G-0086 and 20-G-0087, KEDNY and KEDLI Firm Gas Demand Response 2023-2024 Annual Report (filed June 14, 2024), p. 10 (reporting 26,320 Dth/Day enrollment).

²⁰ 2025 Annual Report, p. 12.

and a performance during events of 50 percent to 96 percent.²¹ KEDNY and KEDLI's BYOT Program, now in its fifth season, has steadily grown every year and reached over 34,992 devices as of November 1, 2024.²² In two events in January 2025, the program achieved savings of 1,722.6 and 1,559.9 Dth, which align with historical performances.²³

As participation in the Firm DR Programs continues to grow, the Companies have proposed adjustments intended to improve program operations and enhance customer performance. In their 2025 Annual Report, the Companies claim that eliminating the early-season Test Event would avoid testing during periods of mild weather, when limited gas use makes it more difficult for participants to achieve their committed reductions.²⁴ The Companies state that customers, particularly those in the Load Shifting program, have reported that early-season Test Events can impose unrealistic requirements which necessitate a complete gas shutoff rather than a partial shutoff.²⁵ The Companies further explain that early-season Test Events often occur under conditions up to 14 degrees warmer than mid-winter events. Under these mild weather conditions participants have limited baseline usage to shutoff, resulting in a greater likelihood of complete shutoffs.²⁶ The Companies state that performance results reflect this trend, with average load reductions during

²¹ 2025 Annual Report, pp. 14, 17.

²² 2025 Annual Report, p. 22. The Companies stated in email correspondence that the number of enrolled devices was reported accurately in the 2025 Annual Report in the pie chart (as represented in this Order); however, the number reported on page 22 of the 2025 Annual Report is inaccurate.

²³ 2025 Annual Report, p. 23.

²⁴ 2025 Annual Report, pp. 44-45.

²⁵ 2025 Annual Report, p. 44.

²⁶ 2025 Annual Report, p. 44.

early-season Test Events approximately eight percent lower than mid-winter Test Events and 34 percent lower than weather-driven events.²⁷

The Companies claim that limiting testing to a single mid-winter Test Event will produce a more accurate assessment of customer capability and better reflect actual operating conditions.²⁸ The Companies maintain that this approach is consistent with practices in electric demand response programs as well as the Companies' Gas BYOT program, which already uses a single test.²⁹ The Companies also state that eliminating the early-season test will reduce the recurring issue of "false" preheating and lower emissions as participants are less likely to switch to backup fuel oil usage as they may do to comply with Test Events during mild weather.³⁰

The Commission finds the proposed modification to be reasonable, as it removes unrealistic load reduction requirements during periods of low gas demand and ensures that Test Events are more representative of system conditions. Retaining a single mid-winter test maintains an appropriate measure of customer performance when system needs are most critical, while reducing customer burden and aligning testing practices across the Companies' demand response portfolios.

In the 2025 Annual Report, the Companies state that "a single test event will occur prior to February 14th of the program season if no actual events have occurred or are

²⁷ 2025 Annual Report, p. 44.

²⁸ Petition, p. 5.

²⁹ 2025 Annual Report, p. 44.

³⁰ Petition, p. 5. "False" preheating refers to customers raising indoor temperatures before an event on a mild day, which inflates baseline usage and makes load reductions appear larger than they actually are.

forecasted to occur.”³¹ Likewise, the Companies’ current tariffs impose a deadline to conduct the mid-winter Test Event - February 14 for KEDNY and KEDLI, and the end of February for NMPC.³² The Petition does not refer to any deadline to conduct the Test Event. However, in contrast with the 2025 Annual Report, the proposed tariff leaves attached to the Petition remove the deadlines for Test Events.³³ The Companies do not provide an adequate explanation regarding the removal of these deadlines from the draft tariff leaves in either the 2025 Annual Report or the Petition. The tariff shall continue to specify the current deadlines for the Companies to conduct a Test Event to ensure that the Test Event occurs and that there is an expected time frame for it. The Commission finds that, absent a justification for removing the deadlines and absent any proposed alternative deadlines to conduct the Test Event, the Companies shall maintain the current deadlines of February 14 for KEDNY and KEDLI, and the end of February for NMPC.

In response to Staff’s information request DPS-DR25-01 (IR Response), included in Appendix A to this Order, KEDNY and KEDLI state that lowering the minimum enrollment threshold from 3 Dth/hr to 2 Dth/hr for their Load Shedding DLC program option will broaden eligibility and allow smaller customers to participate in the DLC option. This adjustment responds to enrollment trends, as most large customers are already engaged in the program and KEDNY and KEDLI expect incremental growth to

³¹ 2025 Annual Report, p. 44.

³² PSC No. 12 - Gas, Third Revised Leaf No. 138.73 (effective November 1, 2024) (KEDNY); PSC No. 1 - Gas, Third Revised Leaf No. 119.67 (effective November 1, 2024) (KEDLI); PSC No. 219 - Gas, Second Revised Leaf No. 122.27 (effective November 1, 2024) (NMPC).

³³ Petition, Attachment A, p. 17 (NMPC); Petition, Attachment B, p. 40 (KEDNY); Petition, Attachment C, pp. 64-65 (KEDLI).

come from smaller accounts. By lowering the threshold, KEDNY and KEDLI can capture additional demand reductions from these smaller customers. Enrolling smaller customers in the Load Shedding DLC program would contribute meaningfully to the program's overall load reduction capability and help offset the loss of several larger participants in recent years. The modification improves the long-term sustainability of the program and enhances its overall effectiveness.

KEDNY and KEDLI state that advancing the enrollment deadline from September 30 to September 1 for the Load Shedding DLC program option would provide them additional time to install metering and communications equipment prior to the start of the winter capability period.³⁴ KEDNY and KEDLI explain that they have experienced recurring difficulties ensuring that all required equipment is installed and verified before the start of DR season, particularly when there are large numbers of new customers.³⁵ An earlier deadline would allow more time to schedule site visits, address customer-specific issues, and complete verification before the peak winter period, thereby improving program readiness and reducing the risk of underperformance due to incomplete installations.

The proposed requirement that KEDNY and KEDLI Load Shedding DLC program customers complete any necessary site work within two weeks of a Company visit addresses delays that have historically prevented KEDNY and KEDLI from installing devices and ensuring they are operational.³⁶ KEDNY and KEDLI explain that some customers have delayed customer-side responsibilities, such as running new power circuits, sometimes by weeks or months

³⁴ IR Response, p. 2.

³⁵ Id.

³⁶ Id.

after a site visit, leaving insufficient time for KEDNY and KEDLI to complete installation of their equipment before a Demand Response event and have created uncertainty regarding responsibility for non-performance.³⁷ The proposal also includes provisions to limit incentive payments where a customer does not complete site work on schedule. Establishing a two-week window will create accountability by ensuring that enrolled customers complete the necessary work in a timely manner, thereby improving compliance and enhancing program performance.

The Commission finds that the KEDNY- and KEDLI-proposed eligibility modifications for the Load Shedding DLC program are reasonable, as they collectively expand opportunities for customer participation, improve program readiness ahead of the winter heating season, and ensure that program resources are efficiently directed to customers prepared to perform during demand response events.

The Commission expects that the Companies will continue to design and operate their Firm DR Programs cost effectively while recognizing the need for flexibility so that the Companies can continue to make improvements to the programs as they identify issues. The Commission finds each of the Companies' proposed changes to their Firm DR Program for the 2025/2026 winter capability period to be reasonable.

The Companies shall file the necessary tariff amendments to implement the draft tariff leaves attached to the Petitions. These tariff amendments shall be filed on not less than five days' notice to become effective on November 1, 2025. As these tariff revisions will be filed in compliance with this Order, and stakeholders have already had an opportunity to comment on the contents of the draft tariff leaves, the

³⁷ Id.

newspaper publication requirements of PSL §66(12)(b) and Title 16 of the New York Codes, Rules and Regulations (NYCRR) Section 720-8.1 shall be waived.³⁸

The Commission orders:

1. The modifications to the Firm Demand Response Programs proposed by The Brooklyn Union Gas Corporation d/b/a National Grid NY, KeySpan Gas East Corp. d/b/a National Grid, and Niagara Mohawk Power Corporation d/b/a National Grid are approved consistent with the discussion in the body of this Order.

2. The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corp. d/b/a National Grid are directed to file tariff amendments on not less than five days' notice to become effective November 1, 2025, as discussed in the body of this Order, reducing the maximum number of Test Events from two to one, to be conducted prior to February 14 of the program season if no actual events have occurred or are forecasted to occur.

3. Niagara Mohawk Power Corporation d/b/a National Grid is directed to file a tariff amendment on not less than five days' notice to become effective November 1, 2025, as discussed in the body of this Order, reducing the maximum number of Test Events from two to one per winter capability period and to provide that a single Test Event shall be conducted prior to the end of February if no actual events have occurred or are forecast to occur.

³⁸ The Commission understands that the Companies have been informing participants of the Companies' requested modifications, approved herein, as part of their enrollment process.

4. The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corp. d/b/a National Grid are directed to file tariff amendments on not less than five days' notice to become effective November 1, 2025, modifying the minimum enrollment threshold for the Direct Load Control Option of the Load Shedding Program to 2 Dth/hr.

5. The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corp. d/b/a National Grid are directed to file tariff amendments on not less than five days' notice to become effective November 1, 2025, modifying the enrollment deadline of the Direct Load Control Option of the Load Shedding Program to September 1.

6. The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corp. d/b/a National Grid are directed to file tariff amendments on not less than five days' notice to become effective November 1, 2025, modifying the Direct Load Control Option of the Load Shedding Program to specify that customers will have two weeks to complete any work identified during a site visit to establish readiness for participation.

7. Newspaper publication requirements pursuant to PSL §66(12)(b) and 16 NYCRR §720-8.1 related to the tariff filings directed in Ordering Clause Nos. 2, 3, 4, 5, and 6 are waived.

8. 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.

CASES 20-G-0086 et al.

9. These proceedings are continued.

By the Commission,

(SIGNED)

MICHELLE L. PHILLIPS
Secretary

Date of Request: September 24, 2025
Due Date: September 29, 2025

Request No. DR 25-01
NG Request No. n/a

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

Case No. 20-G-0086, 20-G-0087, & 20-G-0381

National Grid USA Operating Utilities Firm Gas Demand Response Programs

Request for Information

FROM: PSC - Kate Overacker

TO: National Grid

SUBJECT: KEDNY and KEDLI Gas Demand Response Program Manager

Request:

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

Provide the following:

On page three and four of the June 15, 2025 Petition of Niagara Mohawk Power Corp. d/b/a National Grid (NMPC), The Brooklyn Union Gas Company d/b/a National Grid NY (KEDNY), and KeySpan Gas East Corp. d/b/a National Grid (KEDLI) for Approval of Modifications to their Firm Gas Demand Response Programs, KEDNY and KEDLI propose three modifications to their Load Shedding DLC Option eligibility criteria.

1. Explain whether lowering the enrollment threshold from 3 Dth/hr to 2 Dth/hr is expected to either:
 - a. Meaningfully increase total enrolled load and contribute toward meeting the Capacity Demand Metric, or
 - b. Increase participation counts without meaningfully contributing toward meeting the Capacity Demand Metric.
2. Regarding moving the enrollment deadline from September 30th to September 1st:
 - a. Explain whether this modification will provide the Companies with sufficient additional lead time to schedule site visits, install hardware, and resolve issues before the winter season.
 - b. Explain whether this modification is expected to mitigate recurring problems with

incomplete device installation prior to testing.

3. For the proposed requirement that customers complete any necessary work within two weeks of a site visit, explain what consequences will apply if the work is not completed within that timeframe.

Response:

1. Lowering the enrollment threshold from 3 Dth/hr to 2 Dth/hr is expected to meaningfully increase total enrolled load and contribute toward meeting the Capacity Demand Metric. As the Load Shedding programs grow, the Companies are increasingly reaching out to smaller customers. Our sales representatives have encountered some customers that do not have on-site facilities managers and could only participate via DLC. The Companies have proposed lowering this threshold to allow these customers to participate and increase our total enrollment (in Dth/D). This change was proposed in conjunction with requirements around enrollment deadlines and customer work to ensure that the Companies metering staff is not overrun with work.
2. Moving the enrollment deadline from September 30th to September 1st for the Load Shedding DLC option is anticipated to provide the Companies with sufficient lead time to schedule site visits, install hardware, and resolve metering issues before the winter season begins. Customers enrolling in the DLC option generally have longer lead times until their sites are fully ready to participate (where the Companies are both receiving hourly meter data and have completed the connection to a customer's boiler). The Load Shedding DLC option almost always requires customer work and multiple visits from the Companies' metering technicians. Historically this has drifted into the DR season for customers who enroll close to the September 30 deadline. Moving this enrollment deadline to September 1st for DLC is anticipated to limit the number of sites that have incomplete metering when the season begins.
3. Customers that fail to complete necessary work required to complete a metering install within two weeks of a site visit would remain in the demand response program, but risk non-performance during events. In past seasons, customers have not completed work for weeks or months until after a site visit. If the work were completed right before a DR Event since DLC installs often require a follow-up visit after the customer has completed their work, the Companies were not left with enough time to complete the install before a DR event. This has led to unclear designations of 'fault' if the work is not complete in time for DR event performance. The Companies describe such delays in our tariff (Leaf 138.69), but do not layout a concrete timeline for customer work. This change is intended to remedy that and avoid the delays described above.

Name of Respondent:

Owen Tyrrell

Date of Reply:

September 29, 2025