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October 10, 2025

**VIA ELECTRONIC FILING**

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

Re: CASE 23-M-00298– In the Matter of Budget Appropriations to Enhance Energy Affordability Programs

CASE 14-M-0565 – Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers

Dear Secretary Phillips:

On July 17, 2025, the NYS Public Service Commission (“Commission”) issued its *Order Adopting Enhanced Energy Affordability Policy And Directing Utility Filings* in the subject proceedings.<sup>1</sup> Pursuant to Ordering Clause No. 2, within ninety (90) days of the issuance date of the EEAP Order (by October 15, 2025), the Utilities<sup>2</sup> are required to file a report that includes a benefit-cost analysis of the enhanced energy affordability policy (“EEAP”) pilot enrollment process, providing justification for the method selected to perform income verification during the EEAP pilot period, and providing a feasibility assessment of verifying income eligibility and potentially automatically enrolling customers who stopped receiving low-income energy affordability program (“EAP”) benefits within the two years preceding the initial enrollment period.<sup>3</sup> The Utilities hereby request an extension of this deadline to November 14, 2025.

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<sup>1</sup> Case 23-M-00298, et al., *In the Matter of the Budget Appropriations to Enhance Energy Affordability Programs*, Order Adopting Enhanced Energy Affordability Policy And Directing Utility Filings (issued July 17, 2025) (“EEAP Order”).

<sup>2</sup> The Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), 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 (collectively “National Grid”); National Fuel Gas Distribution Corporation (NFGDC); New York State Electric & Gas Corporation (NYSEG), Orange & Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

<sup>3</sup> EEAP Order, p. 36.

The Utilities share the Commission's goals regarding the EEAP, including the assessment of costs, benefits, and feasibility of options for enrollment in the EEAP pilot. The Utilities have undertaken substantial efforts to date to support the timely development of this report. The Utilities have determined, however, that additional time is required to process and assess information that the Utilities have solicited from applicable market vendors, which is pivotal to this report.

For the reasons outlined above, the Utilities request that you grant an extension of the current filing deadline in Ordering Clause No. 2 of October 15, 2025 by 30 days, to November 14, 2025.<sup>4</sup> Please do not hesitate to contact me with questions.

Respectfully submitted on behalf of  
the Utilities,

By: /s/ Felice Segura

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<sup>4</sup> Pursuant to Ordering Clause No. 15 of the EEAP Order, the deadlines set forth therein may be extended in the Secretary's sole discretion.