



Philip A. DeCicco
New York General Counsel

May 28, 2024

Honorable Michelle L. Phillips, Secretary
New York State Public Service Commission
Office of the Secretary, 19th Floor
Three Empire State Plaza
Albany, New York 12223

Dear Secretary Phillips:

Niagara Mohawk Power Corporation d/b/a National Grid (“National Grid” or the “Company”) submits these rate filings in accordance with the requirements of the New York State Public Service Commission (“Commission”) to set revised rates for the Company’s electric and gas service.

National Grid’s goal is to be at the heart of a clean, fair, and affordable energy future, while ensuring the safety and reliability of our energy networks. These rate filings demonstrate National Grid’s commitment to continuing its support of New York’s energy policies and meeting the challenges of climate change, while also ensuring the overall reliability, resiliency, and affordability of the energy systems. Significantly, these rate filings include numerous investments and programs that will reduce emissions and advance the clean energy goals of the Climate Leadership and Community Protection Act (“CLCPA”). Specific proposals include (i) electric network upgrades to connect renewable generation and support electric vehicles and battery storage, (ii) programs to promote heat electrification and non-wires/pipes alternatives; (iii) initiatives to support affordability and benefit low-income customers and Disadvantaged Communities; (iv) targeted gas main replacements and leak repairs to enhance safety and reduce system emissions, and (v) expanded energy efficiency, weatherization, and demand response offerings. Taken together, the Company estimates these investments and programs have the potential to reduce greenhouse gas (“GHG”) emissions by more than 550,000 metric tons of CO₂e over the course of the proposed four-year rate plan.

Performance Under the Current Rate Plan

As the stewards of energy networks serving 2.3 million customers in upstate New York, the Company is first and foremost focused on providing customers with safe and reliable energy service. We have seen the results of that focus over the term of the current rate plan, which featured the following performance highlights:

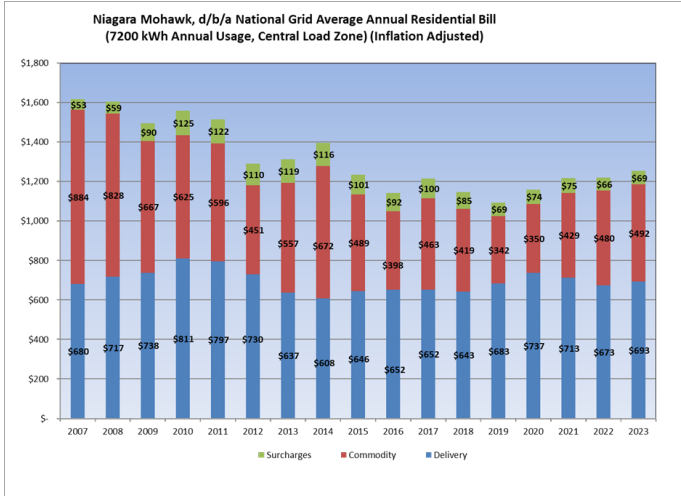
- ***Providing Safe and Reliable Energy.*** We invested more than \$4.4 billion in the electric network and \$1.1 billion in the gas network to enhance safety and modernize New York’s energy systems, including investments to improve reliability and unlock renewable generation while pursuing alternatives to traditional infrastructure investments. The effects of investments on the electric and gas networks are reflected in our system performance and reliability, which have been put to the test during recent severe weather events. Importantly, we have consistently met or exceeded our Electric Reliability and Gas Safety performance metrics. Our electric network maintained strong operational performance through 17 storms in 2023, impacting 1.4 million customers. Our storm restoration efforts returned service to 95 percent of affected customers within 12 hours. For the gas business, we are conducting more safety inspections and leak surveys, and implemented advanced pipeline safety standards.
- ***Expanded Energy Efficiency and Electrification.*** We have delivered more than 11,540,000 MMBtus in customer energy efficiency savings in less than five years. Our electrification programs have grown 600 percent since 2020. We have targeted gas usage reductions through greater reliance on demand-side solutions, and ceased gas marketing activities while promoting non-gas alternatives.
- ***Leak and Emissions Reductions.*** Since 2013, we have retired more than 500 miles of leak-prone main in upstate New York, including more than 120 miles during the current rate plan. Our main replacement program and leak repair efforts have significantly reduced the backlog of system leaks and steadily lowered fugitive emissions over the same period.
- ***Focused on Customer Service and Affordability.*** Over the past four years, our energy efficiency programs have reduced customers’ usage by approximately 1.8 million Megawatt-hours of electricity and 2.7 million dekatherms of gas, while also directing more than \$300 million in financial relief to customers struggling through the COVID-19 pandemic. We also implemented our Expanded Solar for All program, which provides further benefits to energy affordability program customers, while also encouraging development of clean solar generation.
- ***Advancing Our Shared Energy Vision.*** The Company has delivered on its commitments to implement new projects, programs, and ways of working to support New York’s clean energy priorities, including connecting 1.2 GW of solar energy; installing more than 4,600 electric vehicle charging ports; and deploying advanced metering infrastructure (“AMI”) at an average rate of more than 4,500 meters/week. Our engagement portal provides AMI customers near real-time data and other insights to help them manage energy usage.

As we approach the end of the current rate plan, we must update delivery rates to reflect the Company’s current cost of providing service and support New York’s evolving energy policies. The proposed rate increases are necessary to enable continued safe and reliable service, as well as fund the projects and programs needed to deliver a cleaner, safer and more reliable energy future customers expect and deserve over the next four years and beyond.

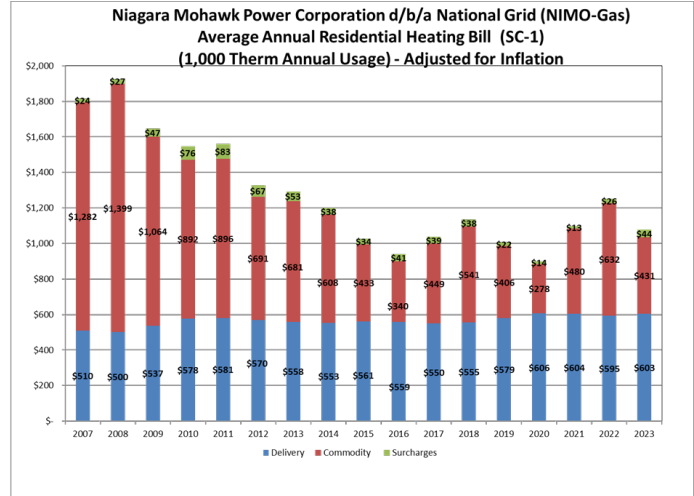
The Rate Filings

The Company’s efficiency initiatives and relatively low commodity costs in recent years have contributed to an extended period of energy price stability. Adjusted for inflation, total bills are lower than they were 16 years ago. In fact, average residential electricity bills are approximately 20 percent lower in 2023 than they were in 2007 and natural gas bills are 40 percent lower over the same time period.

Electric Rates



Gas Rates



The Company last filed for base rate increases in 2020. The Joint Proposal adopted in those proceedings provided for a three-year rate plan commencing July 1, 2021, and continuing through June 30, 2024, with the option for a nine-month “stayout” period. That settlement, which was negotiated at the height of the COVID-19 pandemic, prioritized affordability for customers by significantly reducing requested revenue increases, deferring hundreds of millions of dollars of capital projects, eliminating discretionary programs, and shaping rates with nearly \$200 million of credits. The result was moderate revenue increases and stable customer bills over the term of the current rate plan.

Notwithstanding efforts to keep the cost of delivering energy essentially flat during the current rate plan, there are several factors prompting the need for the requested rate relief, including macro-economic factors, most notably the rising cost of materials due, in part, to global inflation and supply chain shortages, and increases in contractor costs. For the electric business, specific cost drivers include increased capital investments, storm and vegetation management expense, information technology upgrades, and incremental operations and maintenance expense. For the gas business, cost drivers include federal and state pipeline safety mandates requiring system investments and upgrades, as well as the costs to deliver expanded energy efficiency and other demand reduction offerings. Inflation and supply chain challenges continue to significantly drive increased costs for transmission and distribution equipment, such as transformers, poles, overhead and underground cable, with the cost of some equipment more than doubling in recent years.

In these filings, National Grid is proposing to adjust its base electric and gas delivery rates by \$525 million and \$148 million,¹ respectively, in the twelve months ending March 31, 2026 (“Rate Year”). For the Company’s electric business, this equates to increases in delivery revenue of 20 percent and 11 percent of total revenue. For the gas business, this equates to an increase of 28 percent of total delivery revenue and 15 percent of total revenue. A typical residential electric customer would see a \$18.92 monthly increase, equating to a 15.3 percent increase in their total bill (23.4 percent on delivery rates). A typical residential gas heating customer will see a \$18.34 monthly increase, equating to a 20.2 percent increase in their total bill (28.9 percent on delivery rates). The effect on an individual customer’s monthly bills will vary depending on usage and service classification.

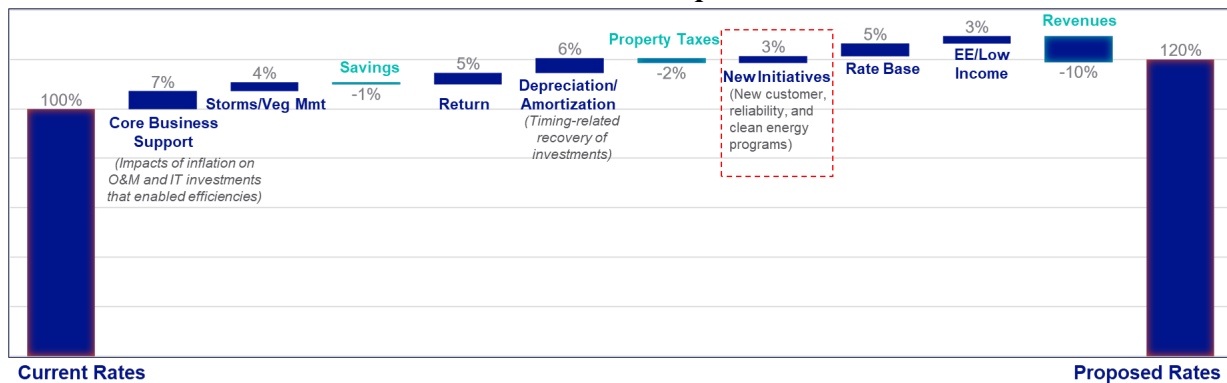
Service	Monthly Usage	Delivery Rate Increase	Total Bill Increase	Total \$/Month
Electric SC-1	625 kWh	23.4%	15.3%	\$18.92
Gas SC-1	78 Therms	28.9%	20.2%	\$18.34

Bill impacts represent typical usage for a customer in the service class.

Significant Impact of Inflation & Rising Costs

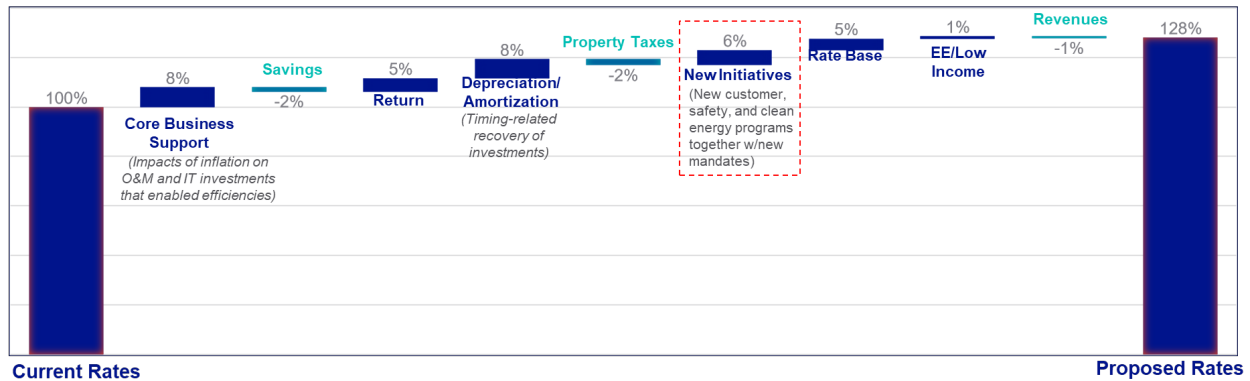
As depicted in the charts below, the proposed bill increases are largely driven by a combination of inflation and cost factors beyond National Grid’s immediate control, including core business cost increases, safety and compliance mandates, energy efficiency, market conditions (return and interest rates), and other non-controllable costs. It is important to recognize that new initiatives, such as new customer programs, account for a relatively small portion of the proposed increases. To help offset the need for rate relief and mitigate the bill impacts of the proposed increases, the Company is working to manage controllable costs in a high-inflation environment and has implemented various saving measures. For example, our work to identify efficiencies has reduced the Company’s combined revenue requirements by more than \$100 million in the Rate Year alone.

Electric Revenue Requirement



¹ Excluding gross receipts tax, the increase is \$519 million for electric and \$146 million for gas.

Gas Revenue Requirement



Our ability to efficiently finance the capital investments necessary to deliver the State’s energy goals is underpinned by credit metrics and ratings that enable long-term borrowing at favorable interest rates. The Company’s proposals to enhance timely cash recoveries, including in the areas of depreciation expense, safety programs, and deferral balances, will ensure the Company has sufficient cash flows to support its current credit ratings.

Key Priorities of the Rate Filings

As part of our commitment to build safer, more reliable, and more sustainable energy systems for New York, we are focused on three priorities for these rate filings. First, continuing to meet our core obligation to deliver safe, reliable energy service to more than two million customers. Second, enabling customers, especially financially vulnerable customers, to affordably meet their energy needs, while also improving the customer experience. Third, supporting the clean energy transition and advancing the goals in the CLCPA.

Priority #1: Delivering Safe, Reliable Service

The Electric and Gas Infrastructure and Operations Panels discuss the proposed investments necessary to ensure the continued delivery of reliable energy in upstate New York to meet customer needs. The panels also discuss the Company’s efforts to reduce capital costs from planning and budgeting through construction, as well as efforts to identify non-pipes alternatives.

Electric Grid Modernization. A significant number of our electric assets have been in service for 70 years or more (with some more than a century old) – and these assets must be upgraded to meet customers’ energy needs. To that end, our “Upstate Upgrade” initiative is a portfolio of more than 70 projects, ranging from large and complex line rebuilds to substation upgrades and technology deployments, that will improve the resiliency and reliability of the electric system and connect locally generated clean energy to communities across New York. Upgrading these assets is essential to continued reliable operation and resiliency of the system and is foundational to meeting CLCPA clean energy goals. The investments that make up this initiative will help the Company to: (i) meet increasing energy demands as customers use more electricity for their home, business, and transportation needs; (ii) safeguard the Company’s systems against extreme weather events; (iii) integrate renewable energy and storage; and (iv) provide modern energy infrastructure to spur economic development and growth in New York. This rate plan will also enable the full deployment of advanced metering across the service

territory, expand the use of system automation to enable remote monitoring and reduce interruptions, and enhance communication capabilities on the transmission and distribution systems.

Climate Resiliency. Weather events such as Winter Storm Elliott (December 2022), and the expectation that similar events will occur with increasing frequency, highlight the need for more reinforcement and resiliency projects to enable the continued provision of safe and reliable service to customers. Following a study last year that assessed climate vulnerabilities on the electric network, we are proposing targeted investments to enhance the resiliency of the system and harden the system against future weather events. Projects include line and substation upgrades that will strengthen transmission facilities and other assets to be able to withstand more intense weather.

Integrated Energy Planning (“IEP”). IEP considers critical interactions among the gas, electric, and customer energy systems as part of the planning processes to achieve long-term climate goals in the least-cost and most orderly way. IEP is necessary to promote the electrification of heat in a reliable and cost-effective manner and support non-pipes alternatives (“NPAs”). We are proposing data driven, no regrets investments and programs to expand IEP capabilities in support of electrification and NPAs, including a Customer Outreach Pilot that would provide customers in selected communities with materials explaining rebates for heat pumps and other equipment to encourage adoption.

Main Replacement and Leak Repairs. New York has among the highest concentrations of aging, leak-prone pipe (“LPP”) in the country. Our LPP retirement program prioritizes the highest-risk, highest-emitting pipeline segments to ensure we are directing resources to the projects that will provide maximum value when considering safety, reliability, and emissions. At the same time, we are also determined to help mitigate the impacts of our capital investments on customer bills by adopting new cost-effective strategies, while maintaining our commitment to safety and reliability. Specifically, we are proposing moderated programs that will effectively maintain the current pace of LPP retirements and enable continued progress through a more deliberate, targeted replacement strategy, as well as greater focus on reducing traditional investments through NPAs.

Priority #2: Meeting the Needs of Our Customers

Being at the heart of a clean, fair, and affordable energy future requires us to maintain our longstanding focus on our customers and do all we can to keep energy affordable. The initiatives we are proposing are designed to ensure energy affordability, improve the customer experience, and maintain high levels of customer satisfaction:

- ***Expanding Energy Affordability Programs.*** These rate filings will fund more than \$100 million in annual bill credits for low-income customers through the Company’s Energy Affordability Programs. Funding is critically important, as is identifying and enrolling eligible customers in available assistance programs. To address this challenge, the Company is proposing to expand resources and marketing efforts supporting these programs. Our Customer Advocates support the Company’s most vulnerable customers by connecting them with programs and services offered by the Company, government

agencies, and local services organizations. Additional Consumer Advocates are needed to support the growing number of customers who are having trouble paying their bills by enabling outreach to thousands of additional households.

- ***Focusing on Disadvantaged Communities.*** The Company has a geographically large and diverse service territory, which includes Disadvantaged Communities in densely populated urban areas such as Buffalo, Syracuse, and Albany, as well as in sparsely populated areas in the North Country, Mohawk Valley, and Central New York. The Company is proposing several initiatives designed to support affordability and benefit low-income customers and Disadvantaged Communities. These include additional personnel focused on serving the needs of the diverse groups of customers that comprise these customer segments and creating a new Indigenous Communities Liaison position.
- ***Eliminating Credit Card Fees.*** We are proposing to implement a “no-fee” model for residential customer payments using debit or credit cards, which will help meet customers’ expectations for improved electronic payment options, lower fees to customers, and avoid using customers’ public assistance benefits to pay administrative transaction costs.
- ***Improving the Customer Experience.*** The Company is proposing customer service enhancements responsive to evolving demands and heightened customer expectations through technology and process upgrades that will enable more self-service options. Among other things, the filings include additional resources to assist our commercial and industrial customers and developers with a wider range of specialized services such as upgrading a facility in connection with energy efficiency program incentives, pursuing electrification options, installing EV charging infrastructure, consideration of NPAs and NWAs, and choosing to enroll in one of the available electric and gas demand response programs.

Priority #3: Advancing the CLCPA

These rate cases represent an opportunity to advance and support the goals of the CLCPA. Specifically, the Climate Action Council’s *Scoping Plan* and the Commission’s orders on CLCPA implementation have helped focus our filings on improving core electric and gas service while also advancing well-supported public policies in the areas of emissions reduction, demand-side management, vehicle electrification, and fuel decarbonization.

In addition to aggressive energy efficiency programs that are aligned with the Commission’s New Efficiency New York Order, the Company’s filing includes proposals that support reliable electric service while advancing the decarbonization and renewable targets set forth in the CLCPA. The Company’s proposed electric investments support GHG emission reductions through the enablement of distributed energy resources (DERs), efficient utilization of network capacity to support further electrification of heating and transportation, and a program to reduce system-wide sulfur hexafluoride emissions. Specific projects include:

- ***Transmission Upgrades to Support Renewables.*** Our transmission investments are designed to address both the Company and State’s transmission needs for integrating

renewable generation and storage. These projects are designed to address transmission system limitations and alleviate the current curtailment of renewable generation. Achieving the CLCPA clean energy goals will require integrating many new renewable generation and storage projects with the transmission system, and certain areas of the system are not currently capable of delivering power from the generators to the load pockets. The electric filing also includes innovative projects like the Clean Resilience Link, which would leverage federal funding to upgrade an existing transmission line that crosses the New York-New England border and enable the efficient flow of energy across the region.

- ***Investments in Energy Storage and Non-wires Alternatives.*** Our investments in this area include the Gilmantown Energy Storage and Kenmore Station Energy Storage projects. The Gilmantown project will supply power to a substation to improve reliability and reduce outages experienced by customers in the area. The Kenmore Station Energy Storage project is an NWA that will reduce stress on the sub-transmission lines in the Kenmore area. The project will improve reliability and provide system-wide peak reductions, while avoiding investment in a more expensive wires solution.
- ***Electric Vehicle (EV) Highway.*** The EV Highway projects are proposed to support expected EV charging demand at highway service areas and truck stops along I-90 from Buffalo to Albany and will support New York’s transportation electrification goals and the emissions reduction goals of the CLCPA. There is an urgent need for anticipatory grid infrastructure upgrades to accommodate the projected growth in highway fast-charging load. The EV Highway projects will create over 100 Megawatts (MW) of capacity for light-duty, medium-duty, and heavy-duty fast-charging across approximately 300 miles of the I-90 corridor. Specific investments include mobile storage, new distribution substations, and other electric infrastructure to support additional charging of EVs at highway service plazas. In support of the State’s goals for electrifying school buses, the Company is proposing projects necessary to support increased demand, targeting locations where school districts have applied for federal grants to offset electrification costs.

For the gas business, the Company’s CLCPA-supporting initiatives include:

- ***Emissions Reductions and Reporting.*** In addition to providing safety and reliability benefits, the LPP removal and leak management programs will directly reduce emissions from the Company’s gas network. As part of our commitment to emissions reductions and improved system performance, we are also proposing to aggressively repair gas leaks, including a new program to identify and prioritize the repair of high-emitting leaks. These programs have reduced direct system emissions by more than 40 percent since 2013. Consistent with commitments made in the 2020 rate case, the Company’s capital investments are supported by GHG assessments for the proposed capital projects and programs, which will allow the Commission and other stakeholders to consider the emission impacts of these investments.
- ***Promoting Energy Efficiency and Demand Response.*** Energy efficiency investments provide immediate GHG reduction while empowering customers to take control over

energy consumption and reduce costs. These rate filings propose more than \$70 million in gas energy efficiency offerings over the term of the rate plan, as well as new programs that will reach more customers and increase participation in Disadvantaged Communities.

- **Targeted Non-Pipes Alternatives (NPAs).** The Company recognizes the importance of NPAs for addressing customers’ energy needs in ways that can reduce GHG emissions and enable lower overall capital investment in the gas network. The Company is proposing to build upon the NPA framework established in its 2020 rate case, adjusted for lessons learned through experience and research over the past few years, and to incorporate some of the NPA process improvements being adopted by National Grid’s downstate affiliates in their pending rate settlement. The filings include additional resources to promote a successful NPA program.
- **Continued Electrification Referrals and Geothermal Projects.** We propose to continue the existing program to refer prospective gas customers to electrification programs (*i.e.*, heat pump programs) to support increased adoption in our service territory. The Company is also advancing geothermal projects in Syracuse and Troy enabled by the Utility Thermal Energy Network and Jobs Act.² The Company is proposing a new Non-Pipeline Alternative Heat Pump Monthly Bill Credit program, which would provide an additional incentive for customers considering heat electrification as part of an NPA proposal to encourage greater adoption of electric heat pumps and increase the number of NPAs.
- **Gas Supply Projects.** The Company also proposes investments in renewable natural gas/biomethane interconnections to support the energy transition and reduce emissions. The Company’s four proposed interconnections would enable the injection of pipeline quality gas from diverse sources, including wastewater, food waste, and dairy manure.
- **Fleet Electrification.** The Company is targeting to electrify its light-duty vehicle fleet with a goal of full electrification by 2030. To that end, we are proposing to replace more than 250 internal combustion engine (“ICE”) vehicles with EVs, as well as capital investments in EV charging solutions. To meet New York State’s zero-emission vehicle and CLCPA emission reductions goals, the Company needs to begin replacing its internal combustion engine (ICE) fleet with EVs and ensure its facilities are equipped with charging capabilities. The Company’s EV proposal will also provide benefits to the Disadvantaged Communities where the Company operates by reducing local GHG emissions, improving air quality, and reducing noise pollution.

Proposed Term of Rate Plan

The Company’s filings propose new rates for the Rate Year only, but cost data for three additional years has been included to facilitate a potential multi-year settlement. While the Company has made every effort to moderate the proposals and resulting bill impacts presented in these filings, we are interested in exploring a multi-year rate plan that would allow the Company to take full advantage of efficiencies and manage bills over a four-year period. Among other

² Although the Company discusses its geothermal efforts as part of this filing, the specific projects are being separately considered by the Commission in the Utility Thermal Energy Network Proceeding (Case 22-M-0429).

opportunities, the Company is well-positioned to levelize rate increases, return customer credits, and use other rate mechanisms to achieve this outcome.

Information Accompanying this Rate Filing

The rate plans proposed in this filing require increases to the Company's charges for electric and gas service and changes to other provisions of the Company's tariffs. The Company provides revised tariff leaves and descriptions in the following attachments:

1. Revised tariff leaves listed in Attachment A, B, and C for P.S.C. No. 220 – Electric Service, P.S.C. No. 214 – Outdoor Lighting, and P.S.C. No. 219 – Gas Service, respectively, to be effective July 3, 2024. Although the revised tariff leaves are proposed to become effective July 3, 2024, Niagara Mohawk understands that after customary suspension, they will likely become effective May 1, 2025.³
2. The written testimony and exhibits of the Company's witnesses, as identified in Attachment D, in support of the proposed rate and tariff changes, which constitute the Company's direct case in support of its electric and gas filings.
3. A proposed notice of filings suitable for use under the State Administrative Procedure Act as set forth in Attachment E.
4. The Commission's Method of Service for providing consent to receive all orders in this proceeding by electronic mail as set forth in Attachment F.

Conclusion and Notice Requirements

National Grid's core responsibility is providing safe and reliable service to the millions of customers and communities who rely on us for life-sustaining energy, while building and maintaining the delivery networks that will support a sustainable energy future for the next generation of New Yorkers. The proposals in these rate cases will modernize the Company's infrastructure, reduce system emissions, improve safety, enhance and improve customer service, and deliver aggressive energy efficiency and other non-infrastructure programs. To achieve these critical priorities, it is necessary to update our delivery rates to ensure we meet the energy needs of millions of customers, maintain financial stability and enable access to debt capital that will fund needed investments. Recognizing the imperative to manage customers' bills, these filings balance the need for continued investment with the need to maintain affordability and protect our most vulnerable customers.

³ The revised tariff leaves are being transmitted electronically to the Commission contemporaneously with this filing. Copies are included with this transmittal letter. The Company hopes to achieve a resolution of these proceedings that will permit the revised rates to become effective April 1, 2025. However, the Company understands that the Commission has the discretion to suspend the revised tariff leaves through April 30, 2025.

The prepared written testimony and exhibits of the Company's witnesses, as identified in Attachment 2, constitute the Company's direct case in support of these rate filings. The testimony, exhibits, and tariff leaves submitted herein explain the need for the Company's proposed changes to rates and services. The Company respectfully requests that, in the absence of agreement of the parties, the Commission approve the changes to become effective on May 1, 2025. Newspaper publication will be made in accordance with §66(12) of the Public Service Law and 16 NYCRR §720-8.

The Company looks forward to working with Department of Public Service Staff and other interested parties to implement the new rate plans and work towards investments that will provide a safe, reliable, and sustainable energy future for customers.

Respectfully submitted,

/s/ Philip A. DeCicco

Philip A. DeCicco

Attachments

cc: New York State Department of State, Utility Intervention Unit

ATTACHMENT A

**List of Revised Tariff Leaves
Niagara Mohawk Power Corporation d/b/a National Grid
P.S.C. No. 220 – Electric Service Tariff**

The tariff leaves submitted for filing are as follows:

Niagara Mohawk Power Corporation d/b/a National Grid P.S.C. No. 220 – Electric Service Tariff

Sixteenth Revised Leaf No. 2
Twenty-Seventh Revised Leaf No. 3
Original Leaf No. 37.4
Second Revised Leaf No. 54
Seventh Revised Leaf No. 77
Seventh Revised Leaf No. 78
Seventh Revised Leaf No. 87
Sixth Revised Leaf No. 113
Fourth Revised Leaf No. 120.1
Fifth Revised Leaf No. 121
Second Revised Leaf No. 148.1
Fourteenth Revised Leaf No. 149
First Revised Leaf No. 149.1
First Revised Leaf No. 155
Original Leaf No. 156.1
First Revised Leaf No. 157
Fifth Revised Leaf No. 159
Third Revised Leaf No. 162
Third Revised Leaf No. 163
Sixth Revised Leaf No. 170
Fifth Revised Leaf No. 171
Fifth Revised Leaf No. 172
Fifth Revised Leaf No. 173
Third Revised Leaf No. 174
Third Revised Leaf No. 175
Fifteenth Revised Leaf No. 176
Sixteenth Revised Leaf No. 194.10
Fifteenth Revised Leaf No. 198
Third Revised Leaf No. 198.1
Ninth Revised Leaf No. 200
Third Revised Leaf No. 201
Ninth Revised Leaf No. 213
Third Revised Leaf No. 216
Eleventh Revised Leaf No. 218
Second Revised Leaf No. 219.2
Sixth Revised Leaf No. 220.0.1
Fourth Revised Leaf No. 220.0.2
Third Revised Leaf No. 220.2.1
Twelfth Revised Leaf No. 221
Eleventh Revised Leaf No. 221.1
Thirteenth Revised Leaf No. 222
Fourteenth Revised Leaf No. 222.1
Ninth Revised Leaf No. 222.2

Fifteenth Revised Leaf No. 223
Ninth Revised Leaf No. 224
Sixth Revised Leaf No. 226
Fourth Revised Leaf No. 226.1
Ninth Revised Leaf No. 229.1
Second Revised Leaf No. 229.5
Third Revised Leaf No. 233
Twelfth Revised Leaf No. 235
Third Revised Leaf No. 235.0.1
Original Leaf No. 235.0.2
Ninth Revised Leaf No. 237
Seventh Revised Leaf No. 240
Second Revised Leaf No. 263.1.1
Twentieth Revised Leaf No. 263.2
Ninth Revised Leaf No. 263.3
Sixth Revised Leaf No. 263.4
Seventeenth Revised Leaf No. 263.5
Fifth Revised Leaf No. 263.5.1
Fourth Revised Leaf No. 263.6
Fourth Revised Leaf No. 263.10
Eighth Revised Leaf No. 263.11
Ninth Revised Leaf No. 263.17
Eighth Revised Leaf No. 263.21
Fifth Revised Leaf No. 263.28
Second Revised Leaf No. 263.32
First Revised Leaf No. 263.38
First Revised Leaf No. 263.39
First Revised Leaf No. 263.40
First Revised Leaf No. 263.41
First Revised Leaf No. 263.42
First Revised Leaf No. 263.43
Sixth Revised Leaf No. 272
Fourth Revised Leaf No. 273
Fourth Revised Leaf No. 275
Fourth Revised Leaf No. 276
Fourth Revised Leaf No. 295
Seventh Revised Leaf No. 325
Seventh Revised Leaf No. 332
Seventh Revised Leaf No. 342
Twenty-Fourth Revised Leaf No. 349
Twenty-First Revised Leaf No. 350
Second Revised Leaf No. 351
First Revised Leaf No. 352
First Revised Leaf No. 354
Twentieth Revised Leaf No. 355
Thirty-Fifth Revised No. 359
First Revised No. 360

First Revised Leaf No. 366
Twenty-Fourth Revised Leaf No. 370
Thirty-Third Revised Leaf No. 371
Sixth Revised Leaf No. 372
Eleventh Revised Leaf No. 375
Tenth Revised Leaf No. 376
Fifth Revised Leaf No. 377.1
Third Revised Leaf No. 377.2
Twenty-Seventh Revised Leaf No. 379
Twenty-First Revised Leaf No. 381
Second Revised Leaf No. 382
Sixth Revised Leaf No. 389
Third Revised Leaf No. 389.1
Twenty-Fourth Revised Leaf No. 391
Twenty-First Revised Leaf No. 392
Ninth Revised Leaf No. 401
Thirteenth Revised Leaf No. 407
Seventeenth Revised Leaf No. 408.4
Seventh Revised Leaf No. 408.6
Second Revised Leaf No. 410
First Revised Leaf No. 412.1
Fourth Revised Leaf No. 415
Sixteenth Revised Leaf No. 418
Fourth Revised Leaf No. 418.1
First Revised Leaf No. 419.1
Third Revised Leaf No. 420
Twenty-Fifth Revised Leaf No. 421
First Revised Leaf No. 421.1
Twenty-Fifth Revised Leaf No. 422
Twenty-Sixth Revised Leaf No. 423
Twenty-Sixth Revised Leaf No. 424
Twentieth Revised Leaf No. 425
Fourth Revised Leaf No. 428
Second Revised Leaf No. 429
Twentieth Revised Leaf No. 432
Sixteenth Revised Leaf No. 438
Third Revised Leaf No. 439
First Revised Leaf No. 439.1

Effective: July 3, 2024

ATTACHMENT B

**List of Revised Tariff Leaves
Niagara Mohawk Power Corporation d/b/a National Grid
P.S.C. No. 214 – Outdoor Lighting Tariff**

The tariff leaves submitted for filing are as follows:

Niagara Mohawk Power Corporation d/b/a National Grid P.S.C. No. 214 – Outdoor Lighting Tariff

Seventh Revised Leaf No. 3
Fifth Revised Leaf No. 4
Ninth Revised Leaf No. 5
Second Revised Leaf No. 5.1
Sixth Revised Leaf No. 6
Thirty-Sixth Revised Leaf No. 7
Eleventh Revised Leaf No. 8
Twentieth Revised Leaf No. 9
Original Leaf No. 9.0.1
Eighth Revised Leaf No. 9.1
Nineteenth Revised Leaf No. 9.2
Fourth Revised Leaf No. 9.2.1
Sixth Revised Leaf No. 9.3
Fifth Revised Leaf No. 9.4
Seventh Revised Leaf No. 9.5
Third Revised Leaf No. 9.5.1
Ninth Revised Leaf No. 9.6
Second Revised Leaf No. 9.6.1
First Revised Leaf No. 9.6.2
Sixth Revised Leaf No. 9.7
Second Revised Leaf No. 9.8
Seventeenth Revised Leaf No. 10
Thirteenth Revised Leaf No. 11
Ninth Revised Leaf No. 12
Seventh Revised Leaf No. 13
Eighth Revised Leaf No. 14
Twenty-Fourth Revised Leaf No. 14.1
Twenty-Third Revised Leaf No. 15
Third Revised Leaf No. 15.1
Twentieth Revised Leaf No. 16
Twenty-First Revised Leaf No. 17
Twentieth Revised Leaf No. 18
Forty-Seventh Revised Leaf No. 19
Seventeenth Revised Leaf No. 19.1
Seventh Revised Leaf No. 20
Eleventh Revised Leaf No. 23
Ninth Revised Leaf No. 26
Eleventh Revised Leaf No. 27
Fifteenth Revised Leaf No. 28
Twenty-Fourth Revised Leaf No. 30
Twenty-Eighth Revised Leaf No. 31
First Revised Leaf No. 31.1
Twenty-Sixth Revised Leaf No. 32
Twenty-Fourth Revised Leaf No. 33
Twenty-Third Revised Leaf No. 33.1

Twenty-Third Revised Leaf No. 34
Twenty-Second Revised Leaf No. 35
Twenty-Fourth Revised Leaf No. 36
Twenty-Fourth Revised Leaf No. 37
Twenty-Third Revised Leaf No. 38
Seventeenth Revised Leaf No. 38.1
Twentieth Revised Leaf No. 39
Fourteenth Revised Leaf No. 39.1
Twenty-Fourth Revised Leaf No. 40
Twenty-Third Revised Leaf No. 41
Eighteenth Revised Leaf No. 42
Third Revised Leaf No. 43.1
Twelfth Revised Leaf No. 47
Third Revised Leaf No. 47.1
Ninth Revised Leaf No. 48
Tenth Revised Leaf No. 50
Twelfth Revised Leaf No. 51
Eleventh Revised Leaf No. 52
Twelfth Revised Leaf No. 53
Twelfth Revised Leaf No. 54
Third Revised Leaf No. 54.1
Twenty-Fifth Revised Leaf No. 55
Sixteenth Revised Leaf No. 56
Ninth Revised Leaf No. 58
Second Revised Leaf No. 58.1
Original Leaf No. 58.2
Thirty-Third Revised Leaf No. 59
Twelfth Revised Leaf No. 61
Twelfth Revised Leaf No. 62
Fourth Revised Leaf No. 62.1
Ninth Revised Leaf No. 63
Forty-First Revised Leaf No. 73
Tenth Revised Leaf No. 80
Sixth Revised Leaf No. 81
Forty-Ninth Revised Leaf No. 82
Twentieth Revised Leaf No. 83
Fourteenth Revised Leaf No. 84
Fourteenth Revised Leaf No. 85
First Revised Leaf No. 85.1
Thirteenth Revised Leaf No. 86
Tenth Revised Leaf No. 87
Fifth Revised Leaf No. 88
Fifth Revised Leaf No. 89
Sixth Revised Leaf No. 90
Fifth Revised Leaf No. 91

Effective: July 3, 2024

ATTACHMENT C

**List of Revised Tariff Leaves
Niagara Mohawk Power Corporation d/b/a National Grid
P.S.C. No. 219 – Gas Service Tariff**

The tariff leaves submitted for filing are as follows:

Niagara Mohawk Power Corporation d/b/a National Grid P.S.C. No. 219 – Gas Service Tariff

Seventeenth Revised Leaf No. 2
Second Revised Leaf No. 2.1
First Revised Leaf No. 11.1
Thirteenth Revised Leaf No. 13
Second Revised Leaf No. 28
Third Revised Leaf No. 29
Fourth Revised Leaf No. 36
Eighth Revised Leaf No. 69
Fourth Revised Leaf No. 69.1
Seventh Revised Leaf No. 72
Eleventh Revised Leaf No. 90
Fourteenth Revised Leaf No. 94
Fourth Revised Leaf No. 99
Tenth Revised Leaf No. 100
Seventh Revised Leaf No. 104
Eleventh Revised Leaf No. 105
Eleventh Revised Leaf No. 106.1
Ninth Revised Leaf No. 106.2
Tenth Revised Leaf No. 107
Twelfth Revised Leaf No. 111.1.1
Eleventh Revised Leaf No. 111.2
Eleventh Revised Leaf No. 112
Tenth Revised Leaf No. 113
Ninth Revised Leaf No. 114
Ninth Revised Leaf No. 116
Original Leaf No. 116.1
Tenth Revised Leaf No. 117
Second Revised Leaf No. 118
Tenth Revised Leaf No. 122
Twelfth Revised Leaf No. 122.1
Seventeenth Revised Leaf No. 122.2
Ninth Revised Leaf No. 122.3
Eighteenth Revised Leaf No. 122.4
Eleventh Revised Leaf No. 122.4.1
Seventeenth Revised Leaf No. 122.5
Eleventh Revised Leaf No. 122.5.1
Sixth Revised Leaf No. 122.5.2
Thirteenth Revised Leaf No. 122.6
Seventh Revised Leaf No. 122.6.1
Thirteenth Revised Leaf No. 122.7
Second Revised Leaf No. 122.7.1
Third Revised Leaf No. 122.14
Second Revised Leaf No. 122.14.1
Tenth Revised Leaf No. 122.15
First Revised Leaf No. 122.17
First Revised Leaf No. 122.18
Fourth Revised Leaf No. 122.19

Original Leaf No. 122.34
Twenty-Eighth Revised Leaf No. 124
Fourth Revised Leaf No. 127
Fifth Revised Leaf No. 127.1
Twenty-First Revised Leaf No. 129
Thirty-Fourth Revised Leaf No. 141
Eighth Revised Leaf No. 143
Fifth Revised Leaf No. 144
Eighteenth Revised Leaf No. 145
Thirty-First Revised Leaf No. 150
Sixth Revised Leaf No. 152
Eighth Revised Leaf No. 153
Twenty-Second Revised Leaf No. 154
Eighth Revised Leaf No. 157
Fourth Revised Leaf No. 162
Second Revised Leaf No. 163
Third Revised Leaf No. 164
Seventh Revised Leaf No. 165
Tenth Revised Leaf No. 167
Sixth Revised Leaf No. 173
Eleventh Revised Leaf No. 177
First Revised Leaf No. 177.1
Ninth Revised Leaf No. 178
Ninth Revised Leaf No. 187
Thirteenth Revised Leaf No. 189
Eighteenth Revised Leaf No. 215.1
Third Revised Leaf No. 215.3
Sixteenth Revised Leaf No. 216
Third Revised Leaf No. 222
Original Leaf No. 222.1
Fourth Revised Leaf No. 229
Fifth Revised Leaf No. 231
Fifth Revised Leaf No. 232
Fifth Revised Leaf No. 234
Fourth Revised Leaf No. 235

Effective: July 3, 2024

ATTACHMENT D

**Summary of Written Testimony
and
Exhibits Supporting Filing**

Niagara Mohawk Power Corporation d/b/a National Grid
2024 Electric and Gas Rate Case
Summary of Written Testimony and Exhibits Supporting Filing

Witness	Title	Purpose of Testimony
Patric R. O'Brien	Vice President, Regulation and Pricing	Management Audit
Joshua C. Nowak	Vice President, Concentric Energy Advisors, Inc.	Return on Equity ("ROE")
Charles F. Willard	Director, New York Environmental	Site Investigation and Remediation ("SIR") Program
Ned W. Allis	Vice President, Gannett Fleming Valuation and Rate Consultants, LLC	Depreciation
Capital Structure Panel		
Matthew DiGregorio	Director, Corporate Finance, U.S. Treasury	Cost of capital and capital structure
Keith Magee	Director, Regulatory Strategy and Analysis	
Climate Leadership and Community Protection Act ("CLCPA") Panel		
Karsten A. Barde	Director, U.S. Policy and Regulatory Strategy	Rate case alignment with the requirements of the CLCPA, greenhouse gas emission reductions, support for Disadvantaged Communities, and Earnings Adjustment Mechanisms ("EAMs")
Patricia J. Dorsch	Director, New York Environmental Sustainability	
Meghan McGuinness	Director, U.S. Regulatory Strategy	
Gideon Banner	Principal Analyst for Strategy and Policy, Distributed Energy Resources	
Customer Panel		
Chris McCusker	Vice President, Energy Efficiency and Clean Transportation Programs	Enhancing the customer experience, uncollectible expense, customer service quality metrics, low-income programs, call center, energy efficiency, and credit card fees
Carlos Nouel	Vice President, Customer Innovation and Development	
Vishal Ahirrao	Director, Customer Energy Integration	
Frederick Daum	Vice President, Contact Centers	
Matthew Foran	Interim Vice President, New York Account Management	

Witness	Title	Purpose of Testimony
Arthur Hamlin	Director, Economic Development	
Jeffrey Koenig	Director, Credit and Collections and Payment Processing	
Electric Infrastructure and Operations Panel (“EIOP”)		
Matthew T. Barnett	Vice President, New York Electric Maintenance and Construction	Capital infrastructure and electric system operations, and facility investments
Charles Kyle Bentley	Lead Director, New York Electric Maintenance and Construction	
Domenico Fuda	Director, Distribution Planning and Asset Management	
Michael V. Falls	Director, Transmission Planning, Asset Management, and Option Solutions Engineering	
Mark W. Thompson	Vice President, Digital Solutions, New York Electric	
Electric Rate Design Panel		
Kellie I. Smith	Director, New York Pricing	Rate design issues
Carol Teixeira	Manager, New York Electric Pricing	
Michael P. Duschen	Lead Analyst, New York Electric Pricing	
Howard S. Gorman	President, HSG Group, Inc.	
Electric Load Forecast Panel		
Shira Horowitz	Director, Load Forecasting and Analytics	Electric sales forecast, historic and forecast electric deliveries and customer counts
Jingrui Xie	Manager, Electric Load Forecasting	
David Reaves	Lead Data Scientist, Electric Load Forecasting	
Electric Supply Panel		
Christopher L. Meyer	Director, Wholesale Electric Supply	Electric supply procurement and hedging policies

Witness	Title	Purpose of Testimony
Jason M. Eno	Manager, New York Wholesale Electric Supply	
Gas Rate Design Panel		
Kellie I. Smith	Director, New York Pricing	Rate design issues
Dawn M. Herrity	Principal Program Manager, New York Gas Pricing	
Melissa M. Barnes	Manager, New York Gas Pricing	
Howard S. Gorman	President, HSG Group, Inc.	
Gas Load Forecasting Panel		
Shira Horowitz	Director, Load Forecasting and Analytics	Gas sales forecast, historic and forecast gas demand and customer counts
Theodore E. Poe, Jr.	Manager, Gas Load Forecasting	
Nathan Peabody	Senior Analyst, Gas Load Forecasting	
Gas Supply Panel		
Elizabeth D. Arangio	Director, Gas Supply Planning	Gas supply procurement
Megan Borst	Manager, Gas Supply Planning	
Samara Jaffe	Director, Gas Contracts, Compliance, and Hedging	
John M. Protano	Manager, Origination and Price Volatility Management	
Gas Safety Panel		
Ross W. Turrini	Chief Operating Officer, New York Gas	Gas safety programs and performance metrics
Timothy S. Graham	Vice President, New York Gas Field Operations	
Richard Delaney	Vice President, Gas Pipeline Safety and Compliance	
Gas Infrastructure and Operations Panel (“GIOP”)		
Ross W. Turrini	Chief Operating Officer, New York Gas	Capital infrastructure and gas system operations, and facility investments
Timothy S. Graham	Vice President, New York Gas Field Operations	

Witness	Title	Purpose of Testimony
Patricia McVeigh	Director, Gas Investment Planning and Rate Case Support	
Richard Delaney	Vice President, Gas Pipeline Safety and Compliance	
Pradheep Kileti	Director, Future of Heat Engineering and R&D Program Management	
Brian Varga	Vice President, New York Gas Asset Management and Engineering	
Human Resources Panel		
Maureen P. Heaphy	Vice President, Global Benefits	Employee compensation and benefits
Roberta M. Burcham	Manager, Compensation	
Information Technology and Digital Panel (“IT&D”)		
Erik Barthel	Chief Information and Digital Officer, New York and New England	IT&D investments and initiatives
Dennis McDermitt	Vice President, Cybersecurity and U.S. Chief Information Security Officer	
Najat Coye	Director, IT&D U.S. Regulatory	
Christophe Chirol	Lead Analyst, New York Revenue Requirements	
Revenue Requirements Panel		
Patric R. O’Brien	Vice President, New York Regulation and Pricing	Revenue requirements
Paula Leaverton	Director, U.S. Property Tax	
Mark W. Stiner	Director, New York Revenue Requirements	
John E. O’Shaughnessy	Director, New York Revenue Requirements	
Samuel F. Dunton	Director, Finance Business Partnering for Performance and Regulatory	

Witness	Title	Purpose of Testimony
Shared Services Panel		
Srividya Madhusudhan	Vice President, Head of Operations Support, New York	Common electric and gas capital investments, including facilities, aviation, and fleet electrification
Kevin Proulx	Vice President, New York Logistics	
Therese Sullivan	Director, Property Strategy, New York	
Niagara Mohawk Tariffs		
Electric Service Tariff	P.S.C. No. 220 – Electric Service	
Outdoor Lighting Tariff	P.S.C. No. 214 – Outdoor Lighting	
Gas Service Tariff	P.S.C. No. 219 – Gas Service	

ATTACHMENT E

**Notices of Proposed Rulemaking Under the
State Administrative Procedure Act**

Notice of Proposed Rule Making (Rate Making only)

Public Service Commission
(SUBMITTING AGENCY)

NOTE: Typing and submission instructions are at the end of this form. Please be sure to COMPLETE ALL ITEMS. Incomplete forms will be cause for rejection of this notice change in text.

1. Proposed action:

The Commission is considering proposed revised tariff leaves filed by Niagara Mohawk Power Corporation d/b/a National Grid ("Niagara Mohawk") that would increase its electric and gas base delivery revenues by \$525 million and \$148 million, respectively.

2. Statutory authority under which the rule is proposed:

Public Service Law Sec. 66.

3. Subject of the rule:

Tariff filings requesting electric and gas base delivery rate changes and approval of tariff amendments and accounting changes.

4. Purpose of the rule:

Determine whether Niagara Mohawks' tariff filing to increase electric and gas bas revenues should be approved.

5. Public hearings (check box and complete as applicable):

A public hearing is not scheduled. (*SKIP TO ITEM 8*)

A public hearing is required by law and is scheduled below. (**Note:** first hearing date must be at least 60 days after publication of this notice unless a different time is specified in statute.)

A public hearing is not required by law, but is scheduled below.

Time:

Date:

Location:

Time:	Date:	Location:
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

6. Interpreter services (check only if a public hearing is scheduled):

Interpreter services will be made available to hearing impaired persons, at no charge, upon written request to the agency contact designated in this notice.

7. Accessibility (check appropriate box only if a public hearing is scheduled):

- All public hearings have been scheduled at places reasonably accessible to persons with a mobility impairment.
- Attached is a list of public hearing locations that are **not** reasonably accessible to persons with a mobility impairment. An explanation is submitted regarding diligent efforts made to provide accessible hearing sites.



8. *Terms of rule* (SELECT ONE SECTION):

- A. The full text of the rule is attached because it does not exceed 2,000 words.
- B. A summary of the rule is attached because the full text of the rule exceeds 2,000 words. Web posting of full text of such rule is not required [SAPA §202(1)(a)].
- C. Pursuant to SAPA §202(7)(b), the agency elects to print a description of the subject, purpose and substance of the rule as defined in SAPA §102(2)(a)(ii) [Rate Making]. Web posting of full text of such rule is not required [SAPA §202(1)(a)].

9. *The text of the rule and any required statements and analyses may be obtained from:*

Agency contact The Hon. Michelle Phillips
 Agency Name Central Operations, Public Service Commission
 Office address 2 Empire State Plaza, Albany, NY 12223-1350
 Telephone _____ E-mail: secretary@dps.ny.gov

10. *Submit data, views or arguments to* (complete only if different than previously named agency contact):

Agency contact The Hon. Michelle Phillips
 Agency name New York State Public Service Commission
 Office address 3 Empire State Plaza
Albany, NY 12223-1350
 Telephone (518) 474-6530 E-mail: secretary@dps.ny.gov

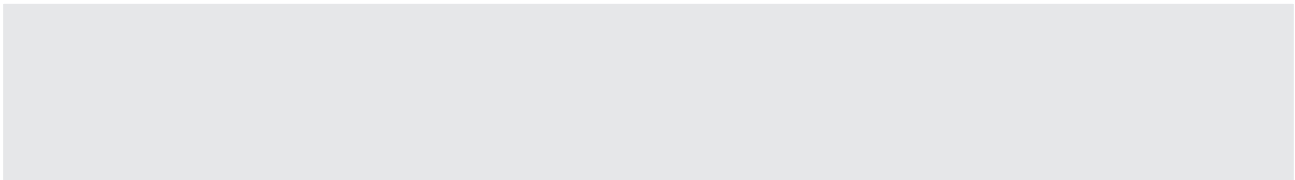
11. *Public comment will be received until:*

- 60 days after publication of this notice (MINIMUM public comment period).
- 5 days after the last scheduled public hearing required by statute (MINIMUM, with required hearing).
- Other: (specify) _____.

12. A prior emergency rule making for this action was previously published in the _____ issue of the *Register*, I.D. No. _____.

13. Additional matter required by statute:

- Yes (include below material required by statute).



- No additional material required by statute.

14. Regulatory Agenda [See SAPA §202-d(1)]:

This action was a Regulatory Agenda item in the following issue of the *State Register*: _____ .

This action was not under consideration at the time this agency's Regulatory Agenda was submitted for publication in the *Register*.

Not applicable.

15. Regulatory Impact Statement, Regulatory Flexibility Analysis, Rural Area Flexibility Analysis and Job Impact Statement

Statements and analyses are not submitted with this notice because the proposed rule is within the definition contained in section 102(2)(a)(ii) of the State Administrative Procedure Act.

16. PUBLIC SERVICE COMMISSION ONLY:

SAPA NO. _____

AGENCY CERTIFICATION (To be completed by the person who PREPARED the notice.)

I have reviewed this form and the information submitted with it. The information contained in this notice is correct to the best of my knowledge.

I have reviewed Article 2 of SAPA and Parts 260 through 263 of 19 NYCRR, and I hereby certify that this notice complies with all applicable provisions.

Name _____ Signature _____

Address _____

Telephone _____ E-Mail _____

Date _____

Please read before submitting this notice:

1. Except for this form itself, all text must be typed in the prescribed format as described in the Department of State's Register procedures manual, *Rule Making in New York*.
2. Rule making notices, with any necessary attachments (in MS Word), should be e-filed via the Department of State website.

ATTACHMENT F

Method of Service Forms Consenting to Electronic Service of Documents

Method of Service

Name:	
Company/Organization:	
Mailing Address:	
Company/Organization you represent, if different from above:	
E-Mail Address:	
Case/Matter Number:	

Request Type

- New Petition/Application - I am filing a new petition/application which requires action by the Commission.
- Service List request – I request to be on the service list for the matter/case.
- Other – Type of request _____

Service Information (Select one option below)

- Electronic Service and Waiver – Consent in Case/Matter Identified Above
As duly authorized by the Participant identified above that I represent, I knowingly waive on behalf of that Participant any right under PSL §23(1) to be served personally or by regular mail with Commission orders that affect that Participant and will receive all orders by electronic means in the above Case. If participating individually, I knowingly waive any PSL §23(1) right to service of orders personally or by regular mail and will receive all orders by electronic means in the above Case. This consent remains in effect until revoked.

- Electronic Service and Waiver – Global Consent in All Cases/Matters
As duly authorized by the Participant identified above that I represent, I knowingly waive on behalf of that Participant any right under PSL §23(1) to be served personally or by regular mail with Commission orders that affect that Participant and will receive all orders by electronic means in all Cases where it participates. If participating individually, I knowingly waive any PSL §23(1) right to service of orders personally or by regular mail, and will receive all orders by electronic means in all Cases where I participate. This consent remains in effect until revoked.
Note: Due to the design of our system, this consent attaches to the individual named here and not to the party that may be represented by that individual. Therefore, individuals who represent multiple parties should be aware that a global consent will affect all matters in which they appear on behalf of any party.

- I do **not** consent to receive orders electronically

E-Mail Preference (Select one option below) – For Case specific request

E-Mail notifications include a link to filed and issued documents.

- Notify me of Commission Issued Documents in this case/matter.
- Notify me of Both Commission Issued Documents and Filings in this case/matter
- Do not send me any notifications of filed or issued documents

Submitted by:	Date:
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