

New York State Electric & Gas

and

Rochester Gas and Electric

2024-2025 Winter Supply Plan

Case 24-M-0205

July 15, 2024

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NYSEG/RG&E 2024-2025 Winter Supply Plan

Overview

The 2024-2025 Winter Supply Plan for New York State Electric & Gas Corporation (NYSEG) and Rochester Gas and Electric Corporation (RG&E) (collectively the Companies) described herein, was prepared and submitted for filing as requested by Mr. Davide Maiorello's (Department of Public Service Staff (DPS)) letter dated May 15, 2024.

NYSEG and RG&E's 2024-2025 Winter Supply Plan submission is designed as a series of responses to the list of questions submitted by DPS Staff.

Please note that certain responses will be submitted requesting Trade Secret protection pursuant to the Commission's Codes, Rules and Regulations, 16 NYCRR Section 6-1.3 and Public Officers Law ("POL") Section 87.2 (c) and (d).

Please do not hesitate to contact Patrick Fox by email at PWFox@nyseg.com, or by telephone at 607.237.8522 if further information is required.

Data Request 1 – System Design Day Capacity – Table 1

System design day capacity capability by service area (or gate when indicated) and peak design day demand by service area (or gate when indicated). Please include all capacity volumes, including all recallable capacity assets that are available or needed for peak design day and specify the volumes supporting sales, transportation customers and retail access capacity release. Include last year's 2023-2024 Table 1 (final update) data for purposes of comparison. Include and show all on system peak and base supply assets such as LNG, CNG, RNG, and demand response type resources being used together with the total capacity capability showing that it meets or exceeds the design peak day demand value provided. Identify any projected capacity assets that are not yet finalized but will be prior to the upcoming winter heating season, including both a description and projected completion date.

Response

Table 1 contains a summary of all capacity volumes that supported sales and transportation customers during the 2023-2024 Winter, as well as the capacity volumes that are planned for the 2024-2025 Winter for NYSEG Total, NYSEG DTI (EGTS)[1], NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen/Walden and RG&E.

[1] *NYSEG and RG&E continue to use the Dominion and/or DTI name only in reference to Pooling Areas in each OPCO's service territory. Any other references to the pipeline have been changed to Eastern Gas Transmission and Storage or EGTS.*

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
TOTAL			
Flowing Supplies	230,619	229,619	
Storage Withdrawals	205,560	205,560	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	1,050	1,050	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [2]:			
Mandatory Retail Access Capacity	63,500	63,500	
Grandfathered Retail Access Capacity	6,406	6,406	
Other Customer Capacity	0	0	
Peak Day Totals	507,135	506,135	457,060
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)
** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:
[1] From Table 2 data.
[2] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: EGTS
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
EGTS			
Flowing Supplies	96,740	96,740	
Storage Withdrawals	127,302	127,302	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	1,050	1,050	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [2]:			
Mandatory Retail Access Capacity	53,717	53,717	
Grandfathered Retail Access Capacity	3,520	3,520	
Other Customer Capacity	0	0	
Peak Day Totals	282,329	282,329	258,310
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)
** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:
[1] From Table 2 data.
[2] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: TCO
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
TCO			
Flowing Supplies	58,294	58,294	
Storage Withdrawals	68,514	68,514	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [2]:			
Mandatory Retail Access Capacity	6,503	6,503	
Grandfathered Retail Access Capacity	83	83	
Other Customer Capacity	0	0	
Peak Day Totals	133,394	133,394	122,989
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

[1] From Table 2 data.

[2] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Lockport (TGP)
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
LOCKPORT (TGP)			
Flowing Supplies	41,906	40,906	
Storage Withdrawals	9,744	9,744	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [2]:			
Mandatory Retail Access Capacity	3,280	3,280	
Grandfathered Retail Access Capacity	2,803	2,803	
Other Customer Capacity	0	0	
Peak Day Totals	57,733	56,733	47,985
	Peak Day Design Temp:		-9

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

[1] From Table 2 data.

[2] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: North Country
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
NORTH COUNTRY			
Flowing Supplies	13,400	13,400	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [2]:			
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Other Customer Capacity	0	0	
Peak Day Totals	13,400	13,400	12,838
	Peak Day Design Temp:		-20

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

[1] From Table 2 data.

[2] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Brewster
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
BREWSTER			
Flowing Supplies [2]	7,329	7,329	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]**:**			
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Other Customer Capacity	0	0	
Peak Day Totals	7,329	7,329	4,663
	Peak Day Design Temp:		-6

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

[1] From Table 2 data.

[2] Flowing Supplies reflect portion of AGT contract volume allocated to serve Brewster.

[3] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Goshen/Walden
Submission Date: July 15, 2024
Version #: 1

New York State Electric & Gas	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
GOSHEN / WALDEN			
Flowing Supplies [2]	12,950	12,950	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Energy Efficiency / Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]**:**			
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Other Customer Capacity	0	0	
Peak Day Totals	12,950	12,950	10,275
	Peak Day Design Temp:		-6

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

[1] From Table 2 data.

[2] Flowing Supplies reflect Central Hudson capacity to serve Goshen and Walden, and the portion of AGT capacity to serve Goshen.

[3] Marketer Provided Supplies updated for winter 2024-25 will be included in the September update.

Table 1: Total System Firm Peak Day Capacity (DT)

Company: RG&E
Service Area: RG&E TOTAL
Submission Date: July 15, 2024
Version #: 1

Rochester Gas & Electric	2023-24 Winter	2024-25 Winter	Design Peak Day Demand [1]
RG&E TOTAL			
Flowing Supplies	226,100	226,100	
Storage Withdrawals	179,000	179,000	
Winter Peaking Service * [2]	40,000	40,000	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Energy Efficiency/Demand Response	0	0	
Cogen Supplies	0	0	
Local Production	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies [3]:			
Mandatory Retail Access Capacity	73,618	73,618	
Grandfathered Retail Access Capacity	11,104	11,104	
Other Customer Capacity	0	0	
Peak Day Totals	529,822	529,822	506,391
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)
** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:
[1] From Table 2 data.
[2] Firm citygate supply for Winter of 2024-2025.
[3] Marketer Provided Supplies updated for Winter 2024-25 will be included in the September update.

Data Request 2 – Estimated Design Requirements – Table 2

Estimated annual, winter season, and daily requirements by service area (or gate when indicated) for last year and the next five years, using design weather. Include a description of the design weather criteria and explain any changes from the previous year. The 2023-2024 actual data experienced last year is to be included for purposes of comparison. Also include any and all service areas (or gate stations when indicated) where moratoriums have been put into place or have the possibility of being instituted in the next five years. Identify where any curtailments to firm customers may occur.

Response

Estimated Requirements (Design Weather): Table 2 provides the actual, winter season, and peak daily requirements for last year and the estimated next five (5) years, using design weather for NYSEG Total, NYSEG DTI (EGTS), NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen/Walden and RG&E. Design weather criteria is also provided for each of these areas. The Design Winter Heating Degree Day value is typically no less than 10% colder than Normal Winter Criteria. The methodology for determining the design weather criteria is further described in the response to Data Request 4.

Currently, NYSEG's service territory has a formal moratorium in place only in the Town of Lansing, Tompkins County. RG&E has no formal moratoriums in place in any location. Pursuant to Case 20-G-0131, Proceeding on Motion of the Commission in Regard to Gas Planning Procedures ("March 2020 Order"), issued and effective March 19, 2020, by the New York Public Service Commission ("Commission"), NYSEG and RG&E have identified locations within their service territories vulnerable to supply constraints. These vulnerable locations can be caused by a shortage of pipeline capacity serving the area, distribution infrastructure issues, or a combination of these and other factors. These areas do not have formal moratoriums; however, the companies continue to refine their modeling efforts, monitor developments associated with identified vulnerabilities, and actively pursue on-going issue resolution.

No firm customers were curtailed in the 2023-2024 heating season. NYSEG and RG&E do not anticipate any issues that would prevent them from serving firm load in the upcoming heating season apart from a force majeure event.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	29,915	25,346	31,209	31,133	31,028	30,958	30,931
Transportation	28,067	23,367	27,444	27,128	26,826	26,482	26,097
Non-Firm							
Sales	329	398	375	374	372	375	378
Transportation	1,897	1,571	1,933	1,926	1,919	1,908	1,892
Total	60,207	50,681	60,961	60,561	60,145	59,723	59,298
Winter Season							
Firm							
Sales	23,089	18,461	23,615	23,521	23,392	23,307	23,329
Transportation	15,611	13,040	15,388	15,224	15,081	14,890	14,595
Non-Firm							
Sales	204	273	250	249	247	249	252
Transportation	969	848	1,004	1,003	1,003	1,000	989
Total	39,873	32,622	40,257	39,997	39,723	39,445	39,165
Peak Day - Dth [1]							
Firm							
Sales	320,389	280,190	320,494	319,800	318,845	318,210	317,970
Transportation	136,555	71,291	136,566	133,696	130,947	127,825	124,316
Total	456,944	351,481	457,060	453,496	449,792	446,035	442,286

Design Weather is defined as [3]:

Annual	7,600	HDD
Winter	6,484	HDD
Peak Day	75	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG EGTS
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	16,752	14,194	17,477	17,434	17,375	17,336	17,322
Transportation	15,717	13,085	15,369	15,192	15,023	14,830	14,614
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	303	251	309	308	307	305	303
Total	32,773	27,530	33,155	32,934	32,705	32,472	32,238
Winter Season							
Firm							
Sales	12,931	10,338	13,224	13,172	13,099	13,052	13,064
Transportation	8,743	7,302	8,617	8,525	8,445	8,338	8,173
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	184	161	191	191	191	190	188
Total	21,858	17,802	22,032	21,888	21,735	21,580	21,426
Peak Day - Dth [1]							
Firm							
Sales	160,566	171,712	160,671	160,283	159,748	159,392	159,258
Transportation	97,628	17,617	97,639	96,031	94,492	92,744	90,779
Total	258,194	189,329	258,310	256,314	254,240	252,136	250,037

Design Weather is defined as [3]:

Annual	7,600	HDD
Winter	6,484	HDD
Peak Day	75	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG TCO
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	7,180	6,083	7,490	7,472	7,447	7,430	7,424
Transportation	6,736	5,608	6,587	6,511	6,438	6,356	6,263
Non-Firm							
Sales	59	72	67	67	67	67	68
Transportation	759	628	773	771	768	763	757
Total	14,733	12,391	14,917	14,820	14,719	14,616	14,512
Winter Season							
Firm							
Sales	5,541	4,431	5,668	5,645	5,614	5,594	5,599
Transportation	3,747	3,130	3,693	3,654	3,619	3,574	3,503
Non-Firm							
Sales	37	49	45	45	45	45	45
Transportation	320	280	331	331	331	330	326
Total	9,644	7,889	9,737	9,675	9,609	9,542	9,473
Peak Day - Dth [1]							
Firm							
Sales	98,327	67,213	98,327	98,160	97,931	97,779	97,721
Transportation	24,662	28,392	24,662	23,973	23,313	22,564	21,722
Total	122,989	95,605	122,989	122,133	121,244	120,343	119,443

Design Weather is defined as [3]:

Annual	7,600	HDD
Winter	6,484	HDD
Peak Day	75	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG LOCKPORT (TGP)
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	3,889	3,295	4,057	4,047	4,034	4,025	4,021
Transportation	3,649	3,038	3,568	3,527	3,487	3,443	3,393
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	398	330	406	405	403	401	397
Total	7,936	6,662	8,031	7,978	7,924	7,868	7,811
Winter Season							
Firm							
Sales	3,002	2,400	3,070	3,058	3,041	3,030	3,033
Transportation	2,029	1,695	2,000	1,979	1,960	1,936	1,897
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	232	204	241	241	241	240	237
Total	5,264	4,299	5,311	5,278	5,242	5,205	5,167
Peak Day - Dth [1]							
Firm							
Sales	39,945	26,459	39,945	39,855	39,731	39,648	39,617
Transportation	8,040	17,893	8,040	7,667	7,310	6,904	6,448
Total	47,985	44,352	47,985	47,522	47,041	46,552	46,065

Design Weather is defined as [3]:

Annual	6,939	HDD
Winter	6,045	HDD
Peak Day	74	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Buffalo (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG NORTH COUNTRY
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	1,197	1,014	1,248	1,245	1,241	1,238	1,237
Transportation	1,123	935	1,098	1,085	1,073	1,059	1,044
Non-Firm							
Sales	250	303	285	284	283	285	287
Transportation	417	346	425	424	422	420	416
Total	2,987	2,597	3,056	3,038	3,019	3,002	2,985
Winter Season							
Firm							
Sales	924	738	945	941	936	932	933
Transportation	624	522	616	609	603	596	584
Non-Firm							
Sales	153	204	188	187	186	187	189
Transportation	232	204	241	241	241	240	237
Total	1,933	1,668	1,989	1,977	1,965	1,954	1,943
Peak Day - Dth [1]							
Firm							
Sales	8,440	5,959	8,440	8,412	8,374	8,349	8,339
Transportation	4,398	5,572	4,398	4,283	4,173	4,048	3,908
Total	12,838	11,531	12,838	12,695	12,547	12,397	12,247

Design Weather is defined as [3]:

Annual	7,659 HDD
Winter	6,685 HDD
Peak Day	85 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Burlington (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG BREWSTER
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	299	253	312	311	310	310	309
Transportation	281	234	274	271	268	265	261
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	580	487	587	583	579	574	570
Winter Season							
Firm							
Sales	231	185	236	235	234	233	233
Transportation	156	130	154	152	151	149	146
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	387	315	390	387	385	382	379
Peak Day - Dth [1]							
Firm							
Sales	3,863	2,853	3,863	3,856	3,846	3,840	3,838
Transportation	800	840	800	772	745	714	679
Total	4,663	3,693	4,663	4,628	4,591	4,554	4,517

Design Weather is defined as [3]:

Annual	6,481 HDD
Winter	5,724 HDD
Peak Day	71 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG GOSHEN/WALDEN
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	598	507	624	623	621	619	619
Transportation	561	467	549	543	537	530	522
Non-Firm							
Sales	20	24	22	22	22	22	23
Transportation	19	16	19	19	19	19	19
Total	1,198	1,014	1,215	1,207	1,199	1,190	1,182
Winter Season							
Firm							
Sales	462	369	472	470	468	466	467
Transportation	312	261	308	304	302	298	292
Non-Firm							
Sales	14	19	18	17	17	17	18
Transportation	0	0	0	0	0	0	0
Total	788	649	798	792	787	781	776
Peak Day - Dth [1]							
Firm							
Sales	9,248	5,994	9,248	9,234	9,215	9,202	9,197
Transportation	1,027	977	1,027	970	915	853	783
Total	10,275	6,971	10,275	10,204	10,130	10,055	9,980

Design Weather is defined as [3]:

Annual	6,481 HDD
Winter	5,724 HDD
Peak Day	71 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average.

Table 2: Estimated Requirements (MDT) – Design Weather

Company: RG&E
Service Area: RG&E
Submission Date: July 15, 2024
Version #: 1

RG&E	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	33,968	26,770	33,807	33,756	33,775	33,785	33,784
Transportation	30,577	25,192	28,876	28,747	28,765	28,798	28,832
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	64,546	51,962	62,684	62,503	62,540	62,582	62,616
Winter Season							
Firm							
Sales	27,337	19,744	27,045	26,987	27,008	27,025	27,036
Transportation	18,003	14,154	16,566	16,484	16,489	16,501	16,515
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	45,340	33,897	43,611	43,471	43,497	43,527	43,551
Peak Day - Dth [1]							
Firm							
Sales	339,722	254,348	339,272	338,809	338,983	339,067	339,065
Transportation	166,669	123,538	167,119	165,939	166,105	166,403	166,713
Total	506,391	377,886	506,391	504,748	505,088	505,470	505,778

[3] **Design Weather is defined as:**

Annual	6,899	HDD
Winter	5,994	HDD
Peak Day	75	HDD

[1] Forecasted Peak Day Demand is in Dths/day.
[2] RG&EAnnual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Rochester (RG&E) weather point; 30 year average.

Data Request 3 – Estimated Normal Requirements – Table 3

Same information as requested in (2) but using normal weather. Include a description of the normal weather criteria and the calculation methodology. The 2023-2024 data submitted last year is to be included for purposes of comparison. Please Note: if Table 3 is based on a sales forecast using anything less than 30 years of weather data, no part of Table 3 may be used to develop any part of Table 2.

Response

Estimated Requirements (Normal Weather): Table 3 provides the estimated annual, winter season, and peak daily requirements for last year and the next five (5) years, using 30-year normal weather for NYSEG Total, NYSEG DTI (EGTS), NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen/Walden and RG&E. Normal weather criteria by area is also included.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	27,195	25,346	28,372	28,302	28,207	28,143	28,119
Transportation	25,515	23,367	24,949	24,662	24,387	24,075	23,724
Non-Firm							
Sales	299	398	341	340	338	340	344
Transportation	1,724	1,571	1,757	1,751	1,745	1,735	1,720
Total	54,734	50,681	55,419	55,056	54,677	54,294	53,907
Winter Season							
Firm							
Sales	20,990	18,461	21,468	21,383	21,265	21,188	21,208
Transportation	14,192	13,040	13,989	13,840	13,710	13,536	13,269
Non-Firm							
Sales	185	273	228	227	225	226	229
Transportation	881	848	913	912	912	909	899
Total	36,248	32,622	36,597	36,361	36,112	35,859	35,604
Peak Day - Dth [1]							
Firm							
Sales	320,389	280,190	320,494	319,800	318,845	318,210	317,970
Transportation	136,555	71,291	136,566	133,696	130,947	127,825	124,316
Total	456,944	351,481	457,060	453,496	449,792	446,035	442,286

Normal Weather is defined as[3]:

Annual	6,908	HDD
Winter	5,894	HDD
Peak Day	75	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG EGTS
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	15,229	14,194	15,888	15,849	15,796	15,760	15,747
Transportation	14,289	13,085	13,971	13,811	13,657	13,482	13,285
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	276	251	281	280	279	278	275
Total	29,794	27,530	30,141	29,940	29,732	29,520	29,308
Winter Season							
Firm							
Sales	11,754	10,338	12,022	11,975	11,909	11,865	11,877
Transportation	7,948	7,302	7,834	7,750	7,677	7,580	7,430
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	167	161	173	173	173	173	171
Total	19,869	17,802	20,029	19,898	19,759	19,618	19,478
Peak Day - Dth [1]							
Firm							
Sales	160,566	171,712	160,671	160,283	159,748	159,392	159,258
Transportation	97,628	17,617	97,639	96,031	94,492	92,744	90,779
Total	258,194	189,329	258,310	256,314	254,240	252,136	250,037

Normal Weather is defined as[3]:

Annual	6,908 HDD
Winter	5,894 HDD
Peak Day	75 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG TCO
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	6,527	6,083	6,809	6,793	6,770	6,754	6,749
Transportation	6,124	5,608	5,988	5,919	5,853	5,778	5,694
Non-Firm							
Sales	54	72	61	61	61	61	62
Transportation	690	628	703	700	698	694	688
Total	13,394	12,391	13,561	13,473	13,381	13,288	13,192
Winter Season							
Firm							
Sales	5,038	4,431	5,152	5,132	5,104	5,085	5,090
Transportation	3,406	3,130	3,357	3,322	3,290	3,249	3,184
Non-Firm							
Sales	33	49	41	41	40	41	41
Transportation	291	280	301	301	301	300	297
Total	8,768	7,889	8,852	8,795	8,735	8,674	8,612
Peak Day - Dth [1]							
Firm							
Sales	98,327	67,213	98,327	98,160	97,931	97,779	97,721
Transportation	24,662	28,392	24,662	23,973	23,313	22,564	21,722
Total	122,989	95,605	122,989	122,133	121,244	120,343	119,443

Normal Weather is defined as[3]:

Annual	6,908 HDD
Winter	5,894 HDD
Peak Day	75 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Binghamton (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG LOCKPORT (TGP)
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	3,535	3,295	3,688	3,679	3,667	3,659	3,656
Transportation	3,317	3,038	3,243	3,206	3,170	3,130	3,084
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	362	330	369	368	366	364	361
Total	7,214	6,662	7,301	7,253	7,204	7,153	7,101
Winter Season							
Firm							
Sales	2,729	2,400	2,791	2,780	2,764	2,754	2,757
Transportation	1,845	1,695	1,819	1,799	1,782	1,760	1,725
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	211	204	219	219	219	218	216
Total	4,785	4,299	4,828	4,798	4,766	4,732	4,698
Peak Day - Dth [1]							
Firm							
Sales	39,945	26,459	39,945	39,855	39,731	39,648	39,617
Transportation	8,040	17,893	8,040	7,667	7,310	6,904	6,448
Total	47,985	44,352	47,985	47,522	47,041	46,552	46,065

Normal Weather is defined as[3]:

Annual	6,309	HDD
Winter	5,496	HDD
Peak Day	74	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Buffalo (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG NORTH COUNTRY
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	1,088	1,014	1,135	1,132	1,128	1,126	1,125
Transportation	1,021	935	998	986	975	963	949
Non-Firm							
Sales	228	303	259	258	257	259	261
Transportation	379	346	387	385	384	382	378
Total	2,715	2,597	2,778	2,762	2,745	2,729	2,713
Winter Season							
Firm							
Sales	840	738	859	855	851	848	848
Transportation	568	522	560	554	548	541	531
Non-Firm							
Sales	139	204	171	170	169	170	172
Transportation	211	204	219	219	219	218	216
Total	1,758	1,668	1,808	1,798	1,787	1,777	1,766
Peak Day - Dth [1]							
Firm							
Sales	8,440	5,959	8,440	8,412	8,374	8,349	8,339
Transportation	4,398	5,572	4,398	4,283	4,173	4,048	3,908
Total	12,838	11,531	12,838	12,695	12,547	12,397	12,247

Normal Weather is defined as[3]:

Annual	6,961 HDD
Winter	6,076 HDD
Peak Day	85 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Burlington (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG BREWSTER
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	272	253	284	283	282	281	281
Transportation	255	234	249	247	244	241	237
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	527	487	533	530	526	522	518
Winter Season							
Firm							
Sales	210	185	215	214	213	212	212
Transportation	142	130	140	138	137	135	133
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	352	315	355	352	350	347	345
Peak Day - Dth [1]							
Firm							
Sales	3,863	2,853	3,863	3,856	3,846	3,840	3,838
Transportation	800	840	800	772	745	714	679
Total	4,663	3,693	4,663	4,628	4,591	4,554	4,517

Normal Weather is defined as[3]:

Annual	5,892 HDD
Winter	5,204 HDD
Peak Day	71 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG GOSHEN/WALDEN
Submission Date: July 15, 2024
Version #: 1

NYSEG	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	544	507	567	566	564	563	562
Transportation	510	467	499	493	488	481	474
Non-Firm							
Sales	18	24	20	20	20	20	21
Transportation	17	16	18	18	17	17	17
Total	1,089	1,014	1,104	1,097	1,090	1,082	1,075
Winter Season							
Firm							
Sales	420	369	429	428	425	424	424
Transportation	284	261	280	277	274	271	265
Non-Firm							
Sales	13	19	16	16	16	16	16
Transportation	0	0	0	0	0	0	0
Total	717	649	725	720	715	710	706
Peak Day - Dth [1]							
Firm							
Sales	9,248	5,994	9,248	9,234	9,215	9,202	9,197
Transportation	1,027	977	1,027	970	915	853	783
Total	10,275	6,971	10,275	10,204	10,130	10,055	9,980

Normal Weather is defined as[3]:

Annual	5,892 HDD
Winter	5,204 HDD
Peak Day	71 HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] NYSEG Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: RG&E
Service Area: RG&E
Submission Date: July 15, 2024
Version #: 1

RG&E	2023-24 Forecast	2023-24 Actual [2]	2024-25	2025-26	2026-27	2027-28	2028-29
Annual							
Firm							
Sales	30,880	26,770	30,734	30,688	30,705	30,713	30,713
Transportation	27,798	25,192	26,251	26,133	26,150	26,180	26,211
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	58,678	51,962	56,985	56,821	56,855	56,893	56,924
Winter Season							
Firm							
Sales	24,852	19,744	24,586	24,534	24,553	24,569	24,578
Transportation	16,366	14,154	15,060	14,986	14,990	15,001	15,013
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	41,218	33,897	39,647	39,519	39,543	39,570	39,592
Peak Day - Dth [1]							
Firm							
Sales	339,722	254,348	339,272	338,809	338,983	339,067	339,065
Transportation	166,669	123,538	167,119	165,939	166,105	166,403	166,713
Total	506,391	377,886	506,391	504,748	505,088	505,470	505,778

[3] Normal Weather is defined as:

Annual	6,273	HDD
Winter	5,450	HDD
Peak Day	75	HDD

[1] Forecasted Firm Peak Day Demand is in Dths/day.
[2] RG&E Annual Actual throughput (June 2023 - May 2024).
[3] Weather criterion for Rochester (RG&E) weather point; 30 year average.

Data Request 4 – Heating Degree Day Source / Uses

Identify your source for heating degree day (HDD) data, including the specific weather data points used for forecasting purposes. Describe your source and/or your calculation of design day and design winter data (i.e. calculated from normal usage or an actual historic period). Identify the time periods used to develop usage per HDD for both design and normal usage and explain the frequency of updates. If 30 years of data is not being used for design, please explain why. Please explain how usage per HDD for the peak period is calculated and verified. Please include any other variables such as wind speed that are used to calculate design day load and how they are used in the calculation.

Response

Heating Degree Data ("HDD")

NYSEG provides gas service to customers geographically dispersed across upstate New York. RG&E, on the other hand, provides gas service to customers primarily in the metro-Rochester area. As such, weather patterns may be substantially different for each of these areas, thereby requiring the need for weather data from several locations.

NYSEG and RG&E receive HDD data from a service arrangement with DTN, LLC. The arrangement provides hourly and daily weather data actuals and forecasts for the following locations:

- Albany County Airport (KALB)
- Binghamton/Broome County Regional Airport (KBGM)
- Buffalo International Airport (KBUF)
- Burlington International Airport (KBVT)
- Poughkeepsie (Dutchess County Airport) (KPOU)
- Rochester Airport (KROC)
- Elmira (KELM)
- Niagara Falls (KIAG)
- Penn Yan (KPEO)

For the sales forecast, weather data is obtained from the National Weather Service. The points used are Albany, Burlington, Buffalo, and Binghamton. The normal HDD is derived from these points and are weighted based on the customer usage in those areas compared to NYSEG's total load. The usage per HDD is developed by subtracting the baseload (average of the two smallest monthly billed usage in the last 12 months) from the actual deliveries divided by the actual HDD.

NYSEG's design weather pattern for planning utilizes weather data for seven (7) NYSEG load areas, while RG&E is a single load area. The companies also utilize GasDay, which is a vendor-supplied software application that delivers customized forecasting models trained on historical weather data. GasDay is used for near-term forecasting, up to seven (7) days in advance.

NYSEG uses the above locations as follows:

1. KBGM weather information for the market areas served by the Eastern Gas Transmission and Columbia Pipeline systems.
2. KBUF weather information for the Lockport area.
3. KBVT weather information is used for daily forecasts for the Plattsburgh and Lowville market areas.
4. KPOU weather information is used for the Brewster and Goshen/Walden market areas.

RG&E uses the KROC weather information for the Rochester market area.

For near term forecasting, GasDay is configured to utilize multiple weather stations that closely represent the geographic areas of NYSEG and RG&E's respective service territories. The following list illustrates the various weather stations for NYSEG and RG&E:

1. KALB (11.31%), KBGM (26.29%), KPEO (36.29%) and KELM (26.12%) weather information for the market areas served by the Eastern Gas Transmission Pipeline system.
2. KALB (7.98%), KBGM (50.49%) and KELM (41.53%) weather information for the market areas served by the Columbia Pipeline system.
3. KROC (42.90%) and KIAG (57.10%) weather information for the Lockport area.
4. KBVT (100%) weather information is used for daily forecasts for the Plattsburgh market area.
5. KPOU (100%) weather information is used for the Brewster market area.
6. KALB (8.86%) and KPOU (91.14%) for the Goshen/Walden market area.
7. KALB (39.87%), KBVT (41.43%) and KPOU (18.71%) weather information is used for daily forecasts for the Lowville market area.
8. KROC (80.17%), KIAG (5.85%) and KPEO (13.98%) weather information for the Rochester market area.

The design day HDDs remain unchanged from last year. These are summarized as follows:

Area	Design HDD
Binghamton / Olean	75
Brewster	71
Goshen	71
Lockport	74
Lowville	85
Plattsburgh	85
Rochester	75

NYSEG and RG&E incorporated a dynamic analysis several years ago, utilizing the most recent 40-years of data, to develop updated design and normal usage degree day calculations. The weather

analysis is updated annually to capture the most recent 40 years of data. From a planning perspective, there is no consensus within the natural gas industry as to the single best approach for a design day HDD standard. Gas Supply has discussed this subject with Marquette Energy Analytics as well; Marquette's recommendation, based on their research, is that design day HDDs should not be lowered based on the latest 40 years of data. Based on the various industry approaches and Marquette's recommendation, NYSEG and RG&E plan to continue to increase the design day HDD should a new peak HDD occur in the current 40-year weather data; however, the design day HDD is not anticipated to be lowered. The Design Winter utilizes the rule curve methodology to establish the highest set of HDDs over the previous 40-year period.

Usage per HDD Verification

The Companies conduct a variety of analyses to validate the design day demand levels for each operating area.

1. The design day analysis evaluation is based upon regression analyses performed on actual winter month usage and associated HDDs to determine base and heat factors and an associated design day estimate.

2. Extrapolation utilizing the heat factor from (1) above multiplied by (design day HDD minus the actual HDD) plus the actual metered load. Then the average, maximum and minimum extrapolated design loads are reviewed.

3. Utilization of total non-daily metered winter heat load divided by the total HDDs multiplied by design day HDD + baseload factor provides a third design day demand estimate.

The Companies presently do not use any other variables such as wind speed to calculate design day load, however, this practice may change in the future.

Data Request 5 – Sales Forecasting

Given that New York State has now eliminated the use of fossil fuels in most new construction applications beginning in 2026, explain how that has been incorporated into the sales forecast for winters 2025, and beyond. Please also provide any forecast increase in demand anticipated leading up to the prohibition, in terms of incremental load.

Response

NYSEG and RG&E use economic indicators from Moody's to develop sales forecasts. The sales forecasts do not include any special adjustments for winters 2025 and beyond nor increase in demand prior.

Data Request 6 – Load Forecasting Tools

Describe the load forecasting tools used to develop the above forecasts. Indicate how all the natural gas efficiency programs, Demand Response Programs, Microgrids, and Non-Pipe Alternatives (NPA) conducted by your company, contractors or the New York State Energy Research and Development Authority (NYSERDA) have been incorporated into these forecasts and your capacity planning. Provide a summary of the projected energy savings and the actual savings realized to date. How are these savings translated into the normal usage projection in Table 3? Also please indicate how your compliance with the requirements of New Efficiency New York (Case 18-M-0084) will affect the peak day load for each year in your five-year forecast. If your customer metering systems have recently switched over to AMI please indicate when the above forecasts will include the use of such customer data and what forecasting tool modifications are being considered for new forecasts going forward.

Response

NYSEG and RG&E use a combination of tools to produce the gas load forecast. Econometric models (developed in MetrixND) are used to forecast the revenue class deliveries. Out of model adjustments are sometimes made based on market research and feedback from our Key Account Managers. Instances of these adjustments are rare, however, and would only occur for a significant change in deliveries not captured in the models such as an existing large customer that leaves the system or a new franchise being established. For this current forecast, an out of model adjustment was made to capture the impact of a customer's significant load increase to the Rochester distribution system.

Impacts of NYSEG and RG&E active energy System Energy Efficiency Plans (SEEP) programs are imbedded in the historical data used in the modeling process. For this forecast, out of model adjustments were made for future incremental SEEP targets reduced per the table below:

	Annual SEEP Target		Cumulative SEEP Target	
Year	NYSEG	RG&E	NYSEG	RG&E
2024	363,997	232,617		
2025	311,067	240,599	675,064	473,216

The actual achieved dekatherm savings reported for 2023 for all gas efficiency programs is 436,685 MMBTU for NYSEG and 298,107 MMBTU for RG&E. There are currently no existing Demand Response Programs that impact Table 3 forecasts.

On June 21, 2021, the New York Public Service Commission issued the "One Commissioner Order Approving Petition for Non-Pipe Alternative Projects, with Modifications" in Case Number 17-G-0432 which approved NYSEG's previously filed petition for NPA solutions to be implemented in the Lansing, NY area. The NPA solutions that will be implemented in Lansing will have a total load reduction impact of 54.6 mcfh.

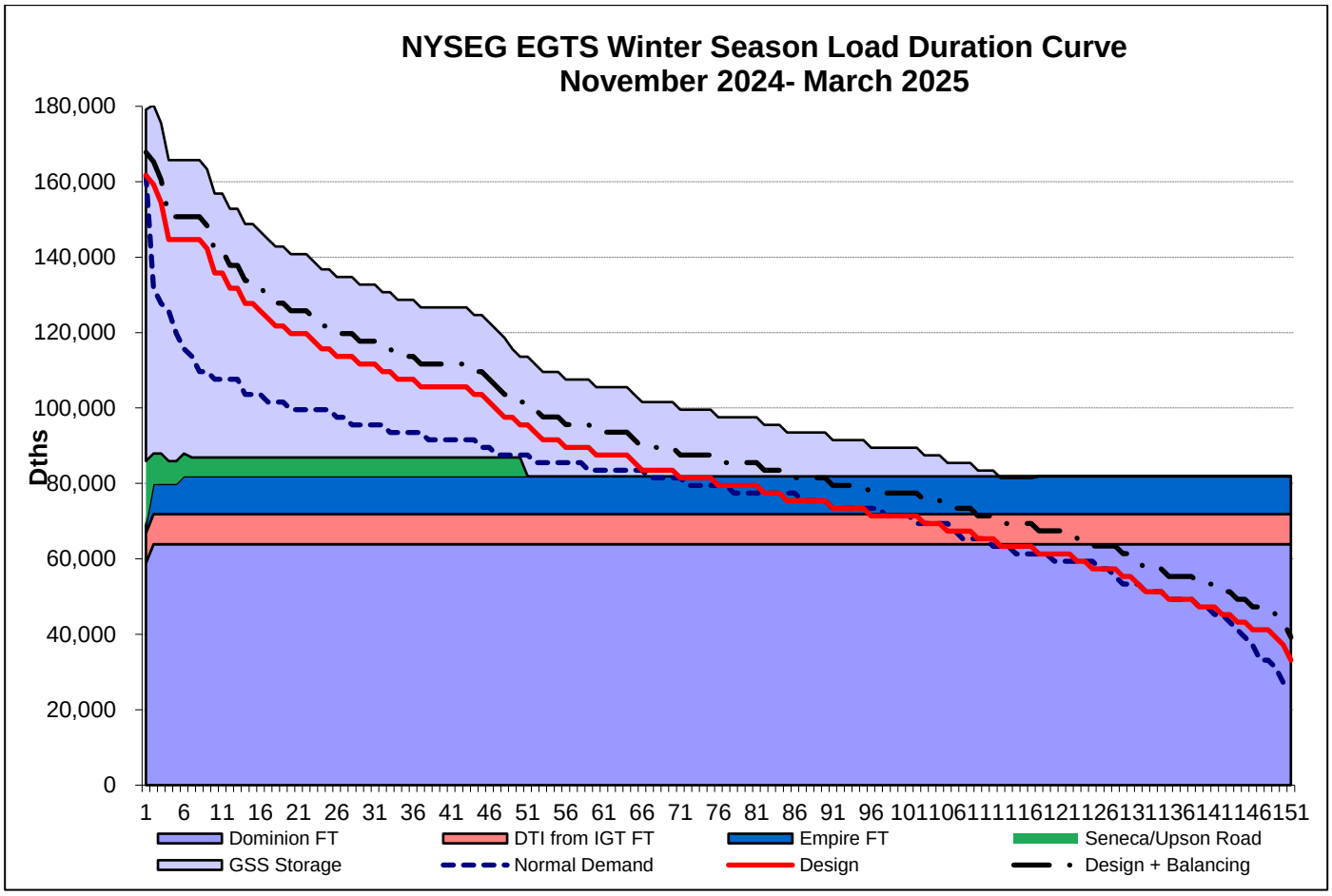
Data Request 7 – Load Duration Curves

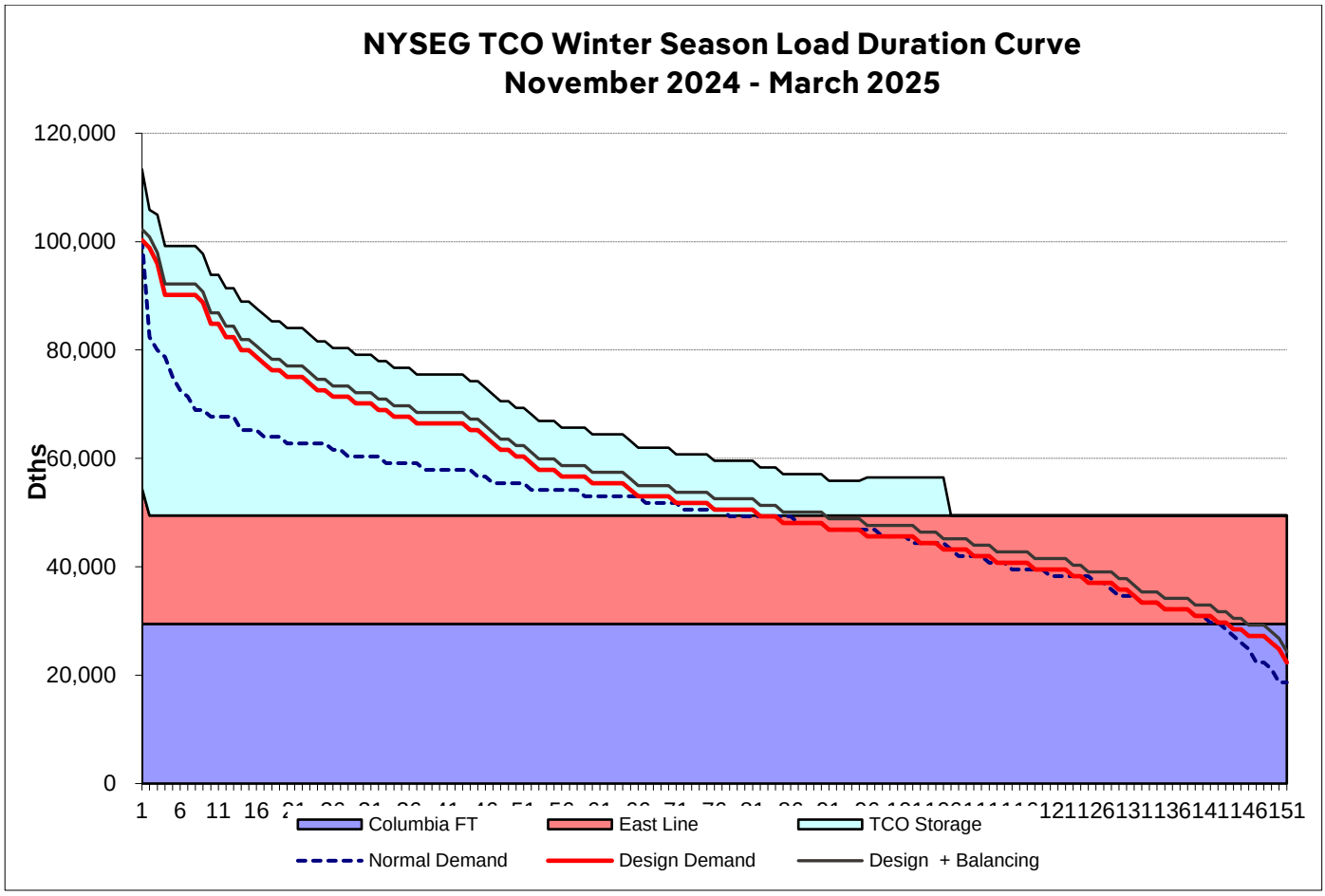
A winter season load duration curve for 2024-2025 send out year that shows how supplies can meet a severe winter season and peak design day. This should be provided for each service area (or gate when indicated). Include all data in an unlocked digital Microsoft Excel file.

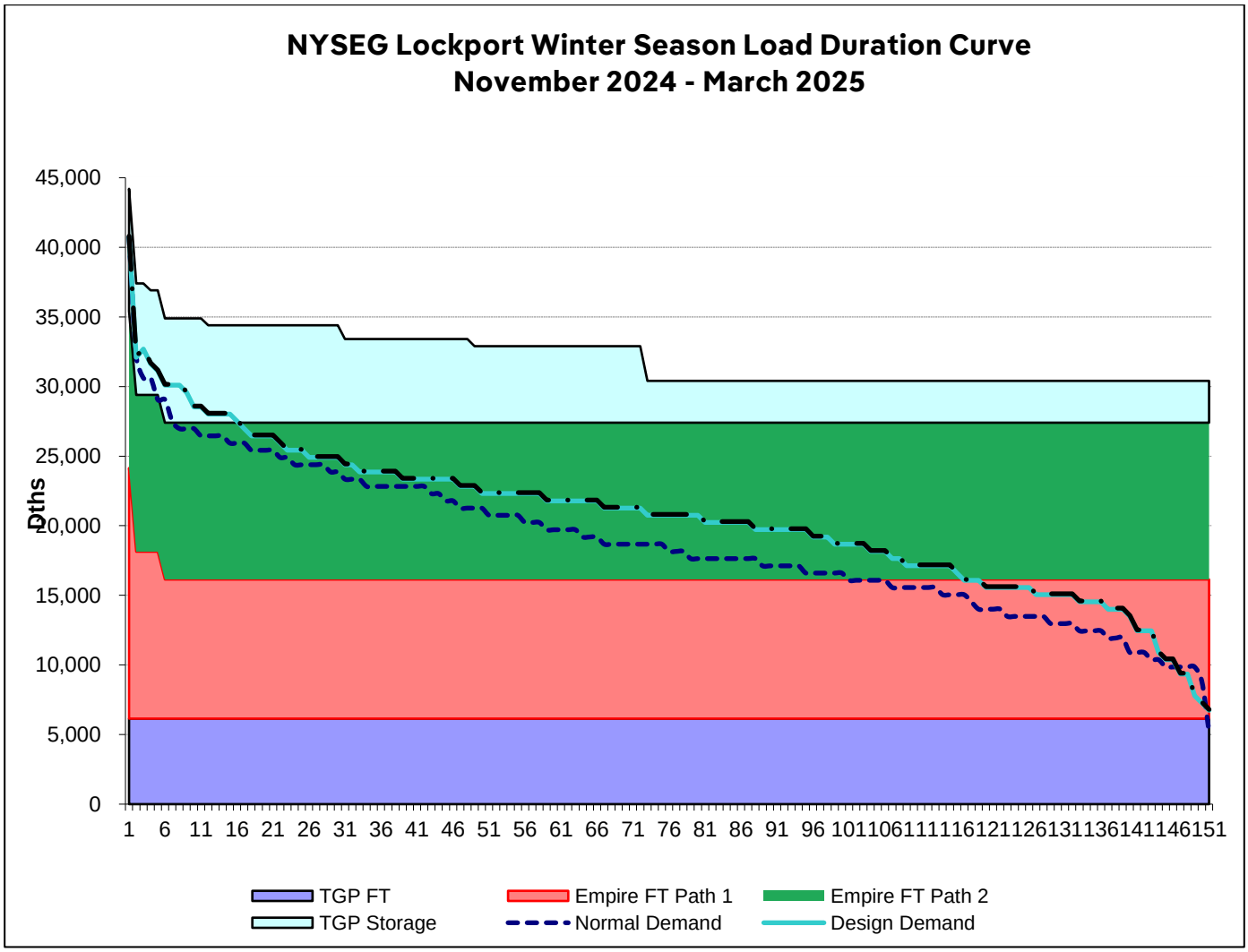
Response

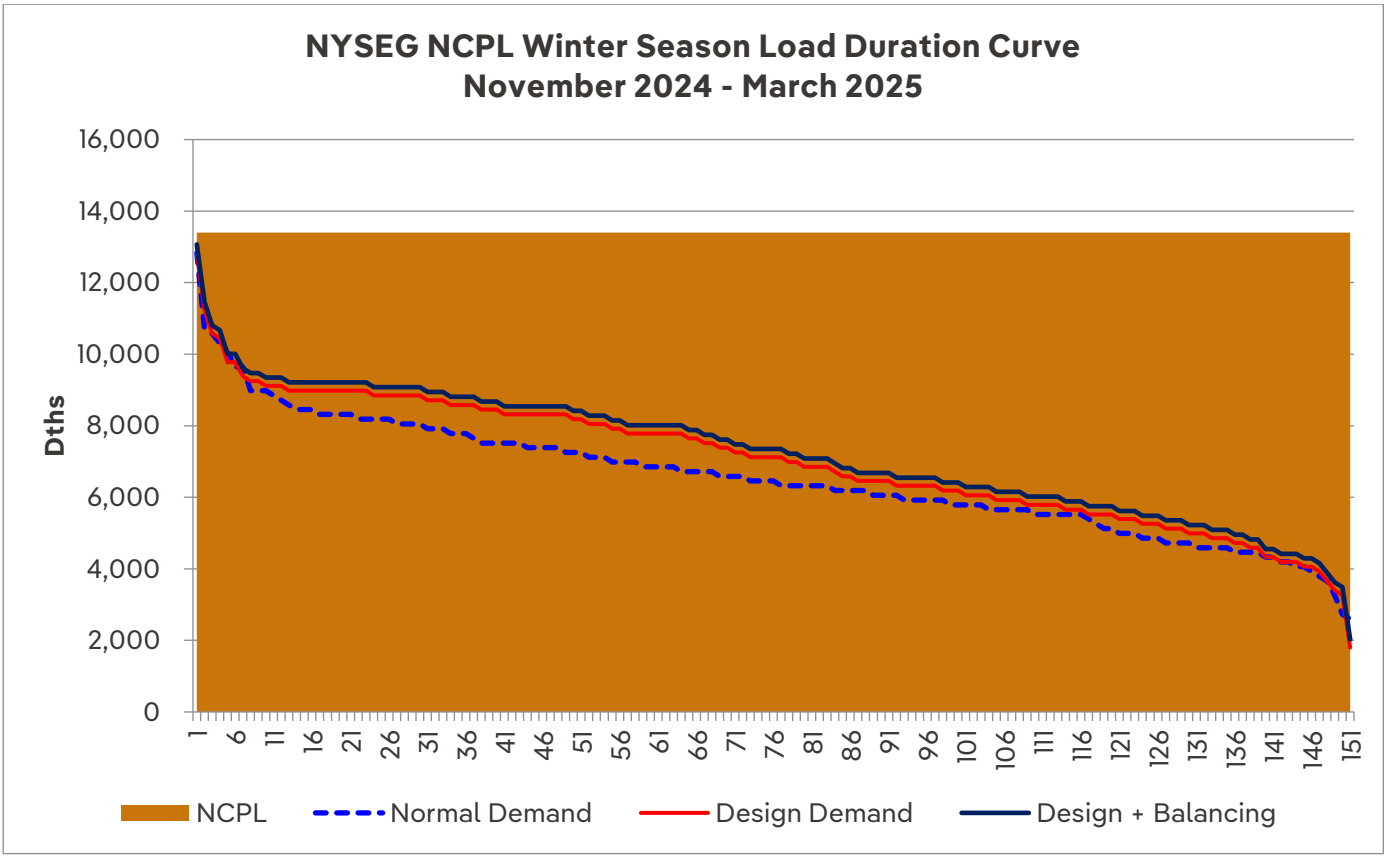
Please find the following 2024-2025 winter season load duration curves for the following service areas on the next six (6) pages:

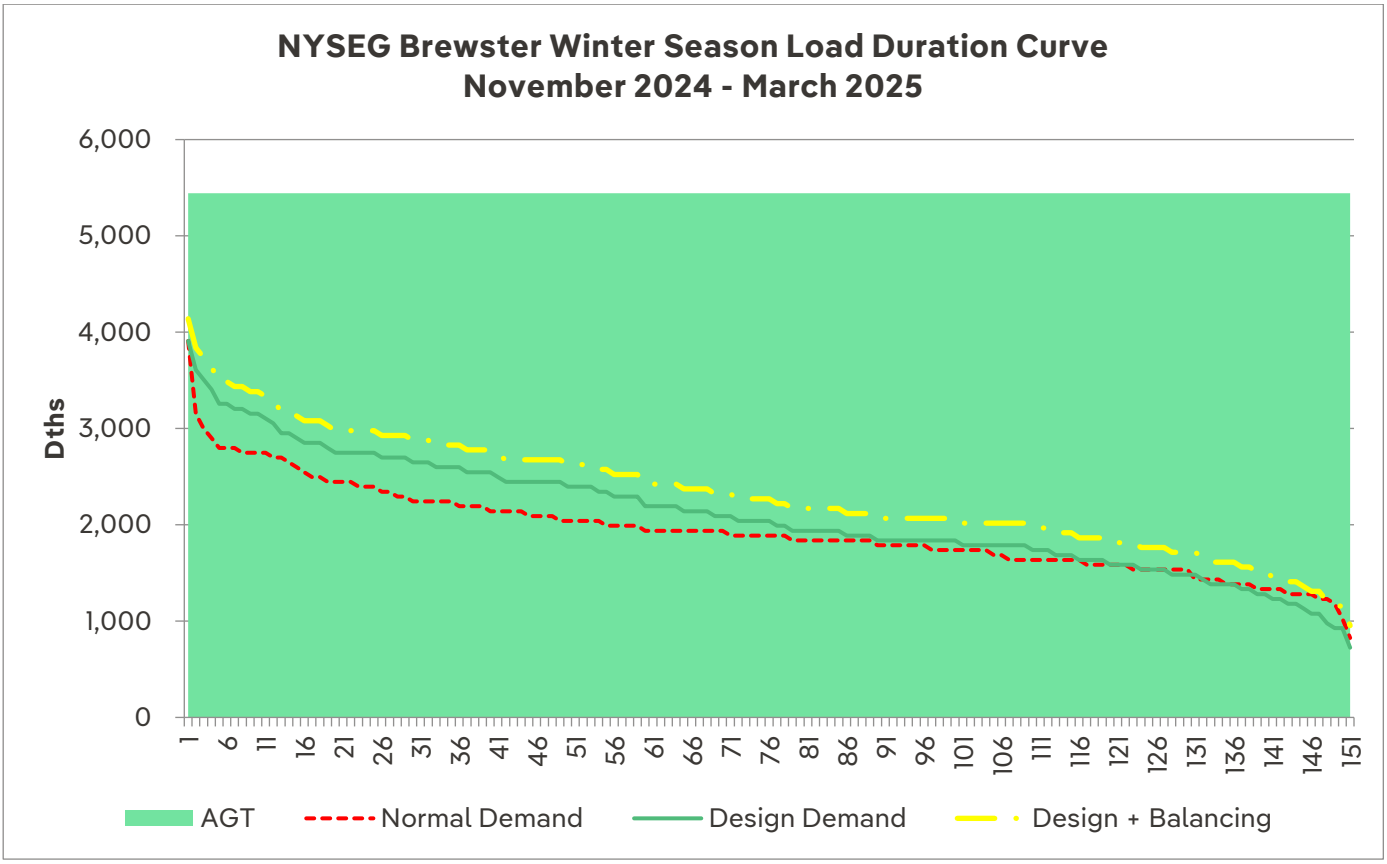
1. NYSEG – Eastern Gas (EGTS)
2. NYSEG – Columbia (TCO)
3. NYSEG – Lockport (TGP)
4. NYSEG – North Country (NCPL)
5. NYSEG – Brewster (AGT)
6. NYSEG – Goshen/Walden (O&R/Central Hudson)
7. RG&E

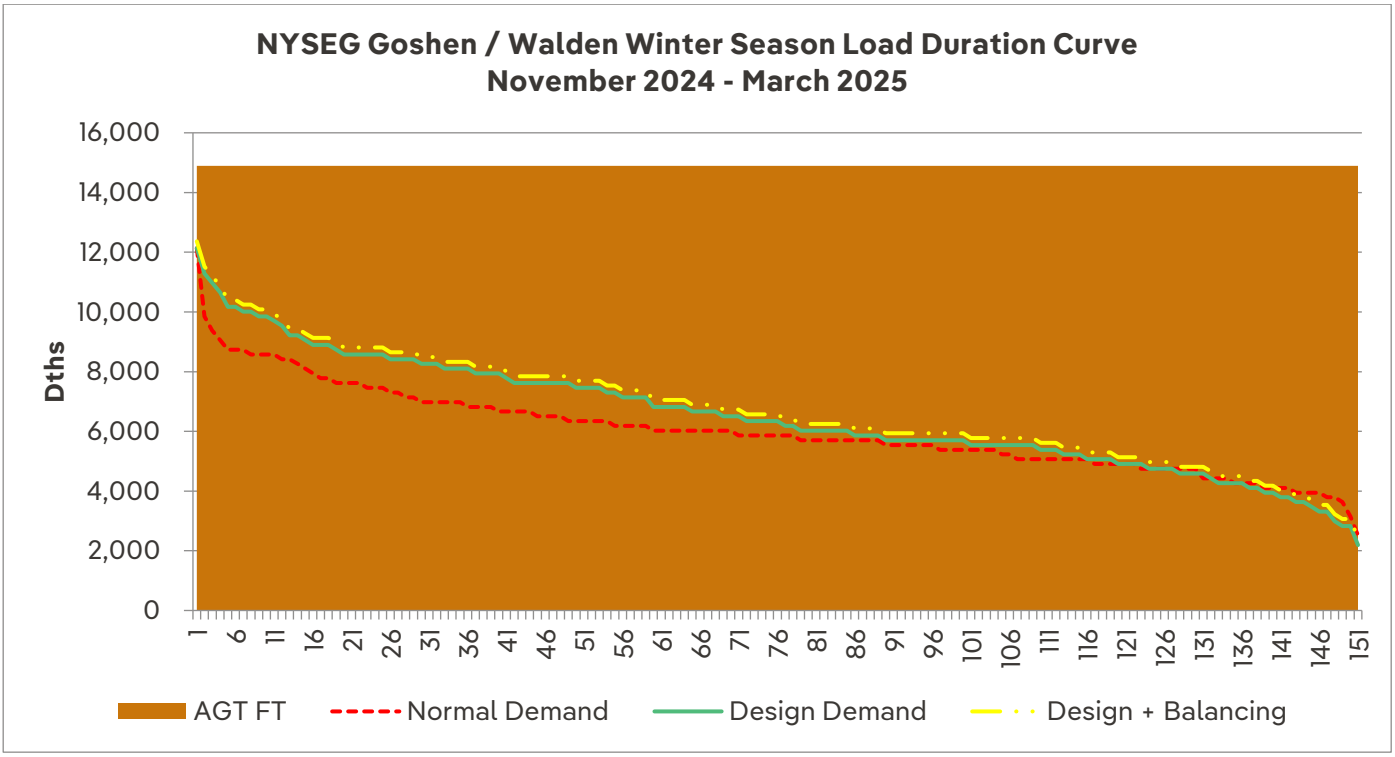

NYSEG EGTS Winter Season Load Duration Curve
November 2024- March 2025
Dths
180,000
160,000
140,000
120,000
100,000
80,000
60,000
40,000
20,000
0
1 6 11 16 21 26 31 36 41 46 51 56 61 66 71 76 81 86 91 96 101 106 111 116 121 126 131 136 141 146 151
Dominion FT
DTI from IGT FT
Empire FT
Seneca/Upson Road
GSS Storage
Normal Demand
Design
Design + Balancing

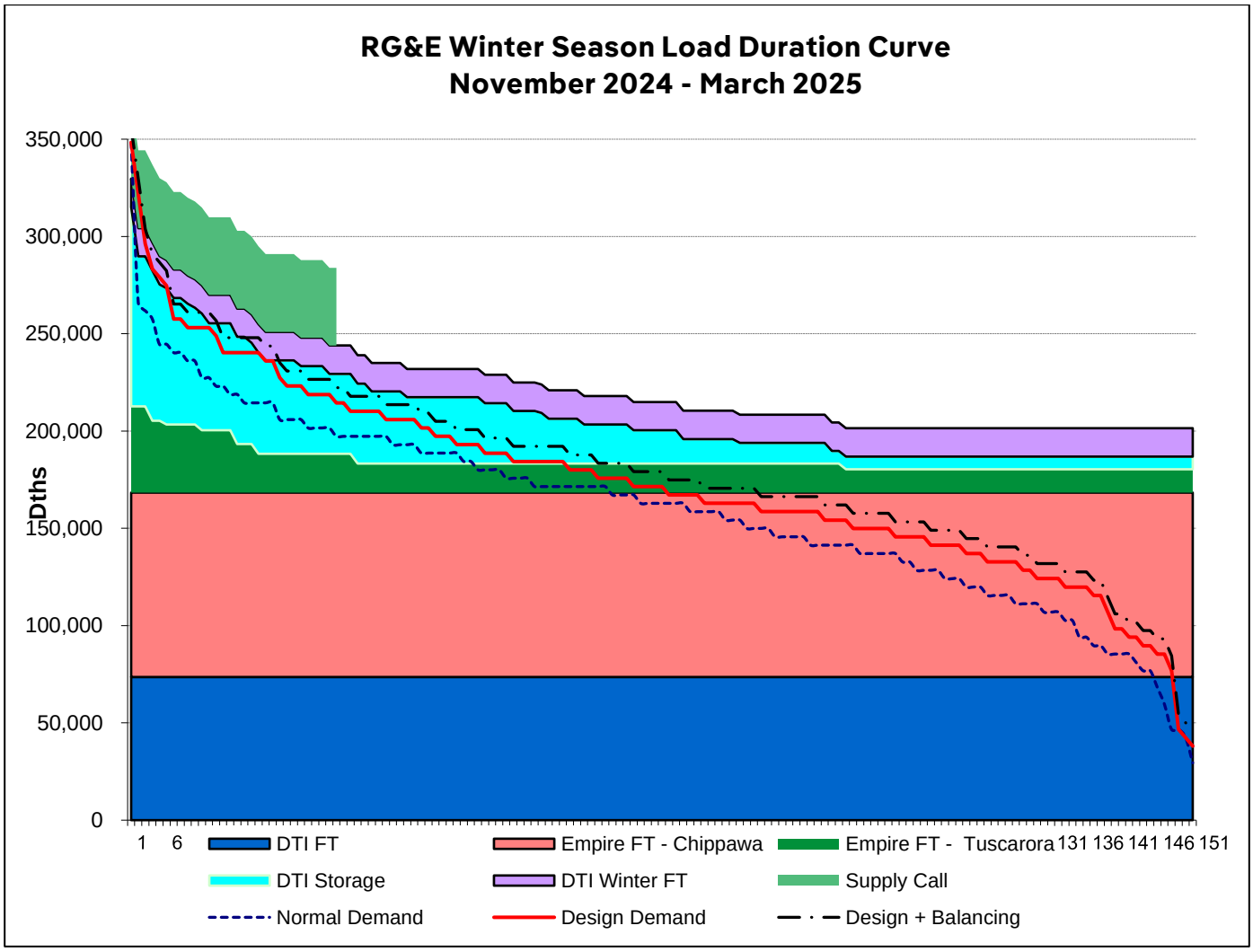

NYSEG TCO Winter Season Load Duration Curve
November 2024 - March 2025
120,000
100,000
80,000
60,000
40,000
20,000
0
Dths
1
6
11
16
Columbia FT
East Line
TCO Storage
Normal Demand
Design Demand
Design + Balancing


NYSEG Lockport Winter Season Load Duration Curve
November 2024 - March 2025
Dths
45,000
40,000
35,000
30,000
25,000
20,000
15,000
10,000
5,000
0
1 6 11 16 21 26 31 36 41 46 51 56 61 66 71 76 81 86 91 96 101 106 111 116 121 126 131 136 141 146 151
TGP FT
TGP Storage
Empire FT Path 1
Normal Demand
Empire FT Path 2
Design Demand


NYSEG NCPL Winter Season Load Duration Curve
November 2024 - March 2025
Dths
16,000
14,000
12,000
10,000
8,000
6,000
4,000
2,000
0
1
6
11
16
21
26
31
36
41
46
51
56
61
66
71
76
81
86
91
96
101
106
111
116
121
126
131
136
141
146
151
NCPL
Normal Demand
Design Demand
Design + Balancing


NYSEG Brewster Winter Season Load Duration Curve
November 2024 - March 2025
Dths
6,000
5,000
4,000
3,000
2,000
1,000
0
1
6
11
16
21
26
31
36
41
46
51
56
61
66
71
76
81
86
91
96
101
106
111
116
121
126
131
136
141
146
151
AGT
Normal Demand
Design Demand
Design + Balancing


NYSEG Goshen / Walden Winter Season Load Duration Curve
November 2024 - March 2025
Dths
16,000
14,000
12,000
10,000
8,000
6,000
4,000
2,000
0
1
6
11
16
21
26
31
36
41
46
51
56
61
66
71
76
81
86
91
96
101
106
111
116
121
126
131
136
141
146
151
AGT FT
Normal Demand
Design Demand
Design + Balancing


RG&E Winter Season Load Duration Curve
November 2024 - March 2025
350,000
300,000
250,000
200,000
150,000
100,000
50,000
0
Dths
1
6
131
136
141
146
151
DTI FT
Empire FT - Chippawa
Empire FT - Tuscarora
DTI Storage
DTI Winter FT
Supply Call
Normal Demand
Design Demand
Design + Balancing

Data Request 8 – Effects on Flow due to Pipeline Limitations

***For each gate station, indicate how much hourly flow would be lost in terms of dekatherms per hour if the specific pipeline in question limited your utility to 1/24th of its daily contract volume rather than 1/20th of its daily contract volume.**

Response

NYSEG and RG&E's gate stations are not individually limited by contract quantity, rather contractual limits are considered to be MDTQ's by pipeline. Also, TCO and EGTS implement Maximum Daily Delivery Obligations ("MDDOs") on each of NYSEG and RG&E's gate stations per pipeline.

Data Request 9 – Storage Curves

Provide this year's and last year's planned storage curves versus actual storage curves for injections and withdrawals.

Response

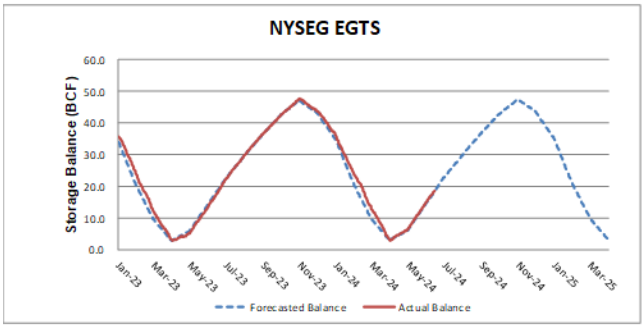
The following graphs represent the planned and actual storage curves for NYSEG and RG&E, net of retail access migration. Actuals are through June 30, 2024.

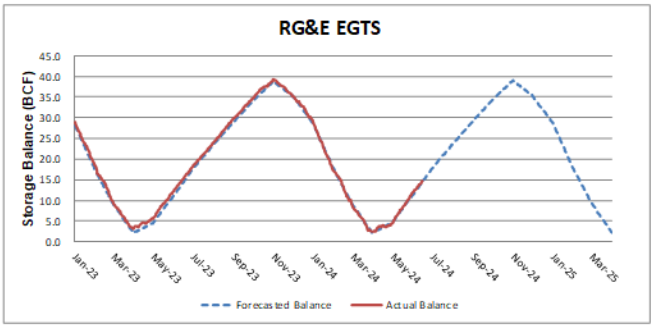
NYSEG
An Avangrid company

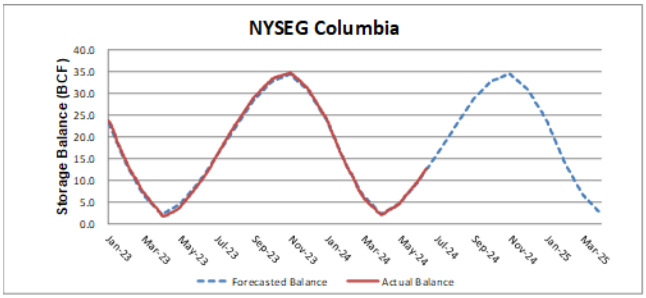
NY SEG and RG&E
Gas Supply Forecasted vs Actual Storage Summary (in Dths)
2024-2025

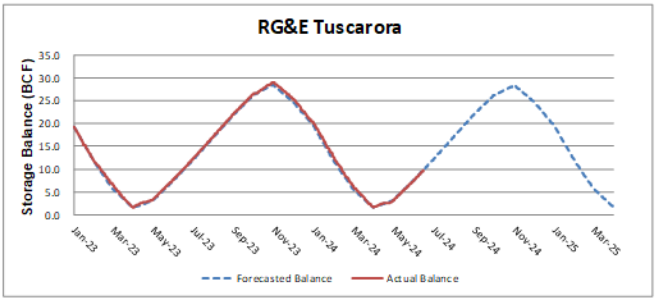
Please note: Actual numbers as of June 30, 2024.

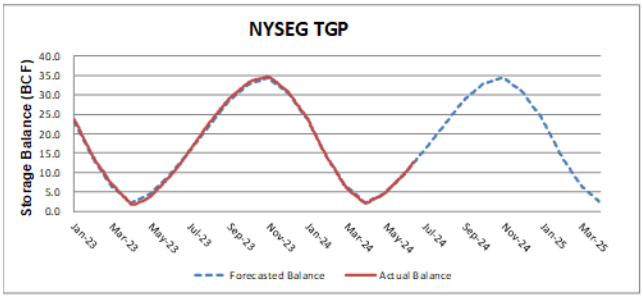
RG&E
An Avangrid company

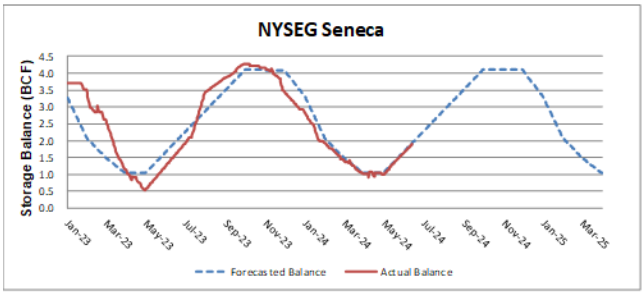












Data Request 10 – Storage Injection Plan

Describe the storage injection plan for this injection season and highlight any modifications from the prior year plan.

Response

NYSEG and RG&E's storage injection plan is similar from year to year due to pipeline tariff requirements. Although the percentages change slightly from year to year, there are no material modifications to the plan.

New York State Electric & Gas				
End of :	EGTS GSS (300063)	TCO FSS (80349)	TGP (536)	Seneca (SL00001S)
Apr-24	12%	13%	18%	20%
May-24	29%	26%	32%	32%
Jun-24	46%	43%	45%	44%
Jul-24	60%	61%	58%	56%
Aug-24	74%	79%	72%	68%
Sep-24	86%	90%	85%	80%
Oct-24	95%	95%	95%	80%

Rochester Gas and Electric		
End of :	EGTS GSS (300084)	ESP FSNN (G12130)
Apr-24	12%	12%
May-24	28%	26%
Jun-24	44%	41%
Jul-24	58%	57%
Aug-24	71%	74%
Sep-24	84%	88%
Oct-24	95%	95%

Data Request 11 – Send Out Schedule Forecasting Requirements

A send out schedule (or curve) for forecasting requirements under the varying conditions that are considered in developing the estimates (e.g., temperature, wind, weekend/weekday, etc.).

Response

The Winter Season Load Duration Curves shown in the response to Data Request 7 illustrate the send out schedule/curve under normal and design conditions for each system.

The analysis takes the daily total throughput into the system minus daily metered transportation throughput to determine non-daily metered demand, which is regressed against actual daily heating degree days for a daily firm demand. To account for the migration of non-daily metered customers to transportation service on the NYSEG and RG&E systems, the base and heat factors calculated to determine ESCO daily delivery requirements are used to reduce the regression results. This produces a firm sales demand for which the Companies will provide gas supply.

Daily Firm Demand = $(A - a_{GTS}) + [(B - b_{GTS}) * W]$

A	=	The baseload required for NDM supply at zero degree days (intercept of the y axis when graphed).
a_{GTS}	=	The baseload calculated for the migrating customers. (Base usage factor)
B	=	The sensitivity to the weather. A one (1) degree increase in temperature will increase the demand for gas by a factor of B (slope of the linear curve)
b_{GTS}	=	The heat load calculated for the migrating customers. (Winter usage factor)
W	=	Heating degree days – which is a measurement of the temperature calculated by subtracting the average temperature for a day from 65 degrees Fahrenheit.

Data Request 12 – Gas Supply Portfolio – Tables 4-6

Gas supply portfolio information (highlight changes as indicated on the charts, including all capacity or supply contracts remaining to be finalized prior to the winter heating season):

a) *Table 4*

Transportation capacity data including contract volumes and expiration dates. Please be prepared to discuss how the capacity is actually used during planning meetings with Staff.

Response

See Table 4 for NYSEG and RG&E, which illustrates the full contractual obligation for each company.

Table 4: Firm Transportation Capacity - Winter 2024-2025

Company: NYSEG
Submission Date: July 15, 2024
Version #: 1

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Winter Quantity (MDT)	Annual Quantity (MDT)	Expiration Date[1]
Flowing Gas To Citygate					
Algonquin Gas Transmission Company - 9225	AFT-1	16,779	2,534	6,124	**10/31/2025 (E)**
Eastern Gas Transmission and Storage, Inc. - 100036	FTNN	80,140	12,101	29,251	**03/31/2030 (E)**
Eastern Gas Transmission and Storage, Inc. - 100120	FTNN	20,000	3,020	7,300	**03/31/2026 (E)**
Eastern Gas Transmission and Storage, Inc. - 200058	FT	8,000	1,208	2,920	**03/31/2030 (E)**
Eastern Gas Transmission and Storage, Inc. - 200392	FT	700	106	256	**03/31/2030 (E)**
Eastern Gas Transmission and Storage, Inc. - 5B7282	FTNN	2,300	347	840	10/31/2025
Empire Pipeline, Inc. - F12132	FTNN	34,816	5,257	12,708	**03/31/2026 (E)**
Iroquois Gas Transmission System, L.P. - R-520-01	RTS-FT	1,890	285	690	11/01/2026 (E)
Iroquois Gas Transmission System, L.P. - R-520-04	RTS-FT	2,975	449	1,086	**09/01/2030**
North Country Gas Pipeline Corporation - 734(3)	FT	13,400	2,023	4,891	**12/21/2027 (E)**
Columbia Gas Transmission, LLC - 80348	FTS	36,794	5,556	13,430	**10/31/2026**
Tennessee Gas Pipeline Company, L.L.C. - 46732	FT-A	2,490	376	909	10/31/2026
Tennessee Gas Pipeline Company, L.L.C. - 62405	FT-A	4,000	604	1,460	**10/31/2029**
Tennessee Gas Pipeline Company, L.L.C. - 358864	FT-A	600	91	219	10/31/2025
Total		**224,884**	**33,957**	**82,083**	
Upstream Pipeline Support[2]					
Iroquois Gas Transmission System, L.P. - R-520-01	RTS	15,309	2,312	5,588	11/01/2026 (E)
Iroquois Gas Transmission System, L.P. - R-520-04	RTS	3,825	578	1,396	**09/01/2030**
TransCanada PipeLines Limited - 51369	FT	3,000	453	1,095	10/31/2026
TransCanada PipeLines Limited - 58623	FT	6,568	992	2,397	10/31/2033
TransCanada PipeLines Limited - 58624	FT	5,132	775	1,873	10/31/2033
Total		**33,834**	**5,110**	**12,349**	
Deliveries from Storage					
Eastern Gas Transmission and Storage, Inc. - 700014	FTNN	110,302	16,656	16,656	**03/31/2030 (E)**
Columbia Gas Transmission, LLC - 80350	SST	68,514	10,346	25,008	03/31/2025
Tennessee Gas Pipeline Company, L.L.C. - 203	FT-A	9,744	1,471	3,557	10/31/2026
Total		**188,560**	**28,473**	**45,221**	
Winter Peaking Service					
Compressed Natural Gas		1,050	11	11	**03/31/2026 (E)**
Total		**1,050**	**11**	**11**	
Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)					
Total		**414,494**	**62,441**	**127,314**	

*** Any changes from the previous year's report are in bold.**

(1) An (E) designates an "Evergreen" contract arrangement.

(2) Capacity used to deliver gas to pipelines that deliver to the citygate, not calculated in total

Table 4: Firm Transportation Capacity - Winter 2024-2025

Company: RG&E
Submission Date: July 15, 2024
Version #: 1

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Winter Quantity (MDT)	Annual Quantity (MDT)	Expiration Date[1]
Flowing Gas To Citygate					
Eastern Gas Transmission and Storage, Inc. - 100021	FTNN	108,600	16,399	35,787	**03/31/2030 (E)**
Empire Pipeline, Inc. - F12131	FTNN	117,500	17,743	42,888	03/31/2026 (E)
Total		**226,100**	**34,141**	**78,675**	
Upstream Pipeline Support[2]					
TransCanada PipeLines Limited - 2939	FT	46,929	7,086	17,129	**10/31/2025**
Total		**46,929**	**7,086**	**17,129**	
Deliveries from Storage					
Eastern Gas Transmission and Storage, Inc. - 700018	FTNN, FT	124,000	18,724	18,724	**03/31/2030 (E)**
Empire Pipeline, Inc. - F12131	FTNN	55,000	8,305	20,075	03/31/2026 (E)
Total		**179,000**	**27,029**	**38,799**	
Winter Peaking Service					
Firm Citygate Delivery		40,000	6,040	0	**2/28/2025**
Total		**40,000**	**6,040**	**0**	
Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)					
Total		**445,100**	**67,210**	**117,474**	

*** Any changes from the previous year's report are in bold.**

(1) An (E) designates an "Evergreen" contract arrangement.

(2) Capacity used to deliver gas to pipelines that deliver to the citygate, not calculated in total.

b) *Table 5*

Storage capacity data, including contract volumes and expiration dates. At our meeting, please be prepared to provide the current average price of gas in storage and your forecast for November 1, as well as the relative per dekatherm price difference compared to last year's injections.

Response

See Table 5 for NYSEG and RG&E which shows the full contractual obligation for each company.

Table 5: Firm Storage Capacity & Storage Plan – Winter 2024-2025

Company: NYSEG
Submission Date: July 15, 2024
Version #: 1

Storage Company Name	Rate Schedule	Daily Quantity (DT) [1]	Winter Quantity (MDT) [2]	Expiration Date [3]
Market Area Storage				
Arlington Storage Company, LLC - SL00001S[4]	FSS/NNSS	51,000	510	03/31/2026
Columbia Gas Transmission, LLC - 80349	FSS	68,514	4,222	03/31/2025
Eastern Gas Transmission and Storage, Inc. - 300063	GSS	110,302	5,922	**03/31/2030 (E)**
Tennessee Gas Pipeline Company, L.L.C. - 536	FS-MA	9,744	880	10/31/2026
Total		**239,560**	**11,534**	
Production Area Storage				
Total		**239,560**	**11,534**	

*** Any changes from the previous year's report are in bold.**

[1] Capacity used to deliver gas to pipelines that deliver to the citygate

[2] Winter Quantity = MSQ

[3] An (E) designates an "Evergreen" arrangement

[4] Includes 17,000 dth Upson Road (from Seneca Storage) and remainder is upstream of EGTS

Table 5: Firm Storage Capacity & Storage Plan – Winter 2024-2025

Company: RG&E
Submission Date: July 15, 2024
Version #: 1

Storage Company Name	Rate Schedule	Daily Quantity (DT) [1]	Winter Quantity (MDT) [2]	Expiration Date [3]
Market Area Storage				
Eastern Gas Transmission and Storage, Inc. - 300084	GSS	124,000	5,000	**03/31/2030 (E)**
Empire Pipeline, Inc. - G12130	FSNN	55,000	3,753	03/31/2026 (E)
Total		179,000	8,753	
Production Area Storage				
Total		179,000	8,753	

*** Any changes from the previous year's report are in bold.**

[1] Capacity used to deliver gas to pipelines that deliver to the citygate

[2] Winter Quantity = MSQ

[3] An (E) designates an "Evergreen" arrangement

c) *Table 6*

Gas supply contract data including contract volumes, terms and expiration dates. This table must include and show all contract data associated for on system and peak supply assets such as LNG, CNG, RNG, indicating any new additions since the previous year and demand response type resources.

Response

Please refer to the next four (4) pages for details related to the 2024-2025 NYSEG and RG&E Request for Quotes (RFQs) issued to suppliers in June 2024. The quantities by receipt point have also been provided by month.

Table 6: Gas Supply Contracts – Winter 2024-2025

Company: NYSEG
Submission Date: July 15, 2024
Version #: 1
CONFIDENTIAL

New York State Electric & Gas

Transporter	Supplier	Receipt Point	AVG Daily Quantity (Dth) [1]	Winter Quantity (MDT)	Annual Quantity (MDT)	Demand ($/Dth-Month)	Commodity ($/Dth)	Flexibility [2]	Expiration Date	Supply Basin [2]
Long Term (>5 years) by FT										
[redacted]										
Immediate Term (1 to 5 years) by FT										
[redacted]										
Short Term (<1 year) by FT										
[redacted]										
Total			[redacted]							

[1] 100% Swing daily quantity is the maximum

[2] "A" for Appalachia, "M" for Marcellus, "C" for Canadian, "G" for Gulf

Table 6: Gas Supply Contracts – Winter 2024-2025
Monthly Breakdown

Company: NYSEG
Submission Date: July 15, 2024
Version #: 1
CONFIDENTIAL

New York State Electric & Gas - Monthly Breakdown								
Transporter	Supplier	Receipt Point	NOV (Dth/d)	DEC (Dth/d)	JAN (Dth/d)	FEB (Dth/d)	MAR (Dth/d)	AVG Daily Quantity (Dth)
Short Term (<1 year) by FT								
[redacted]								
Total			[redacted]					

Table 6: Gas Supply Contracts – Winter 2024-2025

Company: RG&E
Submission Date: July 15, 2024
Version #: 1
CONFIDENTIAL

Rochester Gas and Electric

Transporter	Supplier	Receipt Point	AVG Daily Quantity (Dth) [1]	Winter Quantity (MDT)	Annual Quantity (MDT)	Demand ($/Dth-Month)	Commodity ($/Dth)	Flexibility [2]	Expiration Date	Supply Basin [2]
Long Term (>5 years) by FT										
[redacted]										
Immediate Term (1 to 5 years) by FT										
[redacted]										
Short Term (<1 year) by FT										
[redacted]										
Total			[redacted]							

[1] 100% Swing daily quantity is the maximum

[2] "A for Appalachia, "M" for Marcellus, "C" for Canadian, "G" for Gulf

Table 6: Gas Supply Contracts – Winter 2024-2025
Monthly Breakdown

Company: RG&E
Submission Date: July 15, 2024
Version #: 1
CONFIDENTIAL

Rochester Gas and Electric- Monthly Breakdown								
Transporter	Supplier	Receipt Point	NOV (Dth/d)	DEC (Dth/d)	JAN (Dth/d)	FEB (Dth/d)	MAR (Dth/d)	AVG Daily Quantity (Dth)
Short Term (<1 year) by FT								
[redacted]								
Total			[redacted]					

d) For CNG contracts, please provide the terms under which the vendor is expected to perform, including any temperature triggers and whether there are provisions in vendor contracts for emergency provision of CNG.

Response

To address peak winter demand for natural gas service in Mechanicville that cannot be met from NYSEG's existing supply arrangements, NYSEG contracts for supplemental compressed natural gas to serve Mechanicville's peak winter needs. Each year, a supplier provides peaking compressed natural gas directly into NYSEG's Mechanicville natural gas distribution system from November 1 through March 31 each winter.

NYSEG's Gas Control reviews the forecasted load, pressure, and distribution system constraints. When it is determined the Mechanicville area is approaching peak demand, Gas Control will call upon compressed natural gas to be deployed. Two trailers of compressed natural gas (700 mmBtu) are onsite at the Mechanicville station at all times during the winter. A third trailer is available as needed. Historically, New York State Electric & Gas (NYSEG) has included specific clauses in their contracts to ensure the emergency supply of Compressed Natural Gas (CNG). These provisions are

designed to maintain service continuity and meet the energy needs of their customers during unforeseen events. NYSEG is in the process of submitting a Request For Proposal (RFP) to contract with a vendor for the upcoming winter.

e) In light of extreme weather events that have impacted upstream supply, such as Winter Storm Uri and Winter Storm Elliot, what actions have been taken to enhance capacity/transportation contracts in order to mitigate delivery risks?

Response

NYSEG and RG&E have executed firm interstate pipeline transportation and storage agreements, and in RG&E's case, an additional firm citygate delivered product, all to serve its design demand requirements. During times of high system demand, the Companies are in close contact with each pipeline organization, both from a gas supply perspective as well through our Control Centers. Each pipeline contract is managed/scheduled to minimize any loss of services that would impact reliable delivery. All supply arrangements are handled through NAESB approved counterparties on a firm basis.

Data Request 13 – Peak Shaving

Describe, if applicable, current practices and any anticipated changes related to on-system peaking facilities and other peak shaving techniques. If you operate LNG peaking facilities, please describe current plans for any activities at the facilities that would interrupt their availability and steps being taken to mitigate those interruptions. Please describe all necessary maintenance activities that will take place in the gas year that began on April 1, 2024 and ends on March 31, 2025.

Response

Current peak shaving practices include the use of each Company's respective tariff's, which include provisions for the interruption and/or curtailment of supply. Additionally, NYSEG operates an on-system peaking service through the use of compressed natural gas in the Mechanicville franchise area. The Companies do not anticipate any changes to on-system peaking facilities or other peak shaving techniques prior to the 2024-25 heating season. Neither NYSEG nor RG&E own or operate any LNG peaking facilities.

Data Request 14 – Short Term Forecasting Process

Please explain how accurate your short-term forecasts were during the 2023-2024 heating season by using a back cast after the actual weather is known.

Response

The accuracy of short-term forecasting models, using perfect weather data for the 2023-2024 heating season, were as follows:

Op Area	MAPE
RG&E Total Load	1.79%
RG&E NDM	2.57%
DTI Total Load	2.04%
TCO Total Load	2.50%
Lockport Total Load	2.86%
NCPL Total Load	4.51%
AGT Total Load	2.87%

Data Request 15 – Asset Management / Optimization Agreements

A detailed description of any existing asset management or asset optimization agreements, as well as any such agreements being considered or planned. All agreements that include firm capacity and/or supply that is recallable during the winter heating season should be included in Table 1.

Response

NYSEG and RG&E executed an optimization agreement, effective November 1, 2023, to release their respective TransCanada Pipeline ("TCPL") capacity to a counterparty on a monthly basis for a guaranteed annual recovery over a 12-month term. The arrangement expires October 31, 2024.

Both the TCPL and the optimization agreements between the Companies and the counterparty grant first rights, by 9:00 AM each day, on the transportation capacity. Additionally, the counterparty can deliver firm gas supply if the Companies elect to call on it anytime throughout the period.

NYSEG and RG&E plan to issue an RFQ to optimize the Canadian assets for the 2024-25 period in the near future.

Data Request 16 – Off System Sales / Capacity Release

A description of your company's plans and strategy with respect to off-system sales, capacity release and streaming arrangements for the past winter season as well as any such transactions that extend beyond the coming winter.

Response

Both NYSEG and RG&E implement plans and strategies in an attempt to maximize off-system sales, capacity release and other portfolio optimization transactions, as appropriate. Neither company has any streaming arrangements for the 2024-2025 winter season. Both companies engage the services of a third-party to assist in Canadian portfolio optimization as provided in the response to *Data Request 16*.

The process used in determining what assets are available for off-system sales and capacity release during 2024-2025 will remain similar to previous years. It should be noted, however, as the LDC's contracted asset base changes in response to demand, the ability to perform off-system sales and capacity release increases or decreases proportionately.

In order to identify assets available for optimization, long-term and short-term plans are prepared and in the process a determination is made concerning what combination of assets is needed to meet system requirements. Based on this determination, NYSEG and RG&E enter into various off-system sales and capacity release transactions. All such transactions are executed under terms that ensure each Company has the necessary rights of recall should system requirements dictate such action.

Data Request 17 – Mandatory Capacity Release / Grandfathered Capacity

Status of mandatory capacity release and grandfathered capacity programs.

a) **Status of marketer compliance with the Commission's primary point capacity requirement for grandfathered capacity. Include how much grandfathered capacity remains on your system.**

Response

An email with an attached affidavit template was sent to each active ESCO on NYSEG and RG&E's respective systems on June 28, 2024. The letter was also posted on the Company's Gas Tracking System ("GTS"). The email and GTS posting requested executed affidavits for each Company, as well as copies of all price-redacted contracts used for proving/verifying primary point capacity be returned to the Company no later than August 1, 2024.

As provided in NYSEG and RG&E's NY PSC-approved tariffs, should an ESCO wish to designate a customer as firm secondary rather than to prove primary point capacity, they must do so in writing to the customer and the Company no later than August 1, 2024. Additionally, ESCOs serving customers on RG&E's system must demonstrate they have firm primary point capacity for the Empire portion of their design day load back to Dawn, or they must prove they have a firm supply contract at Chippawa, or another point downstream of Chippawa.

Grandfathered capacity was reviewed in April 2024. The amount of grandfathered capacity on NYSEG's system is 6,406 Dths across all pooling areas. This represents no change in the volumes reported in last year's filing. The amount of grandfathered capacity on RG&E's system is 10,374 Dths, and represents no change in the volumes reported in last year's filing.

b) **Please describe the methodology utilized to determine the mandatory capacity release to the marketers. Indicate how this compares with the methodology utilized to determine capacity required for firm sales customers.**

Response

Capacity requirements and associated releases are based on the Maximum Daily Aggregated Pool Quantity ("MDPQ") for the customers in each ESCOs pool for the month at the citygate. The capacity that is released to the ESCO on behalf of non-daily metered customers is based on 66 Heating Degree Days. The capacity released to ESCOs serving daily metered customers that are mandatory capacity release customers is based on 75 Heating Degree Days.

Capacity required for firm sales customers is determined by forecasting the non-daily metered design day by area less the capacity allocated for non-daily metered migrated customers. The capacity allocated for non-daily metered customers is based upon historical demand by each individual customer (base and heat factor determinants).

c) Please describe how your company keeps marketers informed of changes in procedures. Include the frequency and past/proposed dates of marketer meetings relating to the 2023-2024 and 2024-2025 heating season.

Response

NYSEG and RG&E communicate with ESCOs on a frequent basis. Each of the Lead Analysts in the Supplier Relations Group is assigned a number of ESCOs for whom they are the single point of contact. The Lead Analysts have almost daily contact with ESCOs through email and telephone calls. The Companies send out generic emails to all ESCOs when appropriate, otherwise specific communication is used to contact an ESCO.

In 2023 the Companies hosted one (1) required Gas Marketer Operating Group ("GMOG") meeting, held on October 24, 2023. This meeting included a discussion regarding winter preparedness, operational updates, and program requirements as outlined in the Gas Transportation Operating Procedures Manual ("GTOP Manual"). The Companies shall convene a GMOG meeting annually in advance of the winter period. Any additional meetings will be held on an as-needed basis. The Companies plan to establish a date for the 2024 GMOG meeting in September 2024.

d) List the pipelines and allocation percentages being utilized for the mandatory assignment of capacity.

Response

Please refer to the tables on the next two (2) pages for NYSEG and RG&E's list of pipelines and allocation percentages being utilized for the mandatory capacity release program.

NYSEG Capacity release receipt and delivery points

Pooling Area		Tariff Rate	Capacity %*	# of Days**	Receipt Meter(s)	Delivery Meter(s)
1	**TGP**					
	Transport (Empire)	FTNN	79%		Corning (22008810)	Royalton (012004010)
	Storage Transport	FT-A	21%		N. Storage (460018)	Lockport (420221)
	Storage	FS-MA		90		N. Storage (460018)
2	**Columbia**					
	Transport	FTS	35%		Leach (801) @ 100%	Binghamton (21)
					Leach (801) @ 100%	Olean (52)
	Storage Transport ***	SST	65%		STOW	Binghamton (21)
	Storage	FSS		61.61904		STOW
3	**DTI**					
	Transport	FTNN	53%		Oakford (40208)	20700
	Storage Transport ****	FTNNGSS	47%		EGTS Storage Pt. (10002)	20700
	Storage	GSS		54	EGTS Storage Pt. (10001)	EGTS Storage Pt. (10002)
4	**AGT**					
	AGT	AFT1/AFT2	100%		Brookfield (00251)	Southeast (00084)
5	**IGT**					
	IGT	RTS12	100%		Waddington (67707)	Brookfield (68098)
6	**NCPL – ESCO Released EGTS Capacity**					
	Transport	FTNN	53%		Oakford (40208)	20700
	Storage Transport ****	FTNNGSS	47%		EGTS Storage Pt. (10002)	20700
	Storage	GSS		54	EGTS Storage Pt. (10001)	EGTS Storage Pt. (10002)
7	**O&R – ESCO Released AGT Capacity**					
	AGT	AFT1/AFT2	100%		Brookfield (00251)	Stony Point (00040)

* Capacity % is applied to ESCO peak day (75 HDD for daily/66 HDD for non-daily customers)

** Multiply storage transport (MDQ result by the # of days for SCQ (storage capacity quantity)

*** TCO SST MDQ is half of the winter MDQ during April - September

**** Not available during the summer (April - October)

RG&E Capacity Release Receipt and Delivery Points

Pooling Area	Tariff Rate	Capacity %*	# of Days**	Receipt Meter(s)	Delivery Meter(s)
1 **DTI**					
Transport	FTNN	22.58%		Oakford (40208)	20600
Transport	FT	4.63%		EGTS NP	20600
Transport	FTNNGSS***	28.56%		10002	20600
Storage	GSS		40	EGTS Storage Pt. (10001)	10002
2 **Empire**					
Transport	FTNN	30.13%		Chippawa 12000010	Mendon 120001010
Transport	FTNN	14.10%		Tuscarora	Mendon 120001010
Storage	FSNN		68.238	Empire Storage Pt.	Empire Storage Pt.
3 **TCPL**					
Transport	FT	12.0%		St. Clair	Chippawa

* Capacity % is applied to ESCO peak day (75 HDD daily metered/66 HDD non-daily metered)

** Multiply storage transport MDQ result by the # of days for SCQ (Storage Capacity Quantity)

*** Not available during the summer (Apr-Oct).

e) Please provide a comparison between your company's weighted average cost of capacity and the charges paid by marketers and direct customers for released capacity. What process, if any, is utilized to true-up any differences?

Response

NYSEG currently releases capacity to ESCOs and Direct Customers at the Weighted Average Cost of Capacity ("WACOC") as established through the Natural Gas Collaborative (Case 09-G-0716).

NYSEG calculates the WACOC effective each April 1 for the subsequent twelve (12) month period based on the Company's upstream portfolio of capacity assets. NYSEG re-runs the WACOC calculation internally on a monthly basis. If in any month the actual WACOC should differ from the WACOC as established on April 1 by more than five percent (5%), the Company will reset the capacity release rate. Furthermore, due to the implementation of the 5% trigger, a reconciliation for monthly differences is not performed.

Month	NYSEG WACOC	Actual Cost	Change %
4/1/2023	12.2375	12.5092	2.22%
5/1/2023	12.2375	12.4798	1.98%
6/1/2023	12.2375	12.4798	1.98%
7/1/2023	12.2375	12.4622	1.84%
8/1/2023	12.2375	12.4571	1.79%
9/1/2023	12.2375	12.4383	1.64%
10/1/2023	12.2375	12.4383	1.64%
11/1/2023	12.2375	12.4296	1.57%
12/1/2023	12.2375	12.4249	1.53%
1/1/2024	12.2375	12.4090	1.40%
2/1/2024	12.2375	12.4015	1.34%
3/1/2024	12.2375	12.4015	1.34%

At RG&E, the capacity is released to ESCOs at maximum pipeline rates.

f) Please describe any assets retained by the company that are not released to marketers but are necessary to meet gas loads on days colder than 50 HDDs, and describe how those costs are assessed to marketers, including whether their customers are directly charged instead of the marketer.

Response

NYSEG has one asset (Seneca Storage) that is retained by the company that is not released to marketers but is necessary to meet gas loads on days colder than 50 HDDs. These costs are not assessed to marketers directly but are used in calculating our annual WACOC.

g) Please describe how your company determines the daily delivery quantities (DDQ) provided to marketers each month for their daily delivery requirements. Provide a sample calculation.

Response

The following formulas, as are also provided in the Company's GTOP Manual, are used to calculate the Estimated Total Usage (ETU) for a customer at the citygate:

- Winter ETU = [(base usage factor + (winter usage factor * HDD forecast)) * FA]
- Summer ETU = [(base usage factor + (summer usage factor * HDD forecast)) * FA]

Where:

Base Usage Factor = (Total base therms / # days in base period

Winter and Summer Usage Factors = (Total season therms – (base usage factor * # days of season use)) / (total actual HDD for season)

ETUs are calculated daily based on the current HDD forecast data up to 66 HDDs.

Where:

ETU = Estimated Total Usage

FA = Factor of Adjustment

h) Please indicate if any marketers serving core customers on your system failed to perform as anticipated during the previous winter, and if so, what steps you took to ensure reliability of service.

Response

All ESCOs met their delivery requirements and performed as anticipated during winter 2023-2024.

i) Please indicate if any marketers serving core customers on your system do not have firm primary point capacity for all delivery quantities during winter months and identify the anticipated shortfall.

Response

As verified in the Companies' annual Primary Point Capacity process in August 2023, all marketers serving core customers sufficiently demonstrated to the Companies that they had firm capacity and/or supply to meet the anticipated winter requirements. Each month from November through March, the Companies will update proven capacity volumes and will reach out to ESCOs to request additional proven volumes if their proven requirements increase.

j) Please describe any actual or virtual storage release programs and indicate the daily volumes associated with each ESCO/marketer and the percent that volume represents of your total daily deliverability from storage.

Response

NYSEG and RG&E release storage capacity to ESCOs on a monthly basis as part of the mandatory capacity release program. NYSEG and RG&E currently do not have any virtual storage programs. Please see the tables below which show storage capacity releases to marketers as a percentage of MSQ.

NYSEG Storage Releases to ESCOs

ESCO	TCO	% MDTQ TCO	EGTS	% MDTQ EGTS	TGP	% MDTQ TGP
ESCO 1	85	0.12%	170	0.15%	22	0.23%
ESCO 2	14	0.02%	22	0.02%	0	0.00%
ESCO 3	282	0.41%	426	0.39%	47	0.48%
ESCO 4	13	0.02%	10	0.01%	0	0.00%
ESCO 5	12	0.02%	10	0.01%	1	0.01%
ESCO 6	0	0.00%	0	0.00%	3	0.03%
ESCO 7	686	1.00%	700	0.63%	49	0.50%
ESCO 8	621	0.91%	957	0.87%	98	1.01%
ESCO 9	161	0.23%	187	0.17%	0	0.00%
ESCO 10	846	1.23%	2288	2.07%	29	0.30%
ESCO 11	77	0.11%	1051	0.95%	184	1.89%
ESCO 12	1470	2.15%	765	0.69%	34	0.35%
ESCO 13	367	0.54%	313	0.28%	51	0.52%
ESCO 14	0	0.00%	292	0.26%	0	0.00%
ESCO 15	43	0.06%	129	0.12%	7	0.07%
ESCO 16	12	0.02%	20	0.02%	0	0.00%
ESCO 17	99	0.14%	251	0.23%	13	0.13%
ESCO 18	49	0.07%	93	0.08%	0	0.00%
ESCO 19	42	0.06%	35	0.03%	8	0.08%
ESCO 20	51	0.07%	78	0.07%	6	0.06%
ESCO 21	38	0.06%	116	0.11%	9	0.09%
ESCO 22	2260	3.30%	1813	1.64%	0	0.00%
ESCO 23	95	0.14%	417	0.38%	72	0.74%
ESCO 24	0	0.00%	498	0.45%	207	2.12%
ESCO 25	1598	2.33%	4178	3.79%	105	1.08%
ESCO 26	0	0.00%	24	0.02%	0	0.00%
ESCO 27	270	0.39%	450	0.41%	0	0.00%
ESCO 28	94	0.14%	534	0.48%	0	0.00%
ESCO 29	0	0.00%	31	0.03%	0	0.00%
ESCO 30	343	0.50%	1180	1.07%	0	0.00%
ESCO 31	13	0.02%	33	0.03%	0	0.00%
Total	**9641**	**14.07%**	**17071**	**15.48%**	**945**	**9.70%**

*Volumes are in Dths

**Volumes reflect June 2024 storage releases

RGE Storage Releases to ESCOs

ESCO	EGTS	% MDTQ EGTS	ESP	% MDTQ TGP
ESCO 1	24	0.02%	12	0.02%
ESCO 2	203	0.16%	100	0.18%
ESCO 3	27	0.02%	13	0.02%
ESCO 4	380	0.31%	188	0.34%
ESCO 5	14	0.01%	7	0.01%
ESCO 6	63	0.05%	31	0.06%
ESCO 7	1006	0.81%	497	0.90%
ESCO 8	771	0.62%	381	0.69%
ESCO 9	294	0.24%	145	0.26%
ESCO 10	2755	2.22%	1360	2.47%
ESCO 11	1058	0.85%	522	0.95%
ESCO 12	241	0.19%	119	0.22%
ESCO 13	234	0.19%	115	0.21%
ESCO 14	127	0.10%	63	0.11%
ESCO 15	64	0.05%	32	0.06%
ESCO 16	32	0.03%	16	0.03%
ESCO 17	113	0.09%	56	0.10%
ESCO 18	115	0.09%	57	0.10%
ESCO 19	33	0.03%	16	0.03%
ESCO 20	71	0.06%	35	0.06%
ESCO 21	59	0.05%	29	0.05%
ESCO 22	2422	1.95%	1196	2.17%
ESCO 23	373	0.30%	184	0.33%
ESCO 24	314	0.25%	155	0.28%
ESCO 25	901	0.73%	442	0.80%
ESCO 26	1642	1.32%	810	1.47%
ESCO 27	4417	3.56%	2181	3.97%
ESCO 28	11	0.01%	5	0.01%
ESCO 29	238	0.19%	117	0.21%
ESCO 30	216	0.17%	106	0.19%
ESCO 31	3154	2.54%	1557	2.83%
ESCO 32	87	0.07%	43	0.08%
ESCO 33	85	0.07%	42	0.08%
Total	**21544**	**17.37%**	**10632**	**19.33%**

*Volumes are in Dths

**Volumes reflect June 2024 storage releases

k) Please include Gas System Planning & Reliability Section Energy System Planning & Performance staff on all informational ESCO/marketer meetings and teleconferences.

Response

Invitations to the 2024 GMOG meeting will be sent to Gas System Planning & Reliability Section Energy System Planning & Performance staff in September 2024.

Data Request 18 – Interruptible Service

Provide the following information with regards to Interruptible Service:

a) Temperature/weather criteria at which the interruptible service classifications are to be interrupted for this upcoming winter. If the interruption criteria has not yet been developed for the upcoming winter, provide the response as part of the September update.

Response

NYSEG and RG&E do not have specific temperature/weather criteria at which interruptions occur. Gas Control monitors the system and determines necessary interruptions based on system conditions. Generally, interruptions, if needed on the system, would occur if weather conditions approach 55 to 60 HDDs.

b) Description and status of efforts to verify customer alternative fuel availability and equipment testing.

Response

For NYSEG, letters are sent in September to all interruptible customers along with a survey requesting information regarding the customer's alternate fuel storage capability and arrangements to replenish or curtail. All interruptible customers are required to complete the survey form and return it no later than October 1st. See *Attachment 1: Interruptible Letter and Alternate Fuel Compliance Form.*

For RG&E, letters are sent in September to all dual fuel customers along with a survey requesting information regarding the customer's alternate fuel storage capability and arrangements to replenish or curtail. See *Attachment 2: RG&E Heating Season Letter and Alternate Fuel Compliance Form.*

At RG&E, there are currently no interruptible customers. Should a customer sign up for interruptible service the customer will be required to complete a survey consistent with the current NYSEG policy.

For the 2023-24 Winter, there were four (4) process customers that were exempt from maintaining alternate fuel supplies and each signed the compliance form indicating so.

c) **Please provide the total number of firm dual fuel and interruptible customers, by service class, including how many customers are remotely controlled by the utility, and how many customers must switch to their alternate fuel manually. Methods utilized to verify dual-fuel customers' capabilities, including power generation customers.**

Response

The total number of interruptible and firm dual fuel customers by Company is summarized in the table below. None of these customers are remotely controlled by the utility and must switch to their alternate fuel manually.

Company	Interruptible		Firm Dual Fuel	
	Service Classification	# of Customers	Service Classification	# of Customers
NYSEG	PSC #87; SC 3	6	PSC #88; SC 1	29
	PSC #88; SC 2	23	PSC #88; SC 5	47
			PSC #88; SC 14	8
RG&E	PSC #16, SC15	0	PSC #16; SC 3	14
	PSC #16, SC16	0		

Presently, there are 29 NYSEG interruptible natural gas customers. Each of these customers takes service under one of the following NYS PSC-approved tariff services: PSC #87 - SC #3 and/or PSC #88 - SC #2. When situations arise to interrupt NYSEG's interruptible natural gas customers, a company representative will provide these customers with a minimum two (2) hour notice to curtail/interrupt their natural gas use. Results of the on-site inspections conducted during the Fall of 2023 indicate each of these interruptible customers had demonstrated their ability to utilize their alternate fuel.

As previously mentioned, RG&E does not have interruptible customers. RG&E will follow the same protocols as NYSEG if a customer signs up for interruptible service.

d) **Provide the dates and hours of duration for each interruption for the past five winter heating seasons. Include the number of customers interrupted for each event, the number of customers who failed to comply and the total dollar value of penalties received as a result.**

Response

Please find customer interruptions and non-compliance for the past five winter seasons outlined in the tables below. Customer interruptions are shown by the date of interruption and the associated duration in hours for the interruption. Customer non-compliance is shown by the date and associated penalty information. All affected customers during this period were NYSEG customers, RG&E had no interruptible customers to date.

NYSEG Customer Interruptions November 2019 - March 2020								
Date of Interruption	Hours of Interruption by Customer							
	Customer 1	Customer 2	Customer 3	Customer 4	Customer 5	Customer 6	Customer 7	Customer 8
12/18/2019			12		12			12
12/19/2019			12		12			12
12/20/2019					12			12
1/17/2020					15			15
1/20/2020								11
1/20/2020								15
1/22/2020								12
2/14/2020	19	19	19	19	19		19	20
2/20/2020								12
Total Hours Interrupted	19	19	43	19	70		19	121
Total Service Interruptions	1	1	3	1	5		1	9

NYSEG Customer Interruptions November 2020 - March 2021								
Date of Interruption	Hours of Interruption by Customer							
	Customer 1	Customer 2	Customer 3	Customer 4	Customer 5	Customer 6	Customer 7	Customer 8
12/18/2020								8
12/19/2020			10		10			10
1/23/2021								12
1/25/2021								13
1/28/2021			86		86			86
1/29/2021		65					65	
2/7/2021								13
2/11/2021	38	38	38	38	38		38	38
3/8/2021								8
Total Hours Interrupted	38	103	134	38	134		103	188
Total Service Interruptions	1	2	3	1	3		2	8

NYSEG Customer Interruptions November 2021 - March 2022								
Date of Interruption	Hours of Interruption by Customer							
	Customer 1	Customer 2	Customer 3	Customer 4	Customer 5	Customer 6	Customer 7	Customer 8
1/03/2022								11
1/08/2022								11
1/10/2022	39	39	39	39	39		39	39
1/14/2022	18	18	18	18	18		18	19
1/20/2022	42	42	42	42	42		42	42
1/24/2022	12		12		12			12
1/25/2022	39	39	39	39	39	39	39	39
1/28/2022	65		65		65			65
1/31/2022								19
2/4/2022								40
2/5/2022	19	19	19	19	19		19	
2/13/2022			38		38			38
2/19/2022								14
2/25/2022			13		13			13
2/27/2022			12		12			12
3/3/2022	15	15		15	15		15	15
Total Hours Interrupted	249	172	297	172	312	39	172	389
Total Service Interruptions	8	6	10	6	11	1	6	15

NYSEG Customer Interruptions November 2022 - March 2023								
Date of Interruption	Hours of Interruption by Customer							
	Customer 1	Customer 2	Customer 3	Customer 4	Customer 5	Customer 6	Customer 7	Customer 8
12/23/2022	62		62		62			65
2/3/2023	53	53	53	53	53	53	53	55
2/24/2023								13
Total Hours Interrupted	115	53	115	53	115	53	53	133
Total Service Interruptions	2	1	2	1	2	1	1	3

NYSEG Customer Interruptions November 2023 - March 2024								
Date of Interruption	Hours of Interruption by Customer							
	Customer 1	Customer 2	Customer 3	Customer 4	Customer 5	Customer 6	Customer 7	Customer 8
1/17/2024								13
1/19/2024	62	62	62	62	62	62	62	62
2/24/2024								13
Total Hours Interrupted	62	62	62	62	62	62	62	88
Total Service Interruptions	1	1	1	1	1	1	1	3

NYSEG Interruptible Non-Compliance Penalties 2019-2024			
Type of Charge	Date	Customers	Charge
Unauthorized Use	1/29/2021	1	$6,300.50
Unauthorized Use	2/11/2021	1	$ 4,048.25
Non-Compliance Charge	1/6/2021-4/1/2021	1	$13,670.97
Total Penalties			$24,019.72

e) Provide the dates and hours of duration for each interruption of electric generation service classes for the past five winter heating seasons. Include the number of customers interrupted for each event.

Response

Neither NYSEG nor RG&E had any customers taking service under electric generation service classes during the past five winter seasons.

f) Please provide the results of compliance with the interruptible rules during last winter. Be sure to include the number of customers switched to firm service or removed from gas service due to non-compliance.

Response

29 out of 29 NYSEG interruptible customers were in compliance during the 2023-2024 winter period.

RG&E did not have any interruptible customers last winter.

g) How many customers will be visited out of how many customers in total? Will all customers with non-compliance issues last winter be visited? How often will the compliant customers be visited?

Response

For NYSEG, following the return of the surveys, on-site inspections are conducted for all thirteen (13) interruptible Human Needs/Critical Care customers, 65% of Goshen and Oneonta area customers, and 30% of all other customers. Sixteen (16) interruptible natural gas customers are not required to have on-site inspections as they are neither Human Needs/Critical Care nor distillate/#2 fuel oil customers. For 2024, approximately 16 of the 29 compliant customers will be visited once, or more, as necessary.

For RG&E, no customers were visited. Information is taken from the surveys returned by the customers. In the event RG&E were to have interruptible customers, on-site inspections would be scheduled in the first year. After the first year, RG&E would follow similar protocols to NYSEG.

h) What are the alternate fuels and how many customers are in each fuel category?

Response

Alternate Fuel Type	Number of Customers NYSEG	Number of Customers RG&E
#2 Fuel Oil	17	12
#4 Fuel Oil	1	0
#6 Fuel Oil	1	1
#2 or #6 Fuel Oil	0	0
Vegetable Oil/Yellow Grease	0	0
Propane	4	0
Wood Chips	1	0
Waste Oil	2	1
Alternate Natural Gas Connection	0	0
No Alternate Fuel – Shut Down	3	0

i) Are affidavits required? What is the status of customer compliance with this requirement and how many customers that have been asked to provide affidavits still have not complied? What was the total dollar value of any ensuing penalties and what was the disposition of those received penalty amounts?

Response

Yes, an affidavit must be signed by the customer, attesting that they meet the requirements to take natural gas service.

All customers complied in the 2023-2024 heating season by signing the affidavit, therefore there have been no penalties assessed.

j) Outcome of review? Rechecks?

Response

All NYSEG interruptible customers inspected or surveyed were in compliance.

For RG&E, customers were required to have five (5) days alternate fuel on hand by November 1, 2023, in order for the supplier to not need primary point capacity to serve the customer. Suppliers were notified by Gas Supply of any dual fuel customers not meeting the five (5) day on-hand fuel requirement. Should a dual fuel customer at RG&E become an interruptible customer then an inspection would occur.

k) Did your experience servicing dual fuel customers during last winter indicate the need for additional alternate fuel inventory requirements? If so, what changes do you recommend?

Response

There were no issues experienced serving NYSEG interruptible or RG&E dual fuel customers that would require additional alternate fuel inventory requirements.

l) Is the company aware of any issues regarding interruptible customers not receiving their oil deliveries during the winter season? If so, please provide details of when and where this occurred, as well as what the Company would suggest could be done to help these customers?

Response

NYSEG is not aware of any issues regarding interruptible customers not receiving their oil deliveries during the 2023-2024 winter season.

RG&E did not have interruptible customers during the 2023-2024 winter season.

m) Will you be modifying your procedures for verifying alternate fuel inventories being held by interruptible customers (including generators and temperature-controlled customers)? If so, how? If affidavits are not used, explain why not?

Response

No modifications to NYSEG or RG&E procedures for verifying alternate fuel inventories are planned as a result of the 2023-2024 heating season.

n) In comparison to previous winters, was there a pandemic or market related impact to alternative fuel availability? If so, please describe the impact(s).

Response

No issues due to the pandemic or market related impact regarding alternative fuel availability that we are aware of.

Data Request 19 – Interruptible Customers & Dual Fuel

Describe the methods used to communicate with interruptible customers, their marketers/fuel suppliers, NYSERDA and the various Oil Associations in New York prior to, and during, periods of interruption. Have you made or are you planning to make any changes to these communications based on the events of the 2022-2023 heating season (Winter Storm Elliot)? If yes, what are the changes? Highlight any modifications to communication methods for the upcoming winter season compared to those used last winter.

Response

Interruptible customers provide NYSEG with a 24-hour point of contact. If the need to curtail load is anticipated, the NYSEG account manager would contact customers to provide as much advance notice as possible. In the event NYSEG needs to shed load, customers are contacted by their NYSEG account manager and told how much load to shed and the expected duration of the interruption. During the interruption, the NYSEG account manager keeps in close contact with the customer and advises them as conditions change. Communications to customer marketers/fuel suppliers, NYSERDA, and the various Oil Associations in New York prior to, and during periods of interruption in compliance with Commission Order in Case 11-G-0543 is performed by the Gas Supply Group.

The Company does not plan to make any changes to these communications based on the 2023-24 heating season.

RG&E will follow the same protocols as NYSEG if there is an interruptible customer.

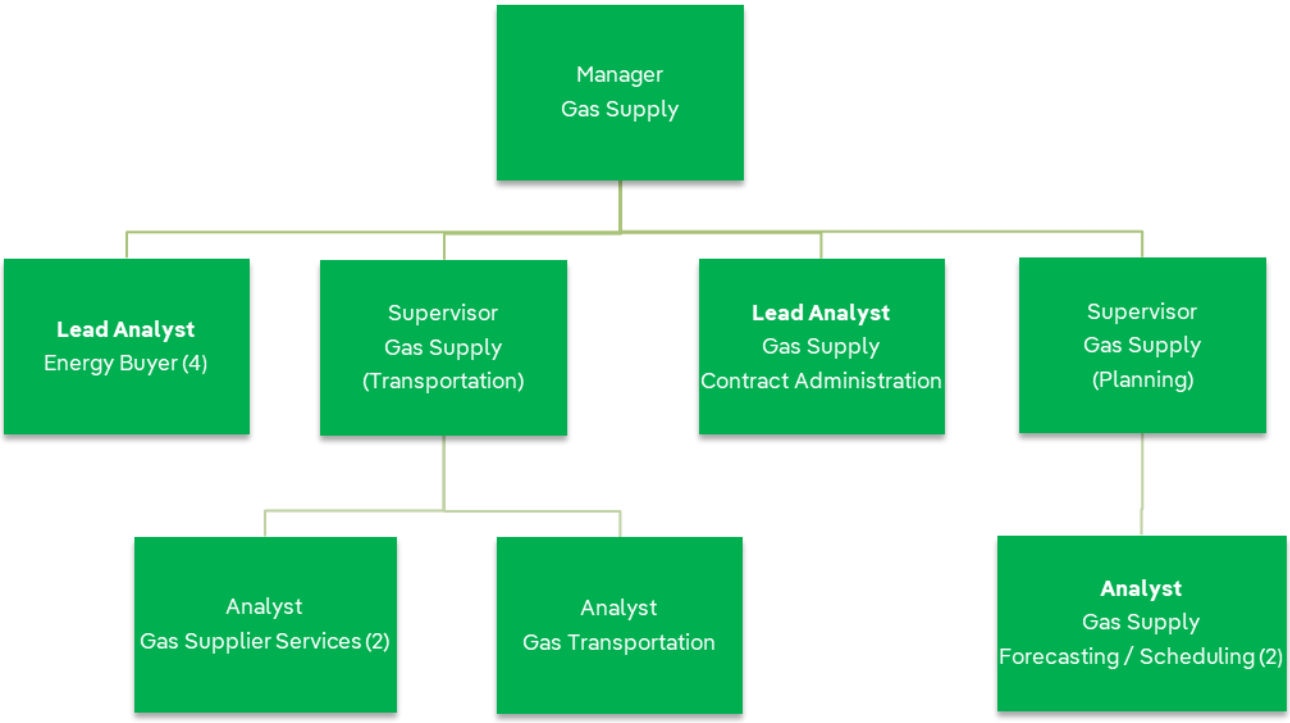
Data Request 20 – Organization Chart

A current organization chart for your company's gas supply department. Please include a list of contact people for the winter season for updated storage, peaking and other supply related information and highlight any personnel changes since last winter. Include the chief dispatcher and telephone numbers for both weekdays and weekends.

Response

A current organizational chart and department contact information are provided below.

Organization Chart – Gas Supply Department for NYSEG and RG&E



Contact Information for 2024-2025 Winter Season for NYSEG and RG&E

Gas Supply - NYSEG and RG&E			
Contact	**Title**	**Office Phone**	**Cell Phone**
TBD	Manager	N/A	N/A
Tim George	Supervisor	N/A	607.338.2439
Stacy Rudock	Supervisor	N/A	607.743.4004
Gas Control – NYSEG and RG&E			
Contact	**Title**	**Office Phone**	**Cell Phone**
Sue Dornblaser	Manager	N/A	607.760.3918
Dylan Repko	Supervisor	N/A	607.752.5530
Gas Control – NYSEG and RG&E Weekends / After Hours and Emergencies			
Contact		**Office Phone**	**Cell Phone**
Gas Control Desk - 24 Hour Coverage		607.762.4209	N/A

Data Request 21 – Gas Purchasing Strategy

A description of your company's gas purchasing strategy, including:

a) Information regarding gas purchases for last year and any planned changes for this year. Were the actual commodity prices more than 20% more costly than forecast on a per dekatherm basis, and if so, explain why. Did your experience during last winter lead to any changes? If so, what are the changes? If not, why not? Please include an identification of the amount of RNG and CNG/LNG purchased.

Response

Actual commodity prices were not more costly than forecasted. Neither NYSEG nor RG&E changed their gas purchasing strategies based on the winter of 2023-2024. Both companies met all storage obligations. Baseload and swing contracts were in place and utilized according to the contracted transportation capacity of each company's portfolio. RNG is currently injected into NYSEG's distribution system in the Geneva area from three production facilities. The gas injected at these points is considered to be local production gas by NYSEG as the Company does not procure the environmental credits associated with this gas. The Mechanicville area uses compressed natural gas as a winter peaking service. In calendar year 2023, NYSEG used 270 dths of compressed natural gas.

b) The types of contracts and associated contract flexibility.

Response

Winter term contracts for baseload and swing supplies are entered into annually. Winter 2024-2025 supply arrangements and their character of service are located in *Table 6* of *Data Request 12.c.*

c) The extent of planned reliance on firm gas, spot gas, swing gas, etc.

Response

System supply gas is base loaded monthly to cover minimum day requirements. Swing gas is purchased to cover forecasted daily demand fluctuations. Storage gas constitutes approximately 42% of NYSEG's and 30% of RG&E's winter demand requirements.

d) The description of any triggers to purchase spot (daily) gas.

Response

WebICE is checked daily to compare market price to winter swing term deals. Lower pricing is a trigger to purchase spot gas. Significant next day weather changes would also cause a spot purchase.

Data Request 22 – Gas Price Risk – Table 7

A description of your company's gas price risk management strategy, including answers to the following questions:

a) What percentage of your gas supply do you hedge (1) physically and (2) financially? Please break this down between storage and distinguish among the types of financial contracts used.

Response

Both NYSEG and RG&E hedge between 50% and 60% of their projected winter requirements. For NYSEG, approximately 42.1% of the projected winter season throughput is in storage on November 1. For RG&E, approximately 27.1% of the projected winter season throughput is in storage on November 1. NYSEG and RG&E purchase NYMEX Henry Hub future financial contracts. The remainder of the gas supply is provided by gas in storage.

b) If you use fixed price contract, how, when and in what increments are they purchased?

Response

Neither NYSEG nor RG&E currently enter into fixed price physical contracts for a period greater than one month. All physical hedges for winter are storage.

Please provide the breakdown between futures and options (include quantities of each type on an annual and winter season basis). How do you finance your swap/futures? Do you pay for them at the time of purchase or delivery?

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility. NYSEG has a quantity of 2,415 MDT financial futures for the winter season. RG&E has a quantity of 5,010 MDT financial futures for the winter season. NYMEX and swap agreement (contract for difference) contracts are "financed" through cash and/or letters of credit, where required (to cover maintenance margin and mark-to-market valuations). NYMEX purchases are exited at or near contract expiration and are typically settled on that date. NYMEX HH purchases are financially settled where the Floating Price for each contract month will be equal to the NYMEX Henry Hub Natural Gas Futures contract final settlement price for the corresponding contract month on the last trading day for that contract month. Bilateral agreements are typically invoiced on business day 10 following the date of the monthly settlement.

c) Describe the types of options you use, when they are used, and why these are better than other instruments.

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

d) How much and what percentage of total gas costs, booked to the GAC, did you spend on options in each of the last five winters and how much do you plan to spend in the winter of 2024-2025?

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility. No options have been purchased in the last 5 years and options will not be purchased for the winter of 2024-2025.

e) How far out, when, and in what increments do you purchase futures?

Response

For any given month's hedging requirement, both NYSEG and RG&E purchase 75% of the contracts twelve months in advance and 25% of the contracts sixteen months in advance.

f) How has your hedging strategy changed in the past year? Did your experience during last winter lead to any changes? If so, what are the changes? If not, why not?

Response

Neither NYSEG nor RG&E have made changes to their hedging strategies in the past year.

g) Table 7: Actual price hedging and supply performance versus planned price hedging and supply performance for last year, a summary of "lessons learned", and arrangements for this year. Include separate quantities for each hedging instrument.

Response

The NYSEG and RG&E hedging program is structured to mitigate price volatility, not managed to specific price performance. Each Company considers pricing information to be Trade Secret; therefore, certain data in Table 7 is being provided under Trade Secret Protection. Table 7 is found on the next two (2) pages.

Table 7: Winter Supply Hedges Summary

Company: NYSEG
Submission Date: July 15, 2024
Version #: 1
CONFIDENTIAL

New York State Electric & Gas: Winter 2023 – 2024 Purchasing Plan & Projected

Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
	TOTAL	[redacted]	

New York State Electric & Gas: Winter 2023 – 2024 ACTUAL Purchasing & Prices

Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
	TOTAL	[redacted]	[redacted]

New York State Electric & Gas: Winter 2024-2025 Purchasing Plan & Projected Prices

Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

*Market Area Storage WACOG estimated value based on NYMEX on 7/01/2024

Table 7: Winter Supply Hedges Summary

Company: RG&E
Submission Date: July 15, 2024
Version #: 1
CONFIDENTIAL

Rochester Gas and Electric: Winter 2023 – 2024 Purchasing Plan & Projected Prices			
Percent Hedged Normal Weather	**Portfolio Summary**	**Amount (MDT)**	**Price Commodity**
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

Rochester Gas and Electric: Winter 2023 – 2024 ACTUAL Purchasing & Prices			
Percent Hedged Normal Weather	**Portfolio Summary**	**Amount (MDT)**	**Price Commodity**
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

Rochester Gas and Electric: Winter 2024 – 2025 Purchasing Plan & Projected Prices			
Percent Hedged Normal Weather	**Portfolio Summary**	**Amount (MDT)**	**Price Commodity**
	Physical Hedges		
[redacted]	Market Area Storage*	[redacted]	[redacted]
[redacted]	Production Area Storage	[redacted]	[redacted]
[redacted]	Fixed Price Contracts	[redacted]	[redacted]
[redacted]	**Financial Hedges**	[redacted]	[redacted]
[redacted]	NYMEX Futures	[redacted]	[redacted]
[redacted]	Collars	[redacted]	[redacted]
[redacted]	Calls	[redacted]	[redacted]
[redacted]	Puts	[redacted]	[redacted]
[redacted]	**Flowing or Floating Price Gas**	[redacted]	[redacted]
[redacted]	Monthly Index	[redacted]	[redacted]
[redacted]	Spot/Daily Price	[redacted]	[redacted]
[redacted]	**TOTAL**	[redacted]	

*Market Area Storage WACOG estimated value based on NYMEX on 7/01/2024

Data Request 23 – Local Production / Landfill

How has your use of local production/landfill/renewable gas changed over the past year? Please provide the average daily volumes of local produced gas acquired for the previous heating season and a forecast for the upcoming season. What percentage of your system throughput is local production/landfill/renewable gas? Provide a project description of any new RNG facilities that were attached during the twelve months prior to May 1, 2023 and any actively being planned for your service areas. Please indicate the status of communications currently underway with any renewable gas/biogas developers including their names and locations of the potential project(s). Describe what process and procedures are in place to ensure gas quality parameters are met prior to flowing into your distribution system. Which processes are in place to verify that btu content is met by RNG producers?

Response

No RNG facilities were added to RG&E's service territory and RG&E continues to have no RNG facilities interconnected. One (1) RNG facility, El-Vi Farms RNG, developed by UGIES, was added to NYSEG's distribution system, in the twelve months prior to May 1, 2024. El-Vi Farms is a dairy farm located in the Town of Phelps, County of Ontario in the NYSEG Geneva Division. It has a production flowrate range of approximately 4.5 – 10.8 MCFH.

The following RNG facilities, all located in NYSEG's service territory, are being planned to be active in the near future:

- Marks Farms located in the Town of Martinsburg, Lewis County in NYSEG's Oneonta Division. This is a dairy farm, being developed by REVLNG, and has a production design flowrate of approximately 16 MCFH.
- Lincoln Dairy located in the Town of Fleming, Cayuga County in NYSEG's Auburn Division. This is a dairy farm, being developed by REVLNG, and has a production design flowrate of approximately 15 MCFH.
- New Hope Farms located in the Town of Homer, Cortland County in NYSEG's Cortland Division. This is a dairy farm, being developed by UGIES, and has a production design flowrate of approximately 8 MCFH.
- Cayuga Regional Digester located in the Town of Auburn, Cayuga County in NYSEG's Auburn Division. This is a food waste digester, being developed by CH4 Generate Cayuga, and has a production design flowrate of approximately 16.5 MCFH.

There are a number of developers that have inquired about potential RNG projects in the Companies service territory as shown in the following table:

OPCO	Division	Project Name	Developer	Location	Status
NYSEG	Auburn	Oakwood Farms	Morning Light RNG	Aurelius	Preliminary Discussion; technically feasible
NYSEG	Geneva	Ontario County RNG	Global Common Ventures	Seneca	Preliminary Discussion; technically feasible
NYSEG	Plattsburgh	Adirondack Farms	SuburbanRNG	Plattsburgh	Preliminary Discussion; technically infeasible
NYSEG/RGE	Auburn/Pavilion	*unnamed*	Divert	multiple	Conceptual discussions; exploring multiple sites

As defined and agreed upon in the Tap Agreement between the Producer and the Company, the Producer is required to meet the Companies' gas quality standards. Gas quality constituents and flow rates are monitored to ensure the gas is meeting the agreed-upon quality specifications utilizing on-line instrumentation for essential parameters. The Producer is required to prepare a gas quality management plan containing a mutually agreeable sampling and constituents of concern (COC) testing schedule prior to placing the RNG facility in-service, and, while facilities are in-service, take action if COCs values fall outside of specification limits. The plan also includes monitoring requirements, procedures, test methods and detection thresholds to ensure compliance, response actions and corrective actions and data retention schedules. COC testing is performed by a mutually agreed upon third party analytical laboratory service provider using mutually agreeable standard sampling and testing methods.

While the RNG facility is in-service, the Producer's gas quality monitoring and sampling information is linked to the Companies Energy Control Center (ECC) where pre-set alarm limits alert for off-specification gas. While the Producers incorporate fail-safe and/or recirculation ability in their process to ensure the RNG meets the gas quality standards and prevent the delivery of off-specification gas, the ECC can remotely shut-in the RNG facility as a last line of defense to prevent off-specification gas from entering the Companies' distribution systems.

BTU content is measured with a gas chromatograph to ensure it meets the gas quality standard.

NYSEG and RG&E plan to purchase local production volumes on an interruptible basis, as production volumes vary day to day and are not considered firm.

NYSEG's average daily purchase for the 2023-24 heating season was 2,716 Dths/day, down from the previous heating season of 6,749 Dths/day. This decrease is due to decreased local production gas sold to NYSEG in the Corning area at Bradley Farms.

RG&E's average daily purchase for the 2023-2024 heating season was 0 Dths/day, which is the same as the previous season.

On an annual basis, NYSEG's and RG&E's local production purchases as a percentage of total system demand are as follows:

	NYSEG			RG&E		
Calendar Year	Local	Total	Percent	Local	Total	Percent
2022	610,082	55,998,322	1.09%	0	58,901,298	0.00%
2023	1,449,964	51,086,830	2.84%	0	53,700,764	0.00%

Data Request 24 – Local Production / RNG Reliability

Are there parts of your service territory that could be impacted, including outages, related to poor performance from an RNG, biofuel, or other local production facility? If so, provide details of each location and the controls in place to ensure reliability of the system.

Response

All local production, including RNG facilities, are consider non-firm gas supply and therefore are not required, nor relied upon, to maintain system integrity and reliability.

Data Request 25 – Use of Hydrogen

Are you currently studying, or plan to study, the use of hydrogen in your distribution system? If so, provide details of each program or project.

Response

NYSEG and RG&E do not plan to perform studies regarding the use of hydrogen in the Companies' distribution system. The Companies will continue to follow (and sponsor) hydrogen research being conducted by others to better understand the role hydrogen blending can have in lowering

GHG emissions in a safe and reliable manner, gas distribution system impacts, customer equipment impacts, costs, timing, project development process, etc.

Data Request 26 – Billing Comparisons -Table 8

Bill impact comparison of last winter (2023-2024) versus the forecasted 2024-2025 winter. Include the work papers used to develop Table 8 (note: they should also tie to the numbers in Table 7).

Response

Please see Tables 8.1 and 8.2, on the next two (2) pages, which represent NYSEG's and RG&E's bill comparisons.

Table 8.1: Bill Comparison (Excluding Taxes)
Winter 2023-2024 to Winter 2024-2025

Company: NYSEG
Submission Date: July 15, 2024
Version #: 1

1	2	3	4	5	6
NYSEG	2023-24 Average Residential Heating Customer Winter Bill	2023-24 Average Residential Heating Customer Winter Bill	2024-25 Forecasted Residential Heating Customer Winter Bill	Commodity Related Percent Change from Last Winter	Expected Percent Change from Last Winter
	Actual	Normalized	Normalized	(column 4 - column 3) / column 3	(column 4 - column 2) / column 2
[3]**Total Delivery Costs**	$369	$389	$398	2%	8%
Total Capacity Costs	$85	$97	$96	-1%	12%
GAC Costs (Commodity)	$147	$166	$215	29%	46%
[1] GAC Reconciliation	-$10	-$12	-$7	-43%	-35%
[2] GAC Surcharges and Refunds	$12	$13	$20	55%	76%
Total Commodity Costs	$148	$168	$229	36%	54%
Total Winter Bill	$602	$654	$723	11%	20%

Assumptions:

Normal = 934 Therms/year with 703 Therms of winter use

Last Year = 620 Therms of winter use

Notes:

[1] Identify the impact of any GAC reconciliation surcharge or refund mechanism.
2023/2024 Annual Reconciliation of Gas Cost ($0.026838)/therm
2024/2025 No estimate at this time

[2] Identify the impact of any other surcharges or refunds included in bills.
- Merchant Function Charge (MFC) average rate $.028819/therm (Winter 2023/24 $0.025224)
- Heater Fuel average rate $.000175/therm (Winter 2023/24 $0.000245)
- Pipeline Refund average rate ($.000000)/therm (Winter 2023/24 ($0.006714))

[3] Includes a residential delivery rate change involving an increase to the customer charge and volumetric rate from Case 22-G-0318 RY1 to RY2. The comparison above reflects a single average residential heating customer.
- Revenue Decoupling Mechanism average rate ($0.003472)/therm (Winter 2023/24 $0.005360)
- Transition Surcharge average rate $0.009738/therm (Winter 2023/24 $0.009742)

	Make up of Monthly Bill Impact -	**2024-2025 Winter**
1	Delivery	50.41%
2	GRT	2.09%
3	Gas Cost Factor	42.12%
4	Transition Surcharge	0.32%
5	Arrears/Late Payment (ARP/LPCO)	2.39%
6	Merchant Function Charge (MFC)	2.81%
7	Revenue Decoupling Mechanism (RDM)	-0.22%
8	Rate Adjustment Mechanism (RAM)	0.08%
9	Other	0.00%
		100.00%

Table 8.2: Bill Comparison (Excluding Taxes)
Winter 2023-2024 to Winter 2024-2025

Company: RG&E
Submission Date: July 15, 2024
Version #: 1

1	2	3	4	5	6
RG&E	2023-24 Average Residential Heating Customer Winter Bill	2023-24 Average Residential Heating Customer Winter Bill	2024-25 Forecasted Residential Heating Customer Winter Bill	Commodity Related Percent Change from Last Winter	Expected Percent Change from Last Winter
	Actual	Normalized	Normalized	(column 4 - column 3) / column 3	(column 4 - column 2) / column 2
[3] **Total Delivery Costs**	$298	$327	$360	10%	21%
Total Capacity Costs	$75	$87	$88	1%	18%
GAC Costs (Commodity)	$146	$169	$208	23%	42%
[1] GAC Reconciliation	-$1	-$1	-$2	156%	248%
[2] GAC Surcharges and Refunds	$11	$13	$18	36%	63%
Total Commodity Costs	$157	$182	$224	23%	43%
Total Winter Bill	$529	$595	$672	13%	27%

Assumptions:

Normal = 927 Therms/year with 691 Therms of winter use

Last Year Actual = 596 Therms of winter use

Notes:

[1] Identify the impact of any GAC reconciliation surcharge or refund mechanism.
2023/2024 Annual Reconciliation of Gas Cost ($0.007909)/therm, SPA charge $.000576
2024/2025 No estimate at this time

[2] Identify the impact of any other surcharges or refunds included in bills.
- Merchant Function Charge (MFC) average rate $.027297/therm (Winter 2023/24 $0.018111)
- Heater Fuel, R&D, Interdepartmental sales, Transp. Revenues $.005852/therm (Winter 2023/24 $0.005666)
- Pipeline Refund average rate ($.000000)/therm (Winter 2023/24 ($0.005929))
- Interim Rec started in March 2024 - August 2024 $0.051364/therm

[3] Includes a residential delivery rate change involving an increase to the volumetric rate from Case 22-G-0320 RY1 to RY2.
The comparison above reflects a single average residential heating customer.
- Revenue Decoupling Mechanism average rate ($0.006450)/therm (Winter 2023/24 ($0.003855))
- Arrears (ARP)/Late Payment Surcharge (LPC)/RAM/EAM $0.005800/therm (Winter 2023/2024 $0.003399)

	Make up of Monthly Bill Impact -	**2024-2025 Winter**
1	Delivery	51.93%
2	GRT	1.85%
3	Gas Cost Factor	43.19%
4	Transition Surcharge	0.00%
5	Arrears/Late Payment (ARP/LPCO)	0.41%
6	Merchant Function Charge (MFC)	2.83%
7	Revenue Decoupling Mechanism (RDM)	-0.40%
8	Rate Adjustment Mechanism (RAM)	0.19%
9	Other	0.00%
		100.00%

Attachment 1: NYSEG Interruptible Letter and Alternate Fuel Compliance Form

Response to Data Request 18b.

NYSEG - ICF 2024.pdf

Attachment 2: RG&E Heating Season Letter and Alternate Fuel Compliance Form

Response to Data Request 18b.

RGE DFCF 2024.pdf