

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

**Proceeding on Motion of the Commission
to Examine Programs to Address Energy
Affordability for Low Income Utility
Customers**

Case No. 14-M-0565

**In the Matter of Budget Appropriations
to Enhance Energy Affordability
Programs**

Case No. 23-M-0298

**THE BROOKLYN UNION GAS COMPANY D/B/A NATIONAL GRID NY PETITION
FOR AUTHORIZATION TO TEMPORARILY INCREASE THE EAP GAS
BUDGET CAP TO 3.0 PERCENT OF TOTAL REVENUES AND REQUEST FOR
EXPEDITED TREATMENT**

I. Introduction

Pursuant to the Public Service Commission’s (“Commission”) Order Adopting Enhanced Energy Affordability Policy and Directing Utility Filings, issued and effective July 17, 2025 in Case 14-M-0565 (the “July EEAP Order”), The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY” or “Company”) files this petition (“Petition”) for authorization to temporarily increase its Energy Affordability Program (“EAP”) budget cap to 3.0 percent of total revenues for the next EAP program year, beginning December 1, 2026. To ensure that the increased budget cap will be implemented in time for the next EAP program year, KEDNY requests expedited treatment of the Petition in accordance with Section 202(6) of the State Administrative Procedure Act (“SAPA”).

II. Discussion

A. Eligibility & Tier Enrollment

In the July EEAP Order, the Commission ordered utilities to raise their EAP budget caps to 2.5 percent of annual revenues, with the option of requesting a temporary increase to 3.0 percent once per budget year. The Commission stated that a 0.5 percent budget cap increase would be “warranted” if utilities demonstrate the need for the increase by showing that the current cap would be exceeded. The increase in the KEDNY EAP budget cap supports affordability for participants by allowing the energy burden to remain at three percent, or as close as possible for customers, and discounts not to be decreased.

The Company has developed the components of EAP including participant eligibility criteria and tier enrollment with oversight from the Commission since the program's inception.¹ The majority of EAP participants qualify for the program based on their annual participation in the federal Low-Income Home Energy Assistance Program ("HEAP"). The remaining EAP participants qualify through automated file matching with state entities, through self-certification, and through their participation in the Department of Social Service Utility Guarantee and Direct Vendor ("UG/DV") programs, when applicable. Information on the Company's EAP eligibility and enrollment is filed in the Annual EAP Report.²

The Company automatically enrolls accounts in EAP based on the amount of HEAP grants. The grant amounts are stored in the customer billing system with the designated tier level to automatically enroll participants on the appropriate tier. The Company performs validations to ensure those grant-tier-level designations are accurate and validates HEAP payment amounts against EAP tier placement. In the September EEAP Order, the Commission directed utilities to include a "detailed process confirming participant eligibility and appropriate tier enrollment...and a detailed description validating the accuracy of low-income average bills."³ Accordingly, Attachment 1 to the Petition describes the HEAP and EAP Tier placement process, the groups responsible for updating and ensuring accuracy, and the controls in place.

B. Program Costs to Exceed Budget Cap

The updated EAP budget for the 2025-2026 program year is \$85.991 million, as demonstrated in Attachment 2. With a 2.5% budget cap, the budget would need to be adjusted downward to \$76.060 million, which would reduce the discounts available for participating customers (see Attachment 3). The Company believes that because of the required downward adjustment and the potential for an increase in customer participation, it is necessary to request the incremental 0.5 percent towards the budget cap for the next program year beginning December 1, 2026. This will enable KEDNY's participants to maintain an energy burden as close as possible to three percent.

C. Average Bill Process and Calculations

After confirming HEAP grant amounts, the new tier discount amounts are calculated along with net energy burden levels and average EAP customer bills as a part of preparing and filing the Energy Affordability Credit Statement and budget workbook. The EAP participant monthly usage and average bill report is provided by Billing to the EAP administrator which is then used for the average bill information in the EAP Monthly Report filing in Case 14-M-0565. This information is also provided to the Company's New York Pricing team to be used to compile the average total bill calculation. The calculation is performed using three-year historical commodity costs plus twelve months forward looking delivery costs. The calculation is reviewed

¹ Case 14-M-0565, *Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers*, Order Instituting Proceeding (Issued and Effective January 9, 2015).

² Case 14-M-0565, Annual Energy Affordability Program Report – KEDLI, KEDNY, and NMPC (filed January 30, 2026).

³ Case 14-M-0565 *et al.*, *Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers*, Order on Procedures for Implementing Enhanced Energy Affordability Program (Issued and Effective September 19, 2025) (the "September EEAP Order").

by the Company's New York Pricing Manager. Once the review is completed, the average total bill calculation is provided to the New York Strategy and Product Success Team and then to the EAP Administrator to update the EAP workbook. Finally, the EAP Administrator will provide the tier credit calculations back to the New York Pricing Manager for review and filing.

III. Request for Expedited Treatment

The Company requests expedited treatment of the Petition under SAPA Section 202(6). The Company aims to file its updated EAP budget for the next program year by November 1, 2026. Granting the temporary increase to the budget cap as proposed herein would allow participating customers to better manage their energy bills during the heating season. The Company submits therefore that approval on an expedited basis by October 1, 2026 is "necessary for the preservation of the public health, safety, or general welfare."⁴ Finally, there is precedent for the Commission to act on an emergency basis when EAP customers may be impacted, such as the emergency order pausing EAP disenrollments throughout the state from the delay in federal HEAP funding that was approved last year.⁵

IV. Conclusion

For the reasons set above, KEDNY respectfully requests that the Commission, on an expedited basis, raise the EAP budget cap to 3.0 percent of total annual revenue for KEDNY.

⁴ New York State Administrative Procedure Act § 202(b).

⁵ Case 14-M-0565, *Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers*, Order Pausing Customer Disenrollments in Utility Energy Affordability Programs (Issued November 13, 2025).

Energy Affordability Program (EAP) – HEAP and EAP Tier Placement Process

Below are the detailed process steps for updating the HEAP amounts and EAP Tier Table in the CSS customer system:

The EAP Administrator receives the updated HEAP benefits spreadsheet from the Office of Temporary and Disability Assistance (“OTDA”) that contains formulas so when the primary HEAP amounts are updated, all other cells are updated appropriately. The EAP Administrator then updates the HEAP amounts based on the HEAP information received for that heating season from OTDA along with the appropriate EAP tier and double checks the spreadsheet with the EAP team.

Billing receives the valid HEAP amounts and the EAP Tiers that coincide with each amount from the EAP Team via a system request (STS). Based on the STS, Billing updates the values based on Company, Dollar amount, and EAP Tier in the CSS table.

Once the changes are made, the Billing team meets with the EAP Administrator and shares the changes to be double checked. Once the changes are reviewed and approved, the changes are promoted through a system migration process. During that process the changes move through environments, including TEST environments prior to Production. The changes are looked over with the EAP Administrator and approved and then moved to the next environment. When the changes are approved, they are moved to production through the CSS push process. When the changes are being approved in these environments, the Billing team sends emails to the IT team who are the ones alerting them that the changes need to be checked and approved.

Following are the controls that exist for this process:

- OTDA provides the spreadsheet to National Grid with formulas for the primary HEAP benefits, and the EAP Administrator updates the HEAP dollar amounts in the spreadsheet based on the HEAP grant amounts for that heating season. The EAP Administrator then reviews the spreadsheet with the EAP team before submitting the STS and providing the spreadsheet to Billing.
- EAP Administrator and Billing utilize Test environments in which the updates are verified and two separate times the updates are reviewed with the EAP Administrator before the updates are finalized.
- The EAP Team manages a set of SQL Control Queries that serve as controls for different scenarios related to EAP. One of the Control Queries counts the number of rows in the HEAP payment amount table production version and compares it against the historic snapshot in the Credit and Collections Analytics Engine for the current heating season. This query confirms that the HEAP table was not updated without the EAP team’s knowledge.
- On a daily basis, a Billing Operations Analyst reviews all Verify Batch reports to ensure that CSS billing static tables and programs have not been inappropriately modified since execution of the prior billing cycle. Evidence of the above review is tracked in the Verify Batch Checklist. All discrepancies are researched and resolved by the Billing Analyst. This review is a Standard Operating Procedure and maintained within Billing Operations.

Total Energy Burden Goal		6.00%
Min. Discount		\$3.00
Electric		
Combined Energy Burden	Adjusted Energy Burden	Factor of Adjustment
6.00%	3.00%	1.000
Gas		
Adjusted Energy Burden	Factor of Adjustment	
3.00%	1.000	

Grandfathered Discounts		Gas	Electric
current	heat	\$0	0
	non-heat	\$0	0

Green highlighted cells indicates current discount per

KEDNY

Program Budget	Sales Revenues (end-use customers) 2025	Pct. of Revs.	Sales (kWh or Therms)	Cost per kWh/Therm	All Customers	\$/Cust./month	\$/Cust./Y ear
elec	\$0	\$0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
gas	\$85,990,655	\$3,042,387,527	2.83%	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Gas Budget Cap (2.5%)	\$76,059,688.18	FALSE					
total cust.	141,529	0	\$85,990,655	#DIV/0!	\$217,737,624	#VALUE!	###
Benefit/cust.	607.58329	#DIV/0!	Discount	39.49%	#DIV/0!		
Benefit/cust./per mo.	\$50.63	#DIV/0!	\$76,059,688.18	N/A			
curr budget			0.130568076	#DIV/0!	#DIV/0!		
budget difference %							

Tier	Ele. Target Bill	Gas Target Bill	gas ht (402 & 444)	gas n/h (403 & 442)	elec ht	elec n/h	bill	pct	target bill	discount	AB-TB	Gas Customers	Electric Customers	Cost - Gas	Cost - Electric	Gas Bills	Electric Bills
Tier 1	\$136.04 \$121.46	\$136.04 \$121.46	gas ht (402 & 444)	gas n/h (403 & 442)	elec ht	elec n/h	\$227.23	40.13%	\$136.04	\$91.19	\$91.19	40,444		44,255,667.18	\$2,767,716	\$110,281,711	\$43,550,379
							\$47.21	6.36%	\$44.21	\$3	\$3.00	76,881	N/A				
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
Tier 2	\$104.28	\$104.28	gas ht (402 & 444)	gas n/h (403 & 442)	elec ht	elec n/h	\$227.23	54.11%	\$104.28	\$122.95	\$122.95	6,182		\$9,121,081	\$1,764	\$16,856,926	\$27,757
							\$47.21	6.36%	\$44.21	\$3	\$3.00	49	N/A				
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
Tier 3	\$81.47	\$81.47	gas ht (402 & 444)	gas n/h (403 & 442)	elec ht	elec n/h	\$227.23	64.15%	\$81.47	\$145.76	\$145.76	16,411		\$28,705,228	\$3,168	\$44,749,114	\$49,849
							\$47.21	6.36%	\$44.21	\$3	\$3.00	88	N/A				
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
Tier 4	\$83.66	\$83.66	gas ht (402 & 444)	gas n/h (403 & 442)	elec ht	elec n/h	\$227.23	63.18%	\$83.66	\$143.57	\$143.57	642		\$1,106,080	\$29,952	\$1,750,590	\$471,299
							\$47.21	6.36%	\$44.21	\$3	\$3.00	832	N/A				
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!
							\$0.00	#DIV/0!	#DIV/0!	#DIV/0!			N/A	#DIV/0!		#VALUE!	#VALUE!

Combined Energy Burden	Total Energy Burden Goal		6.00%		current	heat non-heat	Gas	Electric
	Min. Discount		\$3.00					
	Electric		Gas					
Adjusted Energy Burden	Factor of Adjustment	Adjusted Energy Burden	Factor of Adjustment					
6.00%	3.00%	1.000	3.00%	1.000				

Tier	Ele. Target Bill	Gas Target Bill	gas ht	gas n/h	elec ht	elec n/h	bill	pct	target	discount	Gas		Cost - Gas	Cost - Electric	Gas Bills	Electric Bills
											Customers	Customers				
Tier 1	\$122.01	\$122.01	\$47.21	6.36%	\$47.21	\$149.96	\$77.27	46.30%	\$149.96	\$77.27	40,444	37502063.49	\$110,281,711	\$43,550,379	#VALUE!	#VALUE!
	\$107.43	\$107.43	\$0.00	#DIV/0!	\$272.00	\$0.00	76,881	\$1,771,338	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
	\$271.42	\$271.42	\$0.00	#DIV/0!	\$121.46	\$0.00	N/A	#VALUE!	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Tier 2	\$96.09	\$96.09	\$47.21	6.36%	\$47.21	\$112.97	\$112.97	57.71%	\$112.97	\$112.97	6,182	\$8,380,751	\$16,856,926	\$27,757	#VALUE!	#VALUE!
	\$218.54	\$218.54	\$0.00	#DIV/0!	\$208.56	\$0.00	49	\$1,129	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
	\$104.28	\$104.28	\$0.00	#DIV/0!	\$104.28	\$0.00	N/A	#VALUE!	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Tier 3	\$76.53	\$76.53	\$47.21	6.36%	\$47.21	\$138.67	\$138.67	66.32%	\$138.67	\$138.67	16,411	\$27,309,453	\$44,749,114	\$49,849	#VALUE!	#VALUE!
	\$170.03	\$170.03	\$0.00	#DIV/0!	\$162.94	\$0.00	88	\$2,028	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
	\$81.47	\$81.47	\$0.00	#DIV/0!	\$81.47	\$0.00	N/A	#VALUE!	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Tier 4	\$82.38	\$82.38	\$47.21	6.36%	\$47.21	\$199.38	\$199.38	63.75%	\$199.38	\$199.38	642	\$1,073,757	\$1,750,590	\$471,299	#VALUE!	#VALUE!
	\$0.00	\$0.00	\$0.00	#DIV/0!	\$167.32	\$0.00	832	\$19,169	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
	\$83.66	\$83.66	\$0.00	#DIV/0!	\$83.66	\$0.00	N/A	#VALUE!	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Glide		Minimum	3	2.4	1.92	100.00%	total cust. Benefit/cust.		141,529	0	\$76,059,688	#VALUE!	\$217,737,624	#VALUE!	#VALUE!	#VALUE!
							Benefit/cust./per mo. curr budget		\$44.78	#VALUE!	#VALUE!	Discount	34.93%	#VALUE!	#VALUE!	#VALUE!
							budget difference %		\$44.78	#VALUE!	\$76,059,688	#VALUE!	0	#VALUE!	#VALUE!	#VALUE!

Program Budget	Sales Revenues (end-use customers) 2025	Pct. of Revs.	Sales (KWh or Therms)	Cost per kWh/ Therm	All Customers	\$/Cust/ month	\$/Cust/Year
elec	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
gas	\$76,059,688	\$3,042,387,527	2.50%	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Elec. Budget Cap (2%)		\$0	2.5%	Gas Heating Energy Burden %			
Gas Budget Cap (2%)		\$76,059,688	2.5%	Gas Non-Heat Energy Burden %			
				Tier 1 3.35% 1.09%			
				Tier 2 3.35% 1.52%			
				Tier 3 3.35% 2.14%			
				Tier 4 3.35% 3.62%			

Gas Equal Energy Burden %
3.35%

50