

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

Requesting Party: AES Clean Energy Development, LLC – Sheldon Energy LLC and Stony Creek Energy LLC

Request No.: NYRC-1978 (AES-Sheldon-01-34)

Date of Request: January 9, 2026

Response Due Date: January 20, 2026

Date of Reply: January 20, 2026

Witness: Edward Roedel, Mark Gaines, Appiah Wiafe, Manuel Figuerola, Ken Pixley, Paulo Migliorini

Panel: Electric Capital Expenditures Panel

Subject:

Question:

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

Electric Capital Expenditures Panel:

1. When did NYSEG first determine that capital improvements were needed at the Meyer Substation?
2. According to the Joint Proposals filed with the Commission in its prior rate cases, upgrades to the Meyer Substation have been included in NYSEG’s capital budgets and plans since at least its 2015 rate case (Case 15-E-0283), and the in-service date for the improvements was projected in the 2015 rate case as June 2017. We understand that the scope of the Meyer Substation Project (“Meyer Project”) may have evolved over time (from a transformer replacement/addition to a full substation rebuild).
 - a. Please explain why NYSEG has not yet completed the work included in its capital plans and budgets.
 - b. Please provide the total cost projections for the Meyer Project if the work had been completed during the terms of each of its 2015, 2019, and 2022 rate cases.
3. Exhibit __ (ECE-2CU) shows that \$12,775,000 had been budgeted for the Meyer Project in 2025.

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- a. Please state the amount expended on the Meyer Project in 2025.
 - b. If the amount expended is less than \$12,775,000, please explain the reason(s) for the variance.
 - c. Please provide the current status of the Meyer Project, including a summary of the work completed to date.
4. We understand that NYSEG advised the NYISO, and possibly DPS Staff, in 2015, and later in 2021 and 2023 that the Meyer Project would be completed by October 2018, and then in 2026. Please explain the reason(s) for the delay in completing the Meyer Project.
 5. What is the projected in-service date – month and year – for the Meyer Project?
 6. If full funding for the Meyer Project is included in the revenue requirements for the next three years, what factors, if any, could cause further delays in the completion of the Meyer Project?
 7. NYSEG’s Five-Year Capital Investment Plan, dated June 30, 2025, at Appendix B, page 226, shows the in-service date for the Meyer Project to be “H2 2026.” Please explain the reason for the variance between this information and the in-service date provided in the rate case.
 8.
 - a. Please provide a Gantt chart or equivalent schedule showing the current permitting, equipment procurement, and construction schedule and all milestones for the Meyer Project.
 - b. If NYSEG does not possess a permitting, equipment procurement, and construction schedule for the Meyer Project, please explain why not.
 - c. Please state the percentage completion for each phase of the Meyer Project, based on the phases listed in the Gantt chart or its equivalent; if there is no such schedule, then for each of the following phases: permitting, design, engineering, procurement, construction, commissioning, other (specify).
 9. When did NYSEG first determine that capital improvements were needed at the South Perry Substation?
 10. According to the Joint Proposals filed with the Commission in its prior rate cases, upgrades to the South Perry Substation have been included in NYSEG’s capital budgets and plans since at least its 2015 rate case (Case 15-E-0283), and the in-service date for the improvements was projected in the 2015 rate case as May 2019. Additionally, NYSEG advised the NYISO and market participants in its 2015 Local Transmission Plan that the South Perry Substation Project (“South Perry Project”) would be in-service by June 2017.

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- a. Please explain why NYSEG has not yet completed the upgrades included in its capital plans and budgets.
 - b. Please provide the total cost projections for the South Perry Project if the work had been completed during the terms of each of its 2015, 2019, and 2022 rate cases.
11. Exhibit __ (ECE-04), page 125, states the in-service date for the South Perry Project as “H2 2028.”
- a. Is this still an accurate in-service date?
 - b. If the response to (a) is no, please explain why not.
 - c. If the response to (a) is no, what is the current in-service date?
12. If full funding for the South Perry Project is included in the revenue requirements for the next three years, what factors, if any, could cause further delays in the completion of the South Perry Project?
- 13.
- a. Please provide a Gantt chart or equivalent schedule showing the current permitting, equipment procurement, and construction schedule and all milestones for the South Perry Project.
 - b. If NYSEG does not possess a permitting, equipment procurement, and construction schedule for the South Perry Project, please explain why not.
14. Please provide the current status of the South Perry Project, including a summary of the work completed to date.
15. Please state the percentage completion for each phase of the South Perry Project, based on the phases listed in the Gantt chart or its equivalent; if there is no such schedule, then for each of the following phases: permitting, design, engineering, procurement, construction, commissioning, other (specify).
- 16.
- a. Is NYSEG aware that the deficiencies at the Meyer Substation are causing curtailments of renewable resources in the same area?
 - b. Has NYSEG performed any analysis of the impacts of the curtailments on the commodity costs paid by its customers each month?
 - c. If the response to (b) is yes, please provide a copy of such analysis.
- 17.
- a. Is NYSEG aware that the deficiencies at the South Perry Substation are causing curtailments of renewable resources in the same area?

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- b. Has NYSEG performed any analysis of the impacts of the curtailments on the commodity costs paid by its customers each month?
 - c. If the response to (b) is yes, please provide a copy of such analysis.
- 18.
- a. Has NYSEG performed any analysis of the impacts of the deficiencies at the Meyer Substation on the operation of renewable resources in the same area?
 - b. If the response to (a) is yes, please provide a copy of such analysis.
- 19.
- a. Has NYSEG performed any analysis of the impacts of the deficiencies at the South Perry Substation on the operation of renewable resources in the same area?
 - b. If the response to (a) is yes, please provide a copy of such analysis.
- 20.
- a. Does NYSEG have a policy or procedure regarding replacement of substation equipment when it reaches a certain age?
 - b. If the response to (a) is yes, please provide a copy of the policy or procedure.
 - c. If the response to (a) is no, does NYSEG wait until equipment fails or ceases functioning to replace it?
 - d. If the response to (c) is no, please explain when NYSEG replaces substation equipment.
 - e. If the response to (c) is no, please explain how NYSEG decides to replace equipment within a substation.
21. Is NYSEG aware that when renewable resources in the same area as the Meyer Substation are curtailed, the NYISO dispatches more expensive generating facilities?
22. Is NYSEG aware that when renewable resources in the same area as the South Perry Substation are curtailed, the NYISO dispatches more expensive generating facilities?
- 23.
- a. When was the Meyer Substation derated as compared to its normal operating parameters?
 - b. For what reason(s) was the Substation derated?
 - c. By how much was the Substation derated?
- 24.
- a. Was there a time after the Meyer Substation was first derated that it was further

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

derated?

- b. If the response to (a) is yes, please explain the circumstances that caused the additional derating.
 - c. Please state the additional extent of the derating.
 - d. If the Substation was further derated more than once, please provide the information sought in subparts (b) and (c) for each instance in which an incremental derating occurred.
25. Since the Meyer Substation was derated, please describe the interim actions considered, if any, to increase the transfer capacity of the Substation.
26. Since the Meyer Substation was derated, please describe the interim actions taken, if any, to increase the transfer capacity of the Substation.
27. If no interim actions have been considered or taken, please explain why not.
- 28.
- a. Has the equipment needed for the Meyer Project been purchased or otherwise acquired?
 - b. Is the equipment on-site?
 - c. If the response to (b) is no, when does NYSEG expect the equipment to be delivered to the Substation site?
 - d. If the response to (a) is no, please provide a list of the major components/pieces of equipment that have not yet been procured.
 - e. For each major component or piece of equipment provided in the response to (d), please state:
 - i. when the component or piece of equipment will be purchased or otherwise acquired;
 - ii. when the component or piece of equipment is expected to be delivered to the Substation site; and
 - iii. the alternatives available to NYSEG if the delivery is delayed (*e.g.*, using equipment within NYSEG's inventory, obtaining equipment from an affiliate or unaffiliated utility, using different equipment).

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

29.
 - a. When was the South Perry Substation derated as compared to its normal operating parameters?
 - b. For what reason(s) was the Substation derated?
 - c. By how much was the Substation derated?
30.
 - a. Was there a time after the South Perry Substation was first derated that it was further derated?
 - b. If the response to (a) is yes, please explain the circumstances that caused the additional derating.
 - c. Please state the additional extent of the derating.
 - d. If the Substation was further derated more than once, please provide the information sought in subparts (b) and (c) for each instance in which an incremental derating occurred.
31. Since the South Perry Substation was derated, please describe the interim actions considered, if any, to increase the transfer capacity of the Substation.
32. Since the South Perry Substation was derated, please describe the interim actions taken, if any, to increase the transfer capacity of the Substation.
33. If no interim actions have been considered or taken, please explain why not.
34.
 - a. Has the equipment needed for the South Perry Project been purchased or otherwise acquired?
 - b. Is the equipment on-site?
 - c. If the response to (b) is no, when does NYSEG expect the equipment to be delivered to the Substation site?
 - d. If the response to (a) is no, please provide a list of the major components/pieces of equipment that have not yet been procured.
 - e. For each major component or piece of equipment provided in the response to (d), please state:
 - i. when the component or piece of equipment will be purchased or otherwise acquired;

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- ii. when the component or piece of equipment is expected to be delivered to the Substation site; and
- iii. the alternatives available to NYSEG if the delivery is delayed (*e.g.*, using equipment within NYSEG's inventory, obtaining equipment from an affiliate or unaffiliated utility, using different equipment).

Response:

1. NYSEG first determined capital improvements were needed at the Meyer Substation in 2010, based on the Transmission Planning Long-Term Planning (LTP) studies conducted that year.
2. See below for the response:
 - a. The Meyer Substation project required a full re-evaluation and scoping effort in 2021/22 to address asset-condition concerns and system-reliability needs. In addition, the project was reprioritized to allow advancement of other system-resiliency initiatives.
 - b. The Company does not routinely maintain all previous revisions to project cost estimates that may exist throughout the lifecycle of a project. The referenced rate cases and the associated filings include project information that was available at the time of each filing.

Furthermore, in the case of this project, the necessary scope has evolved considerably causing historical cost estimates to no longer be a useful comparison to the most recent estimate.
3. See below for the response:
 - a. As of year-end 2025, NYSEG invested approximately \$18.8 million in the solution.
 - b. This question is not applicable. As of year-end 2025, expenditures for the Meyer Substation exceeded the \$12,775,000 projected investment.
 - c. For Phase 1, which includes the replacement of the 230/115/34.5 kV transformer, detailed engineering has been completed, and the primary materials have been delivered. The above ground portion of Phase 1 construction is progressing and is on schedule for completion. Phase 2 scope of work is to rebuild the 115/34.5/12.5 kV yard. The conceptual engineering has been completed and detailed engineering is in progress.
4. The Meyer Substation project required a full re-evaluation and rescoping in 2021/2022 to address emergent asset-condition and system-reliability needs. The project was also reprioritized to allow for other system-resiliency initiatives to move forward.

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

5. The Meyer Substation project was divided into two phases: Phase 1 has an expected in-service date of June 2026, and Phase 2 has an expected in-service date of December 2029.
6. The primary risks to project schedule are delays in obtaining the permits to begin construction and the delivery of the main equipment such as transformers and Gas Insulated Switchgear (GIS) for Phase 2.
7. The referenced in-service date (ISD) is a typographical error. The Company confirms the correct ISDs are as follows: H1 2026 for Phase 1 and H2 2029 for Phase 2.
8. Below is Meyer's schedule with the activities and percentage of progress.
 - a. See Attachment #1.
 - b. N/A.
 - c. See the response in 8(a) for estimated progress percentage for each task.
9. NYSEG first determined capital improvements were needed at the South Perry Substation in 2011, based on the Transmission Planning Long-Term Planning (LTP) studies conducted in 2010.
10. See below for the response:
 - a. The South Perry Substation project required a full re-evaluation and scoping effort in 2021/22 to address asset-condition concerns and system-reliability needs. In addition, the project was reprioritized to allow advancement of other system-resiliency initiatives.
 - b. The Company does not routinely maintain all previous revisions to project cost estimates that may exist throughout the lifecycle of a project. The referenced rate cases and the associated filings include project information that was available at the time of each filing.

Furthermore, in the case of this project, the necessary scope has evolved considerably causing historical cost estimates to no longer be a useful comparison to the most recent estimate.
11. See below for the response:
 - a. No.
 - b. The South Perry project was reprioritized to allow for the advancement of other initiatives focused on system resiliency.
 - c. The current in-service date for the South Perry Substation Project is H2 2029.
12. The primary risks to project schedule are delays in the 115 kV line connections and delays in the execution/completion of the 115 kV GIS equipment.
13. Below is South Perry's schedule with the activities and percentage of progress.

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- a. See Attachment #2.
 - b. N/A.
14. Civil works for the South Perry Project is ahead of schedule, with one transformer foundation, pad, and the firewall foundation complete and the second foundation underway. The site platform is finished, temporary fencing is installed for safe separation, and an overhead line has been relocated to clear the work area. Upcoming work includes foundations for the two 34.5 kV GIS buildings and cable trench installation. The 115 kV GIS contract has been awarded, and engineering has begun. One transformer is on site and the second is staged for shipment.
15. See the response in 13(a) for estimated progress percentage of each task.
16. See below for the response:
- a. Yes.
 - b. No.
 - c. N/A
17. See below for the response:
- a. NYSEG not aware that deficiencies at the South Perry Substation are causing curtailments of renewable resources in the same area. Please provide any evidence or documentation that supports this claim.
 - b. N/A
 - c. N/A
18. See below for the response:
- a. No
 - b. N/A
19. See below for the response:
- a. See response to 17(a).
 - b. N/A
20. See below for the response:
- a. No. NYSEG does not have a policy or procedure requiring replacement of substation equipment based solely on age.
 - b. N/A
 - c. No.

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- d. When equipment asset condition issues or capacity and operational constraints are identified, NYSEG undertakes proactive planning to prepare future capital projects..
 - e. NYSEG replaces substation equipment by proactive planning to address asset condition together with any capacity and operational constraints that most affect system reliability.
21. Yes.
22. See response to Question #17a.
23. See below for the response:
- a. The Meyer 230/115 kV transformer's rating was reduced in December 2021.
 - b. The Meyer 230/115 kV transformer's rating was reduced due to maintenance testing that indicated an elevated risk of failure if the unit continued to be operated at its original ratings.
 - c. The transformer's Winter Long-Term-Emergency rating (most relevant to curtailment) was reduced by 19%.
24. See below for the response:
- a. Yes
 - b. In February 2022, while investigating options for upgrading the Meyer transformers, the Company identified a new limiting element that reduced the unit's rating to below the ratings that were identified in December 2021.
 - c. The transformer's Winter Long-Term-Emergency rating (most relevant to curtailment) was reduced by 42% relative to the original rating of the unit.
 - d. N/A
25. NYSEG and NYISO supported periodic (roughly every 2 months) meetings with affected stakeholders to discuss mitigation options. The options discussed included: short term NYSEG project to remove the relay limitations on the Meyer transformer, accelerating the Meyer Rebuild project, accelerating the schedule of the Meyer transformer replacement scope of the project, power flow control device on either the 230 kV network or the Meyer transformer, overcurrent scheme on Meyer transformer.
26. NYSEG developed and executed a project to remove the limitation identified in 2022, effectively increasing the rating of the Meyer transformer to the level discussed in the response to 23(c). NYSEG has worked to accelerate the Meyer transformer replacement portion of the Meyer Substation Rebuild project scope.
27. N/A
28. See below for the response:

**New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation**

**25-E-0375, 25-G-0378, 25-E-0379, 25-G-0380
Request for Information**

- a. Yes. All major equipment for Phase 1 has been fully procured. For Phase 2, all major equipment has been ordered but has not yet been received.
 - b. Yes for Phase 1; and No for Phase 2.
 - c. See Attachment #1 for expected delivery date for the major equipment.
 - d. N/A based on the response to (a).
 - e. N/A based on the response to (d).
29. See below for the response:
- a. The South Perry Substation has not been derated compared to its normal operating parameters.
 - b. Not applicable based on the response to 29(a).
 - c. Not applicable based on the response to 29(a).
30. See below for the response:
- a. Not applicable based on the response to 29(a).
 - b. Not applicable based on the response to 30(a).
 - c. Not applicable based on the response to 30(a).
 - d. Not applicable based on the response to 30(a).
31. Not applicable based on the response to 29(a).
32. Not applicable based on the response to 29(a).
33. Not applicable based on the response to 32.
34. See below for the response:
- a. Yes. All major equipment has been ordered.
 - b. No.
 - c. 34.5kV GIS will be fully installed Q2 2027; 115kV will be fully installed in Q3 2028 and the pending transformer will be delivered in Q3 2026.
 - d. N/A based on the response to (b).
 - e. N/A based on the response to (a).