

NY Gas Tariff Alignment Project
Attachment 2

Section / Tabs Numbers	Topic	Company		Comments / Recommendations	COMPLIANCE FILING UPDATES for 5/20/2022
		NMPC			
General Information	Definitions and Abbreviations	11-13		See Attachment 1	
1	How Service is Obtained	14-27		Each service territory works separately; Customer Consent to Contact language already aligned across all three Companies.	N/A
2	Priority of Service	28-38		Company specific; language consistent across all three tariffs.	No change.
3	Limitation of Service Offer	38-47		Potential opportunity to align: NMPC tariff more robust; KEDNY does not have a denial section specifically for residential.	N/A. Upon further investigation, no changes recommended at this time.
4	Customer Use of Service	48		No proposed changes apart from potential change of address for Downstate companies.	No change.
5	Temporary Service	49		Potential opportunity to align: KEDNY does not explicitly identify Temporary Service.	No change.
6	Resale, Remetering or Submetering	49		KEDLI language is quite lengthy. NMPC has the resale/submetering as a standalone rule and the shared meters is in the Billing and Collection section. KEDNY and KEDLI have both of theirs in their Meter sections. Recommendation will depend if we align sections to be alike.	No change.
7	Access to Premises	50.1-52		No proposed changes per internal audit.	No change.
8	Discontinuance & Complaint Procedures and the Withholding of Service	50-52		Company specific; language consistent across all three tariffs.	No change.
9	Extension of Mains	53-58		Language related to the extension of mains is primarily different between jurisdictions due to existing procedures or for operational/service territory differences. No proposed changes at this time.	N/A
10	Service Lines	59-60		Language for service lines is primarily different between jurisdictions due to existing procedures or for operational/service territory differences. No proposed changes at this time.	N/A
11	Service Equipment	61		Language related to service equipment is primarily different between jurisdictions due to existing procedures or for operational/service territory differences. No proposed changes at this time.	N/A
12	Meter Reading	61-69.1		NMPC is a comprehensive list of metering items. KEDNY standalone rule that incorporates No-Access procedures.	N/A
13	Meter Adjustments	69.2-71		Language consistent across all three tariffs, just different in placement. If we do not reorganize the general info section recommendation is to leave as is.	N/A
14	Billing and Collections	71-77		KEDLI and NMPC have large sections that are inclusive of many items whereas KEDNY tends to have as standalone items or at least in much smaller sections. Recommendation is to leave these sections as is, or potentially align KEDNY and incorporate a larger Billing & Collections section that wraps up all the small sections.	N/A
15	Special Services Performed by Company for Customer at a Charge	88-89		Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	N/A
16	Adjustment of Rates in Accordance with Changes in the Cost of Purchased Gas	90-97		1) All the definitions under GAC will be moved to the 'Definitions' section for KEDNY and KEDLI; 2) All the GAC definitions for KEDNY and KEDLI were aligned in the 16-G-0058 and 16-G-0059 rate case (combined portfolio); 3) LAUF and SPA Calculations for all three Companies are aligned; 4) MFC calculations for all three Companies are aligned; for KEDNY and KEDLI, MFC is shown in GAC statement and for NMPC, it's shown in MFC statement.	No change.
17	Gas Fired Emergency Electric Generation	98		Not applicable to KEDNY; no proposed changes to KEDLI or NMPC at this time.	N/A
18	Tax Factors Applicable in Municipalities Where Service is Supplied	99-100		Company specific in accordance with local laws & surcharges.	No change.
19	Service Re-establishment Charge	100		Language and layout across KEDNY and KEDLI tariffs already aligned; NMPC has reestablishment charges for sales customers and in SC11 for ESCo customers.	N/A
20	Payment of Interest on Customer Overcharges	100-101		Language and layout across all three tariffs already aligned; rate of interest language is already aligned across all three Companies.	N/A
21	Empire Zone Rider	104-106		Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	No change.
22	Excelsior Jobs Program	111-111.1		Potential opportunity to align tariffs by moving 'Certificate of Eligibility' and 'Certificate of Tax Credit' to Definitions section for all three Companies. Additionally, adding "Eligibility Criteria" as a sub title (to be aligned with NMPC's layout).	Done. Leaf 11 for NIMO (copy the definitions from Leaf 111), Keep the definitions on Leaf 111 to be consistent with other part of the tariff.
23	Gas Net Revenue Sharing Mechanism	111.1-112		Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	N/A
24	Weather Normalization Adjustment	113-115		Aligned across all three tariffs; adding subtitle for KEDNY to align layout with KEDLI's tariff.	N/A
25	Transportation and Aggregation Options	115-116		Not applicable to KEDNY and KEDLI due to differences in Class structure - KEDNY and KEDLI have transportation only classes; no proposed changes to NMPC at this time.	N/A
26	Cashout of Imbalances	117-121		Not applicable to KEDNY and KEDLI due to differences in Class structure - KEDNY and KEDLI have transportation only classes; no proposed changes to NMPC at this time.	No change.
27	Research and Development Surcharge	122		NMPC cap language correction to dekatherms (DTH) proposed in Rate Case, to be consistent with Order and KEDNY & KEDLI tariffs.	The change was done on Leaf 122 as part of the the Tariff Compliance filing that was made on Jan 27, 2022.
28	Energy Efficiency Program Charges	122.1		Layout consistent across all three tariffs. For NMPC, ETIP is in base rates; proposed the same changes for KEDNY and KEDLI in the Rate Case.	N/A
29	Revenue Decoupling Mechanism	122.2-122.3		Revenue Decoupling language is generally aligned where possible with the exception of service classifications and exclusions. However, once all three companies have approved revenue per class targets, the language can be further aligned.	No change.
30	Merchant Function Charge	122.4-122.6		Layout consistent across all three tariffs; added MFC definitions for NMPC tariff in definitions section; the methodology are the same for all 3 companies; add 'Calculation of Merchant Function Rate per Therm' header for KEDLI and KEDNY.	Done. Update complete; see Leaf: 11.1
31	NYSERDA Loan Installment Program	122.8-122.10		Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	No change.
32	Service Guarantee	122.11		No proposed changes at this time.	No change.

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33	Community Choice Aggregation Program	122.13		Implemented at the same time for KEDNY, KEDLI and NMPC. Language and layout consistent across all three tariffs; no proposed changes at this time.	N/A
34	Gas Safety and Reliability Surcharge	122.14		Language and layout consistent across all three tariffs; no proposed changes at this time.	N/A
35	Earnings Adjustment Mechanism	122.14		EAM will be implemented for KEDNY and KEDLI for the upcoming Rate Case; once approved, the tariff language will be consistent with NMPC.	N/A
36	Deferral Surcredit	122.15		Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	No change.
37	Inspection, Maintenance and Replacement of Facilities in Public Thoroughfare	N/A		Language consistent between KEDNY & KEDLI; NMPC's language is determined to be appropriate and represents similar rules.	No change.
38	Company Liability	40-41		Language similar across all three tariffs; further review of job aids, procedures, review other areas within tariff, certification processes would be needed before making a recommendation to change.	N/A
39	Leakage	N/A		Potential opportunity for alignment: language could be added for NMPC and revised for KEDLI to be consistent.	N/A
40	Customer Deposits	37-40		KEDLI and NMPC are prescriptive while KEDNY is generic. They all are similar in referring to the regulations. This may be a section we can agree to align but would need to work with Customer since there are some nuances to deposit review, etc.	N/A
41	Service to Which Rates Apply	69.2		Language similar across all three tariffs; KEDLI does not specifically include high pressure sales verbiage.	N/A
42	ESCo-initiated Suspensions	N/A		Language could be removed from KEDNY and KEDLI's tariff because of implementation of consolidated billing charge and POR.	N/A
43	Insulation Standards for Res Space Htg	42		KEDNY - needs to add the word 'not' to the following sentence "Gas Service will not be provided to a new dwelling, or to an existing..." to align with KEDLI. NMPC has more detailed tariff language regarding insulation compliance standards.	N/A
44	Safety Related Service Calls	N/A		KEDLI and NMPC could potentially add similar language as shown in KEDNY, but further consultation would be needed with the applicable groups performing the work.	Done. Update complete; see Leaf: 48
45	Refund Provision	95-96		KEDNY and KEDLI have same language except for KEDNY specific language in parts D. & E.; NMPC is similar and unique with its reconciliation and service classes. All tariffs are considered aligned.	N/A
46	Transition Costs	N/A		The KEDNY tariff includes more details on how transition cost will be applied; KEDLI only includes a definition of the costs, and NMPC includes the explanation of transition cost recovery in the annual gas cost reco language as "Stranded Capacity Costs". Language for KEDLI and NMPC can be revised to be more closely aligned with KEDNY.	Upon further discussion, no changes are necessary at this time.
47	Transition Surcharge	N/A		The KEDNY and KEDLI tariffs include details on how transition surcharges will be calculated; and NMPC includes the explanation of stranded cost recovery in the annual gas cost reco language as "Stranded Capacity Costs". Language for NMPC can be expanded to be more closely aligned with KEDNY and KEDLI.	N/A
48	Delivery Penalty Refund	N/A		The delivery penalty refunds associated with marketers penalties are included in all three Companies commodity reconciliation sections and are generally aligned except for the service classification differences, but the naming of the refunds could be aligned (ie. defining Delivery Penalty Refunds in the definitions section of the tariffs and using that naming convention in all the tariffs)	N/A
49	Premium Service Appointments	N/A		Not applicable to KEDLI and NMPC; no proposed changes to KEDNY at this time.	N/A
50	Deferred Payment Agreement	39		KEDNY has as a standalone rule. KEDLI's DPA section is within Company-Initiated Discontinuance of Service and Complaint Procedure. NMPC has it in its Billing and Collections sections. KEDNY and KEDLI are similarly structured. NMPC is prescriptive. All three have the DPA agreement within the tariff: NMPC and KEDNY in its Form Section and KEDLI in General Info. Recommendation: Leave DPA language as is and possibly align on the Form Section.	Not updating the DPA agreement Form Section as part of this General Information Tariff Alignment project.
51	Dishonored Payment	73		KEDNY has this as standalone. KEDLI has it in its Billing & Payment of Bills section. NMPC has it in its Billing & Collections. KEDNY and NMPC have same charge (\$10) while KEDLI is \$5. When the potential for updating these fees was explored for the 2016 DNY rate case, it was agreed that these charges are more than sufficient as is.	N/A
52	Estimated Bills	61-69		Common theme - KEDNY Standalone. KEDLI's Estimated Bills roll in with the No Access rules. NMPC has it in its Meter Reading Section. Recommendation would be to leave as is, at this time. Potential for further discussion if consideration should be given to combining into Meter Reading section.	N/A
53	Riders	104-107; 111-111.1.1		Company specific; no opportunity for further alignment.	No change.
54	Non-Residential Rules	N/A		Not applicable to NMPC; Company specific to KEDNY and KEDLI, so no proposed changes to either at this time.	N/A
55	Statement Analysis	186		KEDLI does not explicitly discuss statement analysis or historical info. Potential opportunity for further alignment.	No change.
56	Special Meter Read Fee	62		Recommendation to combine the language included on KEDLI Leaf 36 and 119.49 to align with KEDNY and NMPC.	No change.
57	Consolidated Billing Credit/ Charge	187		Potential opportunity for KEDLI language to be aligned to match KEDNY (except for service classification references). Language for NMPC is inherently different because Company provides a billing credit to customers with an ESCo (as opposed to KEDNY and KEDLI where a customer with an ESCo avoids the billing charge that sales customers pay).	No change.
58	Tax Reform Surcredit	N/A		Not applicable to NMPC; language for KEDNY and KEDLI already aligned.	N/A
59	TC IT Revenues Reconciliation Surcharge	N/A		Not applicable to NMPC; language for KEDNY and KEDLI already aligned.	N/A
60	Electric Generator Revenue Reconciliation	N/A		Not applicable to NMPC; language for KEDNY and KEDLI already aligned. The reconciliation for electric generators is included in the Net Revenue Sharing Mechanism.	N/A
61	New York Facilities System Surcharge/Surcredit	N/A		Not applicable to NMPC; language for KEDNY and KEDLI already aligned.	N/A

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62	Delivery Rate Adjustment	in each SC	Potential opportunity to align NMPC to the KEDNY/KEDLI format.

<u>COMPLIANCE FILING UPDATES</u> <u>for 5/20/2022.</u>
The change was done on Leaf 122.19 as part of the the Tariff Compliance filing that was made on Jan 27, 2022 under 'Delivery Service Adjustments' section.