



Lori A. Cole
Manager - Regulatory & Tariffs

March 6, 2018

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Tariff Filing by New York State Electric & Gas Corporation to Revise its Electric Tariff Schedule, P.S.C. No. 121, to Modify Existing and Offer Additional Company-Owned LED Street Lighting Options for Customers Served Under Service Classification No. 3.

Tariff Filing by Rochester Gas and Electric Corporation to Revise its Electric Tariff Schedule, P.S.C. No. 18, to Modify Existing and Offer Additional Company-Owned LED Street Lighting Options for Customers Served Under Service Classification No. 1.

Dear Secretary Burgess:

New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E") (together the "Companies"), subsidiaries of Avangrid, Inc. ("AVANGRID"), hereby submit the enclosed tariff leaves in compliance with the requirements of Appendix 7-H (electronic tariff filing system) to the New York State Public Service Commission's (the "Commission") Codes, Rules and Regulations (16 NYCRR Appendix 7-H).

Below are the revised tariff leaves to become effective April 23, 2018.

NYSEG PSC No. 121 - Electric
Leaf No. 4, Revision 6
Leaf No. 43, Revision 18

RGE PSC No. 18 - Electric
Leaf No. 29, Revision 15
Leaf No. 29.1, Revision 0

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Purpose of Filing

The Companies are filing tariff amendments to offer revised and additional Company-owned light-emitting diode (“LED”) street lighting options for customers served under NYSEG Service Classification No. 3 and RG&E Service Classification No. 1 as the current LED luminaire offerings within the tariffs are no longer available.

Background

On November 21, 2017, the Companies filed compliance tariff leaves in accordance with the Commission’s Order Approving Tariff Amendments with Modifications, issued and effective November 16, 2017 (“the November Order”), to implement Company-owned LED options for customers¹.

Proposed Offerings

Through its implementation process to offer the new LED options for customers, the Companies have evaluated additional and revised LED options that we would like to make available to customers under the Service Classifications for Company-owned lights.

The Companies identified LED options with lower wattages and potential for additional savings for customers. Additionally, the Companies are proposing to revise existing LED options to reflect lower pricing that is now available to the Companies. The proposed revisions will supersede the currently effective LED options.

The Companies are also proposing to use a range of wattages for the LEDs to provide some flexibility when evaluating LEDs that become available. The LED technology continues to evolve and become more efficient and the ranges will allow the Companies to offer the more efficient lamps to its customers.

Rates

The Companies have calculated the rates in accordance with the methodology used by Department of Public Service Staff when evaluating and providing its recommendation to the Commission and as set forth in the November Order.

Newspaper Publication

The Companies request that the requirements of Section 66(12)(b) of the New York Public Service Law and 16 NYCRR Section 720-8.1 as to newspaper publication be waived as these revisions only affect municipal customers, and the Companies will notify customers when contacted to convert their existing street lights to LEDs. Additionally, these revisions do not constitute a “major change” under New York Public Service Law Section 66(12)(c).

¹ Case 16-E-0710 – Tariff Filing by New York State Electric & Gas Corporation to Revise its Electric Tariff Schedule, P.S.C. No. 121 to Offer Company-Owned LED Street Lighting Options for Customers Served Under Service Classification No. 3.

Case 16-E-0711 – Tariff Filing by Rochester Gas and Electric Corporation to Revise its Electric Tariff Schedule, P.S.C. No. 18 to Offer Company-Owned LED Street Lighting Options for Customers Served Under Service Classification No. 1.

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Approval

NYSEG and RG&E respectfully request that the Commission adopt these revised tariff leaves on an emergency basis under the State Administrative Procedure Act (SAPA) § 202(6) with an effective date of April 23, 2018. SAPA § 202(6) allows a state agency to adopt a rule on an emergency basis if “immediate adoption of a rule is necessary for the preservation of the public health, safety or general welfare” and compliance with the SAPA’s general 60-day advanced notice requirement would be contrary to the public interest. Immediate adoption of the tariff leaves is necessary to preserve the general welfare of the customers of NYSEG and RG&E’s Company-owned, Company-maintained street lighting classes. As explained, the LED offerings provided in the current tariffs are no longer available, which does not afford customers with the option to convert from inefficient lighting options to new, high efficiency LED lighting. In addition, with these tariffed LED offerings no longer available, the Companies require these revisions to ensure adherence to the Companies’ tariff offerings.

Customers are inquiring about LED options and requesting estimates for the up-front net book cost to convert their systems. The Companies would like to be able to offer the municipalities these additional options to support additional savings, both economically and for energy efficiency purposes, for its customers.

Company Contacts

If you have any questions related to this filing, please contact Sue Morien at 585.771.4741 or me at 607.762.8710.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Lori A. Cole".

Lori A. Cole

Enclosures