



Carol Teixeira
Manager, NY Electric Pricing

July 2, 2021

Honorable Michelle L. Phillips, Secretary
State of New York
Public Service Commission
Office of the Secretary, 19th Floor
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 15-E-0751 – In the Matter of the Value of Distributed Energy Resources

Dear Secretary Phillips:

The following tariff amendments, issued by Niagara Mohawk Power Corporation d/b/a National Grid (the “Company”), are being transmitted in compliance with the May 17, 2021 *Order Clarifying Banking Rules Under the Community Distributed Generation Program* issued by the New York State Public Service Commission (“Commission”) in the above case number (“Order”):

Thirteenth Revised Leaf No. 149
Fifth Revised Leaf No. 151
First Revised Leaf No. 151.1
Original Leaf No. 151.1.1
Tenth Revised Leaf No. 219
Second Revised Leaf No. 220.8

To P.S.C. No. 220 – Electricity

Effective: September 1, 2021

On December 15, 2020, Department of Public Service Staff (“Staff”) filed the White Paper on Community Distributed Generation Banked Credits (“White Paper”), which included recommendations intended to clarify and standardize banking rules under the Community Distributed Generation (“CDG”) program. The White Paper presented recommendations intended to establish consistent rules for the treatment of credits in a satellite’s bank when the satellite either 1) closes the associated utility account or 2) cancels the subscription, thereby terminating participation in the CDG Project.¹

The White Paper recommended when a CDG satellite’s account is closed, cancelled, or when that CDG satellite terminates its subscription with a CDG host, any remaining banked credits still in that CDG satellite’s bank after the final bill be removed from that customer’s account and added to the CDG Host’s bank. In the Order, the Commission adopted those recommendations to provide program consistency across utility tariffs and minimize stakeholder confusion. In addition, the Commission clarified that CDG Hosts be permitted to allocate banked credits on a monthly basis to enable CDG projects to efficiently manage subscribers joining and departing.

¹ Case 15-E-0751, *In the Matter of the Value of Distributed Energy Resources* (VDER Proceeding), Order Clarifying Banking Rules Under the Community Distributed Generation Program (issued May 17, 2021) (Banked Credits Order), pp. 1-2.

The Company has added language to Rule No. 29 – Community Distributed Generation to P.S.C. No. 220 clarifying the CDG satellite banking rules under this program. The Company also added language to Rule No. 40 – Value of Distributed Energy Resources clarifying that the two-year grace period, whereby a CDG host is permitted to allocate banked annual credits, begins at the end of the annual period when the credits are reallocated to the CDG host and additionally permits monthly allocation of banked credits to CDG satellites.

Ordering Clause No. 1 of the Order directed the utilities to file tariff amendments on no less than thirty days' notice to become effective on August 2, 2021. On June 25, 2021, the Company filed a letter with the Commission, on behalf of the Joint Utilities, requesting an extension of the effective date to make the necessary billing and system updates required to implement the banking rules. On June 30, 2021, the Commission approved this request and therefore, the tariff leaves are being filed with an effective date of September 1, 2021. Attachment 1 contains the Company's redlined tariff leaves showing where the changes have occurred. Please advise the undersigned of any action taken regarding this filing. Ordering Clause No. 3 waives the requirements of Public Service Law §66(12)(b) and 16 NYCRR §720-8.1 as to newspaper publication of the tariff revisions.

Respectfully submitted,

/s/ Carol Teixeira

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Enc.

cc: Sandra Hart, DPS Staff (via e-mail)
Janet Audunson (via e-mail)
Kellie Smith (via e-mail)
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