Received: 01/29/2021

Orange and Rockland Utilities, Inc.
One Blue Hill Plaza
Pearl River, NY 10965-9006
www.oru.com

January 29, 2021

VIA ELECTRONIC MAIL
Honorable Michelle Phillips
Secretary
State of New York
Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Orange and Rockland Utilities, Inc.'s Electric and Gas Base Rate Filings

Dear Secretary Phillips:

Orange and Rockland Utilities, Inc. ("Orange and Rockland" or the "Company") submits these rate filings to propose new rate plans to begin in January 2022 for electric and gas service provided in its service territory. These filings strike the balance between moderating customer bill impacts and providing the Company with the necessary funding. The Company will use this funding to: (1) continue to provide safe and reliable electric and gas services to our customers, in particular by increasing our electric storm hardening investments; (2) invest in our community by supporting job creation and economic growth; and (3) advance our clean energy future through innovative investments that will support distributed energy and the accommodation of increased renewable energy. This funding is also necessary to maintain the Company's financial viability by avoiding further potential downgrades from our rating agencies. To achieve these goals, the Company's rate filings focus on investments to further the Company's three major objectives, which are aligned with State policy objectives: (1) public and employee safety; (2) operational excellence; and (3) enhancing the customer experience. Our filings demonstrate how we are improving system operations and how our investments will empower customers by making it easier for them to take advantage of renewable energy, electric and gas energy efficiency, battery storage and electric vehicle charging. Our proposed investments will increase capacity on the local transmission and distribution system to allow for interconnection of new renewable generation resources, thereby facilitating the State's transition to a clean energy economy. The Company also continues to invest in multiple cybersecurity efforts to secure our networks and systems, particularly those dealing with our customers' personally identifiable information.

Electric Service

The Company seeks an increase in revenues for electric delivery of approximately $24.5 million (including gross receipts tax), resulting in an overall customer bill increase

Received: 01/29/2021

of approximately 3.3 percent,[1] including projected supply costs.[2] Approximately one-third of this increase (*i.e.*, $9.0 million) is due to a lower electric sales forecast. Appendix E shows the estimated effect on the Company's electric revenues by customer class, based on sales and revenues for the Rate Year (*i.e.*, calendar year 2022). This filing explains the need for investments designed to maintain the safety and reliability of Orange and Rockland's electric system, for innovative investments to enable Orange and Rockland to adapt its system for increased distributed energy resources and New York State's energy future plans, to encourage electric vehicle adoption in its service territory, and to support initiatives and programs designed to enhance the customer experience. The Company's storm hardening and strategic undergrounding investments, grid modernization and distribution automation projects, and expanded tree trimming and hazardous tree removal program, will help meet customers' increased expectations regarding system reliability and resiliency and faster storm restoration. The Company is also addressing the challenge of increasing the electrification of buildings and transportation while minimizing their grid-side impacts.

Gas Service

The Company seeks an increase in revenues for gas delivery of approximately $9.8 million (including gross receipts tax), resulting in an overall customer bill increase of approximately 4.0 percent,[3] including projected supply costs.[4] Approximately one-third of this increase (*i.e.*, $3.0 million) is due to a lower gas sales forecast. Appendix F shows the estimated effect on the Company's gas revenues by customer class, based on sales and revenues for the Rate Year. The Company will be implementing a new Pipeline Safety Management System, as well as installing its innovative Advanced Metering Infrastructure ("AMI") enabled Natural Gas Detectors that will provide an automated signal to the Company. The Company proposes to shorten depreciation lives of longer-lived gas assets to take its initial steps to reflect the State's clean energy goal, phased in over 2023 and 2024 to mitigate customer impacts during the current economic conditions. The Company also continues its efforts to remove and replace leak prone pipe. Orange and Rockland's natural gas infrastructure will require significant investment in the coming years, including aggressive main replacement efforts to enhance the safety of its gas delivery system.

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[1] The overall customer bill increase reflects the expiration of the temporary surcharge of $5.7 million in the Energy Cost Adjustment that was implemented in Case 18-E-0067.

[2] Electric supply costs for retail access customers are assumed to be equivalent to the forecasted electric supply costs applicable to customers taking service under the Company's full-service rates. The electric rate increase represents a delivery rate increase of approximately 5.8 percent.

[3] The overall customer bill increase reflects the expiration of the temporary credit of $0.7 million in the Monthly Gas Adjustment that was implemented in Case 18-G-0068.

[4] Gas supply costs for retail access customers are assumed to be equivalent to the forecasted gas supply costs applicable to customers taking service under the Company's full-service rates. The gas rate increase represents a delivery rate increase of approximately 6.9 percent.

Received: 01/29/2021

Customer Experience

The Company will continue its investment in customer facing technologies. Chief among these is the continuation of one of the Company's largest capital investments for implementation of a new enterprise customer care and billing system. The Company also is expanding its investment in information technology solutions that optimize systems and tools to support customers with their energy needs. These include a Data Analytics Platform, a Customer Relationship Management system, Marketplace Enhancements for Small Business & Low-Income customers, and an Online Customer Advisory Community. The Company will also continue to focus on delivering the benefits of AMI to customers, particularly through increased participation in energy efficiency programs and enhancing storm restoration efforts.

Economic Support and Cost Mitigation Efforts

Many of the investments for which the Company seeks funding in these rate filings, particularly for our clean energy future, will contribute to the local economies we serve. The Company's electric and gas infrastructure projects will result in additional jobs and spur economic activity both directly and indirectly. These projects will accordingly aid the Company's service territory in its recovery from the economic repercussions of the COVID-19 pandemic.

At the same time, our cost mitigation proposals will lessen the customer impact during the current economic conditions. Cost management has been, and will remain, at the core of Orange and Rockland's business processes. The Company recognizes its responsibility to manage costs on behalf of its customers and is committed to leveraging best practices to help mitigate cost increases to both the electric and gas sides of its business. The Company is continuing its Business Cost Optimization ("BCO") efforts and the BCO savings the Company has achieved are reflected in the electric and gas revenue requirements. The Company has forecasted additional BCO savings of $1.3 million for electric and $0.6 million for gas during 2022. Moreover, the Company continues to leverage its relationship with its affiliate, Consolidated Edison Company of New York, Inc., to increase efficiency (*e.g.*, the new Customer Service System, AMI Natural Gas Detectors, Customer Relationship Management System, Enterprise Appointment Scheduling System, and Data Analytics Program).

In light of the COVID-19 pandemic and the economic impact it is having on our customers, the Company has taken other steps to mitigate the requested electric and gas revenue requirement increases. It proposes to shorten the amortization period of excess deferred income tax, associated with the Tax Cuts and Jobs Act of 2017, from 15 years (as established in the Company's last base rate cases) to three years for the remaining balance. Doing so reduces the electric revenue requirement by $5.7 million and the gas revenue requirement by $2.3 million in 2022. The Company also proposes to amortize energy efficiency costs over ten years, extend the amortization of storm costs to five years, and phase in pension and Other Post-Employment Benefits costs over the period

Received: 01/29/2021

2022 through 2024. The Company will continue its Low Income Bill Discount Program with certain modifications to the tiered benefit levels.

Finally, to facilitate reaching a multi-year rate plan through settlement, the Company has included a 9.5% return on equity ("ROE") in both its gas and electric rate filings. This ROE figure is at the low end of the unadjusted range of estimates (*i.e.*, 9.50% to 10.00%) identified by the Company's cost of capital witness as being appropriate for the Company. The Company also has included a capital structure with an equity ratio of 50%. Such an allowed equity ratio will help stabilize the Company's credit ratings by providing additional needed cash flow and by providing a positive signal to the rating agencies that the Commission is willing to support the Company's credit.

Proposed Rate Term

While these rate filings propose one-year rate plans for electric and gas service, we intend to explore multi-year rate plans in settlement discussions with Staff of the Department of Public Service ("Staff") and interested parties. Multi-year rate plans benefit customers by providing certainty as to the level of the Company's delivery rates over a number of years. Multi-year rate plans also facilitate implementation of the Company's projects and programs that are detailed in the rate filings. For this filing, the Company would be willing to consider a multi-year settlement that takes the current economic conditions into account.

Information Accompanying These Rate Filings

The proposed rate plans require increases to charges for electric and gas service and revisions to other provisions of the Company's Schedule for Electric Service, P.S.C. No. 3 – Electricity ("Electric Tariff") and its Schedule for Gas Service, P.S.C. No. 4 – Gas ("Gas Tariff"). Revised Tariff leaves, descriptions of changes, and revenue impacts are provided in the following appendices to this letter:

Appendix A – List of Electric Tariff Leaves
Appendix B – List of Gas Tariff Leaves
Appendix C – Description of Electric Tariff Revisions
Appendix D – Description of Gas Tariff Revisions
Appendix E – Electric Revenue Impacts
Appendix F – Gas Revenue Impacts

The tariff leaves are issued as of January 29, 2021, to become effective on February 28, 2021. The Company's expectation is that the Commission will issue appropriate orders suspending the effective date of the tariff leaves through December 31, 2021, and that the proposed electric and gas rates will become effective on January 1, 2022.

Received: 01/29/2021

Pursuant to the Commission’s procedures, the prepared written testimony and exhibits, which comprise the Company’s direct case in support of these rate filings, are being filed electronically with the Commission. Hard copies of this filing are being provided to Staff.

Notice

The Company has included a draft Notice of Proposed Rulemaking in the form required by the State Administrative Procedure Act and the Commission's form regarding consent to receive electronic-only service of Commission orders. In accordance with 16 NYCRR 720-8.1, the Company will provide for public notice of the changes proposed in these filings by means of newspaper publication once a week for four consecutive weeks prior to March 1, 2021. Proof of publication will be submitted upon completion. In addition, the Company will issue appropriate bill inserts in accordance with 16 NYCRR 720-9.1.

Conclusion

The Tariff leaves, testimony and exhibits submitted with these filings explain the reasons for and nature of the proposed changes and establish the reasons for the rate changes requested by the Company. As noted above, the Company will pursue discussions with Staff and other interested parties to the proceedings established by the Commission to consider these filings in an effort to reach agreement on the issues presented and to develop a multi-year rate plan for each of the Company's services.

The Company respectfully requests that, in the absence of agreement of the parties, the Commission approve the changes to become effective on and as of January 1, 2022.

Very truly yours,

ORANGE AND ROCKLAND UTILITIES, INC.

Robert Sanchez
President and Chief Executive Officer

c: New York State Department of State, Utility Intervention Unit (via electronic mail)
Active Parties to Cases 18-E-0067 and 18-G-0068 (via electronic mail)

Received: 01/29/2021

STATE OF NEW YORK
COUNTY OF NEW YORK

Robert Sanchez, being duly sworn, says:

I am the President and Chief Executive Officer of ORANGE AND ROCKLAND UTILITIES, INC., the applicant above-named, on behalf of which I have subscribed the foregoing application and know the contents thereof and the same is true to the best of my knowledge, information and belief.

Robert Sanchez

Subscribed and sworn to
Before me this 27 day of January, 2021.

Daniel J. Perretti

DANIEL J. PERRETTI
Notary Public, State of New York
No. 4988442
Qualified in Rockland County
Commission Expires Nov. 04, 2021

Received: 01/29/2021

ORANGE AND ROCKLAND UTILITIES, INC.

PSC No. 3 - ELECTRICITY: List of Revised Tariff Leaves

Leaf No.	Revision No.	Superseding Revision No.	Leaf No.	Revision No.	Superseding Revision No.
5	8	7	162	3	2
6	4	3	164	5	3
7	3	2	168	9	8
8	4	3	169.1	6	5
12	2	1	169.2	2	1
13	2	1	174	1	0
68	3	2	177	5	4
71	1	0	180.1.1	2	1
72	1	0	180.4	5	4
73	1	0	181.1	7	6
74	1	0	181.6	2	1
75	1	0	182	5	4
76	1	0	185.3	2	1
81	1	0	185.4.1	1	0
83	1	0	185.5	3	2
89	16	15	185.5.1	1	0
90	4	2	185.14	1	0
105	1	0	189.3	1	0
107	1	0	214	7	4
108	2	1	215	6	4
113	2	1	216	7	5
114	3	2	217	3	2
116	3	2	218	7	6
121	1	0	219	10	9
123	1	0	220	7	6
124	1	0	220.1	1	0
143	3	2	220.2	0	
147	4	3	220.3	0	
148.1	4	3	221	1	0
151	4	3	221.1	0	
155	7	6	221.2	0	
155.1	3	2	221.3	0	
156	7	6	221.4	0	
156.1	6	5	221.5	0	
157	6	5	221.6	0	
157.1	6	5	221.7	0	
161	4	2	221.8	0	

Received: 01/29/2021

ORANGE AND ROCKLAND UTILITIES, INC.

PSC No. 3 - ELECTRICITY: List of Revised Tariff Leaves

Leaf No.	Revision No.	Superseding Revision No.	Leaf No.	Revision No.	Superseding Revision No.
221.9	0		259	8	7
221.10	0		259.1	1	0
221.11	0		260	8	7
221.12	0		261	6	5
221.13	0		262	6	5
221.14	0		262.1	2	1
221.15	0		263	3	2
221.16	0		263.1	1	0
221.17	0		263.2	1	0
221.18	0		263.3	1	0
221.19	0		264	11	10
221.20	0		265	5	4
221.21	0		266	8	7
221.22	0		269	12	11
221.23	0		270	11	10
221.24	0		270.1	0	
221.25	0		271	8	6
221.26	0		272	13	12
234	1	0	273	2	1
235	1	0	274	12	11
249	8	7	276	12	11
249.1	3	2	276.1	0	
250	8	7	277	7	6
251	9	8	278	13	12
252	9	8	279	3	1
252.1	6	5	280	1	0
252.2	3	2	283	13	12
252.3	1	0	283.1	2	1
253	6	5	284	12	11
254	5	4	285	15	14
254.1	2	1	286	8	6
254.2	2	1	290	15	14
255	6	5	291	3	1
255.1	1	0	295	15	14
256	5	4	296	5	3
257	6	5	308	2	0
258	6	4	309	13	12

Received: 01/29/2021

ORANGE AND ROCKLAND UTILITIES, INC.

PSC No. 3 - ELECTRICITY: List of Revised Tariff Leaves

Leaf No.	Revision No.	Superseding Revision No.	Leaf No.	Revision No.	Superseding Revision No.
309.1	0		370	3	1
310	13	12	371	3	2
311	3	1	372	12	11
312	11	10	373	11	10
321	11	10	374	11	10
322	11	10	375	11	10
331	11	10	376	7	5
331.1	0		377	6	4
332	11	10	378	1	0
333	15	14	379	2	1
334	3	1	380	1	0
335	6	5	381	2	1
336	11	10	382	2	1
341	12	11	383	2	1
342	5	4	383.1	1	0
343	5	4	384	2	1
345	12	11	385	2	1
346	8	6	386	1	0
347	13	12	387	4	3
348	4	3	388	6	5
349	1	0	389	7	6
350	12	11	390	5	4
351	8	6	391	4	3
352	13	12	392	4	3
353	1	0	393	2	0
354	1	0	394	1	0
356	11	10	395	1	0
356.1	0		396	1	0
357	8	6	397	2	1
358	13	12	398	1	0
359	11	10			

Received: 01/29/2021

Appendix B

ORANGE AND ROCKLAND UTILITIES, INC.

PSC No. 4 - GAS: List of Revised Tariff Leaves

Leaf No.	Revision No.	Superseding Revision No.	Leaf No.	Revision No.	Superseding Revision No.
4	15	14	94.10	17	16
4.1	6	5	94.11	8	7
5	8	7	94.16	20	19
33.3	23	22	112	16	15
34	15	14	112.1	0	
79.1	10	9	112.2	0	
79.2	8	7	112.3	0	
80	18	17	112.4	0	
80.1	19	18	112.5	0	
80.3.1	10	9	112.6	0	
80.3.2	11	10	112.7	0	
80.3.9	3	2	112.8	0	
80.3.10	0		112.9	0	
80.4	10	9	112.10	0	
81.1	13	12	113	10	9
84	3	2	113.1	8	7
85	3	2	113.2	9	8
86	5	4	113.3	4	3
87	2	1	113.4	6	5
88	3	2	113.5	1	0
89	3	2	114	30	29
89.1	1	0	115	18	17
90	3	2	116	33	32
90.1	3	2	117	16	15
90.2	3	2	126	7	6
90.3	3	2	127	11	10
90.4	3	2	128	5	4
90.5	3	2	128.1	2	1
90.6	1	0	130	30	29
90.7	1	0	132	13	12
93	6	5	133	29	28
94.9	17	16	137.2	15	14

Received: 01/29/2021

Changes proposed to the Schedule for Electric Service, P.S.C. No. 3 – Electricity

The Company is filing revisions to its Schedule for Electric Service, P.S.C. No. 3 – Electricity (the "Electric Tariff"). These include revisions to: the rates under Service Classification ("SC") Nos. 1, 2, 3, 4, 5, 6, 9, 15, 16, 19, 20, 21 and 22; Rider J; the Billing and Payment Processing Charge; the Reactive Power Demand Charge; and the Merchant Function Charges ("MFC").

In addition, the Company has proposed the following changes to the Electric Tariff:

- Removal of the Competitive Metering Charges in SC Nos. 2, 3, 9, 20, 21, and 22, and all references to the existing Customer Meter Ownership and Competitive Metering Services provisions in the Electric Tariff. The following sections of the Electric Tariff had these provisions removed: Table of Contents, General Information ("GI") Section Nos. 2, 6, 7, 9, 10, and 13, and Standby Service and Standby Service Rates provisions.
- Renamed two existing GI sections: GI Section No. 15 has been renamed Supply and Supply-related Charges and GI Section No. 16 has been renamed Additional Delivery Charges and Adjustments. The provisions of the Company's various supply- and delivery-related charges and adjustment mechanisms have been moved under these two new GI sections. In addition, references to these individual charges and mechanisms in the Rates – Monthly sections of the individual SCs have been replaced with references to these two new GI sections. Any specific references to GI sections currently referenced throughout the Electric Tariff have been amended to reference the new GI sections. Finally, the Company has moved the provisions of the Customer Complaint GI section, currently GI Section No. 16, and the System Energy and Demand Losses GI section, currently GI Section No. 32, to new GI sections. The following chart outlines the current and proposed GI sections resulting from these changes.

GI Section Name	Current GI Section	Proposed GI Section
Market Supply Charge	15	15.1
Customer Complaints	16	20
Charges for Municipal Undergrounding	20	16.8
Energy Cost Adjustment	25	16.1
System Benefits Charge	26	16.2
Value of DER Cost Recovery	27	16.5
Merchant Function Charge	28	15.2
Transition Adjustment for Competitive Services	29	16.4
Revenue Decoupling Mechanism Adjustment	30	16.3
Clean Energy Standard Delivery Surcharge	31	16.7
System Energy and Demand Losses	32	25
Electric Vehicle Make Ready Surcharge	33	16.9

Received: 01/29/2021

- Revised the Revenue Decoupling Mechanism ("RDM") Adjustment to: (1) include all Standby Service customers in the RDM; (2) update the RDM targets; (3) change the threshold associated with an interim RDM adjustment; and (4) change the time required between filing an RDM Adjustment Statement and the effective date of the Statement.
- Revised GI Section No. 19 to change the term "commodity charges" to reference those charges set forth in GI Section No. 15 (*i.e.*, the Market Supply Charge ("MSC") and the MFC). The Gross Receipts Tax ("GRT") rate applied to the MFC revenue will now be based on the commodity GRT rate.
- Closed SC No. 25 – Standby Service and Standby Service Rates and moved the general provisions of Standby Service to their own GI Section – GI Section No. 24 and moved the Standby Service Rates to SC Nos. 2, 3, 9, 20, 21, and 22. All references to SC No. 25 in the Electric Tariff have been amended to reference either GI Section No. 24 or the SC Standby Service Rates. The following sections of the Electric Tariff were amended accordingly: Table of Contents and GI Section Nos. 7, 8, 13, 15, 16, and 25.
- Revised language in GI Section 7.5 and the Transition Adjustment for Competitive Services mechanism related to the Company's proposed change to the reconciliation of credit and collections costs and revenues associated with retail access customers whose energy service companies participate in the Company's purchase of receivables program.
- Revised language in the MSC to state that the capacity obligation for a customer subject to Mandatory Day Ahead Hourly Pricing cannot be less than zero.
- Added a new component to the Variable Energy Cost Adjustment mechanism to allow for recovery of the costs associated with the Company's proposed behavioral demand response pilot program.
- Extended the Company's Economic Development rate under Rider H for an additional five years.
- Added new LED luminaires to SC No. 16 and removed obsolete luminaires from SC Nos. 4 and 6.
- Revised the total wattage range of several existing luminaires in SC No. 4.
- Made other housekeeping changes, including the removal from the Electric Tariff of the Temporary Surcharge, the Delivery Revenue Surcharge, and other provisions that were specific to the prior rate case and are no longer in effect.

Received: 01/29/2021

Changes proposed to the Schedule for Gas Service, P.S.C. No. 4 – Gas

The Company is filing revisions to its Schedule for Gas Service, P.S.C. No. 4 – Gas (the "Gas Tariff"). These include revisions to: the rates under gas Service Classification ("SC") Nos. 1, 2, 6, and 8; the rates under Riders B and C; the Billing and Payment Processing Charge; and the Merchant Function Charges ("MFC").

In addition, the Company is proposing the following changes to the Gas Tariff:

- Amended the discounts in Rider E – Excelsior Jobs Program based on the results of the Company's revised marginal cost of service study.
- Revised the charge for the first 100 Ccf or less of monthly usage under SC No. 8, Interruptible Transportation and Supplemental Sales and revised the Base Charge cap
- Amended the Monthly Gas Adjustment to provide mechanisms to recover: (1) Non-Pipe Solution project costs; and (2) approved payments made to interstate pipeline facilities at the Company's gate stations.
- Renamed an existing GI section: GI Section No. 13 to Other Delivery Charges. The provisions of the Company's Revenue Decoupling Mechanism ("RDM") Adjustment and the System Benefits Charge ("SBC") have been moved under this new GI section. In addition, references to the RDM Adjustment and SBC in the Rates – Monthly section of the individual SCs have been replaced with references to this new GI section. Any specific references to the RDM Adjustment and SBC throughout the Gas Tariff have been amended to refer to the new GI section. Finally, the Company has moved the provisions of the Form of Application for Service GI section, which is currently GI Section No. 13, to a new GI section. The following chart outlines the current and proposed GI sections resulting from this change.

GI Section Name	Current GI Section	Proposed GI Section
Form of Application for Service	13	23
System Benefits Charge	23	13
Revenue Decoupling Mechanism Adjustment	25	13

- Revised the RDM Adjustment to: (1) update the RDM targets; (2) change the threshold associated with an interim RDM adjustment; and (3) change the time required between filing an RDM Adjustment Statement and the effective date of the Statement.
- Revised GI Section No. 15 to include the MFC as a component of the "commodity rates and charges." The Gross Receipts Tax ("GRT") rate applied to the MFC revenue will now be based on the commodity GRT rate.
- Revised language in GI Section 6.5 and the Transition Adjustment for Competitive Services mechanism related to the Company's proposed change to the reconciliation of credit and collections costs and revenues associated with retail access customers whose energy service companies participate in the Company's purchase of

Received: 01/29/2021

receivables program.

- Reset the definition of normal heating degree days in the weather normalization adjustment.
- Added the Weather Normalization Adjustment to the Rates – Monthly section of the applicable SCs.
- Removed SC No. 5 from the Gas Tariff and deleted all references to this SC.
- Made other housekeeping changes, including the removal from the Gas Tariff of the Temporary Credit, the Delivery Revenue Surcharge, and other provisions that were specific to the prior rate case and are no longer in effect.

Received: 01/29/2021

Appendix E

ORANGE AND ROCKLAND UTILITIES, INC.

Case No. 21-E-XXXX

Impact of Rate Increases on Total Revenue
For the Rate Year Twelve Months Ending December 31, 2022 (1) (2)
(Based on Billed Sales and Revenues)

Service Classification	Rate Year Billed Sales (MWh)	Customers	Revenue At Current Rates ($000s)	Revenue At Proposed Rates ($000s)	Change ($000s)	Percent Change
Residential	1,549,494	207,224	$303,703.0	$319,647.6	$15,944.6	5.3%
Small C&I	926,285	29,522	149,345.3	152,384.7	3,039.4	2.0%
Medium C&I	363,821	472	43,899.7	44,046.2	146.5	0.3%
Large C&I	752,631	84	75,007.3	74,525.0	(482.3)	-0.6%
Lighting	26,718	3,230	7,434.8	7,804.2	369.4	5.0%
Total	3,618,949	240,532	$579,390.1	$598,407.7	$19,017.6	3.3%

Notes:

1. For comparison purposes, an estimated cost of electric supply for retail access customers has been included in total revenues. This is equivalent, on a per unit basis, to the cost of electric supply included in full service customer revenues.

2. Revenue at proposed rates reflects the expiration of the RY3 Temporary Surcharge from Case 18-E-0067.

Received: 01/29/2021

Appendix F

ORANGE AND ROCKLAND UTILITIES, INC.

Case No. 21-G-XXXX

Impact of Rate Increases on Total Firm Revenue
For the Rate Year Twelve Months Ending December 31, 2022 (1) (2)
(Based on Billed Sales and Revenues)

Service Classification	Rate Year Billed Sales (Mcf)	Customers	Revenue At Current Rates ($000s)	Revenue At Proposed Rates ($000s)	Change ($000s)	Percent Change
Res - 1 / 6 - IA	14,068,357	129,586	$194,479.1	$203,954.6	$9,475.5	4.9%
Comm 1 / 6 - IA	926,889	6,191	12,506.5	13,183.9	677.4	5.4%
Comm 2 / 6 - 1B	4,161,745	5,890	42,005.1	42,314.4	309.3	0.7%
Comm 6 - II	1,149,698	100	10,922.7	10,931.4	8.6	0.1%
Total Firm	20,306,690	141,767	$259,913.4	$270,384.3	$10,470.9	4.0%

Notes:

1. For comparison purposes, an estimated cost of gas supply for retail access customers has been included in total revenues. This is equivalent, on a per unit basis, to the cost of gas supply included in full service customer revenues.

2. Revenue at proposed rates reflects the expiration of the RY3 Temporary Credit from Case 18-G-0068.