



Lori A. Cole
Manager - Regulatory & Tariffs

June 24, 2019

VIA ELECTRONIC FILING

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

Re: 15-E-0751 – In the Matter of the Value of Distributed Energy Resources.

Dear Secretary Burgess:

New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E"), (together the "Companies"), are transmitting for filing in compliance with the New York State Public Service Commission's (the "Commission") Order on Standby and Buyback Service Rate Design and Establishing Optional Demand-Based Rates, issued and effective on May 16, 2019 (the "Order"), in the above-referenced proceeding. Appendix A sets forth a list of revised tariff leaves. The tariff leaves will become effective July 1, 2019.

Purpose of Filing

The Companies are submitting tariff revisions in compliance with Ordering Clause Nos. 1, 6 and 8 of the Order.

Overview

In accordance with the Order, NYSEG and RG&E are filing revisions to its standard Service Classifications and Standby Service Classifications to allow demand metered customers the option of electing the rates that would be applicable under the Standby Service Classification regardless if they have on-site generation.

The Companies will establish the Contract Demand for customers that opt for these rates based on the customer's most recent 12 months of billing history. If the customer doesn't have any billing history, the Company will consult with the customer to determine the Contract Demand. Additionally, a customer that opts for the Standby rates will have to remain on these rates for a period of not less than one year.

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Customers that choose this optional election will be required to adhere to the metering and telecommunications requirements of the service classification. The customer will be responsible for any incremental costs for the interval meter and telecommunications equipment.

The Order provides utilities the authority to revise their Revenue Decoupling Mechanism ("RDM") provisions if the utilities did not currently include Standby revenues as part of the RDM. The Companies are revising its RDM tariff provisions to include the revenues from customers that opt into the Standby rates to be included in the RDM in accordance with the Order.

The Companies have also filed revisions to its Reliability Credit provisions to clarify that the customer must have On Site Generation to participate in the Special Provision and also excludes Distributed Energy Resources ("DER") from receiving the Reliability Credit if the DER is compensated under the Value Stack for exports.

The Order also established a limit for purchases of capacity under the Buyback Service Classification. The Companies have revised its tariff to reflect a 5 MW maximum project-level Unforced Capacity purchase limit. Contracts that were effective prior to July 1, 2019 that included Capacity Payments for resources greater than 5 MW are grandfathered.

Newspaper Publication

In accordance with Ordering Clause No. 9 of the Order, newspaper publication in accordance with Public Service Law 66(12)(b) and 16 NYCRR 720-8.1 is waived.

Company Contacts

If there are any questions concerning this filing, please call Kathy Grande at (585)771-4514 or me at (585)484-6810.

Respectfully submitted,

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

Lori A. Cole

Enclosures

Appendix A
List of Leaves

P.S.C. No. 120 – Electric, Schedule for Electric Service

Leaf No. 21, Revision 15
Leaf No. 117.46.26.2, Revision 5
Leaf No. 136, Revision 12
Leaf No. 178, Revision 5
Leaf No. 252, Revision 14
Leaf No. 276.1, Revision 2
Leaf No. 282, Revision 3
Leaf No. 283, Revision 3
Leaf No. 284, Revision 8
Leaf No. 285, Revision 5
Leaf No. 286, Revision 7
Leaf No. 286.1, Revision 4
Leaf No. 290, Revision 2
Leaf No. 290.1, Revision 0
Leaf No. 292, Revision 4
Leaf No. 293, Revision 27
Leaf No. 294.1, Revision 9
Leaf No. 294.2, Revision 1
Leaf No. 294.12, Revision 8
Leaf No. 294.13, Revision 1
Leaf No. 294.14, Revision 2
Leaf No. 294.14.1, Revision 1
Leaf No. 294.15, Revision 3
Leaf No. 294.15.1, Revision 1
Leaf No. 294.16, Revision 3

P.S.C. No. 19 – Electric, Schedule for Electric Service

Leaf No. 81, Revision 21
Leaf No. 160.39.21.1.1, Revision 2
Leaf No. 169.1.1, Revision 12
Leaf No. 181, Revision 4
Leaf No. 193.1.1, Revision 16
Leaf No. 200, Revision 17
Leaf No. 214, Revision 18
Leaf No. 237, Revision 3
Leaf No. 239, Revision 7
Leaf No. 240, Revision 9
Leaf No. 241, Revision 8
Leaf No. 244, Revision 12
Leaf No. 245, Revision 3
Leaf No. 246, Revision 7
Leaf No. 246.1, Revision 11

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Leaf No. 246.2, Revision 13
Leaf No. 249, Revision 7
Leaf No. 250, Revision 8
Leaf No. 251, Revision 4
Leaf No. 252, Revision 2
Leaf No. 252.1, Revision 1
Leaf No. 253, Revision 2
Leaf No. 253.1, Revision 1
Leaf No. 254, Revision 3