



April 9, 2015

Honorable Kathleen H. Burgess, Secretary
State of New York
Public Service Commission
Office of the Secretary, 19th Floor
Three Empire State Plaza
Albany, New York 12223-1350

Dear Secretary Burgess:

The attached leaf, issued by Niagara Mohawk Power Corporation, d/b/a National Grid ("Company"), is being transmitted for filing in accordance with the requirements of the Public Service Commission ("Commission"), State of New York.

First Revised Leaf No. 146

To PSC No. 220 Electricity

Effective: July 20, 2015

The purpose of this filing is to propose clarifying revisions to Rule 28 –Special Services Performed by Company at a Charge of PSC No. 220 Electricity. Specifically, the Company is proposing the following revisions to Rule 28.1 and Rule 28.2:

1. Rule 28.1 - The purpose of the proposed revisions to this rule is to provide clarification to customers when the Company removes or relocates equipment to suit the convenience of the customer. In its order issued February 21, 2014 in Case 13-E-0239, the Commission clarified that the Company has the ability to charge a customer under Rule 28.1 not only for relocation of facilities, but also for the removal of facilities. The Company is revising the tariff to explicitly reflect the Company's ability to charge for the removal of equipment or facilities and potentially avoid future complaints on this issue. The Company also removed language limiting its ability to charge for removals and relocations "at the customer's request" because, in certain cases, the actions of customers force the Company to remove or relocate facilities. An example of customer action necessitating Company removal or relocation is where customer creates an unsafe condition that must be remedied to comply with the Tariff and/or applicable safety requirements. But for the actions of that customer, the Company would not have to remove or relocate facilities and therefore the Company believes that the customer necessitating such action should be held responsible for those costs rather than such costs being subsidized by the Company or other customers.
2. Rule 28.2 – Rule 28.2 permits the Company to charge a customer if it is required to provide additional facilities beyond those normally required to supply the customer's total requirements. There have been several occasions where customers have also requested additional services not explicitly provided for in the tariff, which are above and beyond what is required for their service requirements, sometimes in connection with these additional facilities. These services include, but are not limited to: design fees; upgrades, modifications, or other services performed by the Company for a customer/applicant who ultimately elects not to proceed with a service request; temporary services performed to accommodate a customer (ex. holding a pole during construction or raising lines to permit the ingress/egress of large vehicles); and crews working on overtime at the request of the customer. The proposed revisions would revise the language in Rule 28.2 to allow the Company to charge for additional facilities beyond the customer's normal requirements and any additional services needed to fulfill the customer's request.

Because of the clarifying nature of this filing, waiver of the newspaper publication requirements of PSL § 66-12 and 16 NYCRR Part 720.8 is requested for this filing. Also, Attachment 1 included with this filing contains a redlined leaf showing where the revisions are proposed.

Please contact the undersigned of any action taken regarding this filing.

Sincerely;

/s/ Patricia J. Rivers

Patricia J. Rivers
Lead Rate Analyst
Electric Pricing

PJR