



September 22, 2016

Honorable Kathleen H. Burgess, Secretary  
New York State Public Service Commission  
Office of the Secretary, 19<sup>th</sup> Floor  
Three Empire State Plaza  
Albany, NY 12223

**RE: Revisions to Rule 25.5 Meter Reading**

Dear Secretary Burgess:

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

Second Revised Leaf No. 120

To PSC No. 220 Electricity

Effective: January 1, 2017

The purpose of this filing is to propose a revision to Rule No. 25.5 - Meter Reading regarding the manner in which customers are responsible for procuring and paying for telephone circuits for distributed generation ("DG") projects when they are connected to the Company's electric distribution system for SCADA ("Supervisory Control and Data Acquisition") or DTT ("Direct Transfer Trip") communications. Currently DG customers pay for the transmission of measured billing data through their own telecommunications service provider but due to a change in the Company's communication technology, the Company will now have to own the circuits and pay the costs directly to the Company's telecommunication service provider. The Company is proposing to pass these costs from the service provider to the customer, based on a flat fee, as determined by the service provider and only for the costs incurred by the Company relative to the customer's DG project.

In most instances, these costs will be lower than the costs that DG customers are currently paying to their telecommunications service providers for required telephone circuits.

Under the Company's current practice, when electronic communications between customer equipment and Company equipment are needed for system protection or system control purposes, the customer is required to order wired telephone communications circuits through the local telephone provider to facilitate this communication. The costs of these circuits are directly billed by the provider to the customer's account(s). However, as communications technology moves from wired communication solutions to wireless communication solutions, the Company's technologies must be updated to support wireless communications in order to avoid obsolescence. For a wireless device(s), located at a customer's premises, to communicate with the Company's wireless devices, all devices must be part of the same telecommunications account. To facilitate these changes in technology, the Company must add the wireless device(s) to be located on customer premises to the Company's account and recover the costs from the customer.

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The Company requests a waiver of the newspaper publication requirements of PSL §66-12 and 16NYCRR 720.8.1 for this filing since customers will be advised of these changes as they are converted to this new technology.

Attachment 1 included with this filing contains redlined text to indicate where the changes have occurred.

Please direct any questions regarding this filing to:

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Any information regarding this filing should be directed to the undersigned.

Sincerely;

*/s/ Carol Teixeira*

Carol Teixeira, Manager  
New York Electric Pricing

PJR/CT

cc: Casey Kirkpatrick