

NY Gas Tariff Alignment Project
Attachment 2

		Company			COMPLIANCE FILING UPDATES for 12/10/2021
Section / Tabs Numbers	Topic	KEDLI	KEDNY	Comments / Recommendations	
General Information	Definitions and Abbreviations	11-17	13, 66-78, 115-118, 333, 368, 400-403, 427.1-427.4	See Attachment 1	
1	How Service is Obtained	18-24	14-18	Each service territory works separately; Customer Consent to Contact language already aligned across all three Companies.	N/A
2	Priority of Service	64-68	59-64.1	Company specific; language consistent across all three tariffs.	No change.
3	Limitation of Service Offer	18-24	56	Potential opportunity to align: NMPC tariff more robust; KEDNY does not have a denial section specifically for residential.	N/A. Upon further investigation, no changes recommended at this time.
4	Customer Use of Service	24	15	No proposed changes apart from potential change of address for Downstate companies.	No change.
5	Temporary Service	17,20,40,47	24, 47, 116	Potential opportunity to align: KEDNY does not explicitly identify Temporary Service.	Done. KEDNY: Update complete; see Leaf: 116; KEDLI: N/A
6	Resale, Remetering or Submetering	32-34	20-21	KEDLI language is quite lengthy. NMPC has the resale/submetering as a standalone rule and the shared meters is in the Billing and Collection section. KEDNY and KEDLI have both of theirs in their Meter sections. Recommendation will depend if we align sections to be alike.	No change due to the different structures/ layouts of current tariffs. KEDNY General Info broken out by Res and Non-res; KEDLI is not. The language is generally aligned.
7	Access to Premises	29-30	23-23.1	No proposed changes per internal audit.	No change.
8	Discontinuance & Complaint Procedures and the Withholding of Service	50-63.2	51-53	Company specific; language consistent across all three tariffs.	No change.
9	Extension of Mains	24-28	127-129	Language related to the extension of mains is primarily different between jurisdictions due to existing procedures or for operational/service territory differences. No proposed changes at this time.	N/A
10	Service Lines	24-28	14-18	Language for service lines is primarily different between jurisdictions due to existing procedures or for operational/service territory differences. No proposed changes at this time.	N/A
11	Service Equipment	24-28	14-18, 19-21	Language related to service equipment is primarily different between jurisdictions due to existing procedures or for operational/service territory differences. No proposed changes at this time.	N/A
12	Meter Reading	36-37	59-64.1	NMPC is a comprehensive list of metering items. KEDNY standalone rule that incorporates No-Access procedures.	N/A
13	Meter Adjustments	34-35	37-39	Language consistent across all three tariffs, just different in placement. If we do not reorganize the general info section recommendation is to leave as is.	N/A
14	Billing and Collections	34-50	40-48	KEDLI and NMPC have large sections that are inclusive of many items whereas KEDNY tends to have as standalone items or at least in much smaller sections. Recommendation is to leave these sections as is, or potentially align KEDNY and incorporate a larger Billing & Collections section that wraps up all the small sections.	N/A
15	Special Services Performed by Company for Customer at a Charge	N/A	N/A	Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	N/A
16	Adjustment of Rates in Accordance with Changes in the Cost of Purchased Gas	69-74.1	66-79.7	1) All the definitions under GAC will be moved to the 'Definitions' section for KEDNY and KEDLI; 2) All the GAC definitions for KEDNY and KEDLI were aligned in the 16-G-0058 and 16-G-0059 rate case (combined portfolio); 3) LAUF and SPA Calculations for all three Companies are aligned; 4) MFC calculations for all three Companies are aligned; for KEDNY and KEDLI, MFC is shown in GAC statement and for NMPC, it's shown in MFC statement	No change. Due to the large number of Cost of Gas definitions and in the interest of clarity for our customers, the Company will maintain the definitions specific to the Monthly Cost of Gas Surcharge within Rule 33 for KEDNY and Leaf 69 for KEDLI.
17	Gas Fired Emergency Electric Generation	28	N/A	Not applicable to KEDNY; no proposed changes to KEDLI or NMPC at this time.	N/A
18	Tax Factors Applicable in Municipalities Where Service is Supplied	74-75	90-93	Company specific in accordance with local laws & surcharges.	No change.
19	Service Re-establishment Charge	61-62	53-55	Language and layout across KEDNY and KEDLI tariffs already aligned; NMPC has reestablishment charges for sales customers and in SC11 for ESCo customers.	N/A
20	Payment of Interest on Customer Overcharges	45	43	Language and layout across all three tariffs already aligned; rate of interest language is already aligned across all three Companies.	N/A
21	Empire Zone Rider	N/A	N/A	Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	N/A
22	Excelsior Jobs Program	79.2.1-79.2.3	114-114.3	Potential opportunity to align tariffs by moving 'Certificate of Eligibility' and 'Certificate of Tax Credit' to Definitions section for all three Companies. Additionally, adding "Eligibility Criteria" as a sub title (to be aligned with NMPC's layout).	Done. Leaf 13 for KEDNY (copy the definitions from Leaf 114), Keep the definitions on Leaf 114 to be consistent with other part of the tariff . Leaf 12 & 12.1 for KEDLI (copy the definitions from Leaf 79.2.1), Keep the definitions on Leaf 79.2.1 to be consistent with other part of the tariff
23	Gas Net Revenue Sharing Mechanism	N/A	N/A	Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	N/A
24	Weather Normalization Adjustment	78-79	80-84	Aligned across all three tariffs; adding subtitle for KEDNY to align layout with KEDLI's tariff.	Done. KEDNY: Update complete; see Leaf: 80; KEDLI: N/A.
25	Transportation and Aggregation Options	N/A	N/A	Not applicable to KEDNY and KEDLI due to differences in Class structure - KEDNY and KEDLI have transportation only classes; no proposed changes to NMPC at this time.	No change.
26	Cashout of Imbalances	N/A	N/A	Not applicable to KEDNY and KEDLI due to differences in Class structure - KEDNY and KEDLI have transportation only classes; no proposed changes to NMPC at this time.	No change.
27	Research and Development Surcharge	74.1	90	NMPC cap language correction to dekatherms (DTH) proposed in Rate Case, to be consistent with Order and KEDNY & KEDLI tariffs.	N/A
28	Energy Efficiency Program Charges	119.50-119.51	138.50-138.50.1	Layout consistent across all three tariffs. For NMPC , ETIP is in base rates; proposed the same changes for KEDNY and KEDLI in the Rate Case.	N/A
29	Revenue Decoupling Mechanism	119.52-119.52.1	138.52-138.53	Revenue Decoupling language is generally aligned where possible with the exception of service classifications and exclusions. However, once all three companies have approved revenue per class targets, the language can be further aligned.	KEDNY and KEDLI language aligned as part of August 2021 Compliance filing.
30	Merchant Function Charge	72-72.3	79.2-79.4	Layout consistent across all three tariffs; added MFC definitions for NMPC tariff in definitions section; the methodology are the same for all 3 companies; add 'Calculation of Merchant Function Rate per Therm' header for KEDLI and KEDNY.	Done. KEDNY: Update complete; see Leaf: 80; KEDLI: Update complete; see Leaf: 72.
31	NYSERDA Loan Installment Program	N/A	N/A	Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	No change.
32	Service Guarantee	50.1	35	No proposed changes at this time.	No change.
33	Community Choice Aggregation Program	119.53-119.54	138.57-138.58	Implemented at the same time for KEDNY, KEDLI and NMPC. Language and layout consistent across all three tariffs; no proposed changes at this time.	N/A
34	Gas Safety and Reliability Surcharge	119.52.2	138.54	Language and layout consistent across all three tariffs; no proposed changes at this time.	N/A
35	Earnings Adjustment Mechanism	N/A	N/A	EAM will be implemented for KEDNY and KEDLI for the upcoming Rate Case; once approved, the tariff language will be consistent with NMPC.	N/A
36	Deferral Surcredit	N/A	N/A	Not applicable to KEDNY and KEDLI; no proposed changes to NMPC at this time.	N/A
37	Inspection, Maintenance and Replacement of Facilities in Public Thoroughfare	28	21	Language consistent between KEDNY & KEDLI; NMPC's language is determined to be appropriate and represents similar rules.	N/A
38	Company Liability	63.1-63.2	22	Language similar across all three tariffs; further review of job aids, procedures, review other areas within tariff, certification processes would be needed before making a recommendation to change.	N/A
39	Leakage	64	23	Potential opportunity for alignment: language could be added for NMPC and revised for KEDLI to be consistent.	N/A
40	Customer Deposits	43-48	24-26	KEDLI and NMPC are prescriptive while KEDNY is generic. They all are similar in referring to the regulations. This may be a section we can agree to align but would need to work with Customer since there are some nuances to deposit review, etc.	While all 3 look different, KEDNY refers to the Regs, whereas KEDLI and NMPC are aligned. The Company agrees to leave this alone.

41	Service to Which Rates Apply	35	39	Language similar across all three tariffs; KEDLI does not specifically include high pressure sales verbiage.	N/A
42	ESCo-initiated Suspensions	63-63.2	55.1-55.2	Language could be removed from KEDNY and KEDLI's tariff because of implementation of consolidated billing charge and POR.	N/A
43	Insulation Standards for Res Space Htg	23	65	KEDNY - needs to add the word 'not' to the following sentence "Gas Service will not be provided to a new dwelling, or to an existing..." to align with KEDLI. NMPC has more detailed tariff language regarding insulation compliance standards.	KEDNY: done; KEDLI: N/A.
44	Safety Related Service Calls	N/A	65	KEDLI and NMPC could potentially add similar language as shown in KEDNY, but further consultation would be needed with the applicable groups performing the work.	Done. KEDLI: added section #10 on Leaf: 24
45	Refund Provision	71-71.1	84-85.1	KEDNY and KEDLI have same language except for KEDNY specific language in parts D. & E.; NMPC is similar and unique with its reconciliation and service classes. All tariffs are considered aligned.	N/A
46	Transition Costs	195	86-89	The KEDNY tariff includes more details on how transition cost will be applied; KEDLI only includes a definition of the costs, and NMPC includes the explanation of transition cost recovery in the annual gas cost reco language as "Stranded Capacity Costs". Language for KEDLI and NMPC can be revised to be more closely aligned with KEDNY.	Upon further discussion, no changes are necessary at this time.
47	Transition Surcharge	74	89.1	The KEDNY and KEDLI tariffs include details on how transition surcharges will be calculated; and NMPC includes the explanation of stranded cost recovery in the annual gas cost reco language as "Stranded Capacity Costs". Language for NMPC can be expanded to be more closely aligned with KEDNY and KEDLI.	N/A
48	Delivery Penalty Refund	mentioned in GAC language but not defined	90	The delivery penalty refunds associated with marketers penalties are included in all three Companies commodity reconciliation sections and are generally aligned except for the service classification differences, but the naming of the refunds could be aligned (ie. defining Delivery Penalty Refunds in the definitions section of the tariffs and using that naming convention in all the tariffs)	KEDNY: N/A; KEDLI: added Delivery Penalty refund in Definitions section - see Leaf: 13.1.1.
49	Premium Service Appointments	N/A	35-36	Not applicable to KEDLI and NMPC; no proposed changes to KEDNY at this time.	N/A
50	Deferred Payment Agreement	55-58	43-48	KEDNY has as a standalone rule. KEDLI's DPA section is within Company-Initiated Discontinuance of Service and Complaint Procedure. NMPC has it in its Billing and Collections sections. KEDNY and KEDLI are similarly structured. NMPC is prescriptive. All three have the DPA agreement within the tariff: NMPC and KEDNY in its Form Section and KEDLI in General Info. Recommendation: Leave DPA language as is and possibly align on the Form Section	Not including updating the DPA agreement form section as part of this General Information Tariff Alignment project.
51	Dishonored Payment	47	49	KEDNY has this as standalone. KEDLI has it in its Billing & Payment of Bills section. NMPC has it in it Billing & Collections. KEDNY and NMPC have same charge (\$10) while KEDLI is \$5. When the potential for updating these fees was explored for the 2016 DNY rate case, it was agreed that these charges are more than sufficient as is.	N/A
52	Estimated Bills	41-44	50-51	Common theme - KEDNY Standalone. KEDLI's Estimated Bills roll in with the No Access rules. NMPC has it in its Meter Reading Section. Recommendation would be to leave as is, at this time. Potential for further discussion if consideration should be given to combining into Meter Reading section.	N/A
53	Riders	79.1-79.2	94-114	Company specific; no opportunity for further alignment.	No change.
54	Non-Residential Rules	81-86	115-138	Not applicable to NMPC; Company specific to KEDNY and KEDLI, so no proposed changes to either at this time.	No change.
55	Statement Analysis	N/A	138.49	KEDLI does not explicitly discuss statement analysis or historical info. Potential opportunity for further alignment.	No change.
56	Special Meter Read Fee	119.49	138.49	Recommendation to combine the language included on KEDLI Leaf 36 and 119.49 to align with KEDNY and NMPC.	No change. KEDNY in separate paragraph just for Retail Access.
57	Consolidated Billing Credit/ Charge	119.49	138.49	Potential opportunity for KEDLI language to be aligned to match KEDNY (except for service classification references). Language for NMPC is inherently different because Company provides a billing credit to customers with an ESCo (as opposed to KEDNY and KEDLI where a customer with an ESCo avoids the billing charge that sales customers pay).	No change. Already aligned for KEDNY and KEDLI.
58	Tax Reform Surcredit	119.51	138.51	Not applicable to NMPC; language for KEDNY and KEDLI already aligned.	N/A
59	TC IT Revenues Reconciliation Surcharge	119.52.2	138.54	Not applicable to NMPC; language for KEDNY and KEDLI already aligned.	N/A
60	Electric Generator Revenue Reconciliation	119.52.3	138.55	Not applicable to NMPC; language for KEDNY and KEDLI already aligned. The reconciliation for electric generators is included in the Net Revenue Sharing Mechanism.	N/A
61	New York Facilities System Surcharge/Surcredit	119.52.4	138.55.1	Not applicable to NMPC; language for KEDNY and KEDLI already aligned.	
62	Delivery Rate Adjustment	119.53	138.56	Potential opportunity to align NMPC to the KEDNY/KEDLI format.	N/A