



Carol Teixeira
Manager, NY Electric Pricing

May 6, 2021

Via Electronic Filing

Honorable Michelle L. Phillips, Secretary
State of New York Public Service Commission
Office of the Secretary, 19th Floor
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 15-E-0302 - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Petition of Niagara Mohawk Power Corporation d/b/a National Grid to Modify Calculation of Clean Energy Standard Supply Surcharge

Dear Secretary Phillips:

Niagara Mohawk Power Corporation d/b/a National Grid (the "Company") is filing with the New York State Public Service Commission ("Commission") the following proposed revisions to its Schedule for Electric Service, P.S.C. No. 220 – Electricity (the "Electric Tariff").

Identification of Tariff Amendments:

Eighth Revised Leaf No. 229.3
Fourth Revised Leaf No. 229.4

To P.S.C. No. 220 Electricity
Effective: July 1, 2021

Purpose of the Filing:

The proposed revisions to the Electric Tariff will ensure recovery of future potential Renewable Energy Certificates ("REC") costs, such as Tier 2 RECs and Tier 4 RECs. Modifications to Tier 2 were approved by the Commission in Case 15-E-0302.¹ In the Commission's *Order Adopting Modifications to the Clean Energy Standard*, Ordering Clause 5 states that load serving entities (LSEs) shall comply with LSE obligations under Tier 1 and the Competitive Tier 2 program of the Renewable Energy Standard in order to serve their retail customers, as discussed in the in the CES Modification Order. Accordingly, the Company seeks Commission authorization to revise Rule 46 of the Company's P.S.C. No. 220 - Electricity ("Electric Tariff"). Currently, Rule 46.3.5.1 on Leaf 229.3 of the Electric tariff specifies that

¹ Cases 15-E-0302 *et al.*, *Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard*, Order Adopting Modifications to the Clean Energy Standard (issued October 15, 2020) ("CES Modifications Order").

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the Renewable Energy Standard (“RES”) charge calculation is included as part of the Clean Energy Standard Supply (“CESS”) charge, but that language is specific to Tier 1 RECs. The Company proposes to modify Rule 46.3.5.1 to ensure that any potential REC costs from additional tiers can be recovered from customers.

Additionally, the Company seeks to remove the word “annual” from Rule 46.3.5.5 and 46.4 on Leaf 229.4, which correlates to annual charges and to provide for CESS statement filings at times other than once per year, if needed. As outlined in Ordering Clause 6 of the CES Modification Order, the New York State Energy Research and Development Authority (“NYSERDA”) provided the Company’s Tier 2 REC obligation on May 1, 2021, which was past the Company’s CESS statement filing date on March 25, 2021 for a CESS surcharge effective date for the April billing period. Payments from LSEs will begin in July 2021 as outlined on Page 71 of the CES Modification Order. Due to the proposed timeline, the Company plans to file a CESS statement at the end of June 2021 to include recovery of Competitive Tier 2 RECs in the CESS beginning with the July 2021 billing period.

Conclusion and Notice:

The Company is filing these proposed revisions to the Electric Tariff to become effective on July 1, 2021. The Company requests a waiver of the newspaper publication requirements of PSL § 66-12 and 16 NYCRR 720.8. Attachment 1 contains redlined tariff leaves showing where the proposed revisions to the above leaves have occurred. Please advise the undersigned of any action taken regarding this filing. Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Carol Teixeira

Carol Teixeira
Manager, NY Electric Pricing

Enclosures

cc: Sandra Hart, DPS Staff
MaryAnn Sorrentino, DPS Staff
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