nationalgrid

Dawn M. Herrity Principal Program Manager U.S. Strategy & Regulation

March 13, 2020

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

RE: CASE 06-G-1186 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of KeySpan Gas East Corporation d/b/a National Grid – Revenue Decoupling Mechanism

CASE 16-G-0058 - Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of KeySpan Gas East Corporation d/b/a National Grid

Dear Secretary Phillips:

In accordance with the Commission's "Order Concerning Proposed Revenue Decoupling Mechanism" (Order 1) dated December 22, 2009 in Case 06-G-1186 and "Order Adopting Terms of Joint Proposal and Establishing Gas Rate Plans" (Order 2) dated December 16, 2016 in Case 16-G-0058 KeySpan Gas East Corporation d/b/a National Grid (the "Company") hereby submits:

Statement No. 11 – Statement of Revenue Decoupling Mechanism Statement No. 25 – Statement of System Benefits Charge Schedule to Gas Service, P.S.C. No. 1-GAS Effective Date: May 1, 2020

Order 1 approved the Joint Proposal ("JP") filed by the Company on September 25, 2009 to implement a Revenue Decoupling Mechanism for SC1B (Section VI.1.B). Order 2 approved the continuation of the SC1B Revenue Decoupling Mechanism and the implementation of a Revenue Decoupling Mechanism for SC2 and SC3 (Section V.3.10 and Section V.6.1.11). The Company is submitting its Revenue Decoupling Mechanism Reconciliation for SC1B (Attachment A), a "Customer Count Proxy Analysis" for SC1B (Attachment B), and its Revenue Decoupling Mechanism Reconciliation for SC2 and SC3 (Attachment C).

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The calendar year 2018 SC1B reconciliation shows an over-recovery of the anticipated Allowed Delivery Service Revenues of \$9,745,216, including interest. The RDM reconciliation of calendar year 2017 resulted in an over-collection of \$129,388, including interest. This results in a total reconciliation of \$9,874,604, including interest and a Revenue Decoupling Mechanism factor credit of \$0.0174/therm. The credit will be included in the Delivery Rate Adjustment for Service Classification Nos. 1B, 1BR, 5-1B and 5-1BR effective May 1, 2020.

The SC1 Customer Count Proxy Analysis compares 30-day equivalent bills to the average annual number of residential heating customers measured by open and active meters. This comparison results in a 1% difference in the customer counts.

The calendar year 2019 SC2 reconciliation shows an over-recovery of the anticipated Allowed Delivery Service Revenues of \$9,534,924, including interest. The RDM reconciliation of calendar year 2017 resulted in an under-collection of \$49,346, including interest. This results in a total reconciliation of \$9,485,579, including interest, and a Revenue Decoupling Mechanism factor credit of \$0.0273/therm. The credit will be included in the Delivery Rate Adjustment for Service Classification Nos. 2A, 2B, 5-2A and 5-2B effective May 1, 2020.

The calendar year 2019 SC3 reconciliation shows an under-recovery of the anticipated Allowed Delivery Service Revenues of \$1,645.108, including interest. The RDM reconciliation of calendar year 2017 resulted in an under-collection of \$16,311, including interest. This results in a total reconciliation of \$1,661,419, including interest and a Revenue Decoupling Mechanism factor surcharge of \$0.0304/therm. The surcharge will be included in the Delivery Rate Adjustment for Service Classification Nos. 3A, 3B, 5-3A and 5-3B effective May 1, 2020.

In addition, the Company will be updating its System Benefits Charge ("SBC") to recover lost revenues plus interest from all non-RDM service classifications. The lost revenues plus interest associated with energy efficiency programs for the period January through December 2019 for non-RDM service classifications totaled \$140,567, including interest. The resultant SBC factor applicable to all non-RDM service classifications, effective May 1, 2020 is \$0.00841/therm. The workpaper detailing this adjustment to the SBC factor is contained in Attachment D.

Please contact the undersigned if you have questions or require further information.

Respectfully Submitted,

/s/ Dawn M. Herrity

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Enclosures