



Carol Teixeira
Manager, NY Electric Pricing

December 12, 2019

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: Rule 28 - Special Services Performed for Company at a Charge

Dear Secretary Phillips:

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. 147
To PSC No. 220 Electricity
Effective: April 1, 2020

The purpose of this filing is of a clarifying nature to propose a revision to Rule 28- Special Services Performed by Company at a Charge. Specifically, the Company is proposing to clarify the applicability of the term "customer" for entities and individuals requesting services under Rules 28.1-28.4 of the Tariff.

Rule 28 is applicable to services and facilities requested by entities and individuals that are beyond the Company's general service obligations (*e.g.*, installation of additional facilities, performance of additional services, and removal or relocation of existing facilities for customer-driven reasons). Rule 28 is an "actual cost rule," meaning that the individual or entity requesting the service is required to pay the actual costs incurred by the Company to perform the work.

The Company has received some disputes from parties requesting services under Rule 28, claiming they are not customers for purposes of the rule and should not be subject to charges. The revision proposed is consistent with the Company's historic application of the rule and public policy. Further, adding the proposed section to Rule 28 will clarify that the costs of the work performed will be attributed and paid for by the requesting party that directly benefits from the work and will not be subsidized by other customers who do not require and may not benefit from the work.

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 the proposed revisions.

Any questions regarding this filing can be directed to the undersigned at (315) 428-6104.

Respectfully Submitted,

/s/ Carol Teixeira

Manager,
New York Electric Pricing