nationalgrid

Dawn M. Herrity Principle Program Manager Regulatory Pricing

December 16, 2014

VIA ELECTRONIC MAIL

Honorable Kathleen H. Burgess Secretary New York State Department of Public Service Three Empire State Plaza, 19th Floor Albany, New York 12223-1350

Re: Case 07-M-0548 – Proceeding on Motion of the Commission Regarding an Energy Efficiency Portfolio Standard

Case 09-G-0363 – Petitions for Approval of Energy Efficiency Portfolio Standard (EEPS) Gas Energy Efficiency Programs

Dear Secretary Burgess:

Enclosed please find a revised System Benefits Charge ("SBC") Statement, issued by The Brooklyn Union Gas Company d/b/a National Grid NY (hereinafter "the Company"), in compliance with the requirements of the Public Service Commission of the State of New York ("Commission"):

System Benefits Charge Statement No. 10 To PSC No. 12-GAS Effective: January 1, 2015

The Company is updating its SBC to reflect the authorized collections in compliance with Ordering Clause No. 15 in Case 07-M-0548 dated October 25, 2011 "Order Authorizing Efficiency Programs, Revising Incentive Mechanism, and Establishing a Surcharge Schedule" ("October 25th Order").

The Company began collecting SBC funds effective January 1, 2008 as set forth in the Commission's Order Adopting Gas Rate Plans for KeySpan Energy Delivery New York and KeySpan Energy Delivery Long Island issued December 21, 2007 ("Dec. 21 Order"). In the Dec. 21 Order, the Company was authorized to collect \$20M annually for interim energy efficiency programs through 2012 subject to change as a result of subsequent Commission decisions in the EEPS proceeding. While the collection of SBC funds started January 1, 2008, the Company effectively began offering interim energy efficiency programs in the last quarter of 2007. For Calendar Years 2008 and 2009, the SBC factor was set on an authorized collection of

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\$20M annually. The SBC factor for Calendar Year 2010 was set on the \$20M authorized collection for the interim energy efficiency programs less the actual expenditures for the prior period August 2007 through December 2008, whereas the Calendar Year 2010 SBC factor should have been set at the EEPS authorization collections plus any remaining interim energy efficiency program funding. The SBC factor for Calendar Year 2011 was set on Commissionapproved EEPS budgets less the under-collection of SBC funds for the prior period January 2009 through December 2009. For Calendar Years 2012, 2013, and 2014, the Company set the SBC factor to collect the upcoming calendar year's authorized EEPS funds as set forth in various Commission orders. Upon further review, the Company believes the setting of the SBC factor should also include a reconciliation of authorized collections versus actual collections as reported each June 1st for the prior calendar year to the Commission. This filing seeks to revise prior periods, including a correction of the Calendar Year 2010 SBC factor calculation, and utilize the proper SBC factor- setting methodology going forward beginning with January 1, 2015. In revising the prior periods, the Company did not include in its calculations any authorized collections for the interim gas energy efficiency programs beginning in 2010 due to diminishing program funding needs as the interim energy efficiency programs were replaced with EEPS programs.

The SBC Statement included in this filing reflects the corrected calculation of the SBC factor, along with prior period adjustments.

Attachment 1 lists the authorized Calendar Year 2015 collections as approved in the October 25th Order, Appendix 2 – Table 8. Attachment 2 details the prior period authorized and actual EEPS collection

If you have any questions regarding this filing, please contact me at (929) 324-4580 or <u>Dawn.Herrity@nationalgrid.com</u>.

Sincerely,

Dawn M. Herrity

Dawn M. Herrity Principle Program Manager Regulation & Pricing

/dh Att.

The Brooklyn Union Gas Company d/b/a National Grid NY (formerly "KEDNY") Gas Efficiency Programs

ATTACHMENT 1

2015 EEPS Collections	Source Order Authorizing Collections Table 8; Case 07-M-0548 October 25, 2011	<u>Period</u> 01/01/2015 - 12/31/2015	<u>2015 Amount</u> \$30,013,154	
Total 2015 EEPS Collections			\$30,013,154	
System Benefits Charge Calculation				
	2015 Calendar Year Firm Volume Sales and <u>Transportation (therms)</u>	Authorized Energy Efficiency 2015 Collections	2015 SBC <u>Surcharge (\$/th)</u>	
2015 SBC Calculation 1A, 1AR, 1B, 1BR, 1BI, 1B-DG, 2-1, 2-2, 3, 4A, 4B, 7, 17-CTS 1A, 17-CTS 1AR, 17-CTS 1B, 17-CTS 1BR, 17-CTS 1BI, 17-CTS 2-1, 17-CTS 2-2, 17-CTS 3, 17-CTS 4A, 17-CTS 4B, and 17-CTS 7	1,299,908,364	\$30,013,154	\$0.02309	
Inclusion of Lost Revenues as filed to be effective June 1, 2014 through April 30, 2015 applicable to: 1A, 1AR, 2-1, 2-2, 3, 4A, 4B, 7, 17-CTS 1A, 17-CTS 1AR, 17-CTS 2-1, 17-CTS 2-2, 17-CTS 3, 17-CTS 4A, 17-CTS 4B, and 17-CTS 7			\$0.00499	
<u>SBC Factor Effective January 1, 2015</u> 1B, 1BR, 1BI, 1B-DG, 17-CTS 1B, 17-CTS 1BR, and 17-CTS 1BI			\$0.02309	
1A, 1AR, 2-1, 2-2, 3, 4A, 4B, 7, 17-CTS 1A, 17-CTS 1AR, 17-CTS 2-1, 17-CTS 2-2, 17-CTS 3, 17-CTS 4A, 17-CTS 4B, and 17-CTS 7			\$0.02808	
Historical Under/(Over) Collection CY 2010 - 2013 1A, 1AR, 1B, 1BR, 1BI, 1B-DG, 2-1, 2-2, 3, 4A, 4B, 7, 17-CTS 1A, 17-CTS 1AR, 17-CTS 1B, 17-CTS 1BR, 17-CTS 1BI, 17-CTS 2-1, 17-CTS 2-2, 17-CTS 3, 17-CTS 4A, 17-CTS 4B, and 17-CTS 7 Interest	1,299,908,364 1,299,908,364	\$578,889 (\$74,450)	\$0.00045 <u>(\$0.00006)</u>	
Total Under/(Over) Collection CY 2010 - 2013 <u>Total SBC Factor Effective January 1, 2015</u> 1B, 1BR, 1BI, 1B-DG, 17-CTS 1B, 17-CTS 1BR,			\$0.00039	
and 17-CTS 1BI 1A, 1AR, 2-1, 2-2, 3, 4A, 4B, 7, 17-CTS 1A, 17-CTS 1AR, 17-CTS 2-1, 17-CTS 2-2, 17-CTS 3, 17-CTS 4A, 17-CTS 4B, and 17-CTS 7			\$0.02348 \$0.02847	

The Brooklyn Union Gas Company d/b/a National Grid NY (formerly "KEDNY") Gas Efficiency Programs

ATTACHMENT 2

Historical SBC Reconciliations

2010											
	Authorized		Actual	F	Reconciled Aug 07-Dec 08						
<u>(</u>	<u>Collections</u>		Collections		Under/(Over) Collected	Actual	 Reconciled 	L	Difference		
\$	19,252,996	\$	10,528,269	\$	(9,889,805)	\$	20,418,074	\$ (1,165,078)			
2011											
	Authorized		Actual		Reconciled 2009						
(Collections		Collections		Under/(Over) Collected	Actual	- Reconciled	Difference			
\$	24,931,651	\$	28,779,359	\$	4,078,355	\$	24,701,005	\$	230,646		
2012											
/	Authorized		Actual								
<u>(</u>	<u>Collections</u>		Collections						<u>ifference</u>		
\$	13,500,811	\$	13,083,302					\$	417,509		
					2013						
-	Authorized		Actual								
	<u>Collections</u>		Collections						Difference		
\$	18,171,968	\$	17,076,157					\$	1,095,811		
Under/(Over) Collected											
	\$ 578,889										

Note: Above calculations do not include any authorized collections for the KEDNY interim gas programs beginning in 2010 due to diminishing program funding needs as interim programs were replaced with EEPS programs.