

August 26, 2014

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess, Secretary New York State Public Service Commission Three Empire State Plaza Albany, NY 12223-1350

Re: Gas Tariff Filing to Make Certain Provisions Consistent Between New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation

Dear Secretary Burgess:

The enclosed tariff leaves, issued by Rochester Gas and Electric Corporation ("RG&E"), are transmitted for filing in compliance with the requirements of the New York State Public Service Commission ("Commission") and Appendix 7-H (electronic tariff filing system) to the Commission's Codes, Rules and Regulations (16 NYCRR Appendix 7-H).

Below is a list of the revised tariff leaves to be effective January 1, 2015.

<u>RG&E – PSC No. 16</u> Leaf 69, Revision 10 Leaf 71, Revision 7 Leaf 72, Revision 3 Leaf 73, Revision 7 Leaf 127.36, Revision 3 Leaf 127.37, Revision 3 Leaf 127.40, Revision 5 Leaf 127.42, Revision 6 Leaf 127.43, Revision 3 Leaf 130.2, Revision 5 Leaf 130.5, Revision 5 Leaf 133.2, Revision 4 Leaf 133.3, Revision 5



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Leaf 133.11, Revision 5 Leaf 137, Revision 3 Leaf 138, Revision 3 Leaf 142, Revision 5 Leaf 144, Revision 4 Leaf 144.4, Revision 4 Leaf 147.4, Revision 3 Leaf 147.5, Revision 1 Leaf 147.7, Revision 6 Leaf 147.13, Revision 1 Leaf 149, Revision 2

Purpose of Filing

RG&E is proposing to revise its tariffs related to the calculation of the Gas Supply Charge ("GSC"). Currently, RG&E uses a denominator of historical normalized sales in their calculation of the GSC, whereas New York State Electric & Gas Corporation ("NYSEG") uses a denominator of forecasted normalized sales. Both methods are currently allowed under 16NYCRR Section 720-6.5d.1. The Company is proposing to revise the RG&E methodology to use a denominator of forecasted normalized sales, similar to NYSEG's methodology for calculating the GSC and other related components¹. This change achieves additional consistency between the two Companies with minimal impact².

Newspaper Publication

The Companies request that the requirement of Section 66(12)(b) of the Public Service Law and 16 NYCRR Section 720-8.1 as to newspaper publication be waived as these revisions will not materially impact the Company's customers.

A State Administrative Procedure Act Notice is enclosed for publication in the State Register.

Company Contacts

If there are any questions concerning this filing, please contact me at (607) 762-8710.

Respectfully submitted,

Lori A. Cole Manager - Regulatory & Tariffs Rates and Regulatory Economics Department

Enclosures

¹ Other related components include the Research and Development Surcharge, the Interdepartmental Sales Credit, and the Refund of Revenues Collected Under the Provisions of Balancing and Cashout Charges.

² In addition, RG&E uses forecasted sales when calculating other surcharges (e.g., Temporary State Assessment Surcharge, System Benefits Charge)