



June 25, 2014

VIA ELECTRONIC SERVICE

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

RE: Case 11-E-0176 –New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation – Proposed Tariff Filing

Dear Secretary Burgess:

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

PSC No. 120 – Electricity, Schedule for Electric Service

Leaf No. 27.1, Revision 1 Leaf No. 27.2, Revision 2 Leaf No. 294.12, Revision 2

PSC No. 19 – Electricity, Schedule for Electric Service

Leaf No. 85.4, Revision 2 Leaf No. 85.5, Revision 2 Leaf No. 250, Revision 2

Effective: October 6, 2014.



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Overview

By its Order, issued and effective January 20, 2012, in the above-referenced proceeding, the Commission approved, on a permanent basis, the Company's tariff changes that were filed to implement discounted delivery rates for commercial and industrial customers who qualify for and receive Recharge New York ("RNY") power allocations¹.

Request

The Companies are requesting to modify the load share ratio used to calculate the RNY load and the non-RNY load for standby customers, NYSEG's Service Classification No. 11 and RG&E's Service Classification No. 14. The Companies have recognized with the current load share ratio there is a potential for New York Power Authority (NYPA) to be held responsible for more load than the RNY allocation. Therefore, the Companies are proposing a tariff amendment to specify that for standby customers the maximum metered demand will be used in the load share ratio, which may differ from the monthly billing demand for customer whose otherwise applicable service class is a time-of-use service. The companies are proposing this change in recognition of the unique affect an on-site generator can have on the load share ratio and the unintended result of NYPA having to potentially provide much more energy than the actual RNY allocation.

Publication

The Company respectfully request the requirements of Section 66(12)(b) of the Public Service Law regarding newspaper publication be waived as this change will not affect the majority of the Company's customers.

A State Administrative Procedures Act Notice is enclosed for publication in the State Bulletin.

If there are any questions concerning this filing, please call Sue Morien at (585) 771-4741 or me at (607) 762-8710.

Respectfully submitted,

Lori A Cole

Manager – Regulatory & Tariffs

Rates and Regulatory Economics Department

Enclosures

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¹ The customer's allocation of RNY power will be exempt from paying the following surcharges: System Benefits Charge ("SBC"), Energy Efficiency Portfolio Standard ("EEPS"), and the Renewable Portfolio Standard ("RPS"). Furthermore, the RNY allocation will be exempt from the Companies' Revenue Decoupling Mechanism ("RDM") Adjustment