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May 14, 2014

### VIA ELECTRONIC MAIL

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

**Re:** Case No. 14-M-0039 – Tariff filing by Niagara Mohawk Power Corporation d/b/a National Grid and KeySpan Gas East Corporation d/b/a Brooklyn Union of L.I. to establish fees for residential customers who choose to opt out of using Automated Meter Reading devices.

Dear Secretary Burgess;

Enclosed are the following tariff leaves transmitted for filing by Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid" or "Company") in accordance with the requirements of the New York State Public Service Commission ("Commission"):

> First Revised Leaf No. 120.1 Second Revised Leaf No. 121 To Schedule for Electric Service, P.S.C. No. 220-ELECTRIC Effective: July 1, 2014

On February 6, 2014 the Company submitted a tariff filing to update the Company's electric tariff to reflect National Grid's policies regarding the use of Automated Meter Reading ("AMR") devices. The Company has deployed AMR devices throughout its service territory to allow it to remotely read electric and gas meters. The proposed tariffs would allow residential customers to opt out of using AMR meters by electing to have the Company (i) install/maintain a non-AMR meter (that does not use a transmitter to remotely read the meter) at their premises and (ii) manually read their meters through in-person, bi-monthly meter reads. The purpose of this filing is to update the installation and meter reading fees filed in the Company's February 6, 2014 filing.

Attached hereto as Attachment A are the Company's workpapers supporting the rates charged to customers who opt out of AMR.

Waiver of the newspaper publication requirement of PSL § 66-12 and 16 NYCRR § 720.8 is requested for this filing. Customers will be notified of these changes in accordance with the Company's customer communication plan, which will include, among other things, notice of the fees when a customer elects to opt out of AMR metering.

Please contact the undersigned if you have any questions regarding this filing or the enclosed documents.

# Respectfully submitted;

/s/ Jeremy Euto

encl.

Attachment A Schedule 1 Page 1 of 1

#### Niagara Mohawk Power Corporation d/b/a National Grid Meter Change and Meter Read Cost Calculations

	METER CHANGE COST CALCULATIONS											
Job	Job Date		Labor Times (minutes) Average Straight Time Labor and Wrench Total Job Hourly Capital Straight Time Cost Travel Time Time Rate Burdens Per Job				-	Fee				
		(a)	(b)	(C)	(d)	(e)	((c)/60)*(d)*(1+(e))	(g)				
Gas	2012	13	29	42	\$ 36.57	147%	\$63.19	\$63.19				
Electric	2012	15	14	29	\$ 36.57	141%	\$42.61	\$42.61				
Combined	2012	15	43	58	\$ 36.57	141%	\$85.23	\$85.23				

### METER READ COST CALCULATIONS

		Labo	<sup>r</sup> Times (mi	nutes)					
					Average Straight				
					Time	O&M			
			Wrench	Total Job	Hourly	Labor	Straight Time Cost	Monthly	
Job	Date	Travel	Travel Time		Rate	Burdens	Per Job	Charge 1)	
							(f) =		
		(a)	(b)	(c)	(d)	(e)	((c)/60)*(d)*(1+(e))	(g)= (f)/2	
Gas	2012	13	12	25	\$ 32.82	30%	\$17.73	\$8.87	
Electric	2012	15	9	24	\$ 32.82	30%	\$17.02	\$8.51	
Combined	2012	15	21	36	\$ 32.82	30%	\$25.53	\$12.77	

1) The Company will manually read meters every other month, and will charge 50% of the cost of the manual read every month

Note:

Time based on CMS FY14 work plan Burdens percentages based on 12-month ending October 2012 Labor costs based on October 2012 wages

Source:

Column (d) = Attachment C, schedule 2 Column (e) = Attachment C, schedule 3

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### Niagara Mohawk Power Corporation d/b/a National Grid Average Straight Time Hourly Rate

_	(a)	(b)	(c) = ((a/b)/2080)	(d)	(e)	(f) = ((d/e)/2080)	) (g) = (a-d)	(h) = (b-e)	(i) = ((g/h)/	/2080)	
CMS Field Service Tech and Meter Readers					Meter Reade	rs	Cost	Cost Excluding Meter Readers			
Date	Total Dollars	Total Staffing	Hourly Salary	Total Dollars	Total Staffing	Hourly Salary	Total Dollar	s Total Staffing	Hourly Sa	alary	
Oct-2012	\$24,331,478	356	\$ 32.82	\$8,663,296	150	\$ 27.69	9 \$15,668,18	2 206	\$	36.57	

### Niagara Mohawk Power Corporation d/b/a National Grid Labor and Capital Burdens Average Percentages Twelve Month Ended Average

## Labor and Capital Burdens for Meter Change:

r	r	Gas	Electric								
		Average	Average								
		Twelve Months	Twelve Months								
		Ended	Ended								
Peoplesoft Code	Description	Oct-12	Oct-12								
B06	Pension	29%	29%								
B01	OPEBs	35%	35%								
B03	FAS 112 Benefits	3%	3%								
B09	Payroll Taxes	11%	11%								
B03	Healthcare	13%	13%								
B04	Group Insurance	1%	1%								
B07	401K Match	4%	4%								
B30	Variable Pay	5%	5%								
B50	Time Not Worked	19%	19%								
B08	Workers Compensation	3%	3%								
-	Capital Overheads	23%	17%								
Total Labor and Ca	Total Labor and Capital Burdens for Meter Change 147%										

### Labor Burdens for Meter Read:

		Average
		Twelve Months
		Ended
Peoplesoft Code	Description	Oct-12
B09	Payroll Taxes	11%
B50	Time Not Worked	19%
Total Labor Burder	ns for Meter Read	30%

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#### Niagara Mohawk Power Corporation d/b/a National Grid Monthly Labor and Capital Burdens Percentages

													Gas	Electric
													Average	Average Twelve
													Twelve Months	Months
													Ended	Ended
Description	Nov-2011	Dec-2011	Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Oct-12	Oct-12
Pension	26.91%	26.91%	26.91%	26.91%	26.91%	31.68%	31.68%	31.68%	31.68%	31.68%	31.68%	27.94%	29%	29%
OPEBs	41.62%	41.62%	41.62%	41.62%	41.62%	31.40%	31.40%	31.40%	31.40%	31.40%	31.40%	24.05%	35%	35%
FAS 112 Benefits	0.81%	0.81%	0.81%	0.81%	0.81%	4.24%	4.24%	4.24%	4.24%	4.24%	4.24%	6.56%	3%	3%
Payroll Taxes	14%	14%	14%	14%	14%	8%	8%	8%	8%	8%	8%	8%	11%	11%
Healthcare	11.36%	11.36%	11.36%	11.36%	11.36%	14.16%	14.16%	14.16%	14.16%	14.16%	14.16%	17.34%	13%	13%
Group Insurance	1.35%	1.35%	1.35%	1.35%	1.35%	0.69%	0.69%	0.69%	0.69%	0.69%	0.69%	0.75%	1%	1%
401K Match	4.18%	4.18%	4.18%	4.18%	4.18%	3.47%	3.47%	3.47%	3.47%	3.47%	3.47%	3.20%	4%	4%
Variable Pay	9.39%	5.53%	5.53%	4.57%	2.32%	5.99%	5.99%	5.99%	5.92%	5.92%	3.97%	3.97%	5%	5%
Time Not Worked	19.90%	19.90%	18.50%	17.20%	16.60%	19.10%	19.10%	19.10%	19.10%	19.10%	19.10%	19.10%	19%	19%
Workers Compensation	4.08%	4.08%	4.08%	4.08%	4.08%	3.36%	3.36%	3.36%	3.36%	3.36%	3.36%	0.27%	3%	3%
Capital Overheads - Gas	11.51%	15.98%	18.72%	18.72%	75.44%	18.93%	24.59%	24.88%	20.17%	15.85%	26.55%	4.44%	23%	
Capital Overheads - Electric	18.98%	14.13%	8.89%	8.89%	18.13%	31.28%	20.84%	19.73%	18.84%	6.78%	20.61%	19.61%		17%
Total													147%	141%