



Lori A. Cole
Manager – Regulatory and Tariffs

January 13, 2017

VIA ELECTRONIC FILING

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

Re: Case 15-G-0185 – In the Matter of Heating Fuel Oil Supply Coordination
with Interruptible Gas Service Customers, February 2015 Issues – All Major
Gas Companies

Dear Secretary Burgess,

New York State Electric & Gas Corporation ("NYSEG") hereby transmits for filing the enclosed tariff leaves in compliance with the New York State Public Service Commission's (the "Commission") Order Adopting New Communication Protocols, issued and effective December 16, 2016 (the "Order"), in the above referenced proceeding. These tariff leaves are transmitted for filing in compliance as identified herein and in accordance with the requirements of Appendix 7-H (electronic tariff filing system) to the Commission's Codes, Rules and Regulations (16 NYCRR Appendix 7-H).

Below are the revised tariff leaves to become effective January 14, 2017.

NYSEG P.S.C. No. 87 - Gas
Leaf 26, Revision 5
Leaf 27, Revision 4

NYSEG P.S.C. No. 88 – Gas
Leaf 61, Revision 4
Leaf 61.1, Revision 2
Leaf 64, Revision 4

Purpose of Filing

The Company is filing tariff amendments in accordance with Ordering Clause 1 of the Order.¹

¹ The Company received an extension on December 30, 2016 to file the tariff amendments by January 13, 2017.



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Overview

The Order adopts the five recommendations provided in the Straw Proposal issued on May 25, 2016 with modifications. The Order states that the recommended communication protocols will apply statewide, but recommendations 3, 4, and 5 shall only be implemented if a customer fails to interrupt as required by the Company's tariff for upstate LDCs. NYSEG is therefore amending the gas tariff schedules to include the five recommendations as discussed in the Order.

In regards to recommendation 1, the Company does hereby respectfully request a slight modification. Recommendation 1 states the Company is directed to communicate daily with interruptible customers as soon as weather forecasts project outside temperatures to be 20 degrees or below for the upcoming three consecutive days or during times when three days of consecutive customer interruptions occur. As indicated in NYSEG's comments submitted to the Commission on June 27, 2016, the Company believes using 20 degrees as the threshold is too high and had identified a threshold of 10 degrees as to when the Company would consider interruptions on its most constrained system. The Company reviewed weather data for the last three years, comparing Binghamton and Rochester to Central Park. The average air temperature in Binghamton and Rochester was at least 10 degrees lower than Central Park, New York City. Additionally, as indicated in the table below, since 2014, the number of instances in which communication with interruptible customers would have been required under recommendation 1 would have been significantly higher for upstate utilities when there may not have been a need for interruption. Consequently, the Company respectfully requests to change the threshold temperature to 15 degrees.

Location	Approximate instances in which communications would have been necessary at threshold temperatures $\leq 20^{\circ}$	Approximate instances in which communications would have been necessary at threshold temperatures $\leq 15^{\circ}$
Binghamton	66	30
Rochester	61	17
Central Park	1	1

Newspaper Publication

In accordance with Ordering Clause 3 of the Order, the requirements of 66(12)(b) of the Public Service Law requiring newspaper publication has been waived.

Company Contacts

If you have any questions related to this filing, please contact Kelly Dietrick at 585.724.8135 or me at 607.762.8710

Respectfully submitted,



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Enclosures