



August 22, 2011

VIA ELECTRONIC FILING

Honorable Jaclyn A. Brillling, Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: CASE 11-E-0320 – New York State Electric & Gas Corporation
CASE 11-E-0322 – Rochester Gas and Electric Corporation

Tariff filings to Effectuate Amendments to Public Service Law §66-j and §66-l (Remote Net Metering by Farm and Non-Residential Customer-Generators) and Conforming Changes to Standardized Interconnection Requirements.

Dear Secretary Brillling:

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 compliance with the requirements of the New York Public Service Commission’s (the “Commission”) Notice Establishing Filing Requirements issued and effective on June 21, 2011.

P.S.C. No. 120 – Electricity, Schedule for Electric Service

Leaf No. 117, Revision 6
Leaf No. 117.0, Revision 0
Leaf No. 117.0.1, Revision 0
Leaf No. 117.2.4, Revision 0
Leaf No. 117.2.5, Revision 0
Leaf No. 117.33.1, Revision 0
Leaf No. 117.33.2, Revision 0

P.S.C. No. 19 – Electricity, Schedule for Electric Service

Leaf No. 160.38, Revision 5
Leaf No. 160.38.1, Revision 0
Leaf No. 160.38.2, Revision 0
Leaf No. 160.39.3, Revision 6
Leaf No. 160.39.3.1, Revision 0
Leaf No. 160.39.3.2, Revision 0
Leaf No. 160.39.4.1, Revision 0
Leaf No. 160.39.4.2, Revision 0

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Background

Chapter 35 of the Laws of 2011, which became effective on June 1, 2011, amended Public Service Law (PSL) Section 66-j and Section 66-1 to allow farm and non-residential solar photovoltaic or farm waste, and farm and non-residential wind electric customer generators, to apply excess generation credits from the customer's generator to other meters on property that is owned or leased by the same customer (referred to as "Remote Net Metering").

The Notice directed utilities to make filings necessary to conform their tariffs to the new statutory requirements. The requisite proposed tariff amendments were to be filed by July 22, 2011 and bear an effective date of October 29, 2011. Subsequently the Joint Utilities¹ submitted a request on July 7, 2011 to suspend tariff filings to permit additional time to understand the requirements set forth in Chapter 35. On July 18, 2011, the Secretary issued a Notice approving a 30-day postponement of tariff filings until August 22, 2011 with an effective date of December 1, 2011.

Overview of the Filing

A customer that wants to pursue Remote Net Metering must designate the Host Account (where the eligible generator is interconnected with the Companies' distribution system) and the Satellite Accounts (additional accounts in the customer's name) on a form when submitting their initial remote net metering application.

After the initial application for Remote Net Metering, a customer will be able to designate additional satellite accounts or delete existing active satellite accounts from participating in Remote Net Metering once per year, beginning on January 1. The customer will have up to 30 days to make such changes.

In a month where the Host Account has excess generation, the excess generation will be converted to the equivalent monetary value at the per kWh rate applicable to the Host Account's service classification. The credit will first be applied to the Host Account's current electric bill. Any remaining monetary credit will be allocated between the Host Account and the Satellite Accounts based on the percentage the customer designated to remain on the Host Account. The portion designated for the Satellite Accounts will be applied to the Satellite Account bills as each subsequent Satellite Account bill is calculated. In the case of two Satellite Accounts billed on the same day, the credit will be applied to the highest usage account first. If a monetary credit remains after applying credits to all designated Satellite Accounts, the credit will be carried forward on the Host Account as a monetary credit to the next billing period².

¹ Niagara Mohawk Power Corporation d/b/a National Grid, Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation

² The Companies are evaluating the taxation and system implications to determine if it is beneficial to apply this credit methodology to all demand net meter customers. Should the evaluation prove favorable for both tax and system implications, the Companies will propose tariff changes to request implementation for such changes.

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Publication

The Company requests that the requirement of § 66(12)(b) of the Public Service Law and 16 NYCRR §720-8.1 as to newspaper publication be waived because existing non-residential and farm customers affected by these tariff changes will be notified directly. New customers will be advised of these tariff changes when they enter into interconnection agreements with the Company.

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

If there are any questions concerning this filing, please call Kathy Grande at (585)771-4514 or myself at (607)762-8710.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Lori A. Cole".

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