



July 30, 2012

VIA ELECTRONIC FILING

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

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

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 State Public Service Commission (“PSC” or “Commission”) and Appendix 7-H (electronic tariff filing system) to the Commission's Codes, Rules and Regulations (16 NYCRR Appendix 7-H).

Over the last several years, the Companies have filed consistent tariff language where opportunities for such filings presented themselves. Appendix S of the Joint Proposal in Case 09-E-0715, *et. al.*, provides that “The Companies will meet with Staff after the Commission’s Order in this proceeding to determine whether there are instances where electric and gas service classifications can be made more consistent between NYSEG and RG&E”.

Consistent with the Companies’ prior tariff submissions and the provision in the Joint Proposal, the Companies are proposing revisions to their respective tariff schedules to make the language consistent for certain tariff provisions. The proposed changes are to become effective on December 1, 2012. A listing of the proposed revised tariff leaves is enclosed as Attachment A.

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Overview

The Companies are proposing revisions to their tariff schedules to make the language consistent for certain terms and conditions where the Companies' processes are consistent. These changes will allow Company Representatives to provide consistent information when dealing with developers, ESCOs, etc.

Where appropriate, the Companies propose revisions that achieve consistency across multiple tariff Schedules. For example, RG&E is proposing to eliminate its Electric Construction and Maintenance Statement and to follow the established internal process the Companies use for inquiries to RG&E Gas, NYSEG Gas and NYSEG Electric for customers to reconnect or obtain service¹. The Companies are also proposing revisions to the tariff language related to Residential Insulation Standards, Termination of Service, Complaint Procedures, Deferred Payment Agreements, Meter Reading and Estimating Bills, Backbilling, Liability, Continuity of Supply, Customer's Equipment, Company Equipment and Use of Service, Interest on Customer Overpayments and System Benefits Charge. Both Companies follow the same rules and implement the provisions in the same way.

Electric-Only Provisions

The Companies have identified tariff provisions within their electric schedules where more consistency in the language can be achieved. The Incremental Load Rider (RG&E) and Incremental Load Incentive (NYSEG) contain the same eligibility requirements and how the incentive is applied. The Companies however, still maintain a difference on the term applicable to each incentive. Other provisions where the Companies have proposed revisions to achieve consistency in the tariff language are: Distributed Generation Interconnection Requirements, and General Retail Access Rules. The development of the following surcharges is handled similarly for both Companies: System Benefits Charge, Energy Efficiency Portfolio Surcharge, and Renewable Portfolio Standard Surcharge. The Companies therefore propose changes to standardize the tariff language and the language and format of the Statements.

Gas-Only Provisions

The Companies propose changes to their Gas tariffs for when an application for gas service is made and the requirements that an applicant shall have met before initiating service. The Companies are also able to achieve consistency with the following tariff provisions: Inspection, Maintenance and Replacement of Facilities, Form of Application – Residential, Computation of Bills for High Pressure Metering (Fixed Factor Billing); Discontinuance of Service in Regard to Purchase of ESCO Accounts Receivable Program (POR), Company's Right to Curtail or Limit Service, Gas Requirements during a Curtailment, ESCO and Direct Customer Compliance, Penalties, Compensation for Diverted Gas, Restoration, Force Majeure, Consolidated Billing and Payment Processing, Delivery Point Operator, Creditworthiness, Discontinuance Due to Emergency Conditions, Discontinuance When There is No Customer, and Calculation of the WNA.

¹ Customers are advised of any associated costs at the time of request.

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Street Lighting-Only Provisions

Consistent with RG&E's tariff, NYSEG is proposing to include tariff language regarding customer requests to purchase the portion of the Company's street lighting facilities used to serve the customer (Leaf No. 61 and 61.1 , PSC No. 121 – Electricity). NYSEG currently has the option of selling such facilities in accordance with Public Service Law, however, the tariff does not explain how the Company would respond to such requests. The tariff language set forth in the RG&E schedule provides that if the customer indicates a desire to purchase the street lighting facilities used to serve the customer, the Company is required to develop an estimate of the costs it will incur and determine a proposed purchase price. RG&E is to respond to such written requests within 30 business days. Other provisions in the Street lighting schedules where the Companies are able to propose changes to achieve consistency are: Liability, General Retail Access, System Benefits Charge, Renewable Portfolio Standard Surcharge and the Temporary State Assessment Surcharge. NYSEG tariff revisions include the addition of the Service Guarantee provision to its Street Lighting tariffs. This provision was agreed to as part of the September 2010 Rate Order approving the Company's Joint Proposal and should have been included in the tariffs..

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 do not affect any internal procedures or processes, and will not directly impact the Companies' 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 call Kathy Grande (585) 771-4514 or myself at (607) 762-8710.

Respectfully submitted,



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

Enclosures

**Tariff Filing to Make Certain Provisions Consistent Between NYSEG and RG&E
List of Tariff Leaves**

NYSEG PSC No. 88 – Gas

Leaf No. 16.3, Revision 4
Leaf No. 17, Revision 4
Leaf No. 17.1, Revision 4
Leaf No. 17.1.1, Revision 2
Leaf No. 50.1.1, Revision 4
Leaf No. 50.3, Revision 3
Leaf No. 50.5, Revision 3
Leaf No. 50.26, Revision 10

NYSEG PSC No. 90 – Gas

Leaf No. 2, Revision 5
Leaf No. 3, Revision 10
Leaf No. 4, Revision 1
Leaf No. 5, Revision 1
Leaf No. 10, Revision 1
Leaf No. 11, Revision 2
Leaf No. 11.1, Revision 0
Leaf No. 19, Revision 1
Leaf No. 25.1, Revision 1
Leaf No. 26, Revision 1
Leaf No. 27, Revision 1
Leaf No. 30, Revision 1
Leaf No. 31, Revision 1
Leaf No. 32, Revision 1
Leaf No. 33, Revision 1
Leaf No. 34, Revision 1
Leaf No. 34.1, Revision 3
Leaf No. 35, Revision 1
Leaf No. 36, Revision 2
Leaf No. 37, Revision 1
Leaf No. 38, Revision 2
Leaf No. 39, Revision 1
Leaf No. 40, Revision 1
Leaf No. 41, Revision 2
Leaf No. 42, Revision 1
Leaf No. 43, Revision 3
Leaf No. 44, Revision 4
Leaf No. 45, Revision 1
Leaf No. 46, Revision 1
Leaf No. 47, Revision 1

Leaf No. 48, Revision 3
Leaf No. 49, Revision 1
Leaf No. 50, Revision 1
Leaf No. 51, Revision 1
Leaf No. 52, Revision 1
Leaf No. 53, Revision 1
Leaf No. 54, Revision 1
Leaf No. 55, Revision 1
Leaf No. 56, Revision 1
Leaf No. 57, Revision 1
Leaf No. 58, Revision 1
Leaf No. 60, Revision 2
Leaf No. 61, Revision 1
Leaf No. 62, Revision 1
Leaf No. 63, Revision 1
Leaf No. 64, Revision 1
Leaf No. 65, Revision 1
Leaf No. 66, Revision 1
Leaf No. 67, Revision 2
Leaf No. 68, Revision 2
Leaf No. 69, Revision 2
Leaf No. 70, Revision 2
Leaf No. 71, Revision 4
Leaf No. 76, Revision 1
Leaf No. 77, Revision 1
Leaf No. 78, Revision 1
Leaf No. 79, Revision 1
Leaf No. 80, Revision 1
Leaf No. 81, Revision 1
Leaf No. 82, Revision 1
Leaf No. 83, Revision 1
Leaf No. 84, Revision 1
Leaf No. 85, Revision 1
Leaf No. 87, Revision 1
Leaf No. 100, Revision 4
Leaf No. 101, Revision 2
Leaf No. 105, Revision 5

NYSEG PSC No. 119 - Electricity

Leaf No. 2, Revision 1
Leaf No. 43, Revision 1
Leaf No. 44, Revision 1
Leaf No. 45, Revision 1
Leaf No. 46, Revision 1
Leaf No. 47, Revision 1

Leaf No. 48, Revision 1
Leaf No. 49, Revision 1
Leaf No. 50, Revision 1
Leaf No. 61, Revision 2
Leaf No. 62, Revision 1
Leaf No. 66, Revision 1
Leaf No. 67, Revision 1
Leaf No. 68, Revision 1
Leaf No. 70, Revision 1
Leaf No. 71, Revision 2
Leaf No. 72, Revision 2
Leaf No. 73, Revision 2
Leaf No. 74, Revision 1
Leaf No. 75, Revision 1
Leaf No. 76, Revision 2
Leaf No. 77, Revision 2
Leaf No. 78, Revision 1
Leaf No. 79, Revision 1
Leaf No. 79.1, Revision 2
Leaf No. 80, Revision 3
Leaf No. 81, Revision 2
Leaf No. 82, Revision 2
Leaf No. 83, Revision 3
Leaf No. 84, Revision 1
Leaf No. 85, Revision 1
Leaf No. 86, Revision 1
Leaf No. 87, Revision 1
Leaf No. 88, Revision 1
Leaf No. 89, Revision 1
Leaf No. 90, Revision 1
Leaf No. 91, Revision 2
Leaf No. 92, Revision 1
Leaf No. 93, Revision 1
Leaf No. 94, Revision 1
Leaf No. 95, Revision 1
Leaf No. 96, Revision 1
Leaf No. 96.1, Revision 0
Leaf No. 98, Revision 2
Leaf No. 99, Revision 2
Leaf No. 100, Revision 2
Leaf No. 101, Revision 3
Leaf No. 102, Revision 1
Leaf No. 106, Revision 3
Leaf No. 107, Revision 3
Leaf No. 150, Revision 1

NYSEG PSC No. 120 – Electricity

Leaf No. 18, Revision 11
Leaf No. 50, Revision 4
Leaf No. 51, Revision 1
Leaf No. 53, Revision 4
Leaf No. 57, Revision 5
Leaf No. 58, Revision 5
Leaf No. 59, Revision 8
Leaf No. 60, Revision 3
Leaf No. 63, Revision 2
Leaf No. 64, Revision 2
Leaf No. 69, Revision 3
Leaf No. 71, Revision 3
Leaf No. 73, Revision 2
Leaf No. 74, Revision 5
Leaf No. 76, Revision 4
Leaf No. 79, Revision 2
Leaf No. 80, Revision 2
Leaf No. 95, Revision 2
Leaf No. 106, Revision 1
Leaf No. 107, Revision 1
Leaf No. 111, Revision 4
Leaf No. 111.1, Revision 3
RPS Statement No. 6
SBC Statement No. 9

NYSEG PSC No. 121 – Electricity

Leaf No. 7, Revision 4
Leaf No. 9, Revision 2
Leaf No. 14, Revision 13
Leaf No. 14.1, Revision 4
Leaf No. 61, Revision 5
Leaf No. 61.1, Revision 0
RPS Statement No. 6
SBC Statement No. 9

RG&E PSC No. 16 – Gas

Leaf No. 2, Revision 11
Leaf No. 4, Revision 5
Leaf No. 11, Revision 1
Leaf No. 22, Revision 1
Leaf No. 23, Revision 1
Leaf No. 24, Revision 1

Leaf No. 25, Revision 1
Leaf No. 25.1, Revision 0
Leaf No. 26, Revision 1
Leaf No. 27, Revision 1
Leaf No. 30, Revision 1
Leaf No. 31, Revision 1
Leaf No. 32, Revision 1
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Leaf No. 58, Revision 1
Leaf No. 59, Revision 1
Leaf No. 60, Revision 1
Leaf No. 61, Revision 1
Leaf No. 61.1, Revision 0
Leaf No. 63, Revision 1
Leaf No. 64, Revision 1
Leaf No. 64.1, Revision 0
Leaf No. 79, Revision 1
Leaf No. 85, Revision 1
Leaf No. 85.1, Revision 0
Leaf No. 86, Revision 1
Leaf No. 87, Revision 1
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Leaf No. 96, Revision 1
Leaf No. 97, Revision 1
Leaf No. 98, Revision 3
Leaf No. 100, Revision 3
Leaf No. 101, Revision 5

Leaf No. 102, Revision 4
Leaf No. 103, Revision 1
Leaf No. 104, Revision 1
Leaf No. 110.1, Revision 3
Leaf No. 111, Revision 2
Leaf No. 112, Revision 2
Leaf No. 127, Revision 1
Leaf No. 127.11, Revision 2
Leaf No. 127.19, Revision 2
Leaf No. 127.19.1, Revision 5
Leaf No. 127.19.2, Revision 1
Leaf No. 127.28, Revision 1
Leaf No. 127.29, Revision 8
Leaf No. 127.38.1, Revision 2
Leaf No. 127.45, Revision 5
Leaf No. 127.46, Revision 1
Leaf No. 127.46.1, Revision 2

RG&E PSC No. 18 – Electricity Street Lighting

Leaf No. 2, Revision 5
Leaf No. 11, Revision 10
Leaf No. 15, Revision 2
Leaf No. 16, Revision 1
Leaf No. 24.1, Revision 5
RPS Statement No. 9
SBC Statement No. 16

RG&E PSC No. 19 – Electricity

Leaf No. 2, Revision 14
Leaf No. 4, Revision 5
Leaf No. 18, Revision 2
Leaf No. 18.1, Revision 0
Leaf No. 19, Revision 1
Leaf No. 20, Revision 1
Leaf No. 21, Revision 1
Leaf No. 22, Revision 1
Leaf No. 22.1, Revision 0
Leaf No. 23, Revision 1
Leaf No. 27, Revision 2
Leaf No. 28, Revision 2
Leaf No. 29, Revision 2
Leaf No. 30, Revision 1
Leaf No. 31, Revision 1
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Leaf No. 65, Revision 1
Leaf No. 66, Revision 2
Leaf No. 67, Revision 1
Leaf No. 68, Revision 1
Leaf No. 69, Revision 1
Leaf No. 69.1, Revision 0
Leaf No. 69.2, Revision 0
Leaf No. 72, Revision 1
Leaf No. 73, Revision 1
Leaf No. 73.1, Revision 0
Leaf No. 80, Revision 5
Leaf No. 81, Revision 12
Leaf No. 81.2, Revision 5
Leaf No. 81.3, Revision 6
Leaf No. 87, Revision 1
Leaf No. 87.1, Revision 0
Leaf No. 88, Revision 1
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Leaf No. 99, Revision 1
Leaf No. 100, Revision 1
Leaf No. 102, Revision 1
Leaf No. 103, Revision 1
Leaf No. 105, Revision 1
Leaf No. 118, Revision 1
Leaf No. 119, Revision 1
Leaf No. 120, Revision 5
Leaf No. 160.1, Revision 3
Leaf No. 160.2, Revision 2
Leaf No. 160.3, Revision 2
Leaf No. 160.4, Revision 2
Leaf No. 160.5, Revision 2
Leaf No. 160.6, Revision 2
Leaf No. 160.7, Revision 2
Leaf No. 160.8, Revision 4
Leaf No. 160.8.1, Revision 2

Leaf No. 160.9, Revision 3
Leaf No. 160.10, Revision 2
Leaf No. 160.11, Revision 2
Leaf No. 160.12, Revision 2
Leaf No. 160.13, Revision 2
Leaf No. 160.14, Revision 2
Leaf No. 160.15, Revision 2
Leaf No. 160.16, Revision 2
Leaf No. 160.17, Revision 4
Leaf No. 160.18, Revision 4
Leaf No. 160.19, Revision 2
Leaf No. 160.20, Revision 2
Leaf No. 160.21, Revision 2
Leaf No. 160.22, Revision 2
Leaf No. 160.23, Revision 2
Leaf No. 160.24, Revision 1
Leaf No. 160.25, Revision 8
Leaf No. 160.25.1, Revision 3
RPS Statement No. 9
SBC Statement No. 16

The following list of tariff leaves include changes for purposes in addition to consistency as identified herein between the Companies' tariff schedules:

NYSEG PSC No. 88 – Gas

Leaf No. 50.26 Updated PSC web address

NYSEG PSC No. 120 – Electricity

Leaf No. 18 System Benefits Charge, added clarification that allocations of Recharge NY power not subject to SBC

Leaf No. 58 Updated list of available economic rate incentives

Leaf No. 80 Updated PSC web address

Leaf No. 111 Term for the ILI Program is through 2014 in accordance with the Joint Proposal in 09-E-0715

NYSEG PSC No. 121 – Electricity

Leaf No. 14 Added Service Classification No. 4 in Case 09-E-0715, System Benefits Charge and Renewable Portfolio Standard surcharge is collected from these customers.

Leaf No. 14.1 Added Service Classification No. 4 in Case 09-E-0715, Temporary State Assessment Surcharge is collected from these customers. Also added Service Guarantee Provision in accordance with Joint Proposal in 09-E-0715. Leaf No. 61, Revision 5

RPS Statement Added Service Classification No. 4 in Case 09-E-0715

SBC Statement Added Service Classification No. 4 in Case 09-E-0715

RG&E PSC No. 18 – Electricity Street Lighting

Leaf No. 11 POR Administration Surcharge has expired and no longer applicable

RG&E PSC No. 19 – Electricity

Leaf No. 80 Removed Retail Access Surcharge, no longer applicable. System Benefits Charge, added clarification that allocations of Recharge NY power not subject to SBC

Leaf No. 81.2 POR Administration Surcharge has expired and no longer applicable

Leaf No. 160.1 Updated NYPA program available by removing PFJ and added Recharge NY

Leaf No. 160.9 Updated PSC web address