

# 6.19.7 Attachment 2 – Rate Mechanism for the Recovery of CLCPA Eligible Projects for Rochester Gas and Electric Corporation

## 6.19.7.1 Applicability

This Attachment 2 to Rate Schedule 19 of the ISO OATT establishes the CFC Charge of Rochester Gas and Electric Corporation ("RG&E"). RG&E is an Eligible Transmission Owner and may recover eligible costs for its CLCPA Eligible Projects in accordance with the requirements of Rate Schedule 19 of the ISO OATT.

## **6.19.7.2** Revenue Requirement

For purposes of Rate Schedule 19 of the ISO OATT, the revenue requirement for the Eligible Transmission Owner's CLCPA Eligible Projects shall be determined in accordance with the formula rate protocols set forth in Section 6.19.7.2.1 and the formula rate template set forth in Section 6.19.7.2.2.

### **6.19.7.2.1** Formula Rate Protocols

## **Section 1 Definitions**

The following definitions shall apply for purposes of this Attachment 2 to Rate Schedule 19 of the ISO OATT:

- a. **Accounting Change**: any change in accounting by RG&E or its affiliates that affects inputs to the Formula Rate or the resulting charges billed under the Formula Rate.
- b. **Annual Review Procedures**: the procedures described in this Section 6.19.7.2.1 of Attachment 2 to Rate Schedule 19 of the ISO OATT that provide for review and challenge by Interested Parties of the Annual True-up Adjustment and the Annual Update.

- c. Annual Stakeholder Meeting: an annual meeting for Interested Parties with the intention that RG&E present, explain and answer questions related to the Annual True-up Adjustment and Annual Update.
- d. Actual Annual Transmission Revenue Requirement ("Actual ATRR"): the actual annual revenue requirement of RG&E's CLCPA Eligible Projects for a Rate Year calculated in accordance with the Formula Rate and posted on the ISO website no later than June 15 following the end of such Rate Year.
- e. **Annual True-up Adjustment**: the difference between the revenues collected for that Rate Year under the Formula Rate based upon the Projected ATRR (not including the True-up Adjustment or Corrections) and the Actual ATRR for the same Rate Year. The Annual True-up Adjustment is included in the Annual Update for the next Rate Year.
- f. **Annual Update**: the Projected ATRR for the upcoming Rate Year, including any Annual True-up Adjustment for the prior Rate Year or any Corrections for prior years.
- g. **CLCPA Eligible Projects**: the transmission projects (or any portion thereof) owned by RG&E that qualify as a "CLCPA Eligible Project" as such term is defined in Section 6.19.1.1 of Rate Schedule 19 of the ISO OATT. For the purposes of this Attachment 2 to Rate Schedule 19 of the ISO OATT, such transmission projects may also be referred to as "Schedule 19 Projects."
- h. **Corrections**: changes due to errors or otherwise to prior Actual ATRRs that occur after that Actual ATRR is used to determine that Rate Year's Annual True-up Adjustment and included in the applicable Annual Update.
- i. Formal Challenge: a written challenge, filed with FERC, to the Annual
   True-up Adjustment submitted to the Commission or to the Annual Update posted to

the ISO website.

- j. **Formula Rate**: the Formula Rate Template (as set forth in Section 6.19.7.2.2 of this Attachment 2 to Rate Schedule 19 of the ISO OATT) and the Formula Rate Protocols (as set forth in this Section 6.19.7.2.1 of this Attachment 2 to Rate Schedule 19 of the ISO OATT).
- k. **Formula Rate Template**: the collection of formulas and worksheets, unpopulated with any data, included as set forth in Section 6.19.7.2.2 of this Attachment 2 to Rate Schedule 19 of the ISO OATT.
- 1. **Informal Challenge**: a process by which Interested Parties may challenge certain aspects of the Annual True-up Adjustment or Annual Update. Informal Challenges are presented to RG&E directly.
- m. **Informational Filing**: the filing of the Annual Update and the results of the Review Period with FERC on or before February 1 of each year commencing with the completion of the initial Rate Year for which this Attachment 2 to Rate Schedule 19 of the ISO OATT is effective. This is filed at FERC for informational purposes only and does not require any action by the Commission.
- n. Interested Parties: any transmission customer under the ISO OATT, the New York State Department of Public Service, the New York State Department of State's Division of Consumer Protection Utility Intervention Unit, consumer advocacy agencies, the New York Attorney General or any party that has standing in a RG&E Formula Rate proceeding under sections 205 or 206 of the FPA.
- o. **Posting Date**: the date on which RG&E causes to be posted to the ISO website its Annual Update, which is October 15 of each year; provided, however, that if

such date falls on a weekend or holiday recognized by the Commission, the Posting Date shall be the next business day.

- p. Projected Annual Transmission Revenue Requirement ("Projected ATRR"): the projected annual revenue requirement of RG&E's CLCPA Eligible Projects for the upcoming Rate Year calculated in accordance with the Formula Rate and posted on the ISO website no later than the Posting Date.
- q. **Publication Date**: the date on which RG&E causes the Annual True-up Adjustment to be posted to the ISO website, which is June 15 of each year; provided, however, that if such date falls on a weekend or holiday recognized by the Commission, the Publication Date shall be the next business day.
- r. **Rate Year**: a twelve consecutive month period that begins on January 1 and continues through December 31.
- s. **Review Period**: the period during which Interested Parties may request information or make Informal Challenges to the Annual True-up Adjustment or Annual Update. The Review Period extends from the Publication Date to January 31 of the following calendar year. Information requests can be submitted from the Publication Date through December 1 of the current year.

## Section 2 Applicability

These Formula Rate Protocols shall apply to RG&E's calculation of its Projected ATRR and Actual ATRR, and related Annual True-up Adjustment(s). A timeline of the annual protocol process is contained in Section 10 of this Section 6.19.7.2.1 of Attachment 2 to Rate Schedule 19 of the ISO OATT.

Section 3 Projected ATRR, Actual ATRR, Annual True-up Adjustment and Annual Update

- a. The Projected ATRR calculated pursuant to the Formula Rate shall be applicable on and after January 1 of the Rate Year in which the revenue requirement of Schedule 19 Projects is to be included in transmission rates.
- b. On or before June 15 of each succeeding Rate Year (the Publication Date), RG&E shall calculate its Actual ATRR and resulting Annual True-up Adjustment according to the Formula Rate and cause the results to be posted on the ISO website. Within five (5) days of such posting, RG&E shall provide (or caused to be provided) notice of such posting to Interested Parties. The ISO shall provide notice of such posting via email to Transmission Customers. RG&E shall provide notice via email to all other Interested Parties utilizing the most recent email address provided to RG&E.
- c. On or before October 15 of each year (the Posting Date) beginning when the revenue requirement of Schedule 19 Projects is to be included in transmission rates in the subsequent Rate Year, RG&E shall calculate its Annual Update for the upcoming Rate Year and cause the results to be posted on the ISO website. As part of the Annual Update, RG&E shall determine its Projected ATRR, calculated according to the Formula Rate. The Annual Update will also include the results of the Annual True-up Adjustment for the prior Rate Year and any Corrections for prior years, when applicable. Within five (5) days of such posting, RG&E shall provide (or caused to be provided) notice of such posting to Interested Parties. The ISO shall provide notice of such posting via email to Transmission Customers. RG&E shall provide notice via email to all other Interested Parties utilizing the most recent email address provided to RG&E.
- d. If the Publication Date or the Posting Date falls on a weekend or a holiday recognized by FERC, then the Publication Date or Posting Date, as applicable, shall be the

next business day.

- e. Within thirty (30) days after the Posting Date (October 15), RG&E shall hold the Annual Stakeholder Meeting to present, explain and answer questions concerning the Annual True-up Adjustment for the prior Rate Year and the Annual Update for the upcoming Rate Year. RG&E will provide the opportunity for remote participation at Annual Stakeholder Meetings. To ensure that Interested Parties receive sufficient advance notice of Stakeholder Meetings, RG&E shall schedule each Annual Stakeholder Meeting at least one (1) month in advance and cause notice thereof to be posted on the ISO website. Within five (5) days of such posting, RG&E shall provide (or caused to be provided) notice of such posting to Interested Parties. The ISO shall provide notice of such posting via email to Transmission Customers. RG&E shall provide notice via email to all other Interested Parties utilizing the most recent email address provided to RG&E.
- f. RG&E shall modify the Annual Update to reflect any changes that it and the Interested Parties agree upon by no later than December 1 and shall cause the revised Annual Update to be posted on the ISO website no later than December 15. Any change agreed to or required after November 30 will be implemented as part of the subsequent Annual True-up Adjustment to be effective in the next following Rate Year. Within five (5) days of such posting, RG&E shall provide (or caused to be provided) notice of such posting to Interested Parties. The ISO shall provide notice of such posting via email to Transmission Customers. RG&E shall provide notice via email to all other Interested Parties utilizing the most recent email address provided to RG&E.
  - g. The Actual ATRR and Annual True-up Adjustment posting shall:
    - i. Include a workable, data-populated Formula Rate Template and any

underlying workpapers in native format with all formulas and links intact and based on RG&E's FERC Form No. 1 reports for the prior Rate Year;

- ii. Provide supporting documentation and workpapers for data that are used in the Annual True-up Adjustment that are not otherwise available directly from the FERC Form No. 1 reports;
- iii. Provide sufficient information to enable Interested Parties to replicate the calculation of the Annual True-up Adjustment;
- iv. Identify any changes in the Formula Rate references (page and line numbers) to the FERC Form No. 1 report;
- v. Identify all material adjustments made to the FERC Form No. 1 data in determining Formula Rate Template inputs, including relevant footnotes to the FERC Form No. 1 and any adjustments not shown in the FERC Form No. 1;
- vi. Include, with respect to any Accounting Change that affects inputs to the Formula Rate Template, or the resulting Actual ATRR under the Formula Rate:
  - A. a description of any changes in an accounting standard or policy;
- B. a description of any accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;
- C. any correction of material errors and material prior period adjustments that impact the Annual True-up Adjustment calculation or prior Annual True-up Adjustments;
- D. a description of any new estimation methods or policies that change prior estimates; and
  - E. changes to income tax elections or rates;

- vii. Identify items included in the Annual True-up Adjustment at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);
- viii. Identify any reorganization or merger transaction during the previous year and explain the effect of the accounting for such transaction(s) on inputs to the Annual True-up Adjustment;
- ix. Include, for each item identified pursuant to 3.g.vi 3.g.viii of these Formula Rate Protocols, a narrative explanation of the individual effect of such changes on the Actual ATRR under the Formula Rate; and
- x. Provide for the prior Rate Year the following information related to affiliate cost allocation.
- A. a detailed description of the methodologies used to allocate and directly assign costs between RG&E and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior Rate Year and the reasons and justifications for those changes; and
- B. the magnitude of such costs that have been allocated or directly assigned between RG&E and each affiliate by service category or function.
  - h. The Projected ATRR shall:
- i. Include a workable, data-populated Formula Rate Template and any underlying workpapers in native format with all formulas and links intact;
- ii. Provide supporting documentation and workpapers for all Schedule 19 Projects being added to operating property in the upcoming Rate Year that are used in the Projected ATRR, including projected costs of each project, expected construction schedule and in-service dates; and

- iii. Provide enough information to enable Interested Parties to replicate the calculation of the Projected ATRR.
- i. If RG&E files any corrections to its FERC Form No. 1 that impacts an Annual True-up Adjustment, such corrections and any resulting refunds or surcharges shall be reflected in the subsequent Annual True-up Adjustment or Annual Update as a Correction, with interest.
- j. Interest on the Annual True-up Adjustment shall be determined based on the Commission's regulations at 18 C.F.R § 35.19a a(iii)(A). The interest payable shall be calculated using the average of the interest rates used to calculate the time value of money for the twenty-four (24) months during which the over- or under- recovery in the Actual ATRR exists (middle of Rate Year for which Annual True-up Adjustment is being determined to the middle of Rate Year where the Annual True-up Adjustment is included in the Annual Update). The interest during this 24-month period will initially be estimated and then trued-up to actual and included in a subsequent Annual True-up Adjustment.
- k. Formula Rate Template inputs for (i) the ceiling rate of return on common equity; (ii) extraordinary property losses, and (iii) depreciation and amortization expense rates shall be stated values to be used in the Formula Rate approved by FERC order(s). RG&E may make a limited section 205 filing to change its rate of return on common equity to reflect incentive rate of return adders, if any, which may only be included upon FERC order. Such filings shall comply with the filing requirements that the FERC may have established for seeking such incentives. RG&E may also make a limited section 205 filing to request recovery of the cost of removal regulatory asset, request recovery of extraordinary property losses or change or add new depreciation and amortization rates. In each case, the sole

purpose of any such limited section 205 filing shall be to address whether such proposed changes are just and reasonable and shall not include other aspects of the Formula Rate.

Changes in depreciation and amortization rates to track a state commission order shall become effective only upon FERC order permitting a change in depreciation and amortization rates, which, to the extent possible, should be made effective as of the same date the state commission order becomes effective. RG&E will include notification of such changes in the applicable informational filing. RG&E may also request transmission rate incentives pursuant to section 219 of the FPA.

1. It is the intent of the Formula Rate, including the supporting explanations and allocations described therein, that each input to the Formula Rate will be taken either directly from the FERC Form No. 1 or reconcilable to the FERC Form No. 1 by the application of clearly identified and supported information. If the FERC Form No. 1 is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in FERC Form No. 1. If the FERC Form No. 1 is discontinued, equivalent information as that provided in the FERC Form No. 1 shall be utilized.

## **Section 4. Fundamental Predicates**

- a. The Formula Rate is premised upon data reported or recorded by RG&E consistent with the following predicates ("Fundamental Predicates"):
  - i. FERC's Uniform System of Accounts;
  - ii. Applicable FERC Form No. 1 reporting requirements;
- iii. FERC's policies governing formula rates for transmission service, including FERC's policies that all charges billed under transmission formula rates are subject to: (A) challenge on grounds of imprudence, and (B) an order by FERC requiring

refunds in the manner and to the extent ordered;

- iv. FERC orders establishing transmission ratemaking policies of general application to transmission-owning public utilities, including RG&E; and
- v. The accounting and cost allocation policies, practices and procedures of RG&E to the extent consistent with the authorities listed in (i) through (iv) above.
- b. The Formula Rate is based upon each of these Fundamental Predicates as existed as of the date these Formula Rate Protocols are filed with FERC. Provisions of the Formula Rate may be modified to conform to changes in these Fundamental Predicates in accordance with Section 8 of these Formula Rate Protocols or as ordered by FERC.
- c. The Projected ATRR and the Actual ATRR shall include only costs for CLCPA Eligible Projects approved by the PSC as contemplated by the CSRA and such costs are directly related to or properly allocable to transmission functions pursuant to Rate Schedule 19 of the ISO OATT. Interested Parties shall be entitled to review and challenge (i) the reasonableness and prudence of costs and expenditures included in the Projected ATRR and Actual ATRR, (ii) the basis for and reasonableness of allocating all or any portion of such costs and expenditures in determining the Projected ATRR and Actual ATRR under Rate Schedule 19 of the ISO OATT, and (iii) whether the allocation of costs as applied results in a disproportionate allocation of cost to the Projected ATRR and Actual ATRR for charges under Rate Schedule 19 of the ISO OATT. Any such review and challenge shall adhere to the procedures set forth in Sections 6 and 8 below.

## **Section 5 Construction Work in Progress**

a. This section applies to any and all RG&E Schedule 19 Projects where the

Commission has granted RG&E CWIP in rate base, either 100% or less ("CWIP").

- i. RG&E shall use the following accounting procedures to ensure that, if authorized by a Commission order to include 100% of any CLCPA Eligible Project CWIP in transmission rate base, RG&E ceases to accrue for recovery any AFUDC and, if less than 100% of CWIP in transmission rate base is authorized, a corresponding percentage of AFUDC accruals will cease. RG&E shall assign each Schedule 19 Project where the Commission has authorized CWIP a unique funding project number ("FPN") for internal cost tracking purposes.
- ii. RG&E shall record actual construction costs to each FPN through work orders that are coded to correspond to the FPN for each applicable Schedule 19 Project. Such work orders shall be segregated from work orders for other Schedule 19 Projects for which the Commission has not authorized RG&E to include any portion of CWIP in rate base.
- iii. For each applicable Schedule 19 Project, RG&E shall prepare monthly work order summaries of costs incurred under the associated FPN. These summaries shall show monthly additions to CWIP and transfers to plant in service and shall correspond to amounts shown in RG&E's FERC Form No. 1. RG&E shall use these summaries as data inputs into the Annual True-up Adjustment. RG&E shall make such work order summaries available upon request under the review procedures of Section 6 of these Formula Rate Protocols.
- iv. When a Schedule 19 Project for which the Commission granted CWIP, or portion thereof, is placed into service, RG&E shall deduct from the total CWIP the accumulated charges for work orders under the FPN for that project, or portion thereof. The

purpose of this control process is to ensure that expenditures are not double counted as both CWIP and as additions to plant.

- v. For Schedule 19 Projects for which the Commission has not granted CWIP, RG&E shall record AFUDC to be applied to CWIP and capitalized as part of CWIP and included in the project investment when the project is placed into service.
- vi. For Schedule 19 Projects where the Commission has granted CWIP, RG&E will include in the investment for such project's AFUDC accrued prior to the date that RG&E first includes the CWIP for such projects in rate base.
- b. For each Schedule 19 Project where FERC has approved CWIP in rate base, RG&E shall include in its Informational Filing a report that includes the following concerning each project:
  - the actual amount of CWIP recorded for each project by month for the Rate Year;
  - ii. the current status of each project; and
  - iii. the estimated in-service date for each project.

### **Section 6 Annual Review Procedures**

Each Annual True-up Adjustment and Annual Update shall be subject to the following review procedures:

a. Interested Parties shall have until December 1 to serve reasonable information requests on RG&E for both the Annual True-up Adjustment and the Annual Update. If December 1 falls on a weekend or a holiday recognized by FERC, the deadline for submitting all information and document requests shall be extended to the next business day. Such information and document requests shall be limited to what is necessary to determine:

- i. the extent or effect of an Accounting Change;
- ii. whether the Annual True-up Adjustment or Annual Update fails to include data properly recorded in accordance with these Formula Rate Protocols and the Fundamental Predicates or includes data not properly recorded in accordance with these Formula Rate Protocols and the Fundamental Predicates;
- iii. whether the costs included in the Annual Update are properly accounted for (*e.g.*, recordable and recorded in the appropriate accounts) under FERC's Uniform System of Accounts under 18 C.F.R. Part 101, and otherwise consistent with RG&E's accounting policies, practices, or procedures;
- iv. whether there are errors in the current Annual Update and, if any are identified, whether the same or similar errors were made in prior Formula Rate filings with a further explanation identifying each Formula Rate filing in which such errors were made;
- v. the proper application of the Formula Rate and procedures in these Formula Rate Protocols:
- vi. the accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual True-up Adjustment or the Annual Update;
  - vii. the prudence of actual costs and expenditures;
- viii. the effect of any change to the underlying Uniform System of Accounts or the FERC Form No. 1; or
- ix. any other information that may reasonably have a substantive effect on the calculation of the Projected ATRR or Actual ATRR pursuant to the Formula Rate.
  - b. The information and document requests shall not otherwise be directed to

ascertaining whether the Formula Rate is just and reasonable. Additionally, information requests shall not solicit information concerning costs or allocations where the costs or allocation methods have been determined by FERC (or resolved by a settlement accepted by FERC) or for Annual True-up Adjustments for other Rate Years, except that such information requests shall be permitted if they seek to determine if there has been a material change in RG&E's circumstances.

- c. RG&E shall make a good faith effort to respond to information requests pertaining to the Annual True-up Adjustment and Annual Update within fifteen (15) business days of receipt of such requests. RG&E shall respond to all information and document requests by no later than December 20 unless the information exchange period is extended by RG&E or FERC. If December 20 falls on a weekend or a holiday recognized by FERC, the deadline for response to information requests shall be extended to the next business day.
- d. If RG&E and any Interested Party are unable to resolve disputes related to information requests submitted in accordance with these annual review procedures, RG&E or the Interested Party may petition FERC to appoint an Administrative Law Judge as a discovery master. The discovery master shall have the power to issue binding orders to resolve discovery disputes and compel the production of discovery, as appropriate, in accordance with these annual review procedures and consistent with FERC's discovery rules.
- e. RG&E will cause to be posted on the ISO website all information requests from Interested Parties and RG&E's response to such requests; except to the extent such responses to information and document requests include material deemed by RG&E to be confidential information (in which event such information will not be publicly posted but will

be made available to requesting parties pursuant to a confidentiality agreement to be executed by RG&E and the requesting party).

- f. RG&E shall not claim that responses to information and document requests provided pursuant to these Formula Rate Protocols are subject to any settlement privilege in any subsequent FERC proceeding addressing RG&E's Annual True-up Adjustment, Annual Update, or its Formula Rate.
- g. The dates and time periods set forth in this Section 6 may be modified by agreement between RG&E and other Interested Parties.

## **Section 7 Informational Filing**

- a. By February 1 of each year, RG&E shall submit to FERC an Informational Filing of its Annual Update and the results of the Annual Review Procedures. This Informational Filing must include the information that is required by Section 3, must describe any changes pursuant to the Annual Review Procedures and must describe all aspects of the formula rate or its inputs that are the subject of an ongoing dispute under the Informal or Formal Challenge procedures. Within five (5) days of such Informational Filing, RG&E shall provide (or cause to be provided) notice of the Informational Filing to Interested Parties via email and by posting the docket number assigned to RG&E's Informational Filing on RG&E's website and OASIS.
- b. Any challenges to the implementation of the Annual Update must be made through the Challenge Procedures described in Section 8 of these protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

## **Section 8** Challenge Procedures

- a. Interested Parties have through January 31 of the following year to make an Informal Challenge to RG&E's Annual True-up Adjustment or Annual Update. If January 31 falls on a weekend or a holiday recognized by FERC, the deadline for submitting all Informal Challenges shall be extended to the next business day. Failure to pursue at least one issue through an Informal Challenge shall bar the filing of a Formal Challenge. If at least one Informal Challenge was pursued, then a Formal Challenge may be filed on that issue or any other issue. Failure to pursue an issue with respect to any particular Annual True-up Adjustment or Annual Update shall not bar pursuit of such issue through Informal Challenge or the lodging of a Formal Challenge as to such issue as it relates to subsequent Annual True-up Adjustments or Annual Updates. This Section 8 shall in no way affect a party's rights under FPA section 206.
- b. A party submitting an Informal Challenge to RG&E must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects and provide an appropriate explanation and documents to support its challenge. RG&E shall make a good faith effort to respond to any Informal Challenge within twenty (20) business days of notification of such challenge. RG&E shall appoint a senior representative to work with the party that submitted the Informal Challenge (or its representative) toward a resolution of the challenge. If RG&E disagrees with such challenge, RG&E will provide the Interested Party(ies) with an explanation supporting the inputs and provide supporting calculations, descriptions, allocations, or other information. No Informal Challenge may be submitted after January 31, and RG&E must respond to all Informal Challenges by no later than February 28, unless the Review Period is extended by RG&E or FERC. Informal Challenges shall be subject to the resolution procedures and limitations in this Section 8.

- c. Informal Challenges shall be presented to RG&E and Formal Challenges filed before the FERC, pursuant to these Formula Rate Protocols and shall:
- i. Clearly identify the action or inaction which is alleged to violate the filed Formula Rate or Formula Rate Protocols;
  - ii. Explain how the action or inaction violates the Formula Rate or Formula Rate Protocols;
- iii. Set forth the business, commercial, economic, or other issues presented by the action or inaction as such relates to or affects the party filing the Informal Challenge or Formal Challenge, including:
  - A. The extent or effect of an Accounting Change;
- B. Whether the Annual True-up Adjustment or Annual Update fails to include data properly recorded in accordance with these Formula Rate Protocols;
- C. The proper application of the Formula Rate and procedures in these Formula Rate Protocols;
- D. The accuracy of data and consistency with the Formula Rate of the charges shown in the Annual True-up Adjustment or Annual Update, including errors as described in Section 6.a.iv, for the current Annual True-up Adjustment or Annual Update and for any prior years in which the Formula Rate included such errors;
  - E. The prudence of actual costs and expenditures;
- F. The effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or
- G. Any other information that may reasonably have substantive effect on the calculation of the Annual True-up Adjustment or Annual Update.

- iv. Informal Challenges and Formal Challenges may address whether costs are recorded consistent with the Fundamental Predicates in these Formula Rate Protocols and FERC's policies and regulations, how the costs charged by RG&E's affiliates are recorded on RG&E's books in accordance with Instruction 14 of the Uniform System of Accounts, the amounts of such centralized service company costs, and whether the costs are properly includable in transmission rates.
- v. With respect to an issue that had previously been adjudicated by the Commission in a Formal Challenge proceeding that was not resolved by settlement, the principles of *res judicata and collateral estoppel* shall apply and, therefore, if a subsequent Formal Challenge is made with respect to such issue, RG&E may move to dismiss on such grounds, the challenging party or other Interested Parties may contest whether such principles apply, and the Commission shall have the discretion to determine whether the Formal Challenge may proceed or should be dismissed.
- vi. Make a good faith effort to quantify the financial impact or burden (if any) created for the party filing the Formal Challenge as a result of the action or inaction;
- vii. State whether the issues presented are pending in an existing

  Commission proceeding or a proceeding in any other forum in which the filing party is a

  party, and if so, provide an explanation why timely resolution cannot be achieved in that

  forum;
- viii. State the specific relief or remedy requested, including any request for stay or extension of time, and the basis for that relief;
- ix. Include all documents that support the facts in the Formal Challenge in possession of, or otherwise attainable by, the filing party, including, but not limited to,

contracts and affidavits; and

- x. State whether the filing party utilized the Informal Challenge procedures described in these Formula Rate Protocols to dispute the action or inaction raised by the Formal Challenge, and, if not, describe why not.
- d. Any person filing a Formal Challenge must serve a copy of the Formal Challenge on RG&E. Service to RG&E must be simultaneous with filing at the Commission. Simultaneous service can be accomplished by electronic mail in accordance with 18 C.F.R. § 385.2010(f)(3), facsimile, express delivery, or messenger. The party filing the Formal Challenge shall serve the individual listed as the contact person on RG&E's Informational Filing required under Section 7 of these Formula Rate Protocols.
- e. RG&E will cause to be posted on the ISO website all Informal Challenges from Interested Parties and RG&E's response(s) to such Informal Challenges; except to the extent such Informal Challenges or responses to Informal Challenges include material deemed by RG&E to be confidential information (in which event such information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by RG&E and the requesting party).
- f. Any changes or adjustments to the Annual True-up Adjustment or Annual Update resulting from the information exchange and Informal Challenge processes agreed to by RG&E on or before December 1 will be reflected in the Annual Update for the upcoming Rate Year. Any changes or adjustments agreed to by RG&E after December 1 will be reflected in the following year's Annual True-up Adjustment.
- g. If RG&E and a challenging party have not resolved an Informal Challenge to an Annual Update, the challenging party shall have the right to submit by May 1 a Formal

Challenge with the FERC, which shall be served on RG&E on the date of such filing as specified in Section 8.d., above. However, there shall be no need to make a Formal Challenge or to await conclusion of the time periods in this Section 8 if the FERC already has initiated *sua sponte* a proceeding to consider the Annual Update. A Formal Challenge shall be filed in the same docket as RG&E's informational filing discussed in Section 7 of these Formula Rate Protocols. RG&E shall respond to the Formal Challenge by the deadline established by FERC. A party may not pursue a Formal Challenge if that party did not submit an Informal Challenge on at least one issue during the applicable Review Period.

- h. In any proceeding initiated by FERC concerning the Annual True-up Adjustment or Annual Update or in response to a Formal Challenge, RG&E shall bear the burden, consistent with FPA section 205, of proving that it has correctly applied the terms of the Formula Rate consistent with these Formula Rate Protocols, and that it followed the applicable requirements and procedures in these Formula Rate Protocols. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.
- i. In the event an error, as further described in Section 6.a.iv, is identified in an Annual True- up Adjustment or Annual Update and such error was present in prior Annual True-up Adjustments or Annual Updates, an Interested Party may request a FERC order making any correction or providing other remedial relief retroactive to the first Formula Rate filing in which such error occurred. RG&E retains all rights to oppose such a request.
- j. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of RG&E to file unilaterally, pursuant to FPA section 205 and the regulations thereunder, to change the Formula Rate or any of its inputs (including, but not limited to, rate of return and transmission incentive rate treatment), or to replace the Formula

Rate with a stated rate, or the right of any Interested Party to request such changes pursuant to FPA section 206 and the Commission's regulations thereunder.

- k. No Interested Party shall seek to modify the Formula Rate under the challenge procedures set forth in this Section 8, and the Annual True-up Adjustment and Annual Update shall not be subject to challenge by anyone for the purpose of modifying the Formula Rate. Any modifications to the Formula Rate will require, as applicable, an FPA section 205 or section 206 filing.
- 1. Any Interested Party seeking changes to the application of the Formula Rate due to a change in the Uniform System of Accounts or FERC Form No. 1 shall first raise the matter with RG&E in accordance with this Section 8 before pursuing a Formal Challenge.

## **Section 9** Changes to Annual Informational Filings

Any changes to the data inputs as a result of revisions to RG&E's FERC Form No. 1 or as a result of any FERC proceeding to consider the Annual True-up Adjustment or as a result of the procedures set forth herein shall be incorporated into the Formula Rate (with interest determined in accordance with 18 C.F.R. § 38.19a) in the Annual Update for the next effective Rate Year. This approach shall apply in lieu of mid-Rate Year adjustments or any refunds or surcharges. However, actual refunds or surcharges (with interest determined in accordance with 18 C.F.R. §38.19a) for the then current Rate Year shall be made if the Formula Rate is replaced by a stated rate by RG&E.

### **Section 10** Timeline of Annual Process

## Section 6.19.7.2.2 Formula Rate Template

## Rochester Gas and Electric Corporation Transmission Formula Rate Schedule 19 Projects

## Actual for the 12 Months Ended 12/31/2021

## Index

Worksheet	Tab	Description
Α	Appendix A	Annual Transmission Revenue Requirement for Schedule 19 Projects
1	RB Items	Average Balances for Most Rate Base Items
2a	ADIT-Current Year	Current Year Average Accumulated Deferred Income Taxes
2b	ADIT-Prior Year	Prior Year Average Accumulated Deferred Income Taxes
2c	ADIT Proration Projected	Proration of Projected Accumulated Deferred Income Taxes
2d	ADIT Proration Actual	Proration of Actual Accumulated Deferred Income Taxes
3	EADIT	Excess Accumulated Deferred Income Tax Rate Base and Amortization
4	IT Permanent Differences	Permanent Book/Tax Differences
5	Project Return	Return on Schedule 19 Projects
6	Project Cost Of Capital	Schedule 19 Project Cost of Capital
7	True-up Adjustment	Annual True-up Adjustment
8	Depreciation Rates	Depreciation Rates Approved by the Commission and Used to Determine Schedule 19 Projects Depreciation and Amortization Expense
9	Corrections	Prior Period Corrections

Formula Rate - Non-Levelized

Transmission Formula Rate Template Utilizing FERC Form 1 Data

Actual for the 12 Months Ended 12/31/2021

## Rochester Gas and Electric Corporation Appendix A: Annual Transmission Revenue Requirement for Schedule 19 Projects

	Composite Depreciation Rates								
	(1)	(2)		(3)			(4)	(5)	
Line		Form No. 1 or Transmission		oany Total where				Schedule 1	9
No.	RATE BASE (Note A):	Formula Rate Reference		olicable)		Allocator	(Note K)	Projects	
	GROSS PLANT IN SERVICE				_				
1	Production	Worksheet 1, Line 6, Col. (c)		0	N	Α			0
		Worksheet 1, Line 6, Col. (d) or Col.							
2	Transmission	(m)		0	D				0
3	Distribution	Worksheet 1, Line 6, Col. (e)		0	N				0
4	Electric General	Worksheet 1, Line 6, Col. (f)		0		19 W/S	#DIV/0!	#DIV/0!	
5	Electric Intangible	Worksheet 1, Line 6, Col. (b)		0		19 W/S	#DIV/0!	#DIV/0!	
6	Common	Worksheet 1, Line 6, Col. (g)		0		P*S19 W/S	#DIV/0!	#DIV/0!	
7	TOTAL GROSS PLANT	(Sum of Lines 1 through 6)		0		iP=	#DIV/0!	#DIV/0!	
8	Without Common - For Gross Plant Allocator C	alculation Only		0	G	iPE=	#DIV/0!	#DIV/0!	
_	ACCUMULATED DEPRECIATION								_
9	Production	Worksheet 1, Line 12, Col. (c)		-	N	A			0
10	Transmission	Worksheet 1, Line 12, Col. (d) or Col.			D				
11	Distribution	(m)		-	N				- 0
12	Electric General	Worksheet 1, Line 12, Col. (e)		-		19 W/S	#DIV/0!	#DIV/0!	U
13	Electric General Electric Intangible	Worksheet 1, Line 12, Col. (f) Worksheet 1, Line 12, Col. (b)		-		19 W/S	#DIV/0! #DIV/0!	#DIV/0!	
14	Common	Worksheet 1, Line 12, Col. (b) Worksheet 1, Line 12, Col. (g)		-		P*S19 W/S	#DIV/0! #DIV/0!	#DIV/0! #DIV/0!	
	TOTAL ACCUM. DEPRECIATION			<del></del>	C	F 319 W/3	#DIV/0!	#DIV/0!	
15	TOTAL ACCUM. DEPRECIATION	(Sum of Lines 9 through 14)		-				#DIV/0!	
	NET PLANT IN SERVICE								
16	Production	(Line 1 - Line 9)		0					0
17	Transmission	(Line 2 - Line 10)		0					0
18	Distribution	(Line 2 - Line 10)		0					0
19	General	(Line 4 - Line 12)		0				#DIV/0!	·
20	Intangible	(Line 5 - Line 12)		0				#DIV/0!	
21	Common	(Line 6 - Line 14)		0				#DIV/0!	
22	TOTAL NET PLANT	(Sum of Lines 16 through 21)		0				#DIV/0!	
		(							
23	CWIP (Note O)	Worksheet 1, Line 18, Col. (g)		NA					-
24	ABANDONNED PLANT	Worksheet 1, Line 18, Col. (j)		NA					0
24	ABANDONNED PLANT	Worksheet 1, Line 16, Col. (j)		INA					U
	ACCUMULATED DEFERRED INCOME								
	TAXES (Note B)								
25	Accumulated Deferred Income Taxes	Worksheet 2a, Line 11, Col. (g)		NA				#DIV/0!	
		(9)							
26	Excess Accumulated Deferred Income Taxes	3-EDIT		NA					0
	TOTAL ACCUMULATED DEFERRED								
27	INCOME TAXES	(Line 25 + Line 26)						#DIV/0!	
28	LAND HELD FOR FUTURE USE	Worksheet 1, Line 18, Col. (h) or (i)		0	D	A			0
	OTHER RATE BASE ITEMS								
29	Cash Working Capital (Note C)	(Line 50 times 45/360)		NA				#DIV/0!	
30	Materials & Supplies - Transmission	Worksheet 1, Line 18, Col. (k)		0	S	19P	#DIV/0!	#DIV/0!	
	Materials and Supplies - Electric and Gas -			_	_				
	Assigned to Construction	Worksheet 1, Line 18, Col. (I)		0		P*GPE	#DIV/0!	#DIV/0!	
32	Prepayments	Worksheet 1, Line 18, Col. (m)		0		P*GPE	#DIV/0!	#DIV/0!	•
33	Regulatory Asset (Note E)	Worksheet 1, Line 18, Col. (n)	NA			A D*C40 W/C	#DI\ //OI	#D#//01	0
34	Unfunded Liabilities	Worksheet 1, Line 18, Col. (q)		-	C	P*S19 W/S	#DIV/0!	#DIV/0!	
35	TOTAL OTHER RATE BASE ITEMS	(Sum of Lines 29 through 34)		NA				#DIV/0!	
		(Line 22 + Line 23 + Line 24 + Line 27							
36	RATE BASE	+ Line 28 + Line 35)		NA				#DIV/0!	
	- <del>-</del>	,							

Formula Rate - Non-Levelized Rate Formula Template Actual for the 12 Months Ended 12/31/2021 Utilizing FERC Form 1 Data

## Rochester Gas and Electric Corporation

	Арре	Rochester Gas and E endix A: Annual Transmission Revenu			
Line	(1)	(2)	(3)	(4)	(5)
	ANNUAL TRANSMISSION REVENUE REQUIREMENT	Form No. 1 or Transmission Formula Rate Reference	Company Total (where applicable)	Allocator (Note K)	Schedule 19 Projects
	OPERATIONS AND MAINTENANCE				-
37	EXPENSES Transmission - Direct Assign	320-323.112.b fn	0	DA	0
38	Transmission - Allocate	320-323.112.b fn	0	DA .	0
39	Less: EPRI Dues in Account 566	352-353	0		
40	Subtotal - Transmission to Allocate	Line 38 - Line 39	0	S19P #DIV/0!	#DIV/0!
41 42	Electric A&G Less: EPRI Dues in A&G	320-323.197.b 352-353	0		
43	Less: Regulatory Commission Expenses	320-323.189.b	0		
44	Less: Property Insurance	320-323.185.b	0		
45 46	Less: Account 930.2 Items Adjusted Electric A&G	Note L Line 41 - Line 42 - Line 43 - Line 44 - Line 45	0	S19 W/S #DIV/0!	#DIV/0!
	Plus: Transmission Related Regulatory Expenses	350-351 fn	0	S19 #DIV/0!	#DIV/0!
	Plus: Direct Assigned Regulatory	000 001	U	751770.	#B1070.
48 49	Commission Expenses Plus: Property Insurance	350-351 fn 320-323.185.b	NA 0	DA GPE #DIV/0!	#DIV/0!
50	TOTAL O&M	Sum of Lines 37, 40 and 46 through 49	NA		#DIV/0!
	DEPRECIATION AND AMORTIZATION EXPER	NSE			
51	Transmission	336.7.f, fn	0	DA	0
52	Electric General	336.10 f	0	S19 W/S #DIV/0!	#DIV/0!
53	Electric Intangible	220 44 5	0	S19 W/S #DIV/0!	#DIV/0!
54	Common Electric Amortization of Cost of Removal Regulatory	336.11.f	0	S19 W/S #DIV/0!	#DIV/0!
55	Asset	232	NA		0
56	Amortization of Abandoned Plant	230a fn	NA	DA	0
57	TOTAL DEPRECIATION	Sum of Lines 51 through 56	0		#DIV/0!
	TAXES OTHER THAN INCOME TAXES LABOR RELATED				
58	Payroll (Note D)	262-263.9.I+262-263.18.I	0	CP*S19 W/S #DIV/0!	#DIV/0!
59	PLANT RELATED				
60 61	Real Estate Franchise Tax	262-263.6.I 262-263	0	CP*GPE #DIV/0! CP*GPE #DIV/0!	#DIV/0! #DIV/0!
62	Gross Receipts Tax	Note M	NA	Note M	#BIV/0:
63	Other (Note E)	262-263	0		0
64	TOTAL OTHER TAXES	Sum of Lines 58 and 60 through 63	0		#DIV/0!
	INCOME TAXES (Note F)				
		T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT			
	Composite Tax Rate = T	* FIT * p)}=	0.0000%		
	Gross-up Factor Income Tax Factor	1 / (1 - T) T/(1-T)	0.0000 0.0000		
٠.	Amortization of Investment Tax Credit (enter	.,()	0.0000		
68	negative)	266-267.11. f, fn	NA	DA	0
60	Amortization of Excess Deferred Income Taxes (enter negative)	Worksheet 3	NA	DA	0
	Tax Effect of Permanent Differences	Worksheet 4, Line 2, Col. (e)	NA NA	DA	-
71	Income Tax Calculation	(Line 77 * Line 67)	NA	Calc	#DIV/0!
72	ITC adjustment	(Line 68 * Line 66)	NA	Calc	0
73	Amortization of Excess Deferred Income Tax Adjustment	(Line 69 * Line 66)	NA	Calc	0
74	Permanent Differences Tax Adjustment	(Line 70 * Line 66)	NA	Calc	0
75	TOTAL INCOME TAXES	Sum of Lines 71 through 74	NA		#DIV/0!
76	RETURN (Note H) Debt	Westehast Edited 40 Oct (*)	NA	Calc	#DIV/0!
76 77	Common Equity and Preferred Stock	Worksheet 5, Line 12, Col. (i) Worksheet 5, Line 12, Col. (f)	NA NA	Calc	#DIV/0!
	TOTAL RETURN	Sum of Lines 76 through 77	NA		#DIV/0!
79	ANNUAL TRANSMISSION REVENUE REQUIREMENT BEFORE REVENUE CREDITS	(Line 50 + Line 57 + Line 64 + Line 75 + Line 78)	NA		#DIV/0!
80	REVENUE CREDITS	(Line 104)	NA		
81	ANNUAL TRANSMISSION REVENUE REQUIREMENT (ATRR)	(Line 79 + Line 80)	NA		#DIV/0!
82	CORRECTIONS	Worksheet 9, Line 11, Col. (b)	NA		0
	ANNUAL TRUE-UP ADJUSTMENT (ATU)				
83	(Note G)	Worksheet 7, Line 7	NA		0

Sum of Lines 81 through 83

NA

84 ATRR PLUS ATU AND CORRECTIONS

#DIV/0!

Rate Formula Template Utilizing FERC Form 1 Data

**Rochester Gas and Electric Corporation** 

#### SUPPORTING CALCULATIONS AND NOTES

Line				
No.	TRANSMISSION PLANT ALLOCATOR			
85	Electric Plant	(Line 99)	0	
86	Total Transmission Plant	(Line 2)	0	
87	Schedule 19 Projects	(Line 2)	0	
88	Schedule 19 Projects Plant Allocator	(Line 87 / Line86)	#DIV/0! S19P	
89	Transmission Plant Allocator	(Line 86 / Line 85)	#DIV/0! TP	
	ELECTRIC WAGE AND SALARY			
	ALLOCATOR			
90	Production	354-355.20.b	0	
91	Transmission	354-355.21.b	0	
92	Distribution	354-355.23.b	0	
93	Other	354-355.24,25,26.b	0	
94	Total	Sum of Lines 90 through 93	0	
95	Transmission Wage and Salary Allocator	(Line 91 / Line 94)	#DIV/0! T W/S	
	Schedule 19 Projects Wages and Salaries			
96	(transmission wages and salary times S19P)	(Line 91 * Line 88)	#DIV/0!	
	Schedule 19 Projects Wage and Salary	(======================================		
97	Allocator	(Line 96 / Line 94)	#DIV/0! S19 W/S	
	Schedule 19 Projects Transmission Wage and			
98	Salary Allocator	(Line 96 / Line 91)	#DIV/0! S19 W/S T	
	ELECTRIC COMMON PLANT ALLOCATOR			
	(CE)			% Electric
99	Electric	200-201.3.c+6.c	0	
100	Gas	200-201.3.d+6.d	0 CP=	0.000%
101	Total (excludes common)	(Line 99 + Line 100)	0	

	REVENUE CREDITS		
	Account 454, Rent from Electric Property		
102	(Note I)	300-301, fn	-
103	Account 456, Other Electric Revenue (Note J)	300-301, fn	-
104	Total Payanua Cradite		

Formula Rate - Non-Levelized Utilizing FERC Form 1 Data Actual for the 12 Months Ended 12/31/2021

Actual for the 12 Months Ended 12/31/2021

#### Rochester Gas and Electric Corporation Appendix A: Annual Trans nt for Schedule 19 Projects

General Note: References to pages in this transmission formula rate rate are indicated as: (page#, line#, col.#) References to data from FERC Form 1 are indicated as: #.y.x (page, line, column)

- All amounts shown are based on five quarter averages which are contained in footnotes to the FF1 (with the following exceptions: CWC in line 28 which is based upon one-eighth of O&M, Accumulated Deferred Income Taxes in line 24 which are a combination of beginning and end of year averages and proration amounts, and Excess Accumulated Deferred Income Taxes in line 25 which are beginning/ending year averages). Α
- В The maximum accumulated deferred tax offset to rate base is calculated in accordance with the proration formula prescribed by IRS regulation section 1.167(I)-1(h)(6).
- С Cash Working Capital for Schedule 19 Projects equals one-eighth (45 days) of O&M allocated to Schedule 19 Projects.
- D ncludes only FICA and unemployment taxes.
- Includes removal costs related to assets removed to make room for Schedule 19 Projects which are amortized over 10 years to FERC Account 407.3, subject to FERC approval under a future, limited Section 205 filing. Ε
- Below are the currently effective income tax rate, where FIT is the Federal income tax rate; SIT is the State income tax rate, and p = "the percentage of federal income tax deductible for state income taxes". If the utility is taxed in more than one state it must attach a work paper showing the name of each state and how the blended or composite SIT was developed. Furthermore, a utility that elected to utilize amortization of tax credits against taxable income, rather than book tax credits to Account No. 255 and reduce rate base, must reduce its income tax expense by the amount of the Amortized Investment Tax Credit (Form 1, 266.8.1) multiplied by (1/1-1). Any Excess or Deficient Deferred Income Taxes reduce or increase income tax expense by the amount of the expense multiplied by (1/1-1).

0.00%
 0.00% (State Income Tax Rate or Composite SIT)
 0.00% (percent of federal income tax deductible for state purposes)

- Include ATU for Year N with Projected ATRR for Year N+2
- Debt cost rate = long-term interest / long term debt. Preferred cost rate = preferred dividends / preferred outstanding. The ROE is determined by the New York Public Utilities Commission and capped by he ROE determined by FERC. The ROE Cap will be supported in the original filing and no change in ROE Cap may be made absent a filing with FERC.
- ncludes revenue related to Schedule 19 Projects only, such as pole attachments, rentals and special use.

Gross Receipts Tax

- ncludes revenue related to Schedule 19 Projects only.
- The following acronyms are used for allocators:
- The following acronyms are used for allocators:

  CP= common plant allocator (allocate common plant and common expenses to total electric)

  DA= DA=direct assignment (the item is direct assigned to Schedule 19 Projects)

  GP= gross plant allocator (allocated Schedule 19 Projects gross plant as % of electric and common plant)

  GPE= gross electric plant allocator (allocated Schedule 19 Projects gross plant as % of total electric gross plant)

  S19P= Schedule 19 Projects plant allocator (schedule 19 Projects gross plant as % of total transmission gross plant)

  S19 W/S= Schedule 19 Projects wage and salary allocator (Schedule 19 Projects wages and salaries as % of total transmission gross plant)

  S19 W/ST Schedule 19 Projects wage and salary allocator for transmission (Schedule 19 Projects wages and salaries as % of transmission wages and salaries)

  NA= not applicable (the item is not applicable to Schedule 19 Projects)

  TPE= transmission plant allocator (transmission plant as % of electric

  T W/S= transmission wages and salaries as % of electric wages and salaries

  Rochester Gas and Electric will exclude items in Account 930.2 shown on FF1 page 335 that are greater than \$1 M and not directly or indirectly related to its transmission assets.

  In accordance with the NYISO OATT, Section 14.1.5, the gross receipts tax included in Schedule 19 Projects ATRR is as follows:

  Gross receipt tax rate

  Revenue requirement

Revenue requirement

O May include CWIP in rate base as authorized by FERC

(n)

## Rochester Gas and Electric Corporation Workpaper 1: Average Balances for Most Rate Base Items Actual for the 12 Months Ended 12/31/2021

						A	ctual for the 12 Months	Ended 12/31/2021					
							Gross Operation	a Dranautu					
							Gross Operatio	ig Property					
(a)		(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)
										Schedule	19 Projects		
Month	Year	Electric Intangible	Production	Transmission	Distribution	Electric General	Common	Project 1	Project 2	Project 3	Project 4		Total
FF1 Reference		204-207, line 5 fn	204-207, line 46 fn	204-207, line 58 fn	204-207, Line 75 fn	204-207, I. 99 fn	355 fn	204-207, line 58 fn	204-207, line 58 fn	204-207, line 58 fn	204-207, line 58 fn	204-207, line 58 fn	Sum of Columns (h) through (l)
Appendix A Line #		5	1	2	3	4	6	2	2	2	2	2	2
1 December	2020	-	-	-	-	-	-	-	-	-	-	-	-
2 March	2021	_	_	_	_	_	-	_	_	-	_	_	-
3 June	2021	-	-	_	_	-	_	-	-	_	-	-	-
4 September	2021	_	_	_	_	_	-	-	_	_	-	_	-
5 December	2021	-	-	_	_	-	_	-	-	_	-	-	-
6 Average		-	-	-	-	-	-	-	-	-	-	-	
							Note: Exc	ude Asset Retirement Oblig	gations				

							Accumulated D	epreciation					
										Schedule	19 Projects		
Month	Year	Electric Intangible	Production	Transmission	Distribution	Electric General	Common	Project 1	Project 2	Project 3	Project 4		Total
FF1 Reference		200-201.21c	219, lines 20-24 fn	219, line 25 fn	219, line 26 fn	219, line 28 fn	355 fn	219, line 25 fn	219, line 25 fn	219, line 25 fn	219, line 25 fn	219, line 25 fn	Sum of Columns (h) through (l)
Appendix A Line #		13	9	10	11	12	14	10	10	10	10	10	10
7 December	2020	-	-	-	-	=-	-	-			-	-	-
8 March	2021	-	-	-	-	-		-			-		-
9 June	2021	-	-	-	-	-		-			-		-
10 September	2021	-	-	-	-	-	-	-	-	-	-		-
11 December	2021	-	-	-	-	-	-	-			-		-
12 Average		0	0	0	0	0	0	0	0	0	0	0	

										Miscel	laneous Rate Base Items			
				Schedule 19 Pro	jects - CWIP									
Month	Year	Project 1	Project 2	Project 3	Project 4		Total	Transmission Land Held for Future Use	Schedule 19 Projects - Land Held for Future Use	Schedule 19 Projects - Abandoned Plant	Materials & Supplies - Transmission	Materials and Supplies - Assigned to Construction (Electric and Gas)	Prepayments	Regulatory Asset - Removal Costs
								214, line 17 fn	214, line TBD	230b, line TBD	227, Line 8 fn	227, line 5 fn	110-111, line 57 fn	232 fn
FF1 Reference		216 fn	216 fn	216 fn	216 fn	216 fn								
Appendix A Line #		23	23	23	23	23	23	28	28	24	30	31	32	33
13 December	2020	-	-	-	-	0	-	-	-	-	-	-	-	-
14 March	2021	-	-	-	-	0	-	-	-	-	-	-		-
15 June	2021	-	-	-	-	0	-	-	-	-	-	-	-	-
16 September	2021	-	-	-	-	0	-	-	-	-	-	-	-	-
17 December	2021	-	-	-	-	0	-		-	-		-	-	-
18 Average		0	0	0	0	0	0	0	0	0	0	0	0	

				Unfunded Liabilit	ies - Account 242
	Month		Accrued Vacation	Other	Total
	FF1 Reference		NA	NA	
	Appendix A Line #		NA	NA	
19	December	2020	-	-	-
20	March	2021	-	-	-
21	June	2021	-		-
22	September	2021	-	-	-
23	December	2021			
24	Average		0	0	0

#### Rochester Gas and Electric Corporation Workpaper 2a: Accumulated Deferred Income Taxes (ADIT) Worksheet - Current Year Actual for the 12 Months Ended 12/31/2021

(a) (c) Schedule 19 (d) (e) (g) (h) (b) Plant Labor Total ADIT Current Year ADIT-190 (Line 24) (Line 30) (Line 38) (Line 1 + Line 2 + Line 3) ADIT-282 ADIT-283 Subtotal Schedule 19 Projects W/S Allocator #DIV/0! Appendix A #DIV/0! #DIV/0! Appendix A (Line 4 \* Line 5 or Line 6) GP Allocator End of Year ADIT End of Previous Year ADIT #DIV/0! #DIV/0! #DIV/0! #DIV/0! Worksheet 2b, Line 7 Average Beginning and End of Year Prorated ADIT Total ADIT (Average of Line 7 + Line 8) From Worksheet 2c, Line 14, Col. (r) or Worksheet 2d, Line 13, Col. (n) #DIV/01

In filling out this attachment, a full and complete description of each item and justification for the allocation to Columns B-G and each separate ADIT item will be listed dissimilar items with amounts exceeding \$100,000 will be listed separately;

(a) ADIT-190 - Includes Only Items Applicable to	(b)	(c)	(d) Schedule 19	(e)	(f)	(g)	(h)
Schedule 19 Projects			Projects	Plant	Labor		
	Total	Excluded	Related	Related	Related		Justification
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
	0	0	0	0	0		
Fotal	0	0	0	0	0		
	ADIT-190 - Includes Only Items Applicable to Schedule 19 Projects	#ADIT-190 - Includes Only Items Applicable to Schedule 19 Projects	#ADIT-190 - Includes Only Items Applicable to Schedule 19 Projects	ADIT-190 - Includes Only Items Applicable to   Schedule 19   Projects   Total   Excluded   Related	ADIT-190 - Includes Only Items Applicable to   Projects   Plant   Projects   Plant   Projects   Plant   Projects   Plant   Plant   Projects   Plant   Plant	ADIT-190 - Includes Only Items Applicable to Schedule 19 Projects   Total   Sectuded   Projects   Plant   Labor   Related   Re	### ADIT-190-Includes Only Items Applicable to Schedule 19 Projects    Total Excluded Related

- Instructions for Account 190:
- ADIT items related only to Schedule 19 Projects are directly assigned to Column D
   ADIT items related to Plant are included in Column E

ADIT items related to Labor are included in Column F
 Deferred income taxes arise when telms as included in taxable income in different periods than they are included in book income.
 If the item giving rise to the ADIT is not included in the annual transmission revenue requirement ("ATRR"), the associated ADIT amount shall be excluded.

### Rochester Gas and Electric Corporation

Workpaper 2a: Accumulated Deferred Income Taxes (ADIT) Worksheet - Current Year

(a) ADIT- 282 - Includes Only Items Applicable to	(b)	(c)	(d) Schedule 19	(e)	(f)	(g)	(h)
Schedule 19 Projects	Total		Projects	Plant	Labor		
		Excluded	Related	Related	Related		Justification
25 Depreciation - Liberalized Depreciation - Prorated	#DIV/0!	0	#DIV/0!	0	0		Worksheet 2c, Line 14, Col. (r)
26	0						
27	0						
28	0						
29	0	0	0	0	0		
30 Total	#DIV/0!	0	#DIV/0!	0	0		

- Instructions for Account 282:

  1. ADIT items related only to Schedule 19 Projects are directly assigned to Column D

1. ADIT items related only to Schedule 19 Hrigots are directly assigned to Courtni D
2. ADIT items related to Plant are included in Column F
3. ADIT items related to Labor are included in Column F
4. Deferred income taxes arise when items are included in taxable income in different periods than they are included in book income.

If the item giving rise to the ADIT is not included in the annual transmission revenue requirement ("ATRR"), the associated ADIT amount shall be excluded.

#### Rochester Gas and Electric Corporation Workpaper 2a: Accumulated Deferred Income Taxes (ADIT) Worksheet - Current Year

	(a) ADIT-283 - Includes Only Items Applicable to	(b)	(c)	(d) Schedule 19	(e)	(f)	(g)	(h)
	ADIT-283 - Includes Only Items Applicable to Schedule 19 Projects	Total		Projects	Plant	Labor		
			Excluded	Related				Justification
31	Cost of Removal	0		0	0	0		
32		0		0				
33		0						
34		0						
35		0						
36		0						
37		0						
	Total	0	0	0	0	0		

Instructions for Account 283:

1. ADIT items related only to Schedule 19 Projects are directly assigned to Column D

2. ADIT items related to Plant are included in Column E

3. ADIT items related to Labor are included in Column F

4. Deferred income taxes arise when items are included in taxable income in different periods than they are included in book income.

If the item giving rise to the ADIT is not included in the annual transmission revenue requirement ("ATRR"), the associated ADIT amount shall be excluded.

## Rochester Gas and Electric Corporation Workpaper 2b: Accumulated Deferred Income Taxes (ADIT) Worksheet - Prior Year Actual for the 12 Months Ended 12/31/2021

(a)  Nonprorated Items	(b) Schedule 19 Projects	(c) Plant Related	(d) Labor Related	(e)	(f) Total ADIT		(g)
Prior Year   ADIT-190	0 0 0 0	#DIV/0!	#DIV/0!	-	#DIV/0!	(Line 20) (Line 26) (Line 34) (Line 1 + Line 2 + Line 3) Appendix A Appendix A (Line 4 * Line 5 or Line 6)	

In filling out this attachment, a full and complete description of each item and justification for the allocation to Columns B-G and each separate ADIT item will be listed, dissimilar items with amounts exceeding \$100,000 will be listed separately;

	(a) ADIT-190 - Includes Only Items Applicable to	(b)	(c)	(d) Schedule 19	(e)	<b>(f)</b>		(g)
	Schedule 19 Projects			Projects	Plant	Labor		
		Total	Excluded	Related	Related	Related		Justification
8		0	0	0	0	0	l e	
9		0	0	0	0	0	l e	
10		0	0	0	0	0	l e	
11		0	0	0	0	0	l e	
12		0	0	0	0	0	i e	
13		0	0	0	0	0	1	
14		0	0	0	0	0	i e	
15		0	0	0	0	0	1	
16		0	0	0	0	0	i e	
17		0	0	0	0	0	1	
18		0	0	0	0	0	i e	
19		0	0	0	0	0	l l	
20	Total	0	0	0	0	0		

| 0 0 0 0 | 0 |
Instructions for Account 190: | 0 0 0 0 |
1. ADIT items related only to Schedule 19 Projects are directly assigned to Column D
2. ADIT items related to Plant are included in Column E
3. ADIT items related to Plant are included in Column F
4. ADIT items related to 1 Labor are included in Column F
5. ADIT items related to 1 Labor are included in Column F
6. ADIT items related to 1 Labor are included in 1 Labor are includ

#### Rochester Gas and Electric Corporation

#### Workpaper 2b: Accumulated Deferred Income Taxes (ADIT) Worksheet - Prior Year

(a)	(b)	(c)	(d)	(e)	(f)	(g)					
ADIT- 282 - Includes Only Items Applicable to Schedule 19 Projects		Excluded	Schedule 19 Projects Related	Plant Related	Labor Related	G Justification					
Depreciation - Liberalized Depreciation - Prorated	#DIV/0!	0	#DIV/0!	0	0	0 Worksheet 2d, Line 13, Col. (n)					
2	0		0								
3	0										
4	0										
	0	0	0	0	0	0					
Total	#DIV/0!	0	#DIV/0!	0	0	0					
Instructions for Account 282: 1. ADIT team related only to Schedule 19 Projects are directly assigned to Column D 2. ADIT team related only to Schedule 19 Projects are directly assigned to Column E 3. ADIT team related to Plant are included in Column E 4. Deferred income taxes arise when items are included in taxable income in different periods than they are included in book income.  If the team often only rise to the ADIT is not included in the annual transmission revenue requirement ("ATRIP") the associated ADIT amount shall be excluded.											
Rochester Gas and Electric Corporation											

## Rochester Gas and Electric Corporation Workpaper 2b: Accumulated Deferred Income Taxes (ADIT) Worksheet - Prior Year

	(a) ADIT-283 - Includes Only Items Applicable to	(b)	(c)	(d) Schedule 19	(e)	(f)	(g)
	ADIT-283 - Includes Only Items Applicable to Scheduel 19 Projects	Total		Projects	Plant	Labor	
			Excluded	Related			Justification
27	Cost of Removal	0		0	0	0	
28		0		0			
29		0					
30		0					
31		0					
32		0					
33		0					
34	Total	0	0	0	0	0	

Instructions for Account 283:

1. ADIT flems related only to Schedule 19 Projects are directly assigned to Column D

2. ADIT flems related to Plant are included in Column E

3. ADIT flems related to Labor are included in Column F

4. Defermed income taxes arise when terms are included in taxable income in different periods than they are included in book income.

If the item glving rise to the ADIT is not included in the annual transmission revenue requirement ("ATRR"), the associated ADIT amount shall be excluded.

## Rochester Gas and Electric Corporation Workpaper 2c: Accumulated Deferred Income Taxes - Prorated Projection Actual for the 12 Months Ended 12/31/2021

Debit amounts are shown as positive and credit amounts are shown as negative.

Rate Year = 2021

Account 282 (Note A)

(a)

Beginning Balance & Monthly

Changes

Month

Month

Month

Remaining in

Year Albeys in the

Number of D

Year Albeys in the

Year (c) (d) (e)

Days in the Number of Days Total Days

Month Remaining in in the

Year After Projected

Current Month Rate Year (g) Beginning Balance/ Monthly Amount/ Ending Balance (n) (o) (p)

Labor W/S Labor

Related Allocator Allocation

(General and (Appendix (n) \* (o)

Common) A) (f) Weighting for Projection (d)/(e) (h) (i)
Schedule 19 Transmission
Projects Proration
(f) x (h) (k) (I)
Gross Plant Plant
Allocator Allocation (j)
(Appendix A) \* (k) (m) Plant Proration (f) x (l) (q) Labor Proration (f) x (p) (r)
Total Transmission
Prorated Amount (i)
+ (m) + (q) December 31st balance of Prorated
1 ADT (Note B)
3 Fabruary
5 Fabruary
6 May
7 June
8 July
9 August
10 September
10 Coccere
11 Docember
12 December
14 Prorated Balance 100.00% 91.78% 84.11% 75.62% 67.40% 58.90% 50.68% 42.19% 33.70% 25.48% 16.99% 8.77% 0.27% #DIV/0! #DIV/0! #DIV/0! 0 #DIV/01 #DIV/01
0 #DIV/01 #DIV/01 #DIV/0! 335 307 276 246 215 185 154 123 93 62 32 #DIV/0! #DIV/0!
#DIV/0!
#DIV/0!
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#DIV/0!
#DIV/0!
#DIV/0!
#DIV/0!
#DIV/0! 14 Prorated Balance #DIV/0!

Note A: The calculations of ADIT amounts resulting from liberalized depreciations are performed in accordance with the proration requirements of Treasury Regulation Section 1.167(i)-1(h)(6). Note B: From Worksheet 2d-Prior Year ADIT Proration Actual

## Rochester Gas and Electric Corporation Workpaper 2d: Accumulated Deferred Income Taxes - Actual Proration Actual for the 12 Months Ended 12/31/2021

Year = 2021
Debit amounts are shown as positive and credit amounts are shown as negative.

#### Account 282 (Note A)

	Days	in Period			Projection	<ul> <li>Proration of F</li> </ul>	rojected Deferred Tax	Actual Activ	vity - Proration of	Projected Deferre	d Tax Activity and A	Averaging of Other Defe	erred Tax Activity
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(i)	(k)	(1)	(m)	(n)
Month	Days in the Month	Number of Days Remaining in Year After Month's Accrual of Deferred Taxes	Total Days in Projected Rate Year (Line 14, Col b)	Proration Percentage (c)/(d)	Projected Monthly Activity	Prorated Amount (e) * (f)	Prorated Projected Balance Sum of (g)	Actual Monthly Activity (table below, grand total)	Difference between projected monthly and actual monthly activity (i) -	Preserve proration when actual monthly and projected monthly activity are either both increases or decreases. (See Note A)	Difference between projected and actual activity when actual and projected activity are either both increases or decreases. (See Note A)	when projected activity	Balance reflecting
December 31st balance		•							•				
January	31	335	365	91.78%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
February	28	307	365	84.11%	n n	Ö	ő	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
March	31	276	365	75.62%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
April	30	246	365	67.40%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Mav	31	215		58.90%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
June	30	185	365	50.68%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
July	31	154	365	42.19%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
August	31	123		33.70%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
September	30	93	365	25.48%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
October	31	62	365	16.99%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
November	30	32	365	8.77%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
December	31 365	1	365	0.27%	0	0	0	#DIV/0!	#DIV/0!	#DIV/0! #DIV/0!	#DIV/0! #DIV/0!	#DIV/0! #DIV/0!	#DIV/0!
Total								#DIV/0!	#DIV/0!				

	Schedule 19 Projects	Plant Related	Gross Plant Allocator (Appendix A)	Total (d) * (e)	Labor Related (General and Common)	W/S Allocator (Appendix A)	Total (g) * (h)	Grand Total (b) + (f) + (i)
Actual Monthly Activity								
15 January	0	0	#DIV/0!	#DIV/0!	(	#DIV/0!	#DIV/0!	#DIV/0!
16 February	0	0	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!
17 March	0	0	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!
18 April	0	0	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!
19 May	0	0	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!
20 June	0	0	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!
21 July	0	0	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!
22 August	0	0		#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!
23 September	0	0	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!
24 October	0	0	#DIV/0!	#DIV/0!	(	#DIV/0!	#DIV/0!	#DIV/0!
25 November	0	0	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!
26 December	0	0	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!

Note A: The calculations of ADIT amounts resulting from liberalized depreciations are performed in accordance with the proration requirements of Treasury Regulation Section 1.167(i)-1(h)(6). Differences attributable to over-projection of ADIT in the annual projection will result in a proportionals reversal of the projected prorated ADIT activity to the extent of the over-projection. Differences attributable to under-projection of ADIT in the annual projection will result in an adjustment to the projected prorated ADIT activity by the difference between the projected monthly activity and the actual monthly activity. However, when projected monthly ADIT activity is an increase, and actual monthly ADIT activity is an actual monthly activity and the actual monthly ADIT activity is an increase, actual monthly ADIT activity is a projected monthly ADIT activity is an increase, actual monthly ADIT activity is a projected monthly ADIT activity is an increase. ADIT activity is a projected monthly ADIT activity is an increase, actual monthly ADIT activity is an increase.

## Rochester Gas and Electric Corporation Workpaper 3: Excess Accumulated Deferred Income Taxes Resulting from Income Tax Rate Changes (Note A) Actual for the 12 Months Ended 12/31/2021

bit amounts are shown as positive and credit a (a)	(b)	as negative. (c)	(d)	(e)	(f)	(g)	(h)	(1)	0	(k)	(1)	(m)	(n)
<u>Description</u>	ADIT Balances Prior to Remeasurement	ADIT Balances After Remeasurement (Note C) Column (b) * Line 43	Deficient or Excess Accumulated Deferred Taxes at December 31, Column (b) - Column (c)	Adjustments After Remeasurement	Adjusted Deficient or Excess Accumulated Deferred Taxes  Column (d) + Column (e)	Schedule 19 Projects Allocation Factors (Note B)	Allocated to Schedule 19 Projects Column (f) *	Protected (P) Unprotected Property (UP) Unprotected Other (UO) (Note B)	Amortization Year	Balance at December 31 Column (h) - Column (j)	Amortization Year	Balance at December 31 Column (k) - Column (l)	
Deficient Deferred Income Taxes - amortized to 410.1 FERC Account 190													
	0 0 0	0	0 0 0	0 0	0	0.000% 0.000%	0		0	0 0 0	0	0	
Total FERC Account 190	0		0	0	0	0.000%	0		0	0	0	0	
FERC Account 282													
	0 0 0	0	0 0 0	0	0 0 0		0 0 0		0 0 0	0 0	0 0 0	0 0 0	
Total Account 282	0	0	0	0	0	0.000%	0		0	0	0	0	
FERC Account 283	0 0 0	0	0 0 0	0	0	0.000% 0.000% 0.000% 0.000%	0 0 0		0 0 0	0 0 0	0 0 0	0 0 0	
7 Total FERC Account 283	0	0	0	0	0		0		0	0	0	0	
Subtotal Before Being Grossed up for Income Taxes	·	Ü	0	·	0		0		0	0		0	
Gross Up Total Deficient Accumulated Deferred Income Taxes - Account 182.3			0		0		0		-	0		0	
Excess Accumulated Deferred Income Taxes - amortized to 411.1 FERC Account 190													
2	0	0	0	0	0		0		0	0	0	0	
Total Account 190 FERC Account 282	0	0	0	0	0		0		0	0	0	0	
Accelerated Depreciation	0 0 0	0 0 0	0	0	0	0.000%	0 0 0		0 0 0	0 0 0	0	0 0 0	
Total Account 282	0		0	0	0	0.000%	0		0	0	0	0	
FERC Account 283	0	0	0	0	0	0.000%	0		0	0	0	0	
	0 0	0 0 0	0 0	0	0	0.000% 0.000% 0.000%	0		0 0	0 0	0	0	
Total Account 283	0		0		0	0.000%	0		0	0	0	0	
Subtotal Before Being Grossed up for Income Taxes Gross Up			0		0	1	0		0	0	0	0	
Total Excess Accumulated Deferred Income 3 Taxes - Account 254			0		0	-	0	-	-	0		0	
Grand Total			0		0		0			0		0	
Total Amortization											0		
Note A: Includes Excess Deferred Income 1 Schedule 19 Project ADITs. Note B: The allocation factors used to allocation								opulated and re	eplicated for cha	anges in federal	, state or local inc	come tax rates imp	acting
Note C: Remeasurement Factor equals the	ratio of the current i	nominal tax rate to ti	he prior nominal to	ax rate  New nominal rate  Prior nominal rate				1.0%					
				Prior nominal rate Remeasurement Fa	actor			1.0%					

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# Rochester Gas and Electric Corporation Workpaper 4: Permanent Book/Tax Differences

## Actual for the 12 Months Ended 12/31/2021

_Line #	(a) Tax Effect of Permanent Book/Tax Differences	(b) (c) AFUDC Equity Local Transmission Projects		(d) Other 3	(e) Total
	FF1 Reference				
1	Amount	-	0	0	-
2	Income Tax Effect	-	0	0	_
			Line 1 *	Line 1 *	Sum of
Ref		Line 1 * Income Tax Factor	Income Tax Factor	Income Tax Factor	Columns (b), (c) and (d)

#### Rochester Gas and Electric Corporation Workpaper 5: Schedule 19 Project Return Actual for the 12 Months Ended 12/31/2021

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(i)	(k)	(1)	(m)	(n)	(o)
			Five Q	uarter Averages				Allocate Other I	Rate Base Items t	to Schedule 19 P	rojects				
_Line#		Gross Plant in Service	Allocator	Accumulated Depreciation	Net Operating Property	Net General Plant - Using Allocator	Net Intangible Plant Using Allocator	Net Common Plant Using Allocator	CWIP	Abandoned Plant - Using Allocator	Accumulated Deferred Income Taxes - Using Allocator	(Excess)/Deficient ADIT - Using Allocator	Land Held for Future Use - Using Allocator	Other Rate Base Items - Using Allocator	Total Rate Base
	Reference Project	Workpaper 1, Line 6	Calculated	Workpaper 1, Line 12	Col. (b) - Col. (d)	Line 6 * Col. (c)	Line 6 * Col. (c)	Line 6 * Col. (c)	Workpaper 1, Line 18	Workpaper 1, Line 18	Line 6 * Col. (c)	Line 6 * Col. (c)	Line 6 * Col. (c)	Line 6 * Col. (c)	Sum of Col. (e) through Col. (n)
1	Groupina 1	-	#DIV/0!	-	-	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
2	Project Groupina 2	-	#DIV/0!	-	=	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
3	Project Groupina 3	-	#DIV/0!	-	ē	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
4	Project Groupina 4	-	#DIV/0!	-	-	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
5			#DIV/0!			#DIV/0!	#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
6 Ref	Total	-	#DIV/0!	-	-	#DIV/0! Appendix A, Line 19	#DIV/0! Appendix A, Line 20	#DIV/0! Appendix A, Line 21	0 Workpaper 1, Line 18	0 Workpaper 1, Line 18	#DIV/0! Appendix A, Line 25	0 Appendix A, Line 26	Appendix A, Line 28	#DIV/0! Appendix A, Line 35	#DIV/0!

Kei						Lille 19	Lille 20	LINE Z I	Lille 10
					Weighted				
					Preferred and	Preferred and			
					Common Equity	Common		Weighted	
		Rate Base	WACC	Return	Rate	Equity Return		Debt Rate	Debt Return
					Workpaper 6,				
			Workpaper 6,		Lines 2 + 3,			Workpaper,	
			Line 4, Line 8,		Lines 6 + 7,			Line 1, Line	
			Line 12, or	Col. (b) * Col.	Lines 10 + 11 or	Col. (b) * Col.		5, Line 9 or	Col. (b) * Col.
	Reference	Col. (o)	Line 16	(c)	Lines 14 + 15	(e)		Line 13	(h)
	Project								
7	Grouping 1	#DIV/0!	#DIV/0!	#DIV/0!	0.00%	#DIV/0!		#DIV/0!	#DIV/0!
	Project								
8	Groupina 2	#DIV/0!	#DIV/0!	#DIV/0!	0.00%	#DIV/0!		#DIV/0!	#DIV/0!
	Project								
9	Grouping 3	#DIV/0!	#DIV/0!	#DIV/0!	0.00%	#DIV/0!		#DIV/0!	#DIV/0!
	Project								
10	Groupina 4	#DIV/0!	#DIV/0!	#DIV/0!	0.00%	#DIV/0!		#DIV/0!	#DIV/0!
11		#DIV/0!		#DIV/0!		#DIV/0!			#DIV/0!
12	Total	#DIV/0!		#DIV/0!		#DIV/0!			#DIV/0!
		#D17/0:		#DIV/U:		#DIV/U:			

	Danier 1	Desired	Schedule 19 Project	Included in Each Project Group
1	Project Name	Project	Gross Investment	
Project Groupina 1	Teamo	Describer	an coamon	
Groupina 1				
Project				
Project Groupina 2				
1				
Project Grouping 3				
Grouping 3				
Project Groupina 4				
Groubing 4				
I				

#### Section 6.19.7.2.2 Project Cost of Capital Page 13 of 16

#### Rochester Gas and Electric Corporation Workpaper 6: Schedule 19 Project Cost of Capital Actual for the 12 Months Ended 12/31/2021

		(a)	(b)	(c)	(d)		(e)	(f)	(g)	(h)	(i)	(i)
Line #	Project Grouping 1			(Note A)								
			Capitalization	%s	Cost Rates	WACC						
1	Long Term Debt	Line 22, Col. (i)	0	0.0%	#DIV/0!	#DIV/0!		ROE per New York Sta	te Public Service Co	mmission, Case No.		0.00%
2	Preferred Stock	Line 22 Col. (b)	-	0.0%	0.000%	0.00%		ROE Cap				10.87%
3	Common Stock	Line 22 Col. (d)	0	0.0%	0.000%	0.00%						
					(Lines 1 and 2,							
4	Total Capitalization		0	0.0%	Col. (j))	#DIV/0!						

Project Grouping 2						
		Capitalization	%s	Cost Rates	WACC	
Long Term Debt	Line 22, Col. (i)	0	0.0%	#DIV/0!	#DIV/0!	ROE per New York State Public Service Commission, Case No.
6 Preferred Stock	Line 22 Col. (b)	-	0.0%	0.000%	0.00%	ROE Cap
7 Common Stock	Line 22 Col. (d)	0	0.0%	0.000%	0.00%	
				(Lines 5 and 6,		
8 Total Capitalization		0	0.0%	Col. (j))	#DIV/0!	

	Project Grouping 3							
			Capitalization	%s	Cost Rates	WACC		
9	Long Term Debt	Line 22. Col. (i)	0	0.0%	#DIV/0!	#DIV/0!	ROE per New York State Public Service Commission. Case No.	0.00%
10	Preferred Stock	Line 22 Col. (b)	-	0.0%	0.000%	0.00%	ROE Cap	10.87%
11	Common Stock	Line 22 Col. (d)	0	0.0%	0.000%	0.00%		
					(Lines 9 and 10,			
12	Total Capitalization		0	0.0%	Col. (j))	#DIV/0!		

	Project Grouping 4							
			Capitalization	%s	Cost Rates	WACC		
13	Long Term Debt	Line 22, Col. (i)	0	0.0%	#DIV/0!	#DIV/0!	ROE per New York State Public Service Commission, Case No.	(
14	Preferred Stock	Line 22 Col. (b)	-	0.0%	0.000%	0.00%	ROE Cap	10
15	Common Stock	Line 22 Col. (d)	0	0.0%	0.000%	0.00%		
					(Lines 13 and 14,			
16	Total Capitalization		0	0.0%	Col. (j))	#DIV/0!		

			Common Equity				Long-term Debt				
			Total	Less: Preferred	Less: Accumulated Other Comprehensive Income	Common Equity for Capitalization	Total	Unamortized Gains on Reacquired Debt	Unamortized Debt	Unamortized Loss on Reacquired Debt	Long-term Debt for Capitalization
			Total	SIUCK	IIICOIIIE	Capitalization	lotai	Reacquired Debt	Expense	Dent	Capitalization
						Col. (a) - Col.					Col. (e) + Col.
	Month	Year	112-113, I.16, fn	112-113, I.3, fn	112-113, I.15, fn	(b) - Col. (c)	112-113, I.24, fn	112-113, I.61, fn	110-111, I.69, fn	110-111, I.81, fn	(f) - Col. (g) - (h)
17	December	2020		-	-			-	-	-	
18	March	2021		-	-			-	-	-	
19	June	2021		-	-			-	-	-	
20	September	2021		-	-			-	-	-	
	December	2021		-	-			-	-	-	
22	Average			-							

		(114-117c, sum of lines 62, 63,		
23	Long Term Interest	64, 65, 66)	0	
24	Long-Term Debt	(Line 22, Col. (i))	0	
25	Long-term Debt Interest Rate	(Line 23 / Line 24)	#DIV/0!	
26	Preferred Dividends	118-119c, I.29	-	
27	Preferred Stock	(Line 22 Col. (b))	-	
28	Preferred Stock Rate	(Line 26 / Line 27)	0	

Note A: The above common equity, preferred stock and long-term debt amounts are not used for capital structure purposes since the CSRA requires use of the NYPSC approved capital structure.

## Rochester Gas and Electric Corporation Workpaper 7: True-up Adjustment for Schedule 19 Projects Actual for the 12 Months Ended 12/31/2021

Debit amounts are shown as positive and credit amounts are shown as negative.

The Annual True-Up Adjustment ("ATU") component of the Formula Rate for each Year shall be determined as follows:

- In accordance with its formula rate protocols, RG&E shall recalculate its Annual Transmission Revenue Requirement ("ATRR") for the previous calendar year based on its actual costs as reflected in its Form No. 1 and its books and records for that calendar year, consistent with FERC accounting policies.
- (ii) Determine the difference between the Actual ATRR as determined in paragraph (i) above, and actual revenues based upon the Projected ATRR for the previous calendar year
- Multiply the ATRR Before Interest by (1+i)^24 months

Where:

Average of the monthly rates from the middle of the Rate Year for which the ATU

is being calculated through the middle of the year in which the ATU is included in rates (24 months). The interest rates are initially estimated and then trued-up to actual.

To the extent possible each input to the Formula Rate used to calculate the Actual ATRR will be taken directly from the FERC Form No. 1 or will be reconcilable to the FERC Form 1 by the application of clearly identified and supported information. If the reconciliation is provided through a worksheet included in the filed Formula Rate Template, the inputs to the worksheet must meet this transparency standard, and doing so will satisfy this transparency requirement for the amounts that are output from the worksheet and input to the main body of the Formula Rate.

Line

					meresi
			Estimated	Actual Interest	Rate True-
			Interest Rate	Rate	Up
1	Α	ATRR based on actual costs included for the previous calendar year	0		
2	В	Revenues based upon the Projected ATRR for the previous calendar year and excluding any true-up adjustment	0		
3	С	Difference (A-B)	0	0	
4	D	Future Value Factor (1+i)^24	1.0000	1.0000	0
5	E	True-up Adjustment (C*D)	0	0	
6	F	Interest Rate True-up from Prior Periods	0		
7	G	ATU Adjustment with Interest Rate True-up From Prior Periods	0		

i = average interest rate as calculated below

	Interest on Amo	ount of Refunds or Surcharges	Estimated	Actual
			Monthly	Monthly
	Month	<u>Year</u>	Interest Rate	Interest Rate
8	July	Year 1	0.0000%	0.0000%
9	August	Year 1	0.0000%	0.0000%
10	September	Year 1	0.0000%	0.0000%
11	October	Year 1	0.0000%	0.0000%
12	November	Year 1	0.0000%	0.0000%
13	December	Year 1	0.0000%	0.0000%
14	January	Year 2	0.0000%	0.0000%
15	February	Year 2	0.0000%	0.0000%
16	March	Year 2	0.0000%	0.0000%
17	April	Year 2	0.0000%	0.0000%
18	May	Year 2	0.0000%	0.0000%
19	June	Year 2	0.0000%	0.0000%
20	July	Year 2	0.0000%	0.0000%
21	August	Year 2	0.0000%	0.0000%
22	September	Year 2	0.0000%	0.0000%
23	October	Year 2	0.0000%	0.0000%
24	November	Year 2	0.0000%	0.0000%
25	December	Year 2	0.0000%	0.0000%
26	January	Year 3	0.0000%	0.0000%
27	February	Year 3	0.0000%	0.0000%
28	March	Year 3	0.0000%	0.0000%
29	April	Year 3	0.0000%	0.0000%
30	May	Year 3	0.0000%	0.0000%
31	June	Year 3	0.0000%	0.0000%
32	Average		0.00000%	0.00000%

## Rochester Gas and Electric Corporation Workpaper 8: Electric and Common Depreciation and Amortization Rates

Actual for the 12 Months Ended 12/31/2021

FERC Account	<u>Description</u>	Rate (Note 1)
Transmission		
350	Land Rights	1.33%
352	Structures and Improvements	1.69%
353	Station Equipment	1.92%
354	Towers and Fixtures	2.00%
355	Poles and Fixtures	2.17%
356	Overhead Conductors & Devices	1.92%
357	Underground Conduit	1.57%
358	Underground Conductors & Devices	1.79%
359	Roads and Trails	NA
Electric General and Intangible		
302	Franchises and Consents	NA
303	Intangible Plant	14.29%
390	Structures and Improvements	2.18%
391	Office Furniture and Equipment	3.57%
391.2	Computer Equipment	14.29%
391.3	Office Equipment	2.77%
394	Tools, Shop and Garage Equipment	3.43%
395	Laboratory Equipment	0.96%
397	Communication Equipment	3.63%
397.1	Communication Equipment - Overhead	2.86%
398	Miscellaneous Equipment	6.67%
Common		
302	Franchises and Consents	NA
303	Intangible Plant	13.09%
390	Structures and Improvements	2.98%
391	Office Furniture and Equipment	3.42%
391.2	Computer Equipment	13.09%
391.3	Office Equipment	1.09%
392.09	Mini Passenger Vans	10.00%
392.13	Passenger Cars	11.25%
392.32	Full Size Pickups	8.18%
392.33	Light Duty Gas Powered Utility Trucks Heavy Duty Gas Powered Utility Trucks	9.00%
392.34 392.36	, ,	6.92% 11.25%
392.36 392.37	Mini Cargo Vans Full Size Cargo Vans	10.00%
392.38	Mini Pickups	9.00%
392.30	Heavy Duty Diesel Powered Utility Trucks	9.00 %
392.39	and Equipment Medium Duty Diesel Powered Utility	6.92%
392.42	Trucks	7.50%
392.42	Medium Duty Gas Power Utility Trucks	8.18%
393	Stores Equipment	2.87%
394	Tools, Shop and Garage Equipment	2.91%
395	Laboratory Equipment	2.83%
396	Power Operated Equipment	7.69%
397	Communication Equipment	5.38%
398	Miscellaneous Equipment	6.25%
		0.2070

Note 1: The above depreciation rates cannot change absent Commission authorization

0

# Rochester Gas and Electric Corporation Workpaper 9: Prior Period Corrections Actual for the 12 Months Ended 12/31/2021

	Actual for the 12 Months Ended 12/31/2021							
	Debit amounts are shown as positive and credit amounts are sho	own as negative.	(a)	<b>(b)</b> Calendar Year				
Line <u>No.</u>	<u>Description</u>	<u>Source</u>	Revenue Impact of <u>Correction</u>	Revenue <u>Requirement</u>				
1 2	Filing Name and Date Original Revenue Requirement			0				
3 4	Description of Correction 2  Description of Correction 2			0				
5	Total Corrections	(Line 3 + Line 4)		0				
6	Corrected Revenue Requirement	(Line 2 + Line 5)		0				
7	Total Corrections	(Line 5)		0				
8 9 10	Average Monthly FERC Refund Rate Number of Months of Interest Interest on Correction	Note A Note B (Line 7 * Line 8 * Line 9)		0.00%				

## Notes:

11 Sum of Corrections Plus Interest

- A The interest rate on corrections will be the average monthly FERC interest rate for the period from the beginning of the year being corrected through the end of the rate year where the correction is reflected in rates the same as how interest on the Annual True-up Adjustment is computed.
- B The number of months in which interest is computed is from the middle of the rate year in which the correction is needed to the middle of the rate year where the correction is reflected in rates the same as how interest on the Annual True-up Adjustment is computed.

(Line 7 + Line 10)