

VIA ELECTRONIC SERVICE

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

July 26, 2023

Re: *New York Independent System Operator, Inc.*
Docket Nos. ER23-1816-000 & ER23-1817-000
Response to June 28, 2023 Letter

Dear Secretary Bose,

New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (“RG&E”) (collectively, the “Applicants”) hereby submit their response to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) letter requesting further information issued on June 28, 2023.¹ This submittal supplements the May 3, 2023 filings made by NYSEG and RG&E in the above-referenced proceedings.

I. Background

On May 3, 2023, the New York Independent System Operator, Inc. (“NYISO”) filed, on behalf of the Applicants and pursuant to Federal Power Act Section 205, proposed revisions to the NYISO Open Access Transmission Tariff (“OATT”).² The proposed revisions establish the Applicants’ formula rate templates and associated formula rate implementation protocols (together “Formula Rates”) to derive and recover the costs of certain local transmission upgrades that will be determined by the New York State Public Service Commission (“NYPSC”) to be necessary to meet the climate and renewable energy goals under New York state’s Climate Leadership and Community Protection Act. On June 28, 2023, the Commission issued a deficiency letter requesting additional information concerning the Applicants’ filings.³

II. List of Documents

The Applicants’ filing consists of narrative responses and related supporting documentation, each described below:

- **Attachment 1** – Applicants’ Narrative Responses to the June 28 Letter
- **Attachment 2** – Clean updated version of Applicants’ proposed Formula Rate Template – Section 6.19.6.2.2 of Attachment 1 to Rate Schedule 19 of the NYISO OATT for

¹ *New York Independent System Operator, Inc.*, Deficiency Letter, Docket Nos. ER23-1816-000, et al. (June 28, 2023) (“June 28 Letter”).

² NYISO submitted the filings on behalf of NYSEG in Docket No. ER23-1816-000 and RG&E in Docket No. ER23-1817-000 in its role as administrator of the NYISO OATT. The NYISO also submits this filing on behalf of each Applicant solely in the NYISO’s role as the tariff administrator of the NYISO OATT. The burden of demonstrating that the proposed tariff amendments are just and reasonable rests on NYSEG and RG&E, respectively. The NYISO takes no position on any substantive aspect of this filing at this time. Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them under the NYISO OATT.

³ June 28 Letter at 1.

NYSEG in Docket No. ER23-1816 or 6.19.7.2.2 of Attachment 2 to Rate Schedule 19 of the NYISO OATT for RG&E in Docket No. ER23-1817 (PDF)⁴

- **Attachment 3** – Redlined updated version of Applicants’ proposed Formula Rate Template – Section 6.19.6.2.2 of Attachment 1 to Rate Schedule 19 of the NYISO OATT for NYSEG in Docket No. ER23-1816 or 6.19.7.2.2 of Attachment 2 to Rate Schedule 19 of the NYISO OATT for RG&E in Docket No. ER23-1817 (PDF)⁵
- **Attachment 4** – Clean updated version of Applicants’ proposed Formula Rate Implementation Protocols – Section 6.19.6.2.1 of Attachment 1 to Rate Schedule 19 of the NYISO OATT for NYSEG in Docket No. ER23-1816 or 6.19.7.2.1 of Attachment 2 to Rate Schedule 19 of the NYISO OATT for RG&E in Docket No. ER23-1817 (PDF)
- **Attachment 5** – Redlined version of Applicants’ proposed Formula Rate Implementation Protocols – Section 6.19.6.2.1 of Attachment 1 to Rate Schedule 19 of the NYISO OATT for NYSEG in Docket No. ER23-1816 or 6.19.7.2.1 of Attachment 2 to Rate Schedule 19 of the NYISO OATT for RG&E in Docket No. ER23-1817 (PDF)⁶
- **Attachment 6** – The 2018 Depreciation Studies (NYSEG’s Study for Docket No. ER23-1816 or RG&E’s Study for Docket No. ER23-1817)
- **Attachment 7** – November 19, 2020 NYPSC Order and Settlement, including Attachment Z

III. Communications

The Applicants respectfully request that the following representative be added to the service list maintained by the Commission for each of the above-captioned proceedings.⁷

Danielle K. Mechling
Avangrid Networks, Inc.
FERC Legal Director
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IV. Service

The Applicants have sent an electronic copy of this filing to the service list maintained by the Commission for each of the above-captioned proceedings and the official representative of each party to the proceedings specified in the Cost Sharing and Recovery Agreement/Schedule 19 Order, which includes the NYPSC. In addition, a complete copy of this filing will be posted on the NYISO’s website at www.nyiso.com. The NYISO has confirmed to the Applicants that it will send an electronic link to this filing to the official representative of each of its customers and each participant on its stakeholder committees. Finally, as required by the June 28 Letter, the Applicants will also provide a copy of this filing to Paul Robinson at FERC at the email address provided.

⁴ A clean version of each Applicant’s formula rate template in native excel format that reflects the incremental revisions proposed herein is also being submitted with each Applicant’s respective filing.

⁵ The documents included in Attachment 3 depict in redline format only the proposed incremental changes to the revisions initially proposed in the Applicants’ respective May 3, 2023 filings.

⁶ The documents included in Attachment 5 depict in redline format only the proposed incremental changes to the revisions initially proposed in the Applicants’ respective May 3, 2023 filings.

⁷ Applicants respectfully request waiver of Rule 203(b)(3) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3) (2023), to the extent necessary to permit more than two persons to be included on the official service list on its behalf in this proceeding.

V. Conclusion

For the reasons set forth in their original applications and the attached responses, the Applicants respectfully request that the Commission accept for filing, effective as of July 3, 2023 (*i.e.*, the effective date requested in each Applicant's respective initial filing on May 3, 2023), or such other date as may be prescribed by the Commission, the Formula Rates filed in the above-captioned dockets.

Respectfully Submitted,

/s/ Danielle K. Mechling

Danielle K. Mechling

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Counsel to Applicants

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically served the foregoing Responses to the Commission's Deficiency Letter on each person listed on the Official Service List in this proceeding.

Dated in Orange, CT this 26th day of July, 2023.

Danielle K. Mechling
Danielle K. Mechling

Dated: July 26, 2023