June 29, 2020

VIA ELECTRONIC DELIVERY

Honorable John Rhodes
Chair
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

**Re: 20-G-0131 - Support Request to the Commission to develop a standardized format for utilities to report their costs under the 100-foot rule and to order utilities to collect and report data in that format**

Dear Chair Rhodes:

The 100-foot rule, which provides ratepayer-subsidized gas infrastructure free to building owners, is a strong incentive for the expansion of gas infrastructure investments in New York State. If the Commission seeks transparency, equity and a way to minimize infrastructure investments, it will be important to understand the true and full costs of this fossil fuel subsidy.

We, the undersigned organizations support the April 30, 2020 filing by NY-GEO regarding the 100-foot subsidy. The filing requests the Commission to develop and quickly implement a standardized format for utilities to report their costs for providing the subsidy required by the 100-foot rule. In its filing NY-GEO gave what it considered a conservative estimate of the 5 year cost to ratepayers of the 100-foot rule subsidy as nearly $1 Billion.

In the “background” statement in its order opening this proceeding, the Commission calls on utilities, …to meet current customer needs and expectations in a transparent and equitable way while minimizing infrastructure investments and maintaining safe and reliable service. Additionally, planning must be conducted in a manner consistent with the recently enacted Climate Leadership and Community Protection Act (CLCPA).

We urge the Commission to immediately begin the process of developing accurate and full accounting of the costs to utility ratepayers of the 100-foot rule subsidy. Having accurate cost numbers is an important first step in evaluating the role of the 100-foot subsidy relative to minimizing infrastructure investments.

Respectfully Submitted,

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