

BEFORE THE  
STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

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In the Matter of

Case 07-M-0906

Joint Petition of Iberdrola, S.A., Energy East Corporation, RGS Energy Group, Inc., Green Acquisition Capital, Inc., New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation for Approval of the Acquisition of Energy East Corporation by Iberdrola, S.A.

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January 31, 2008

Exhibit \_\_\_\_ (RDRA – 1)

Case No. 07-M-0906

Iberdrola, S.A. and Energy East Corp.

Staff Response to Request For Information

STAFF RESPONSE TO: IBER/EE IR No. 133

PREPARED BY: Colonel Dickens

DATE: January 28, 2008

Question:

1. Page 13, lines 16-19 of Colonel Dicken's testimony states:  
"NYSEG's overstatement of its standby lost revenues results in its excessive assessment of charges against the ASGA."  
Please provide Department of Public Service Staff's assessment of standby lost revenues including all applicable calculations and workpapers.

Response:

Attached is a workpaper setting forth Staff's calculations. Because the calculations are based on information NYSEG submitted on a trade secret basis to the Records Access Officer, Staff is treating the material as a Highly Sensitive Trade Secret and is serving the workpaper only on the petitioners.