

VIA AIRBORNE EXPRESS

November 19, 2004

Hon. Jaclyn A. Brillling
Secretary
State of New York
Public Service Commission
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

Re: Case 03-E-0188 - Proceeding on Motion of the Commission
Regarding a Retail Renewable Portfolio
Standard.

NIAGARA MOHAWK POWER CORPORATION

REQUEST FOR AN EXTENSION OF TIME

Dear Secretary Brillling:

On September 24, 2004, the State of New York Public Service Commission ("Commission") issued and made effective an *Order Regarding Renewable Portfolio Standard* ("Order") in Case 03-E-0188. Ordering Clause 8 of the Order requires the major electric corporations to "update their billing systems and . . . be prepared to adjust their bill formats to incorporate the revisions described in this Order" within 120 days of the issuance of the Order. Niagara Mohawk Power Corporation ("Niagara Mohawk" or "Company") has calculated the required compliance date to be January 21, 2005.

Pursuant to Section 3.3 of the Commission's Regulations, 16 N.Y.C.R.R. Section 3.3, Niagara Mohawk hereby seeks an extension of time until September 1, 2005 to complete the required billing system changes and be prepared to adjust its electric service bill formats.

Copies of this request have been served via the RPS List Server upon the subscribed parties to this RPS List Server to the Active Parties in this proceeding. Kindly acknowledge receipt and filing of this request by date-stamping the enclosed copy of this letter and returning it in the postage-paid envelop provided for your convenience.

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Ordering Clause 3 of the Order specifies that the actual RPS surcharge will not commence until the October 2005 bill cycle, yet Ordering Clause 8 requires the major electric utilities to complete all billing system changes by January 2005, a full 10 months prior to actual billing. While Niagara Mohawk can and will implement Ordering Clause 8 by the January 2005 period if necessary, in order to do so the Company will be required to reschedule internal resources that are currently being expended on other major projects. In addition to programming changes to accommodate the new gas distributed generation rates, new CTC rates, and scheduled monthly and year-end price changes, the Company is also making needed changes to accommodate P.S.C. No. 207 - SC-6 and SC-7 customers and is towards the end of its efforts to move the remaining pre-CSS accounts into CSS. These latter efforts will be continuing into the first part of 2005, along with programming to implement the new wind net metering legislation.

The Company would prefer to proceed with its currently scheduled work activities, rather than proceed with implementation of billing changes that are not even required until October 2005. Further, Niagara Mohawk would point out that many of the accounting details that will also be required to be programmed into the Company's CSS will apparently not even be finalized until mid-May 2005, or 45 days after Staff submits its scheduled March 31, 2005 implementation plan.

For the foregoing reasons, Niagara Mohawk respectfully requests that its request for an extension of time until September 1, 2005 to comply with Ordering Clause 8 be granted.

Respectfully submitted,

NIAGARA MOHAWK POWER CORPORATION

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cc: Active Parties (Case 003-E-0188) via RPS List Server