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February 27, 2015

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess, Secretary
New York State Public Service Commission
3 Empire State Plaza, 19th Floor
Albany, NY 12223-1350

Re: Case 06-G-1185 – The Brooklyn Union Gas Company d/b/a National Grid NY - Rates – Report Concerning Retail Access Program Collaborative.

Case 06-G-1186 – KeySpan Gas East Corp. d/b/a Brooklyn Union of L.I. - Rates – Report Concerning Retail Access Program Collaborative.

Case 14-G-0330 – Tariff Filing by KeySpan Gas East Corp. d/b/a Brooklyn Union of L.I. to modify the retail access program under S.C. No. 8 - Sales Service contained in P.S.C. No. 1 - Gas.

Case 14-G-0331 – Tariff Filing by The Brooklyn Union Gas Company d/b/a National Grid NY to modify the retail access program under S.C. No. 19 - Seller Transportation Aggregation Service contained in P.S.C. No. 12 - Gas.

Dear Secretary Burgess:

In the *Order Approving Balancing Collaborative Report Recommendations With Revisions*, dated October 23, 2014 (“Order”), the Commission directed The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”) and KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”) (collectively, “National Grid” or “Companies”) to file tariff amendments by January 5, 2015, to become effective April 1, 2015, implementing the recommendations discussed in the Companies’ Initial and Supplemental Collaborative Reports.¹ These recommendations involve a number of enhancements to the administration of the Companies’ retail access programs, including the capability to track forecast and actual daily requirements for retail marketer pools, support monthly imbalance trading and storage inventory transfers, and automate physical releases. The Commission’s Order acknowledged that the implementation of the Companies’ proposed Gas Transportation Information System (GTIS), at the time expected to be in service by April 1, 2015, was necessary for proper implementation of the Collaborative’s recommendations.² On January 5, 2015, National Grid filed the necessary tariff amendments³ to become effective April 1, 2015 pursuant to the Commission’s Order.

¹ Cases 06-G-1185 and 06-G-1186, *The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corp. dba Brooklyn Union of L.I. – Rates*, Report Concerning Retail Access Program Collaborative (dated August 11, 2014), hereinafter Initial Collaborative Report. Cases 06-G-1185 and 06-G-1186, Supplemental Collaborative Report (dated August 11, 2014).

² Order at 11.

At this time, however, National Grid is requesting a postponement of the tariff leaves filed on January 5, 2015, as well as an extension of time under the Order for the Companies to fully implement the recommendations in the Initial and Supplemental Collaborative Reports, to allow additional time for the implementation of the GTIS. Affording National Grid additional time for GTIS development, testing and training will help facilitate the retail access program changes discussed in the Initial and Supplemental Collaborative Reports. National Grid is currently targeting November 1, 2015 for the new implementation date for the GTIS.

On February 26, 2015, National Grid conducted a telephone conference with gas marketers to discuss the delay in implementation of GTIS and the January 5, 2015 tariff changes.

Given all of the above, and following discussion with Staff, National Grid respectfully requests (i) an extension to November 1, 2015 to fully implement the recommendations in the Initial and Supplemental Collaborative Reports and (ii) a concomitant postponement of the tariff leaves filed on January 5, 2015 to November 1, 2015.

Tariff Postponement

In accordance with Section 720-2 et al. of the Commission's Regulations, 16 NYCRR § 720-2 et al., The Brooklyn Union Gas Company d/b/a National Grid NY hereby submits the following Supplement to become effective April 1, 2015 to postpone the effective date of the Company's January 5, 2015 tariff filing to November 1, 2015:

Supplement No. 71
To Schedule for Gas Service, P.S.C. No. 12-GAS

KeySpan Gas East Corp. d/b/a National Grid hereby submits the following Supplement to become effective on April 1, 2015 to postpone the effective date of the Company's January 5, 2015 tariff filing to November 1, 2015

Supplement No. 60
To Schedule for Gas Service, P.S.C. No. 1-GAS

Given the Companies' current request for postponement, the Companies have not made a newspaper publication of the tariff changes in the Companies' January 5, 2015 tariff filing. Subject to the determination on this extension and postponement request, the Companies plan to make the required newspaper publication pursuant to the Commission's rules and regulations prior to the November 1, 2015 effective date.

³ The tariff amendments incorporated the outstanding Initial and Supplemental Collaborative Report recommendations including implementing "Tier 2A – Storage Capacity Release" where storage capacity assets and related storage transportation assets were to be released to Sellers starting May 1, 2015; a transfer of gas inventory that remains in storage as of May 1, 2015 to Sellers at the Company's weighted average storage inventory price; and a daily weather true-up adjustment.

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Please contact the undersigned if you have any questions regarding this request.

Respectfully submitted,

/s/ Mahati Guttikonda
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