



November 19, 2013

Hon. Kathleen H. Burgess
Secretary
New York State Department of Public Service
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

Re: Case 13-G-0439 - Tariff filing by The Brooklyn Union Gas Company d/b/a National Grid NY to modify the calculation of the monthly cost of gas for sales customers under Service Classification Nos. 4A-High Load Factor Service; 4A-CNG Compressed Natural Gas Equipment Service and 4B-Year-Round Air Conditioning Service.

Dear Secretary Burgess:

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 ("National Grid" or "Company") hereby submits the following Supplement to become effective December 23, 2013:

Supplement No. 64
To Schedule for Gas Service, P.S.C. No. 12-GAS

The purpose of this filing is to postpone the Company's September 19, 2013 tariff filing ("September 19th Filing") to modify the calculation of the monthly cost of gas for sales customers provided service under Service Classification Nos. 4A, High Load Factor Service; 4A-CNG, Compressed Natural Gas Equipment Service and 4B, Year-Round Air Conditioning Service. In its September 19th Filing, the Company proposed to modify the calculation of the fixed cost credit component of the monthly cost of gas for these service classifications.

To address comments filed in response to the Company's September 19th Filing, and following consultation with Staff, the Company has agreed¹ to further modify its calculation of the monthly cost of gas for sales customers provided service under Service Classification Nos. 4A, High Load Factor Service; 4A-CNG, Compressed Natural Gas Equipment Service and 4B, Year-Round Air Conditioning Service to update the fixed cost component as well. After conducting an analysis of the SC-4A, 4A-CNG and 4B fixed gas costs and developing a methodology for determining how fixed gas costs should be allocated to these sales classes, the Company will file amended tariff leaves to take effect September 1, 2014 setting forth the new methodology for determining both the fixed gas costs and fixed cost credits.

¹ See, Case 13-G-0439, Case 13-G-0439 - Tariff filing by The Brooklyn Union Gas Company d/b/a National Grid NY to modify the calculation of the monthly cost of gas for sales customers under Service Classification Nos. 4A-High Load Factor Service; 4A-CNG Compressed Natural Gas Equipment Service and 4B-Year-Round Air Conditioning Service, *Reply Comments of The Brooklyn Union Gas Company d/b/a National Grid NY* (dated November 15, 2013).

The Company also respectfully requests a waiver of the Commission's rules and regulations regarding newspaper publication.

Please contact the undersigned with any questions regarding this letter or the enclosure.

Very truly yours,

Melissa R. Nairn
Program Manager
Regulation and Pricing