

Jeremy J. Euto Senior Counsel

May 14, 2014

VIA ELECTRONIC MAIL

Honorable Kathleen H. Burgess Secretary New York State Public Service Commission Three Empire State Plaza Albany, NY 12223

Re: Case No. 14-M-0039 – Tariff filing by Niagara Mohawk Power Corporation d/b/a National Grid and KeySpan Gas East Corporation d/b/a Brooklyn Union Gas of L.I. to establish fees for residential customers who choose to opt out of using Automated Meter Reading devices.

Dear Secretary Burgess;

Enclosed are the following tariff leaves transmitted for filing by KeySpan Gas East Corporation d/b/a National Grid ("National Grid" or "Company") in accordance with the requirements of the New York State Public Service Commission ("Commission"):

> Fourth Revised Leaf No 34 First Revised Leaf No. 34.1 To Schedule for Gas Service, P.S.C. No. 1-GAS Effective: July 1, 2014

On February 6, 2014 the Company submitted a tariff filing is to update the Company's gas tariff to reflect National Grid's policies regarding the use of Automated Meter Reading ("AMR") devices. The Company is in the process of deploying AMR devices throughout its service territory to allow it to remotely read gas meters. The proposed tariffs would allow residential customers to opt out of using AMR meters by electing to have the Company (i) install and maintain a non-AMR meter (that does not use a transmitter to remotely read the meter) at their premises and (ii) manually read their meters through inperson, bi-monthly meter reads. The purpose of this filing is to update the installation and meter reading fees filed in the Company's February 6, 2014 filing.

Attached hereto as Attachment A are the Company's workpapers supporting the rates charged to customers who opt out of AMR.

Waiver of the newspaper publication requirement of PSL § 66-12 and 16 NYCRR § 720.8 is requested for this filing. Customers will be notified of these changes in accordance with the Company's customer communication plan, which will include, among other things, notice of the fees when a customer elects to opt out of AMR metering.

Please contact the undersigned if you have any questions regarding this filing or the enclosed documents. Thank you.

Respectfully submitted;

/s/ Jeremy Euto

encl.

Attachment A Schedule 1 Page 1 of 1

KeySpan Gas East Corporation d/b/a National Grid ("KEDLI") Meter Change and Meter Read Cost Calculations

METER CHANGE COST CALCULATIONS									
	Lab	or Times (m	inutes)						
				Average					
				Straight					
				Time	Labor and				
		Wrench	Total Job	Hourly	Capital	Straight Time Cost			
Date	Travel	Time	Time	Rate	Burdens	Per Job	Fee		
						(f) =			
	(a)	(b)	(c)= (a+b)	(d)	(e)	((c)/60)*(d)*(1+(e))	(g)		
2012	14	35	49	\$ 36.88	218%	\$95.64	\$95.64		

METER READ COST CALCULATIONS										
	Lab	or Times (m	inutes)	- Average Straight Time						
Job	Travel	Wrench Time	Total Job Time	Hourly Rate	Labor Overhead	Straight Time Cost Per Job	Monthly Fee 1)			
2012	(a) 14	(b) 8	(c) 22	(d) \$ 32.37	(e) 31%	(f) = ((c)/60)*(d)*(1+(e)) \$15.54	(g)= (f)/2 \$7.77			

1) The Company will manually read meters every other month, and will charge 50% of the cost of the manual read every month'

Note:

Time based on CMS FY14 work plan

Burdens percentages based on 12-month ending October 2012 Labor costs based on October 2012 wages

Source:

Columns (a) & (b): CMS FY14 work plan

Column (d) : Attachment C, Schedule 2

Meter Change Cost: Attachment C, Schedule 2, Column (i)

Meter Read Cost: Attachment C, Schedule 2, Column (c)

Column (e) : Attachment C, Schedule 3

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KeySpan Gas East Corporation d/b/a National Grid ("KEDLI") Average Straight Time Hourly Rate

	(a)	(b)	(c) = ((a/b)/2080)	(d)	(e)	(f) = ((d/e)/2080)	(g) = (a-d)	(h) = (b-e)	(i) = ((g/h)/2080)
CMS Field Service Tech and Meter Readers					Meter Reade	s	CMS Field Service Tech			
Date	Total Dollars	Total Staffing	Hourly Salary	Total Dollars	Total Staffing	Hourly Salary	Total Dollars	Total Staffing	Hourly \$	Salary
Oct-2012	\$ 12,096,307	180	\$ 32.37	\$ 2,584,525	56	\$ 22.32	\$ 9,511,782	124	\$	36.88

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KeySpan Gas East Corporation d/b/a National Grid ("KEDLI") Labor and Capital Burdens Average Percentages Twelve Month Ended Average

Labor and Capital Burdens for Meter Change:

Oracle Code	Description	Average Twelve Months Ended Oct-12
716	Pension	32%
717	OPEBs	39%
739	FAS 112 Benefits	-2%
719	Payroll Taxes	15%
718	Healthcare	25%
736	401K Match	1%
733	Variable Pay Union	2%
721	Paid Absence	7%
722	Vacation	9%
738	Workers Compensation	2%
727	Capital Overheads	89%
Total Labor a	nd Capital Burdens for Meter Change	218%

Labor Burdens for Meter Read:

Oracle Code	Description	Average Twelve Months Ended Oct-12
719	Payroll Taxes	15%
721	Paid Absence	7%
722	Vacation	9%
Total Labor B	31%	

Attachment A Schedule 3 - Backup Page 1 of 1

				WORLIN	y Labui anu	Capital Bu	Idens Feice	inages					
Description	Nov-2011	Dec-2011	Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Average Twelve Months Ended Oct-12
Pension	35.15%	35.15%	27.78%	16.22%	-1.53%	27.92%	40.92%	40.92%	40.92%	40.92%	40.92%	40.92%	32%
OPEBs	39.47%	39.47%	37.45%	32.22%	15.72%	32.12%	44.59%	44.59%	44.59%	44.59%	44.59%	44.59%	39%
FAS 112 Benefits	-1.19%	-1.19%	-2.70%	-3.44%	-5.69%	-1.07%	-1.18%	-1.18%	-1.18%	-1.18%	-1.18%	-1.18%	-2%
Payroll Taxes	10.59%	10.59%	22.67%	28.51%	38.52%	9.58%	10.52%	10.52%	10.52%	10.52%	10.52%	10.52%	15%
Healthcare	22.68%	22.68%	20.22%	32.33%	28.50%	22.47%	24.44%	24.44%	24.44%	24.44%	24.44%	24.44%	25%
401K Match	0.92%	0.92%	0.72%	0.00%	-0.59%	0.84%	0.69%	0.69%	0.69%	0.69%	0.69%	0.69%	1%
Variable Pay Union	1.92%	1.02%	1.25%	1.07%	0.00%	1.89%	3.57%	3.57%	2.31%	2.04%	2.05%	2.10%	2%
Paid Absence	4.96%	11.65%	6.51%	6.51%	6.51%	6.18%	7.10%	7.10%	7.29%	7.24%	6.10%	5.94%	7%
Vacation	10.65%	-13.81%	13.66%	13.66%	13.66%	7.55%	8.61%	8.61%	8.61%	8.61%	8.61%	16.64%	9%
Workers Compensation	1.66%	1.66%	1.15%	-1.27%	5.09%	1.39%	1.53%	1.53%	1.53%	1.53%	1.53%	1.53%	2%
Capital Overheads	83.79%	83.79%	83.79%	83.79%	83.79%	79.02%	94.82%	94.82%	94.82%	94.82%	94.82%	94.82%	89%
Total													218%

KeySpan Gas East Corporation d/b/a National Grid ("KEDLI") Monthly Labor and Capital Burdens Percentages