

..DID: 13543

..TXT:

THE BROOKLYN UNION GAS COMPANY  
One MetroTech Center  
Brooklyn, NY 11201

October 31, 2000

Honorable Janet H. Deixler  
Secretary  
New York State Public  
Service Commission  
Executive Office, 14th Floor  
Three Empire State Plaza  
Albany, New York 12223

Re: Case No. 99-M-0631 - In the Matter of Customer Billing Arrangements

Dear Secretary Deixler:

The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York ("Company") hereby files electronically the following tariff leaves to become effective February 1, 2001:

Third Revised Leaf No. 138.49  
Original Leaf No. 138.50  
Original Leaf No. 138.51  
Original Leaf No. 138.52  
Original Leaf No. 138.53  
Original Leaf No. 138.54  
Original Leaf No. 138.55  
to Schedule for Gas Service, P.S.C. No. 12.

These leaves are being filed in compliance with the Commission's Order Denying Petitions for Rehearing dated September 1, 2000 directing the Company to file customer billing tariffs. Workpapers will be filed under separate cover via Federal Express on this date.

The Company has included in its backout credit a placeholder amount of \$0.10 representing the Company's current estimate of transaction costs it will incur when the Electronic Data Interchange (EDI) is implemented. These transaction costs are separate and apart from any capital or other implementation charges the Company will incur and which are or will be the subject of the Company's industry restructuring proceeding. Rather, the transaction costs represent the incremental costs the Company will incur on a daily basis as they exchange information with

ESCOs and others

Hon. Janet H. Deixler

Page 2

October 31, 2000

through EDI. Those transaction costs are not subject to recovery in any other forum and would not be avoided if the Company exits the billing function. Because EDI has not yet been implemented, the Company reserves the right to replace this placeholder amount with a more refined estimate developed as EDI nears implementation, or with actual costs after it is implemented.

Because the success of more widespread billing by ESCOs and utilities depends largely on the implementation of EDI, and it is unlikely that ESCOs will be able to issue single bills to customers without the use of EDI technology, the Company requests that the Commission suspend the effective date of these tariffs until after EDI is implemented and may be relied on for billing purposes.

The Company has met with Staff to review this filing.

If you have any questions regarding this filing, please contact Joan Graves at (718) 403-2560 or the undersigned at (718) 403-3008.

Sincerely,

M. Margaret Fabic  
Counsel

MMF:dh

Enclosures

cc: F. Carr  
T. Coonan  
N. LeBlang  
G. Shorr  
G. Abraham