THE BROOKLYN UNION GAS COMPANY d/b/a KEYSPAN ENERGY DELIVERY NEW YORK One MetroTech Center Brooklyn, NY 11201

October 22, 2004

Jaclyn A. Brilling, Secretary New York State Public Service Commission Three Empire State Plaza Albany, NY 12223-1350

Re: Case 03-G-1392, Amendment to Compliance Tariffs

Dear Secretary Brilling:

The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York ("KeySpan") hereby submits the following supplement, to become effective November 22, 2004:

Supplement No. 31 To Schedule for Gas Service, P.S.C. No. 12-GAS.

The purpose of this supplement is to further postpone KeySpan's October 1, 2003 filing to simplify the methodology for calculating the value-added charge for Service Classification No. 20 in a manner that places all SC-20 customers on an equal footing until February 1, 2005. This postponement will allow for further review by Staff.

Please call Dawn Herrity at (718) 403-2975 if you have any questions or concerns.

Very truly yours,

Catherine L. Nesser