



Orange and Rockland Utilities, Inc.
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July 16, 2004

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

RE: Case 02-G-1553

Dear Secretary Brillling:

Orange and Rockland Utilities, Inc. ("O&R" or "the Company") is filing today with the Public Service Commission ("the Commission") Supplement No. 31 to its Schedule for Gas Service, PSC No. 4 – Gas.

On January 23, 2004, the Company filed with the Commission proposed tariff leaves to provide the Company with the right to use or acquire firm, non-recallable, primary delivery point capacity obtained by Marketers from third parties in a manner that would enable the Company to rely on such capacity for reliability purposes. The implementing tariffs were filed to become effective May 1, 2004.

By orders dated March 31, 2004, May 7, 2004 and June 4, 2004, the Commission postponed the effective date of the filing to June 1, 2004, July 1, 2004, and August 1, 2004. The Company hereby requests that the effective date of the filing be postponed until September 1, 2004 to allow for additional time to discuss the proposal with the pipelines, marketers and staff.

Accordingly, the Company files today Supplement No. 31 postponing the effective date of the tariff leaves filed on January 23, 2004 to September 1, 2004. Supplement No. 31 bears an initial effective date of August 16, 2004. The Company respectfully requests that Supplement No. 31 be allowed to go into effect on August 1, 2004 on short notice, and that the requirement of newspaper publication of the change proposed by the supplement be waived.

Please direct any questions pertaining to this filing to me at (212) 460-3308.

Respectfully submitted,

William A. Atzl, Jr.
Director – O&R Rates