



national fuel

December 22, 2010

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

Re: Case No. 10-G-0474 Further Proposed Tariff Revision by National Fuel Gas Distribution Corporation to Modify the Cash-Out Provisions for Gas Transportation Service

Dear Secretary Brillling:

National Fuel Gas Distribution Corporation (“Distribution” or the “Company”) submits the following revisions to its tariff, P.S.C. No. 8 – GAS:

Leaf No. 148.15

Revision 2

The proposed revision is submitted as of the date hereof for an effective date of February 1, 2011.

At the request of Department of Public Service Staff, the Company is adding a sentence to Leaf No. 148.15 to clarify the determination of applicable imbalance pricing. The new sentence does not change the intent of Leaf 148.15, Revision 1, filed on December 3, 2010.

Distribution believes that another round of newspaper publication is neither necessary nor in the public interest. The change contained in the attached further revision does not materially alter the tariff changes that were noticed in the Company's initial newspaper publication. Thus, the initial publication was sufficiently broad in scope to obviate the need for further publication.

Conclusion

For all of the foregoing reasons, Distribution respectfully requests that the Public Service Commission approve the proposed tariff revision for an effective date of February 1, 2011. If you have any questions regarding this filing, please contact Michael Novak of our office at (716) 857-7884.

Respectfully submitted,

Randy C. Rucinski
Senior Attorney