



national fuel

December 2, 2011

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

Re: Proposed Tariff Revisions
National Fuel Gas Distribution Corporation

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. 2	Revision 12
Leaf No. 37.1	Revision 4
Leaf No. 37.2	Revision 0
Leaf No. 74	Revision 10
Leaf No. 74.1	Revision 5
Leaf No. 84	Revision 11
Leaf No. 85	Revision 2
Leaf No. 86	Revision 10
Leaf No. 105	Revision 1
Leaf No. 116	Revision 1
Leaf No. 118	Revision 1
Leaf No. 123	Revision 1
Leaf No. 143	Revision 8
Leaf No. 144	Revision 6
Leaf No. 148.7	Revision 4
Leaf No. 148.9	Revision 11
Leaf No. 148.9.1	Revision 2
Leaf No. 148.9.2	Revision 2
Leaf No. 148.9.3	Revision 2
Leaf No. 148.9.4	Revision 2
Leaf No. 148.10	Revision 6
Leaf No. 150	Revision 14
Leaf No. 152	Revision 12
Leaf No. 153	Revision 12
Leaf No. 153.1	Revision 3
Leaf No. 156.2	Revision 8

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Leaf No. 156.3	Revision 8
Leaf No. 158	Revision 14
Leaf No. 187	Revision 13
Leaf No. 190	Revision 11
Leaf No. 207	Revision 10
Leaf No. 209	Revision 9
Leaf No. 210	Revision 8
Leaf No. 211	Revision 12
Leaf No. 222	Revision 17
Leaf No. 224	Revision 11
Leaf No. 234	Revision 3
Leaf No. 243	Revision 3
Leaf No. 252	Revision 2
Leaf No. 266.1	Revision 8
Leaf No. 266.2	Revision 5
Leaf No. 291	Revision 2
Leaf No. 299	Revision 6
Leaf No. 300	Revision 5
Leaf No. 302	Revision 4
Leaf No. 304	Revision 5
Leaf No. 305	Revision 4
Leaf No. 306	Revision 4

The proposed revisions are submitted as of the date hereof for an effective date of February 1, 2012.

Description of Proposed Revisions

In this filing, the Company proposes non-substantive, “housekeeping” and administrative changes to its tariff. The revisions propose to remove outdated tariff provisions, relocate gas quality provisions applicable to production received into the Company’s system, revise and otherwise streamline month end imbalance resolution and cash out language in several service classifications, and update various lists of applicable service classifications for several calculations within the tariff’s general information section. None of these proposed revisions affect revenues or expenses, or result in changes to any cost allocations, rates or operating provisions. Instead, all of these changes are non-substantive and are intended to provide consistency and clarity.

In addition to the above described changes, the Company is also using this filing for other non-substantive housekeeping changes designed to streamline the tariff and remove dated text or surplus age.

Specific Revisions

Leaf No. 2

The Table of Contents is being revised to show General Information Section No. 8 as beginning on Leaf No 37.2.

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Leaf Nos. 74, 74.1, 143, 148.9, 148.9.1, 148.9.2, 148.9.3, 148.9.4, 148.10 and 207

Language describing various charges, calculations, refunds and surcharges is being updated to reference all applicable service classifications.

Leaf Nos. 84, 85, 86, 105 and 148.7

Recovery of costs associated with the Transition Cost Expense Recovery Surcharge for Large Volume Transportation Customers has been completed, therefore the language on Leaf Nos. 84-86 describing this mechanism no longer serves a purpose and is proposed to be removed from Distribution's tariff. As a result, General Information Section No. 19.j is proposed to be removed and tariff leafs proposed to be Reserved for Future Use. Similarly, outdated language regarding Outdoor Gas Lighting on Leaf No. 105 is proposed to be removed. Finally, language within the Filing of Lost Revenue Recovery Rate Statement referencing revenue from 2007 to be recovered in 2008 is proposed to be deleted.

Leaf Nos. 74, 74.1, 143, 144, 148.9, 148.9.1, 148.9.2, 148.9.3, 148.9.4 and 148.10

Language describing various calculations, refunds and surcharges is being updated to reference all applicable service classifications.

Leaf Nos. 150, 153, 153.1, 156.2, 156.3, 158, 187, 190, 210, 211, 222, 299, 300, 304 and 305

Language referencing Transition Costs Associated with FERC Order No. 636 is proposed to be removed and subsequent provisions renumbered. The underlying General Information Section 19.k is no longer in the tariff.

Leaf Nos. 37.1 and 37.2

The gas quality provisions from the Transportation Service Agreement on Leaf No. 118 are proposed to be relocated to new Leaf No. 37.2 within General Information Section 7, METERS AND REGULATORS as a new section g. Gas Quality Requirements for Production Facilities. The beginning of General Information Section 8. METER READING, BILLING AND COLLECTION is relocated from Leaf No. 37.1 to Leaf No. 37.2.

Leaf Nos. 116, 118 and 123

The gas quality provisions from the Transportation Service Agreement on Leaf No. 118 are proposed to be relocated to new Leaf No. 37.2 as described above. In their place, language referencing the new General Information Section 7.f and provisions applicable to City Gate receipts is inserted. On Leaf 116, references to General Information Sections 26.1 and 26.2 are renumbered as 26.A and 26.B, respectively. Finally, the form of agreement on Leaf No. 123 is renumbered and reformatted.

Leaf Nos. 152, 299 and 304

A superfluous decimal point or period is proposed to be removed on each of these leaves.

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Leaf Nos. 209, 224, 234, 243, 252, 266.1, 266.2, 291, 302 and 306

Tariff language is proposed to be revised and/or otherwise streamlined regarding month end imbalance resolution and cash out provisions across several service classifications. The intent of these changes is to eliminate any unintended ambiguity concerning the application of General Information Section 52 (“§52”), in part by standardizing tariff language or references. While most service classifications access §52 via aggregation under Service Classification (“SC”) 19, indirect references in SC 23 and SC 24 have been updated to the section General Information and update various lists of applicable service classifications for several calculations within the tariff’s General Information section.

Newspaper Publication

The Company requests a waiver of the Commission’s requirement under Public Service Law §66(12)(b) for newspaper publication of the above revisions. These revisions are largely non-substantive in customer effect, and therefore the expense of publication would not serve the public interest.

Conclusion

For all of the foregoing reasons, Distribution respectfully requests that the Public Service Commission approve the proposed tariff revisions for an effective date of February 1, 2012. If you have any questions regarding this filing, please contact Michael Novak at (716) 857-7884.

Respectfully submitted,



Daniel Ligman
Attorney