

Orange and Rockland Utilities, Inc. 4 Irving Place
New York NY 10003-0987
www.oru.com

July 23, 2019

Honorable Kathleen H. Burgess Secretary State of New York Public Service Commission Three Empire State Plaza Albany, New York 12223-1350

Re: Case 19-G-0171, Non-Pipe Solutions

Dear Secretary Burgess:

Orange and Rockland Utilities, Inc. ("O&R" or the "Company") is filing with the Public Service Commission (the "Commission") amendments to its Schedule for Gas Service, P.S.C. No. 4 – GAS (the "Gas Tariff").¹

The revised tariff leaves, which are identified below, are filed to become effective on September 1, 2019.

<u>Leaf No.</u>	Revision No.	Superseding No.
73	23	22
80.3.1	7	6

Reasons for and Summary of Proposed Tariff Modifications

On March 4, 2019, the Company filed proposed modifications to its Gas Tariff to provide for the recovery of certain costs associated with trucked and stored compressed natural gas ("CNG") and liquefied natural gas ("LNG") projects that are not currently covered by the definitions of gas costs in the Gas Supply Charge ("GSC") and the Balancing Charge component of the Monthly Gas Adjustment ("MGA") (the "March Filing"). The tariff changes were proposed to become effective on July 1, 2019.

On May 31, 2019, at the request of the Staff of the Department of Public Service ("Staff"), the Company postponed to September 1, 2019 the effective date of the tariff changes that were filed in the March Filing. Accordingly, the Company filed Supplement No. 77 to the Gas Tariff, to postpone the effective date of the tariff changes to September 1, 2019.

Based upon further discussions with Staff, the Company is proposing changes to clarify the descriptions of Fixed Costs in the GSC and the Balancing Charge component of the MGA.

Notice and Conclusion

The Company has completed publication of the notice of the March Filing. Since the changes proposed today are only meant to further clarify the language proposed in the March Filing, the Company

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¹ Since O&R and Consolidated Edison Company of New York, Inc. ("Con Edison") operate a joint gas portfolio, Con Edison is making a contemporaneous tariff filing that proposes to update its gas tariff leaves consistent with the changes proposed by O&R.

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respectfully requests waiver from the Commission's notice requirements with respect to the tariff changes filed today.

Any questions regarding this filing can be directed to Cheryl Ruggiero at (212) 460-3189.

Very truly yours,

/s/

William A. Atzl, Jr. Director – Rate Engineering