

May 29, 2019

Hon. Kathleen H. Burgess Secretary New York State Public Service Commission Three Empire State Plaza Albany, NY 12123-1350

Re: Case No. 17-M-0815 – Proceeding on Motion of the Commission on Changes in Law that May Affect Rates

Tariff Revision – General Housekeeping

Dear Secretary Burgess:

National Fuel Gas Distribution Corporation ("Distribution" or the "Company") submits a general housekeeping revision to Tariff Section 0, Leaf 150 of the Company's existing P.S.C. No. 9 - GAS. The tariff leaf submitted in the instant filing is issued on not less than 30 days notice and has an effective date of August 1, 2019.

By way of background, Ordering Clause 3 of *Order Approving Tariff Amendments on a Permanent Basis* issued and effective on April 22, 2019 in the above referenced case (the "Order") ordered that the annual reconciliation filing for each affected utility shall be filed with the Commission 45 days after each affected utility's annual tax sur-credit cycle has been completed, causing an inconsistency in the Company's approved Tariff Section 0, Leaf 150.

This proposed tariff revision updates the timing of the annual reconciliation of the surcredit calculation implemented in the above referenced case, consistent with the Order.

Concurrent with this filing, Distribution respectfully requests a waiver of the requirements of Public Service Law §66(12) and 16 NYCRR §720-8.1 pertaining to newspaper publication. The proposed tariff change is being made for consistency and clarification purposes, has no substantive customer effect and, therefore, the expense of publication would not serve the public interest.

Please do not hesitate to contact me at (716) 857-7954 or KochD@natfuel.com if you have any questions regarding this filing.

Respectfully submitted,

Donald N. Koch Rate Analyst II