national**grid**

Kellie I. Smith Manager – NY Gas Pricing

March 15, 2019

Honorable Kathleen H. Burgess, Secretary State of New York Public Service Commission Office of the Secretary, 19th Floor Three Empire State Plaza Albany, New York 12223-1350

RE: Case 16-G-0059– Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Brooklyn Union Gas Company d/b/a/ National Grid for Gas Service.

Gas Safety and Reliability Surcharge ("GSRS") for Brooklyn Union Gas Company d/b/a National Grid

Dear Secretary Burgess:

The Brooklyn Union Gas Company d/b/a National Grid NY ("the Company") hereby submits its Statement of Gas Safety and Reliability Surcharge ("GSRS") in compliance with Rule 51 of PSC No. 12 Gas Tariff. The GSRS allows the Company to recover (i) a return on investment, depreciation expense, and certain operations and maintenance expense associated with incremental replacement of leak prone pipe ("LPP") above the levels funded in base rates, (ii) the cost to repair system leaks in excess of the Company's leak backlog targets, and (iii) any positive revenue adjustments earned for LPP productivity, LPP removals, and leak repairs.

The KEDNY LPP retirement figure submitted represents the LPP retirement footage completed between January 1, 2018 and December 31, 2018. These projects are in various stages of closeout and certain of the projects submitted as part of this filing have "design" footage in place of "actual" footage until final closeout of project documentation occurs. "Design" footage represents a conservative estimate of the LPP retirement and, therefore, final closeout commonly results in the increase of LPP footage claimed per project. Once these remaining projects are closed out, the Company will determine the actual LPP footage for each. For this reason, final closeout of all CY18 documentation may require an adjustment of the claimed LPP retirement footage in the following year's annual filing.

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The Company has calculated the GSRS related to the period January 1, 2018 through December 31, 2018, including prior year total imbalance. Effective April 1, 2019 through March 31, 2020, the following GSRS will be implemented:

• Service Classification Nos. 1A, 1AR, 1B, 1BI, 1BR, 1B-DG, 2-1, 2-2, 3, 4A, 4A-CNG, 4B, 7, 17 and 21: \$0.00171 per therm.

Attachment 1 contains the calculations used to develop the GSRS Surcharge.

Questions pertaining to this filing may be directed to Rozita Shortell at (315) 460-1023.

Respectfully Submitted,

/s/ Kellie I. Smith

Kellie I. Smith Manager, NY Gas Pricing