



April 1, 2019

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

**Re: Proposed Tariff Revisions**

Dear Secretary Burgess,

National Fuel Gas Distribution Corporation (“Distribution” or the “Company”) hereby submits the following revisions to its tariff, P.S.C. No. 9 – GAS:

<u>Section No.</u>	<u>Leaf No.</u>	<u>Revision No.</u>	<u>Superseding Revision No.</u>
19	3	2	1
19	3.1	0	

By way of background, this is a filing to adjust month end storage inventory level requirements applicable to energy services companies (“ESCOs”), serving customers under Service Classification No. 19. Additionally, the Company proposes new tariff language to permit it to temporarily adjust storage inventory level requirements, by posting notice to its website. These tariff changes have a proposed initial effective date of August 1, 2019.

Upon advanced notice and consultation with Department of Public Service Staff, the Company tested the proposed month end storage inventory level requirements over the past two years, via tariff waiver. During the test period, system reliability was maintained and the Company is codifying its approach for updating storage inventory level requirements in the tariff.

The Company’s newly proposed tariff language makes current business practices transparent to stakeholders, without seeking an additional tariff waiver. The proposed process applies only for adjustments to November, December and January month end limits (e.g., adjusting a December limit from 71.00% to 70.00%). It cannot be used to tighten a month limit (e.g., tightening a December limit by increasing it from 71.00% to 72.00%).

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Concurrent with this filing, Distribution respectfully requests a waiver from the requirements of Public Service Law §66(12) and 16 NYCRR §720-8.1, pertaining to newspaper publication. ESCOs have already operated under the adjusted storage inventory level requirements for the previous two years, and the Company provided advanced notice of this filing at its Spring 2019 Marketer/Supplier Teleconference on March 21, 2019. No concerns were raised by ESCOs during the review and discussion of this item at the meeting. The proposed tariff changes are largely non-substantive in customer effect, and therefore, the expense of publication would not serve the public interest.

If you have any questions regarding the Company's tariff filing, please contact Christopher Cej at (716) 857-6985 or myself at your convenience.

Respectfully submitted,

*/s/ Michael E. Novak*

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Attachment