



February 8, 2017

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

**Re: Case 15-G-0185 - National Fuel Gas Distribution Corporation
Proposed Tariff Amendments**

Dear Secretary Burgess:

National Fuel Gas Distribution Corporation (“Distribution” or the “Company”) submits the following amendment to its tariff, P.S.C. No. 8 – GAS:

Leaf No. 148.18 Revision 1

Distribution respectfully requests that the above tariff revision be approved for an effective date of February 9, 2017.

Introduction

This filing is submitted to the New York Public Service Commission (“NYPSC” or “Commission”) by the Company in compliance with Ordering Clause 1 of the Commission’s *Order Adopting New Communication Protocols*, issued and effective December 16, 2016 (“Order”) in Case 15-G-0185 - In the Matter of Heating Fuel Oil Supply Coordination with Interruptible Gas Service Customers, February 2015 Issues – All Major Gas Companies. On December 29, 2016, Distribution requested an extension to January 13, 2017 of the filing deadline in Ordering Clause 2 to hold discussions concerning implementation of the new communications protocols with the sole customer on its system receiving service under a demand response service classification. On the same day, a ruling was issued granting the request (“Extension Ruling”). On January 13, 2017 Distribution submitted its compliance filing (“Initial Compliance Filing”).

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Description of Instant Filing

Based upon discussions with Department of Public Service Staff (“DPS Staff”), Distribution is submitting revised tariff language to better address the intent of the Order. This same day, Distribution will submit revisions to its Gas Transportation Operating Procedures Manual (“GTOP” or “Procedures Manual”), that among other things, will reflect that it will commence daily communications with demand response customer at 20 degrees or higher.¹

Effective Date

Ordering Clause 2² provided that tariff filings be filed on not less than one day’s notice to become effective on January 1, 2017, on a temporary basis, and shall not become effective on a permanent basis until approved by the Commission. With respect to the Extension Ruling, Distribution submitted its Initial Compliance Filing to become effective on January 14, 2017, on a temporary basis, not to become effective on a permanent basis until approved by the Commission. Similarly, Distribution requests the instant filing to become effective on February 9, 2017, on a temporary basis, not to become effective on a permanent basis until approved by the Commission.

Newspaper Publication

Consistent with Ordering Clause 3³ which waives the requirements of Public Service Law §66(12)(b), Distribution will not publish notice of the instant tariff amendment.

Company Contacts

For questions related to this filing, please contact the undersigned at (716) 857-7884.

Respectfully submitted,



Michael E. Novak
Assistant General Manager,
Rates & Regulatory Affairs

¹ Distribution is not withdrawing the waiver request contained in its Initial Compliance Filing. Instead, based upon a prospective Order addressing the waiver request, Distribution will submit modifications to its GTOP, if appropriate.

² Order, p. 15.

³ Id.