

..DID: 9373
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NATIONAL FUEL GAS DISTRIBUTION CORPORATION

*10 Lafayette Square
Buffalo, NY 14203*

July 8, 1999

Hon. Debra Renner
Acting Secretary
Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 98-M-1343 -- Retail Access Business Rules
Further Revisions

Dear Acting Secretary Renner:

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

Leaf No. 133 - Revision 2

The revised tariff leaf is issued as of today for an effective date of August 9, 1999. The purpose of this filing is described below.

Proposed Revisions

The attached amendment further revises a compliance filing submitted by the Company on April 26, 1999, pursuant to an April 15, 1999 order issued by the Commission in the Retail Access Business Rules proceeding, Case 98-M-1343 ("UBP Order"). More specifically, among the changes submitted by the Company were revisions to the standard-form marketer operating agreement contained in the Company's tariff. On Leaf No. 133, the Company's April 26, 1999 filing revised section B., Identification of STBA Customers, consistent with the UBP Order. In what appears to have been an oversight, previous language not consistent with the UBP Order and intended to be removed in the April 26, 1999 filing was not. The instant filing corrects that oversight by deleting the nonconforming language. There are no other changes proposed in this filing.

Effect of Proposed Revisions

The change proposed herein will correct an oversight and bring Distribution's tariff into compliance with the UBP Order. The text that is deleted in this filing is a holdover from the Company's

operating procedures prior to June 1, 1999, the UBP Order implementation

- 2 -

date. At that time, the Company required marketers to give notice of customer switches and enrollment status on a monthly basis. Actual current switching procedures, however, comply with the UBPs. The changes proposed in this filing reflect actual practice under the UBP Order.

Newspaper Publication

The requirement of Section 66(12) of the Public Service Law as to newspaper publication was waived by the Commission for filings in compliance with the UBP Order. The instant filing is in further compliance with the UBP Order. Accordingly, for the same reasons underlying the Commission's waiver approval for UBP Order compliance filings, waiver should be granted for the instant revisions.

Company Contacts

All communications relating to this filing should be directed to the undersigned.

Conclusion

Distribution respectfully requests that the above tariff revisions be approved for an effective date of August 9, 1999.

Respectfully submitted,

Michael W. Reville

Attachment