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THE BROOKLYN UNION GAS COMPANY One MetroTech Center Brooklyn, NY 11201

August 28, 2001

Honorable Janet H. Deixler Secretary Public Service Commission State of New York Executive Office, 14th Floor Three Empire State Plaza Albany, New York 12223

Dear Honorable Deixler:

The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery-New York ("Company") hereby files electronically the following tariff leaves to become effective December 01, 2001:

Third Revised Leaf No. 197

Third Revised Leaf No. 198

Third Revised Leaf No. 207

Third Revised Leaf No. 208

Third Revised Leaf No. 217

Third Revised Leaf No. 218

Third Revised Leaf No. 219

Third Revised Leaf No. 220

to Schedule for Gas Service, P.S.C. No. 12.

The purpose of this filing is to revise the following Temperature Controlled Service for; Service Classification No. 6C, Commercial/Industrial (SC No. 6C); Service Classification No. 6G, Government Agencies (SC No. 6G); and Service Classification No. 6M, Multi-Family Buildings (SC No. 6M.

Currently, the Ceiling Price is set at the rate per therm at a level which is no less than the Company's Incremental Cost of Gas as filed with the Public Service Commission and no higher than the lesser of (1) 115% of the No. 2 oil gas equivalent price, inclusive of any petroleum related taxes applicable to commercial or industrial use, or (2) the tailblock rate of Service Classification No. 2 (General Service-Non-Residential)

Rate Schedule 1 (Non-Heating inclusive of the applicable Monthly Cost of Gas less \$.01.

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The Ceiling under the new proposal will be to the greater of (1) 115% of the No. 2 oil gas equivalent price, inclusive of any petroleum related taxes applicable to commercial or industrial use, or (2) the tailblock rate of Service Classification No. 2 (General Service-Non-Residential) Rate Schedule 1 (Non-Heating inclusive of the applicable Monthly Cost of Gas less \$.01.

The spike realized in gas prices last winter, highlighted the fact that our existing Ceiling Price, under extreme conditions, may be inadequate. For example, last January where the Company's Ceiling Price for SC No. 6C, SC No. 6G and SC No. 6M was 8.25/dth, yet the cost of gas for such customers was \$8.02/dth (prices excluding taxes). Although the sales rate remained greater than the cost of gas, had gas prices continued its upward spiral, the Company's Ceiling Price would not have been adequate to recover gas costs.

We believe the proposed Ceiling fairly sets the upper limit at competitive oil and/or the otherwise applicable firm tailblock.

If you have any questions regarding this filing, please contact Nancy Cianflone at (718) 402-2505 or the undersigned at (718) 403-3008.

Sincerely,

M. Margaret Fabic Counsel

MMF:eob Enclosures