



One MetroTech Center  
Brooklyn, New York 11201

June 27, 2008

Honorable Jaclyn A. Brillling  
Secretary  
State of New York  
Public Service Commission  
Three Empire Plaza  
Albany, New York 12223

**RE: CASE 06-G-1185 – Proceeding on Motion of the Commission as to the Rates,  
Charges, Rules and Regulations of The Brooklyn Union Gas Company d/b/a  
KeySpan Energy Delivery New York – Implementation Of Monthly Billing**

Dear Secretary Brillling:

In accordance with the Public Service Commission of the State of New York's ("Commission") "Order Adopting Gas Rate Plans For KeySpan Energy Delivery New York and KeySpan Energy Delivery Long Island" dated December 21, 2007 ("December 21 Order") and other applicable Rules and Regulations, The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York ("KEDNY") hereby submits one copy of the revised tariff leaves listed in Appendix A hereby issued by KEDNY to its Schedule for Gas Service, PSC No. 12 on June 27, 2008 to become effective on a temporary basis on and after July 1, 2008. The purpose of the filing is to implement monthly billing for all customers currently billed on bi-monthly basis from and after July 1, 2008. *See* December 21 Order at 31 implementing the provision of the Gas Rates Joint Proposal dated October 10, 2007 ("JP-4") at 14.

Under the December 21 Order, KEDNY was authorized to implement monthly billing on not less than one day's notice. *See* December 21 Order at 70, Ordering Paragraph 3. KEDNY's revised tariff leaves affects customers in Service Classification Nos. 1A, 1AR, 1B, 1B1, 1BR, 1B-DG, 2-1 and 2-2. In addition, the implementation of monthly billing has an impact on the merchant function charge because it reduces the lead/lag rate used to calculate the return requirement on gas purchase-related working capital from 8.45% to 5.08%. KEDNY's revised tariff leaves reflect the impact of this change. In accordance with the requirements of JP-4, KEDNY provided advance notice of the change to monthly billing by providing bill messages in customer bills beginning May 12, 2008.

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KEDNY requests that the Commission approve this compliance filing as soon as possible. To the extent that any waivers of the Commission's regulations are necessary to allow such approval, KEDNY requests that they be granted. Copies of this filing are being served electronically on all active parties to this proceeding.

Please contact the undersigned if you have questions or require further information.

Yours truly,

Catherine L. Nesser

Enclosures

cc: Active Parties – Case 06-G-1185

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**APPENDIX A**

Third Revised Leaf No. 27  
Tenth Revised Leaf No. 140  
Tenth Revised Leaf No. 144  
Fifth Revised Leaf No. 148  
Ninth Revised Leaf No. 152  
Ninth Revised Leaf No. 153  
Fifth Revised Leaf No. 156  
Third Revised Leaf No. 158.1  
Tenth Revised Leaf No. 159  
Tenth Revised Leaf No. 160