



One MetroTech Center
Brooklyn, New York 11201

July 14, 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 – Revenue Decoupling Mechanism**

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 submit the revised tariff leaves to become effective on October 1, 2008:

Nineteenth Revised Leaf No. 80
Thirteenth Revised Leaf No. 82

To Schedule for Gas Service, P.S.C. No. 12-GAS.

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The Parties have been collaborating on a proposed revenue decoupling mechanism (RDM) that is scheduled for a September 1, 2008 implementation date. The actual RDM credit or surcharge would not be applied until January 1, 2010. While the mechanics of the final RDM have not been fully developed, it has been agreed that there should be no impact from weather on the RDM surcharge or credit. The purpose of this filing is to remove the 2.2% deadband from KEDNY's weather normalization adjustment calculation prior to the upcoming heating season so that the calculation of the RDM credit or surcharge is based on fully normalized revenue.

If you have any questions regarding this filing, please contact Dawn Herrity at (718) 403-2975 or Dawn.Herrity@us.ngrid.com.

Respectfully submitted,

THE BROOKLYN UNION GAS COMPANY
d/b/a KEYSPAN ENERGY DELIVERY NY

By: _____

Enclosures

cc: Active Parties – Case 06-G-1185