



Orange and Rockland Utilities, Inc.
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www.oru.com

August 24, 2005

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

Dear Secretary Brilling:

Orange and Rockland Utilities, Inc. ("O&R" or the "Company") hereby submits for filing tariff leaves reflecting revisions to its Schedule for Gas Service, P.S.C. No. 4 – GAS (the "Gas tariff").

The tariff leaves filed electronically today are to become effective on October 1, 2005. Appendix A to this filing letter sets forth the revised tariff leaves being filed.

Reasons for the Proposed Changes

On June 30, 2005, O&R filed revisions to its Service Classification ("SC") No. 3 and SC No. 8 interruptible sales and transportation services of its Gas tariff ("June 2005 Filing") to bring O&R's interruptible service more in-line with the interruptible service provided by Consolidated Edison Company of New York, Inc. ("Con Edison"). The revisions were filed as a result of discussions between the Company and Staff and are based on changes to Con Edison's interruptible service approved by the Commission¹. The tariff revisions included in the June 2005 Filing are scheduled to become effective October 1, 2005.

After reviewing the June 2005 Filing, Staff has suggested that an additional change be made to conform O&R's interruptible service to Con Edison's interruptible service with respect to the application of a non-compliance charge for a customer's failure to make operable its alternate fuel/energy facilities within the required repair period.

Under the changes filed today, interruptible customers taking service under SC No. 3 and under SC No. 8 will not be subject to the charge for inoperable alternate fuel/energy facilities if the customer makes operable its facilities within a forty-eight hour, or in certain cases a seven day, repair period.

¹ On July 30, 2004 Con Edison filed changes to its interruptible transportation and off-peak firm service. By Order dated October 22, 2004 in Case 04-G-0948, the Commission approved the tariff changes filed by Con Edison and directed Con Edison to file additional tariff changes on not less than one days' notice. On October 29, 2004, Con Edison filed further tariff revisions that became effective on November 1, 2004.

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Summary of Tariff Modifications

The enclosed tariff leaves reflect additional revisions to the SC No. 3 - Interruptible Sales Service and SC No. 8 - Interruptible Transportation Service tariff leaves originally included in the June 2005 Filing².

Special Provision F (1) in SC No. 3 and Special Provision G (1) in SC No. 8 entitled "Failure to Interrupt" have been revised by amending the last sentence of the second paragraph to read as follows (underlined text is new):

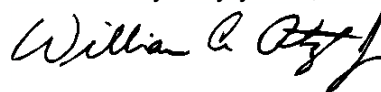
"During the forty-eight hour repair period, or, if applicable, the extended seven day repair period, the customer will be subject to all applicable charges of this Service Classification, except for the charge for inoperable alternate fuel/energy facilities or inadequate fuel reserves set forth in Special Provision (F) (3)³, provided that the customer makes operable its alternate fuel/energy facilities within the forty-eight hour or seven day repair period, whichever is applicable."

Notices

The Company published notice of the June 2005 Filing on July 28, 2005 and August 4, 11, and 18, 2005. Accordingly, the Company respectfully requests waiver from the Commission's notice requirements with respect to the conforming tariff changes filed today.

Questions regarding this filing can be directed to me at (212) 460-3308.

Very truly yours,



William A. Atzl, Jr.
Director – O&R Rates

² Leaf No. 141.4, which was not filed on June 30, 2005, is being filed to accommodate the additional tariff language added to Leaf No. 141.1.

³ This tariff reference is to the applicable SC No. 3 charge. The applicable SC No. 8 charge is set forth in Special Provision (G) (3).

APPENDIX A - Filed August 24, 2005

P.S.C. No. 4 Gas

Leaf 122.2	Revision 4
Leaf 141.1	Revision 4
Leaf 141.2	Revision 5
Leaf 141.3	Revision 7
Leaf 141.4	Revision 2