

National Fuel Gas Distribution Corporation
6363 Main Street
Williamsville, NY 14221

April 28, 2005

Hon. Jaclyn A. Brillling, Secretary
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Dear Secretary Brillling:

Enclosed is an electronic version of Monthly Gas Supply Charge Statement No. 38 applicable to Service Classification Nos. 1, 2, and 3, and Delivery Adjustment Charge Statement No. 37 applicable to Service Classification Nos. 1, 2, 3, 5, 7, 8, and 9 of our Rate Schedule P.S.C. No. 8 – Gas. The Monthly Gas Supply Charge Statement No. 38 and the Delivery Adjustment Charge Statement No. 37 will be effective commencing with gas used on or after May 1, 2005.

The estimated amount related to surcharges and credits included in Statements No. 37 & 38 is \$2,000 based on estimated May 2005 sales of 33,780,000 Ccf. The estimated effect on revenue, exclusive of surcharges and credits, is a decrease of \$916,100 on a monthly basis.

The surcharge calculation for May 2005 Intermediate Pipeline Stranded Capacity Surcharge pursuant to General Leaf No. 148.2 of P.S.C. No 8 – Gas results in a unit surcharge of \$0.0144 /Mcf is applicable for May 1, 2005 through May 31, 2005.

The surcharge calculation for May 2005 Upstream Pipeline Stranded Capacity Surcharge pursuant to General Leaf No. 148.1 of P.S.C. No 8 – Gas results in a unit surcharge of \$0.0000 /Mcf is applicable for May 1, 2005 through May 31, 2005.

The Company is removing the Interim Annual Reconciliation filing it included in its March 2005 Monthly Gas Supply Charge. In the Company's review of ongoing updates to the calculation it was determined that the interim filing is no longer needed in the determination of the Company's estimated over/undercollection calculation for the twelve months ending August 31, 2005.

In addition, Deficiency Imbalance Sales Service Rate Statement No. 88, Demand Transfer Recovery Rate Statement No. 86, Gas Transportation Statement No.88, Natural Gas Vehicle Statement No. 88, Standby Sales Service Rate Statement No.88, Transportation Sales Service Rate Statement No.90, Revenue Credit Statement No. 80, Reserve Capacity Cost Statement No. 54, Weather Normalization Clause Multipliers Statement No. 37, and Distributed Generation Statement No. 17 are included.

This statement is filed in compliance with 16 NYCRR, Section 270.55. Information pertaining to section 270.55d(7) will be delivered under separate cover letter.

In connection with this filing, the Company is also required to submit information that contains trade secrets. Accordingly, the Company has filed the required information with the Department Records Access Officer, together with a request for trade secret protection under the Commission's regulation. The instant filing includes redacted copies of the documents submitted to the Department Records Access Officer. The information for which trade secret protection has been requested is deleted. Copies of the same documents, with the redacted sections shaded (but legible) for identification, are being submitted to the Department Records Access Office under separate cover.

Very truly yours,

Eric H. Meinel
General Manager
Rates & Regulatory Affairs

Encl.