



Orange and Rockland Utilities, Inc.
4 Irving Place
New York NY 10003-0987
www.oru.com

February 18, 2004

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

RE: Case Nos. 98-M-1343, 99-M-0631 and 03-M-0017

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 become effective on February 19, 2004. Appendix A to this filing letter sets forth the tariff leaves being filed.

Reason for Filing

This filing is being made pursuant to the Commission's Order Adopting Revised Uniform Business Practices (the "November Order") issued and effective November 21, 2003, in Case No. 98-M-1343, and as further amended by the Order on Petitions for Rehearing and Clarification (the "December 5 Order"), issued and effective December 5, 2003, and the Order Granting Extensions and Denying Petitions in Part (the "December 19 Order"), issued and effective December 19, 2003, in Case Nos. 98-M-1343, 99-M-0631, and 03-M-0017, concerning retail access business rules, customer billing arrangements, and implementation of Chapter 686 of the Laws of 2002.

Ordering Clause 2 of the December 19 Order directed the utilities to file revisions to their tariffs and operating procedures as necessary to incorporate the Uniform Business Practices ("UBP"), as adopted in the Commission's November Order, and as further amended by the December 5 Order. Ordering Clause 3 of the December 19 Order required the utilities to make further changes to their tariffs and operating procedures necessary to implement the December 5 Order.¹

¹ As required by Ordering Clause 1 of the December 19 Order, a filing was made on February 2, 2004, making a tariff change that became effective on February 3, 2004, on a temporary basis, to incorporate the Commission's requirements on proration of payments made toward consolidated bills.

Honorable Jaclyn A. Brilling
February 18, 2004
Page 2 of 4

Summary of Tariff Changes

Changes to the Company's Gas tariff are described below:

- The "Abbreviations and Definitions" section was modified to include the term "UNIFORM BUSINESS PRACTICES" and the abbreviation "UBP" to reference the Uniform Business Practices adopted by the Commission in Case 98-M-1343, as may be amended from time to time by the Commission, and as set out in Addendum-UBP to the Gas tariff.
- In compliance with the Commission's December 19 and November Orders, the UBP, as adopted by the Commission in its November Order and as further amended by the December 5 Order, was added as an addendum to the Gas tariff ("Addendum-UBP-1"). In addition, "Addendum-UBP" was added to the Table of Contents.
- General Information Section No. 6.5(2)(A) "Customer Choice of Billing Option", was modified to replace references to billing and payment practices with references to the UBP.
- General Information Section No. 6.5(2)(B) "Utility Single Billing Service", was modified to add a charge for incremental postage required for Marketer bill inserts exceeding one-half ounce included in a Utility Single Bill.
- General Information Section 9, "Refusal or Discontinuance of Service", was modified (1) to define disconnection of service to include the suspension of delivery service at the request of a Seller in accordance with the UBP and HEFPA; (2) to provide that service to a residential customer participating in the Company's Gas Transportation Service Program may be disconnected, at the request of a Seller, in accordance with the UBP and HEFPA; (3) to indicate that the amount that customers participating in the Company's Gas Transportation Service Program and receiving a Utility Single Bill must pay to have service restored shall be the lesser of (a) the combined charges for both the Company's delivery service and the Seller's gas supply, and (b) the Company's charges calculated as if the customer had purchased its gas supply from the Company; and (4) to specify the circumstances under which the Company will reconnect service after a Seller-initiated suspension of service to a customer receiving a Marketer Single Bill.
- In General Information Section No. 10, "Charge for Bill History Information", text describing the scope of historical usage, billing and credit information that may be provided to a Seller has been eliminated. Instead, this section now indicates that such information will be provided in accordance with the UBP. A statement has also been added affirming that the Company will not disclose information to a Seller if the customer has given the Company advance notification in writing that such information should not be disclosed.
- The following changes have been made to Rider A – Gas Transportation Service Program:
 - (1) Text was added indicating that service under the Rider is provided in accordance with the provisions of the Rider and the provisions of the UBP; and

Honorable Jaclyn A. Brilling
February 18, 2004
Page 3 of 4

- (2) Sections of text in the "Customer Enrollment", "Customer Billing", and "Termination of Service" sections of the Rider have been deleted in cases where the information is set forth in the UBP and the Sections "Switch of Seller" and "Unauthorized Switch of Seller" have been removed in their entirety since the information is contained in the UBP.
- Service Classification ("SC") No. 11 applicable to Sellers providing service to firm transportation customers has been modified as follows:
 - (1) Text has been added indicating that service under SC No. 11 is provided in accordance with the provisions of SC No. 11 and the provisions of the UBP.
 - (2) Existing text with respect to customer eligibility was deleted and new text added indicating that Sellers must meet the eligibility and creditworthiness requirements of the UBP to qualify for service under SC No. 11.
 - (3) The "Rate" section of SC No. 11 was modified to update references to the charges applicable to Sellers.
 - (4) The "Terms of Payment", "Billing Questions and Disputes", "Consumer Protection", "Discontinuance of Service by a Seller", "Dispute Resolution Process" and "Creditworthiness" sections have been removed since the information is contained in the UBP.
 - (5) Special Provision J indicating that Sellers are required to provide evidence of creditworthiness before requiring deposits and/or prepayments from residential and small commercial customers, pursuant to Case No. 00-M-0504, was modified to refer to small commercial customers only. Seller requirements pertaining to residential deposits are contained in HEFPA.
 - (6) Special Provision K was modified to include the method for calculating the alternate payment amount to end a Seller-initiated suspension as directed by Ordering Clause 2 of the Commission's December 5 Order.
- SC No. 13 applicable to Sellers providing service to interruptible transportation customers has been modified as follows:
 - (1) Text has been added indicating that service under SC No. 13 is provided in accordance with the provisions of SC No. 13 and the provisions of the UBP.
 - (2) Existing text with respect to customer eligibility was deleted and new text added indicating that Sellers must meet the eligibility and creditworthiness requirements of the UBP to qualify for service under SC No. 13.
 - (3) The "Terms of Payment", "Billing Questions and Disputes", "Discontinuance of Service by a Seller", "Dispute Resolution Process" and "Creditworthiness" sections have been removed since the information is contained in the UBP.

Honorable Jaclyn A. Brilling
February 18, 2004
Page 4 of 4

Summary of Changes to the Gas Transportation Operating Procedures

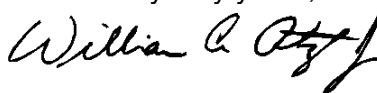
Conforming changes have been made to the Company's Gas Transportation Operating Procedures ("GTOP"). The GTOP was initially prepared in 2000. At that time, there were no general rules for retail access, and the GTOP provided guidance to Sellers and Company personnel on a wide variety of subjects. The recent adoption of the substantially revised UBP and the requirement that the UBP be included in the Company's Gas tariff as an addendum renders much of the GTOP duplicative and no longer necessary. Thus, the sections on creditworthiness, Seller discontinuance, and dispute resolution have been substantially reduced or eliminated and reference made to the UBP. Other changes have been made to expressly acknowledge the UBP's role in the Company's Gas Transportation Service Program.

Conclusion and Notice

In compliance with Ordering Clauses 2 and 3 of the December 19 Order, tariff changes are filed to become effective, on a temporary basis, on February 19, 2004. Ordering Clause 4 of the December 5 Order waived newspaper publication. A copy of this filing will be mailed by regular mail to all parties to Case Nos. 98-M-1343, 99-M-0631 and 03-M-0017.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "William A. Atzl, Jr.", with a stylized flourish at the end.

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

ORANGE AND ROCKLAND UTILITIES, INC.**PSC No. 4 - Gas****APPENDIX A****Initial Effective Date: February 19, 2004**

Leaf 5.1	Revision 0	Leaf 166	Revision 3
Leaf 9	Revision 2	Leaf 166.1	Revision 4
Leaf 33.2	Revision 3	Leaf 166.2	Revision 1
Leaf 34	Revision 6	Leaf 166.3	Revision 1
Leaf 51	Revision 1	Leaf 166.4	Revision 4
Leaf 51.1	Revision 0	Leaf 166.5	Revision 1
Leaf 59	Revision 2	Leaf 166.6	Revision 2
Leaf 60	Revision 1	Leaf 166.7	Revision 2
Leaf 60.1	Revision 0	Leaf 166.11	Revision 4
Leaf 61	Revision 1	Leaf 166.12	Revision 2
Leaf 62	Revision 3	Leaf 183	Revision 5
Leaf 94	Revision 5	Leaf 185	Revision 3
Leaf 94.1	Revision 1	Leaf 185.1	Revision 1
Leaf 94.2	Revision 3	Leaf 186	Revision 3
Leaf 94.3	Revision 3	Leaf 187	Revision 3
Leaf 94.4	Revision 2	Leaf 188	Revision 3
Leaf 94.5	Revision 2	Leaf 188.1	Revision 2
Leaf 94.6	Revision 2	Leaf 188.2	Revision 2
Leaf 152	Revision 9	Leaf 188.3	Revision 2
Leaf 152.1	Revision 4	Leaf 188.4	Revision 2
Leaf 152.2	Revision 5	Leaf 188.5	Revision 2
Leaf 152.3	Revision 0	Leaf 188.6	Revision 2
Leaf 160	Revision 7	Leaf 188.7	Revision 4
Leaf 160.1	Revision 2	Leaf 188.8	Revision 2
Leaf 161	Revision 6	Leaf 188.9	Revision 2
Leaf 162	Revision 6	Leaf 188.10	Revision 2
Leaf 163	Revision 5	Leaf 188.11	Revision 3
Leaf 164	Revision 5	Leaf 188.12	Revision 4
Leaf 164.1	Revision 2		
Leaf 165	Revision 4		