New York Off Heating Association, Inc.

Supporters of:

EMPIRE STATE PETROLEUM ASSOCIATION, INC. NATIONAL ASSOCIATION FOR OILHEAT RESEARCH & EDUCATION NATIONAL OILHEAT RESEARCH ALLIANCE, INC. PETROLEUM MARKETERS ASSOCIATION OF AMERICA TRI STATE OILHEAT CONSUMER EDUCATION ALLIANCE



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APRIL 27, 2007

JACLYN A. BRILLING, SECRETARY NEW YORK STATE PUBLIC SERVICE COMMISSION THREE EMPIRE STATE PLAZA ALBANY, NY 12223-1350

RE: CASE 00-G-0996 - IN THE MATTER OF ESTABLISHMENT OF CRITERIA FOR INTERRUPTIBLE GAS SERVICE.

DEAR SECRETARY BRILLING:

MY NAME IS JOHN MANISCALCO AND I SERVE AS THE EXECUTIVE VICE PRESIDENT OF THE NEW YORK OIL HEATING ASSOCIATION (NYOHA), INC. NYDHA IS A 1939 ESTABLISHED, NOT-FOR-PROFIT HEATING OIL TRADE ASSOCIATION WHICH REPRESENTS THE INTERESTS OF HOME HEATING OIL DISTRIBUTORS AND OIL TERMINAL OPERATORS SITUATED THROUGHOUT, AND WHICH SERVICE, THE CITY OF NEW YORK'S FIVE BOROUGHS.

SINCE 80% OF THE HOME HEATING OIL CONSUMED WITHIN NEW YORK CITY IS DELIVERED BY NYDHA'S MEMBER COMPANIES; NYDHA'S MEMBERS SUPPLY THE MAJORITY OF THE HEATING OIL CONSUMED BY THE OVER 5,600 NEW YORK CITY DEMAND INTERRUPTIBLE AND TEMPERATURE CONTROL (TC) NATURAL GAS CUSTOMERS.

NYOHA WHOLEHEARTEDLY ENDORSES THE COMMENTS FILED BY THE EMPIRE STATE PETROLEUM ASSOCIATION (ESPA) AS THEY RELATE TO THIS CASE. SPECIFICALLY SPEAKING; THE WAY IN WHICH THE STUDY CORRECTLY IDENTIFIES THE INTERRUPTIBLE ISSUE AS A GROWING PROBLEM IS MOST CONCERNING. FURTHERMORE, ESPA'S PROPOSED RECOMMENDATIONS AS THEY RELATE TO 0 SUPPLY CONTRACTS 9 NEW INTERRUPTIBLE CUSTOMERS 8 EXISTING INTERRUPTIBLE CUSTOMERS & MANDATE USAGE & REPLENISHMENT LEVELS REQUIRE THE PUBLIC SERVICE COMMISSION'S SINCERE CONSIDERATION.

JOHN MANISCALCO

EXECUTIVE VICE PRESIDENT

A COMPLETELY INTEGRATED TRADE ASSOCIATION REPRESENTING ALL BRANCHES OF THE OIL HEATING INDUSTRY IN THE METROPOLITAN NEW YORK AREA