

# STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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October 4, 2013

Hon. Kathleen Burgess  
Secretary  
Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

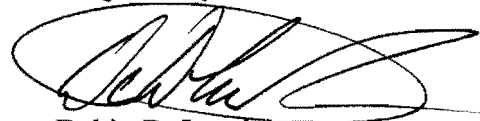
Re: Case 13-G-0136, National Fuel Gas Distribution Corporation – Rates

Dear Secretary Burgess:

Attached for filing in the above-referenced proceeding is the Department of Public Service Staff's response to the Position of National Fuel Gas Distribution Corporation on the Applicability of Public Service Law §66(20) to this Proceeding.

Thank you for your attention to this matter.

Respectfully submitted,



Dakin D. Lecakes  
Assistant Counsel

cc: (via email): Hon. Kevin Casutto  
Hon. David Prestemon  
Parties