

NATIONAL FUEL GAS DISTRIBUTION CORPORATION  
NEW YORK DIVISION

REQUEST FOR ADMISSION TO UTILITY INTERVENTION UNIT, DIVISION  
OF CONSUMER PROTECTION, NYS DEPARTMENT OF STATE PURSUANT  
TO 16 NYCRR § 5.5

CASE 16-G-0257

1) Does Mr. Collar admit that he testified as follows at page 6 of his testimony in the most recent Consolidated Edison Company of New York, Inc. rate cases for electric and gas service (Cases 16-E-0060 and 16-G-0061 respectively):

"Under the current target, the Company does not incur a NRA until it exceeds a threshold of 2.3 complaints per 100,000 customers. I recommend the Commission lower this threshold to 1.9 complaints per 100,000 customers (See Exhibit \_ (GCC-2)). According to the Company's response to UIU IR No. 79, it experienced 1.79 complaints per 100,000 customers in 2013, 1.75 in 2014, and 1.42 in 2015. The Company's performance under this metric could therefore deteriorate significantly before the Company would incur a NRA."

Response:

Yes.

2) Does Mr. Collar further admit that in the most recent KeySpan Gas East Corp. dba Brooklyn Union of L.I. for Gas Service. ("KEDLI") and The Brooklyn Union Gas Company dba National Grid NY for Gas Service ("KEDNY") (collectively, the "Companies") cases (Cases 16-G-0058 and 16-G-0059 respectively) he testified at pp. 11-12 that he recommended that the Companies' proposed PSC complaint rate targets be adopted, and that the Companies' proposed PSC complaint target rates were 1.05 for KEDNY and 1.1 for KEDLI?

Response:

Yes.