

June 12, 2014

VIA ELECTRONIC MAIL

Hon. Kathleen H. Burgess, Secretary
State of New York
Department of Public Service
3 Empire State Plaza
Albany, NY 12223
Secretary@dps.ny.gov

Re: Case 10-G-0527, In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, In Relation to Complaint Procedures-Cross Appeals by Apartment Management Associates, LLC, and The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered Partly in Favor of Each Party (932768), et al.¹

Dear Secretary Burgess:

By this letter, The Brooklyn Union Gas Company d/b/a National Grid (“KEDNY”) and KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”) (collectively, “National Grid”) respond to (i) the New York Public Service Commission (“Commission”) Determination on Rehearing of May 13, 2014 (“May Determination”) and (ii) the Commission’s Request for Additional Information, dated June 5, 2014.

May Determination

In its May Determination, the Commission directed rebilling on four KEDNY accounts due to calculation errors in the Commission’s Determination of February 24, 2014 (“Original Determination”). Pursuant to the May Determination, National Grid has issued refunds on the four additional accounts determined to be eligible for rebilling, as identified in Appendix B. Appendix B sets forth (i) the account numbers, (ii) the amount of the refund, (iii) the amount of the interest applied, and (iv) the date refund checks were mailed to the customer/consultant. To issue these refunds, National Grid mailed paper checks on the date indicated in Appendix B.

Request for Additional Information

For three KEDLI accounts addressed in the Original Determination, the Company's analysis between heating and non-heating rates initially determined that these accounts would

¹ This case is one of 22 appeals from separate informal review decisions. A list of the cases at issue is contained in Appendix A to this letter.

have been billed more under the non-heating rate and, therefore, were not entitled to a refund. Following further discussions with the customers' rate consultant (Utility Check) regarding the mechanics of the analysis and refund calculation, National Grid has determined that two of the three accounts are, in fact, entitled to a refund (see Appendix C).

In recalculating the refunds, National Grid determined that some of the data points used to calculate the initial refund amounts for these accounts were inaccurate. As indicated in Appendix C, recalculation shows that two of the three accounts are entitled to a refund, while the third account is not. The rate analysis for Account 402-79-2111-0 (East Meadow High School District) determined the customer would have paid more during the specified billing period under the non-heating rate. A lower bill under the heating rate is possible due to the application of the weather normalization factor on heating accounts. When weather is colder than normal, the weather normalization factor is applied as a credit to heating customers (and not to non-heating accounts). The weather normalization credit on all usage can offset the higher delivery rate paid by heating customers in the higher blocks.

Within the last week, National Grid and Utility Check reached final agreement on the refund calculations for these accounts, including the determination that the East Meadow School District account is not entitled to a refund. The refunds were issued (mailed/applied to the account with interest) on the dates set forth in Appendix C.

Documentation supporting the billing under the heating rate, as well as calculations of the rebilling under the non-heating rate, will be provided to Department of Public Service Staff under a separate cover.

Finally, please note that in our earlier communication the name on one of the accounts (John Froccaro) was inadvertently misspelled, which has been corrected in the attached.

If you have any questions, please contact me at (718) 403-3142.

Respectfully submitted,
/s/ Philip DeCicco
Phillip A. DeCicco, Jr.

cc: Douglas DiCeglio, URAC (via electronic mail)
E. Bindler, Utility Check (via electronic mail)

Appendix A

CASE 10-G-0527 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Cross Appeals by Apartment Management Associates, LLC, and The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered Partly in Favor of Each Party (932768)

CASE 11-G-0187 - In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by Spillane Parkside Corp. of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005528)

CASE 11-G-0188 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by McDonald's of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005534)

CASE 11-G-0189 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by Brooklyn PMC, Inc. of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005550)

CASE 11-G-0190 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by Spillane Page Corp. of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005572)

CASE 11-G-0192 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by PRPKFC Holdings of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005524)

CASE 11-G-0193 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by Brooklyn & Avenue V Enterprises of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005538)

CASE 11-G-0194 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by PRPKFC Holdings of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005520)

CASE 11-G-0195 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by PRPKFC Holdings of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (005512)

CASE 11-G-0196 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by 82 Court St. Corp. of the Informal Decision Rendered in Favor of The Brooklyn Union Gas Company d/b/a National Grid (006124)

CASE 11-G-0178 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered in Favor of Ciampa Metropolitan (004986)

CASE 11-G-0202 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered in Favor of Mercy First/Angel Guardian Home (004986)

CASE 11-G-0206 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered in Favor of Brooklyn PMC (008832)

CASE 11-G-0207 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered in Favor of Bay Hylan Enterprises (005566)

CASE 11-G-0208 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by The Brooklyn Union Gas Company d/b/a National Grid of the Informal Decision Rendered in Favor of Bay Hylan Enterprises (005556)

CASE 11-G-0008 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of Comsewogue School District (000352)

CASE 11-G-0009 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of Pine Hollow Country Club (000364)

CASE 11-G-0127 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of Veterans Products Company (002652)

CASE 11-G-0129 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of Atherton Franchise (018800)

CASE 11-G-0130 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of John Frocaro (014458)

CASE 11-G-0132 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of East Meadow School District (024580)

CASE 11-G-0133 – In the Matter of the Rules and Regulations of the Public Service Commission, Contained in 16 NYCRR, in Relation to Complaint Procedures—Appeal by KeySpan Gas East Corporation DBA Brooklyn Union of Long Island d/b/a National Grid of the Informal Decision Rendered in Favor of Massapequa School District (020906).

Appendix B

Account	Period Covered	Principle	Interest	Total Refund	Issued
10-G-0527 (932768) Apartment Management Associates; Account number: 23052-49022	03/04/08- 03/03/09	\$544.01	\$968.81	\$1,512.82	Check mailed to the customer 6/10/14
11-G-0192 (005524) PRKFC Holding, Account number: 03040-51010	03/10/09- 03/16/10	\$497.10	\$639.18	\$1,136.28	Check mailed to the consultant 6/11/14
11-G-0194 (005520) PRKFC Holdings, Account number: 02820-40048	03/25/08- 03/24/09	\$463.16	\$791.23	\$1,254.39	Check mailed to the consultant 6/12/14
11-G-0195 (005512) PRKFC Holdings, Account number: 10540-16582	03/10/08- 03/09/09	\$701.31	\$1,218.60	\$1,919.91	Check mailed to the consultant 6/12/14

Appendix C

Account	Period Covered	Principle	Interest	Total Refund	Issued
11-G-0008 Comsewogue School District (000352) 856-20-5200-1	03/17/08- 03/17/09	\$83.58	\$151.47	\$235.05	Adjustment made to account 6/11/14; check mailed to the consultant 6/12/14
11-G-0130 John Froccaro (014458) 136-52-3201-0	03/08/08- 03/10/10	\$1,336.60	\$2,055.41	\$3,392.01	Adjustment made to account 6/11/14; applied to the account on 6/12/14
11-G-0132 East Meadow School District (024580) 402-79-2111-0	03/03/08- 03/04/09			-\$13.26	N/A