

KEYSPAN

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KeySpan Corporation
One MetroTech Center
Brooklyn, New York 11201-3850

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VIA FEDERAL EXPRESS
July 25, 2002

Hon. Janet Hand Deixler
Secretary
Public Service Commission of the
State of New York
Three Empire State Plaza
Albany, New York 12223

Orig-Files
C 02-G-0897
Copies!
MR. J. Finberg
MS. N. Lee

Re: Case 02-G-0897
Urac's July 2, 2002 Petition for a Declaratory Ruling

Dear Secretary Deixler:

In its letter to you dated July 2, 2002 ("Petition"), Urac Corp. ("Urac"), a utility rate consultant, claims that The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York ("KeySpan" or the "Company") failed to "acknowledge and respond to billing disputes" filed by it on behalf of its clients "in a fair and reasonable amount of time." (Petition at 1.) Urac requests that the Commission require KeySpan to set forth a plan to correct the "problem" and make assurances that the "problem" will not continue. (*Id.* At 2.) Urac further seeks a fine in the amount of \$50,000 against KeySpan under Public Service Law section 25.

For the reasons set forth herein, KeySpan respectfully posits that Urac has not identified any real problem with KeySpan's responses to complaints from rate consultants and urges the Commission to deny Urac's Petition in its entirety.

KeySpan was advised by your office that its response to Urac's Petition is due July 26, 2002. I have enclosed an original and six copies of this Response by KeySpan to URAC's Petition. Kindly acknowledge receipt by date stamping one of the copies and returning it to me in the enclosed self-addressed stamped envelope.

KeySpan's Practice on Rate Consultant Inquiries

KeySpan receives a substantial volume of inquiries on billing, rate classification and other matters from several rate consultants conducting business within its service territory. KeySpan takes these rate consultant inquiries very seriously. It is important to the Company that the investigations be conducted fairly and completely, as KeySpan wants to be sure that its

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customers are on the correct rate and that they have been billed correctly. To date in 2002, KeySpan has completed investigations of almost 200 such inquiries.

A rate consultant may initiate an inquiry with KeySpan in writing through via mail, e-mail or facsimile. It is the Company's practice to promptly acknowledge in writing its receipt of the inquiry. It is the Company's goal to complete its investigation of the inquiry within sixty days from its receipt.

Each inquiry is unique, with some raising highly technical issues. Some concern rate assignment. Some raise tax issues. Others question the computation of a customer's bill. The level of information and detail provided by the rate consultants also varies. Thus, the time needed to investigate each inquiry may vary. Different areas within the Company are tapped to provide information and analysis necessary for an investigation. Certain inquiries will necessitate a physical visit/inspection to the customer's premises. In these instances, access issues can delay completion of an investigation. At times, the Company seeks information from non-KeySpan sources. The variety of issues raised and of information needed to respond to those issues results in differing times to complete the investigations.

In the vast majority of rate consultant inquiries conducted in 2002, KeySpan has completed its investigation in well under 60 days. KeySpan has investigated 184 rate consultant inquiries in 2002. Of those, 180, or 97.83%, were completed within 60 days. Many are completed much earlier. In fact, 150 of the 184, or 81.52% were completed within 15 days; 170 or 92.39% were completed within 30 days; and 178 or 96.74% were completed within 45 days. Attached as Exhibit "A" hereto are two lists of the rate consultant inquiries received in 2002 which also contains the time (in days) to complete each investigation. The lists are sorted two ways: by date the inquiry was received, and by number of days to complete. As these lists demonstrate, KeySpan clearly makes every effort to resolve these rate consultant inquiries within a reasonable amount of time, and is doing so.¹

¹ As a practical matter, it should be noted that KeySpan has a disincentive to intentionally delay the investigation of an inquiry. In addition to its desire to see that its customers are billed appropriately, the imposition of interest on overcharges provides a disincentive for the Company to delay the resolution of an inquiry. Further, neither Urac nor its clients have been harmed.

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The Three Urac Inquiries

Urac attached copies of its three letters initiating billing inquiries with KeySpan as Exhibit A to its Petition. Urac's inquiries are dated November 28, 2001 (Katz Realty/Cinderella Realty) and February 20, 2002 (both Trump Management/Briarwyck and Trump Management/Trump Village Section #1).

Urac asserts that "[n]one of the letters were 'promptly acknowledged' or fairly investigated 'in a reasonable amount of time.'" (Petition at 2.) Urac's assertions, however, are inaccurate.

KeySpan Promptly Acknowledged Each Inquiry

As is KeySpan's practice, each of Urac's letters of complaint was promptly acknowledged in writing. Attached as Exhibit "B" hereto, is a copy of KeySpan's acknowledgment letters to Urac in each of the three matters. The acknowledgment letters are dated December 6, 2001 and February 28, 2002. (Both of the Trump Management matters were acknowledged in the same letter.) In each case, the Company states "[t]his is to acknowledge receipt of your inquiries dated _____ regarding the above accounts. We have begun the process of compiling the information necessary to respond to these inquiries. If we need additional information regarding your inquiry we will contact you."

In each instance, KeySpan sent out its letter of acknowledgment within nine (9) days from the date of Urac's letter. Thus, despite Urac's assertion to the contrary, KeySpan promptly acknowledged its inquiries.

KeySpan Investigated Each Inquiry Within a Reasonable Time Frame

After a thorough investigation into the facts and circumstances surrounding each account, each of the three inquiries at issue in Urac's Petition was resolved in a different way. In the Katz Realty/Cinderella Realty matter, the Company determined that the customer did qualify for another rate, changed the customer to that rate, and issued a credit with interest to the customer. In the Trump Management/Briar Wyck matter, the Company investigation concluded that the customer had not been overbilled, as Urac had asserted. Finally, the investigation of the Trump Management/Trump Village matter indicated that there had been an equipment problem with the corrector, but that the meter was recording accurately. Attached as Exhibit "C" hereto are copies of KeySpan's letters to Urac explaining the results of the Company's investigations in each of the three inquiries.

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Urac filed a formal complaint with the Commission in the two matters in which the Company did not agree with its allegation of over billing. It is not clear from its Petition whether Urac also is complaining therein about the actual outcomes of KeySpan's investigations of its three inquiries in addition to the timing of those investigations. In any event, the appropriate venue for such a complaint would be to file a formal complaint with the Commission, which Urac did in two of the matters.

As is set forth above, the Company strives to resolve rate consultant inquiries as soon as possible, preferably within sixty days. In the vast majority of these matters -- well over 97% -- the Company meets this goal. The investigations of the three Urac cases at issue herein took between 110 and 209 days. While these took longer than the sixty days the Company aims for, they were completed as soon as the necessary information was obtained and analyzed. The Company's practice, the results of which are reflected in Exhibit "A" is reasonable in all respects.

No Fine is Warranted

Urac's Petition should be denied as lacking in merit, as the information provided above makes clear. KeySpan is diligently and responsibly responding to a large number of rate consultant inquiries. KeySpan's acknowledgments and responses are timely. The Company's practice, the results of which are reflected in Exhibit "A" is reasonable in all respects. In addition to the lack of merit to the allegations in Urac's Petition, its request for a fine must fail for technical reasons.

In its Petition, Urac additionally suggests that the PSC "levy a fine" on KeySpan in the amount of \$50,000 under Public Service Law ("PSL") Section 25. However, Urac's Petition is not the appropriate venue for the imposition of a fine under section 25. Rather, as set forth in subpart 5 to section 25, "[p]enalties provided for pursuant to this section shall be recovered in an action as provided in section twenty-four of this article." PSL Section 25 (5) (McKinney 2000). Under section twenty-four, an action to impose a penalty would be pursued through an action in a court prosecuted by the Commission on behalf of the people of the state of New York. PSL Section 24 (McKinney 2000). Urac's Petition fails to satisfy these procedural requirements. Therefore, KeySpan respectfully urges that the fine requested cannot be imposed in the way suggested by Petitioner.

Conclusion

KeySpan has shown above that it acknowledged Urac's inquiries promptly. The Company further described its practice in handling inquiries of rate consultants and the large

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percent of investigations which are completed under the goal of sixty days. These inquiries vary in both the time and personnel needed to resolve them. KeySpan's practice in handling these inquiries is demonstrably reasonable. Therefore, for all the reasons set forth above, KeySpan respectfully requested that the Petition be denied in all respects.

If you have any further questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cynthia R. Clark", followed by a long horizontal flourish line extending to the right.

Cynthia R. Clark
Attorney for
The Brooklyn Union Gas Company
d/b/a
KeySpan Energy Delivery New York

Enclosures

cc: Paul Agresta, Esq.
Douglas DiCeglio

Rate Consultant Cases For 2002

	Received At Keyspan	Name	Address	Account Number	Case	Comp	Days To Complete	Type
1	02/08/02				M 020063	02/08/02	0	Statement
2	02/08/02				M 020059	02/08/02	0	Rate 2-2
3	02/08/02				M 020060	02/08/02	0	Rate 2-2
4	02/08/02				M 020061	02/08/02	0	Inq
5	02/08/02				M 020062	02/08/02	0	Statement
6	02/08/02				M 020058	02/08/02	0	Rate 2-2
7	02/28/02				M 020075	02/28/02	0	Statement
8	03/15/02				M 020091	03/15/02	0	Tax Inq
9	04/16/02				M 020109	04/16/02	0	Statement
10	04/16/02				M 020208	04/16/02	0	Statement
11	05/07/02				M 020128	05/07/02	0	Statement
12	05/07/02				M 020129	05/07/02	0	Statement
13	05/14/02				M 020133	05/14/02	0	Statement
14	06/07/02				M 020157	06/07/02	0	Statement
15	06/11/02				M 020159	06/11/02	0	Statement
16	06/17/02				M 020161	06/17/02	0	Rate 6
17	02/08/02				M 020064	02/09/02	1	10 Statements
18	02/12/02				M 020066	02/13/02	1	Rate 2-2
19	02/12/02				M 020065	02/13/02	1	Rate2-2
20	02/14/02				M 020068	02/15/02	1	Rate 2-2
21	02/14/02				M 020069	02/15/02	1	Rate 2-2
22	02/14/02				M 020067	02/15/02	1	Rate 2-2
23	02/28/02				M 020076	03/01/02	1	Rate 2-2
24	03/01/02				M 020078	03/02/02	1	9 Statements
25	03/14/02				M 020089	03/15/02	1	Rate Inq
26	03/14/02				M 020090	03/15/02	1	Rate Inq
27	04/30/02				M 020119	05/01/02	1	Statement
28	05/02/02				M 020124	05/03/02	1	Statement
29	05/02/02				M 020125	05/03/02	1	Statement
30	05/13/02				M 020134	05/14/02	1	Statement
31	06/03/02				M 020148	06/04/02	1	Statement
32	01/02/02				M 020009	01/04/02	2	Tax Issue
33	01/02/02				M 020010	01/04/02	2	Tax Issue

34	01/02/02
35	01/02/02
36	01/02/02
37	01/02/02
38	01/02/02
39	01/23/02
40	01/29/02
41	02/14/02
42	02/14/02
43	02/21/02
44	02/28/02
45	04/09/02
46	04/09/02
47	04/09/02
48	06/25/02
49	06/25/02
50	01/29/02
51	03/01/02
52	03/01/02
53	06/11/02
54	02/01/02
55	02/01/02
56	02/01/02
57	02/01/02
58	03/07/02
59	03/25/02
60	05/03/02
61	06/03/02
62	06/03/02
63	06/03/02
64	06/03/02
65	06/07/02
66	06/24/02
67	06/24/02
68	01/02/02
69	01/02/02
70	01/02/02

M 020011	01/04/02	2	Tax Issue
M 020014	01/04/02	2	Billing Inq.
M 020012	01/04/02	2	Tax Issue
M 020015	01/04/02	2	Statement
M 020013	01/04/02	2	Statement
M 020033	01/25/02	2	Statement
M 020035	01/31/02	2	Statement
M 020070	02/16/02	2	Rate 2-2
M 020071	02/16/02	2	Rate 2-2
M 020073	02/23/02	2	Mtr Inq
M 020074	03/02/02	2	Rate 2-2
M 020103	04/11/02	2	Statement
M 020103	04/11/02	2	Statement
M 020104	04/11/02	2	Statement
M 020168	06/27/02	2	Statement
M 020167	06/27/02	2	Statement
M 020034	02/01/02	3	Rate 2-2
M 020080	03/04/02	3	7 Statements
M 020079	03/04/02	3	9 Statements
M 020160	06/14/02	3	Rate 2 Inq
M 020036	02/05/02	4	Rate 2-2
M 020037	02/05/02	4	Rate 2-2
M 020055	02/05/02	4	Tax Inquiry
M 020046	02/05/02	4	Rate Issue
M 020087	03/11/02	4	Rate 2-2
M 020101	03/29/02	4	Rate Inq
M 020127	05/07/02	4	Rate 2
M 020152	06/07/02	4	Statement
M 020151	06/07/02	4	Statement
M 020150	06/07/02	4	Statement
M 020149	06/04/02	4	Statement
M 020156	06/11/02	4	Statement
M 020163	06/28/02	4	Rate 2
M 020165	06/28/02	4	Rate 2
M 020019	01/07/02	5	Statement
M 020021	01/07/02	5	Statement
M 020023	01/07/02	5	6 Statements

71	01/02/02
72	01/02/02
73	01/02/02
74	01/02/02
75	01/02/02
76	02/14/02
77	04/10/02
78	04/24/02
79	05/02/02
80	05/02/02
81	02/01/02
82	02/01/02
83	02/01/02
84	02/01/02
85	02/01/02
86	02/01/02
87	02/01/02
88	02/01/02
89	02/01/02
90	02/01/02
91	02/01/02
92	02/01/02
93	02/01/02
94	02/01/02
95	02/01/02
96	02/01/02
97	03/05/02
98	04/30/02
99	05/02/02
100	05/02/02
101	05/29/02
102	05/29/02
103	05/29/02
104	05/29/02
105	06/19/02
106	03/19/02
107	03/19/02

M 020020	01/07/02	5	Statement
M 020016	01/07/02	5	Billing Inq.
M 020022	01/07/02	5	Billing Inq.
M 020017	01/07/02	5	Statement
M 020018	01/07/02	5	Statement
M 020072	02/19/02	5	Rate 2-2
M 020106	04/15/02	5	Statement
M 020118	04/29/02	5	Rate Inq.
M 020126	05/07/02	5	Tax iss
M 020121	05/07/02	5	Question
M 020038	02/07/02	6	Statement
M 020049	02/07/02	6	Statement
M 020039	02/07/02	6	Statement
M 020044	02/07/02	6	Statement
M 020045	02/07/02	6	Statement
M 020040	02/07/02	6	Statement
M 020052	02/07/02	6	Statement
M 020053	02/07/02	6	Statement
M 020054	02/07/02	6	Statement
M 020038	02/07/02	6	Statement
M 020041	02/07/02	6	Statement
M 020042	02/07/02	6	Statement
M 020043	02/07/02	6	Statement
M 020047	02/07/02	6	Rate Issue
M 020050	02/07/02	6	Statement
M 020051	02/07/02	6	Statement
M 020086	03/11/02	6	Statement
M 020120	05/06/02	6	Rate 2
M 020123	05/08/02	6	Rate 4
M 020122	05/08/02	6	Rate 6
M 020144	06/04/02	6	Statement
M 020145	06/04/02	6	Statement
M 020143	06/04/02	6	Statement
M 020142	06/04/02	6	Statement
M 020163	06/25/02	6	Rate 2
M 020096	03/26/02	7	Statement
M 020098	03/26/02	7	Statement

108	03/19/02
109	03/19/02
110	03/19/02
111	03/19/02
112	03/19/02
113	04/23/02
114	04/23/02
115	06/04/02
116	06/04/02
117	06/07/02
118	04/03/02
119	04/03/02
120	04/03/02
121	04/03/02
122	04/16/02
123	05/07/02
124	05/07/02
125	06/17/02
126	03/15/02
127	04/09/02
128	04/09/02
129	04/19/02
130	04/19/02
131	04/19/02
132	05/06/02
133	01/11/02
134	01/23/02
135	01/23/02
135	02/01/02
137	02/01/02
138	04/17/02
139	05/30/02
140	05/31/02
141	03/01/02
142	03/01/02
143	03/01/02
144	03/01/02

M 020097	03/26/02	7	Statement
M 020100	03/26/02	7	Statement
M 020099	03/26/02	7	Statement
M 020094	03/26/02	7	Statement
M 020095	03/26/02	7	Statement
M 020115	04/30/02	7	Rate 2
M 020116	04/30/02	7	Rate 2
M 020154	06/11/02	7	Statement
M 020155	06/11/02	7	Statement
M 020158	06/14/02	7	Rate 6
M 020105	04/11/02	8	Statement
M 020105	04/11/02	8	Statement
M 020105	04/11/02	8	Statement
M 020105	04/11/02	8	Statement
M 020110	04/24/02	8	3 Statements
M 020131	05/15/02	8	Rate 2
M 020130	05/15/02	8	Rate2
M 020162	06/25/02	8	Rate 6
M 020093	03/25/02	10	13 Statements
M 020102	04/19/02	10	Statement
M 020102	04/19/02	10	Statement
M 020114	04/29/02	10	Statement
M 020113	04/29/02	10	Statement
M 020112	04/29/02	10	Statement
M 020132	05/17/02	11	Rate 6
M 020030	01/23/02	12	Tax Issue
M 020031	02/04/02	12	Rate 2-2
M 020032	02/04/02	12	Rate 2-2
M 020057	02/13/02	12	Rate Issue
M 020056	02/13/02	12	Rate Issue
M 020111	04/29/02	12	Fixed Factor
M 020146	06/11/02	12	Rate 6
M 020147	06/12/02	12	Rate 6
M 020084	03/14/02	13	Billing
M 020084	03/14/02	13	Billing
M 020081	03/14/02	13	Rate 6
M 020081	03/14/02	13	Billing

145	05/22/02
146	05/22/02
147	04/10/02
148	05/21/02
149	06/17/02
150	05/21/02
151	05/01/02
152	06/24/02
153	01/04/02
154	01/04/02
155	01/04/02
156	01/04/02
157	01/02/02
158	01/02/02
159	05/16/02
160	05/21/02
161	06/24/02
162	12/11/01
163	01/02/02
164	01/02/02
165	01/02/02
166	01/11/02
167	05/13/02
168	05/13/02
169	01/02/02
170	03/15/02
171	04/16/02
172	01/02/02
173	01/02/02
174	01/02/02
175	03/01/02
176	03/01/02
177	12/12/01
178	12/11/01
179	03/12/02
180	11/29/01
181	

M 020140	06/04/02	13	Statement
M 020141	06/04/02	13	Statement
M 020107	04/24/02	14	Rate 6 Issue
M 020138	06/04/02	14	Statement
M 020161	07/01/02	14	Rate 6
M 020139	06/05/02	15	Statement
M 020135	05/17/02	16	Rate 4
M 020166	07/10/02	16	Billing
M 020025	01/23/02	19	Statement
M 020027	01/23/02	19	Statement
M 020026	01/23/02	19	Statement
M 020028	01/23/02	19	Statement
M 020003	01/23/02	21	Rate 2-2
M 020024	01/23/02	21	6 Statements
M 020137	06/06/02	21	Rate 2
M 020153	06/11/02	21	Rate 4
M 020166	07/15/02	21	Billing
M 010205	01/02/02	22	Rate 2-2
M 020001	01/24/02	22	Rate 2-2
M 020002	01/24/02	22	Rate 2-2
M 020004	01/25/02	23	Rate 2-2
M 020029	02/04/02	24	Rate 2-2
M 020136	06/06/02	24	48 Rate 6
M 020136	06/06/02	24	Rate Crged
M 020005	01/28/02	26	Rate 2-2
M 020092	04/11/02	27	Billing
M 020117	05/17/02	31	Billing
M 020006	02/04/02	33	Rate 2-2
M 020007	02/04/02	33	Rate 2-2
M 020008	02/04/02	33	Rate 2-2
M 020083	04/03/02	33	Billing
M 020083	04/03/02	33	Billing
M 010209	01/22/02	41	Rate 2-2
M 010206	01/24/02	44	Rate 2-2
M 020088	05/01/02	50	Rate 4
M 010179	01/22/02	54	Rate 6

182	03/01/02	Briar Wyck Apts	8625 Van Wyck Expressway	10460/30310	M 020082	06/19/02	110	Billing
183	03/01/02	Palump	2940 Ocean Parkey	23117/24510	M 020085	06/24/02	115	Billing
184	12/06/01	Cinderella Realty	3435 76 Street	32607/3700	M 010183	07/03/02	209	Rate 6

Rate Consultant Cases For 2002

	Received At Keyspan	Name	Address	Account Number	Case	Comp	Days To Complete	Type
1	11/29/01							
2	12/06/01	Cinderella Realty	3435 76 Street	32607/3700	M 010179	01/22/02	54	Rate 6
3	12/11/01				M 010183	07/03/02	209	Rate 6
4	12/11/01				M 010205	01/02/02	22	Rate 2-2
5	12/12/01				M 010206	01/24/02	44	Rate 2-2
6	01/02/02				M 010209	01/22/02	41	Rate 2-2
7	01/02/02				M 020009	01/04/02	2	Tax Issue
8	01/02/02				M 020010	01/04/02	2	Tax Issue
9	01/02/02				M 020011	01/04/02	2	Tax Issue
10	01/02/02				M 020014	01/04/02	2	Billing Inq.
11	01/02/02				M 020012	01/04/02	2	Tax Issue
12	01/02/02				M 020015	01/04/02	2	Statement
13	01/02/02				M 020013	01/04/02	2	Statement
14	01/02/02				M 020019	01/07/02	5	Statement
15	01/02/02				M 020021	01/07/02	5	Statement
16	01/02/02				M 020023	01/07/02	5	6 Statements
17	01/02/02				M 020020	01/07/02	5	Statement
18	01/02/02				M 020016	01/07/02	5	Billing Inq.
19	01/02/02				M 020022	01/07/02	5	Billing Inq.
20	01/02/02				M 020017	01/07/02	5	Statement
21	01/02/02				M 020018	01/07/02	5	Statement
22	01/02/02				M 020003	01/23/02	21	Rate 2-2
23	01/02/02				M 020024	01/23/02	21	6 Statements
24	01/02/02				M 020001	01/24/02	22	Rate 2-2
25	01/02/02				M 020002	01/24/02	22	Rate 2-2
26	01/02/02				M 020004	01/25/02	23	Rate 2-2
27	01/02/02				M 020005	01/28/02	26	Rate 2-2
28	01/02/02				M 020006	02/04/02	33	Rate 2-2
29	01/02/02				M 020007	02/04/02	33	Rate 2-2
30	01/04/02				M 020008	02/04/02	33	Rate 2-2
31	01/04/02				M 020025	01/23/02	19	Statement
32	01/04/02				M 020027	01/23/02	19	Statement
33	01/04/02				M 020026	01/23/02	19	Statement
					M 020028	01/23/02	19	Statement

34	01/11/02
35	01/11/02
36	01/23/02
37	01/23/02
38	01/23/02
39	01/29/02
40	01/29/02
41	02/01/02
42	02/01/02
43	02/01/02
44	02/01/02
45	02/01/02
46	02/01/02
47	02/01/02
48	02/01/02
49	02/01/02
50	02/01/02
51	02/01/02
52	02/01/02
53	02/01/02
54	02/01/02
55	02/01/02
56	02/01/02
57	02/01/02
58	02/01/02
59	02/01/02
60	02/01/02
61	02/01/02
62	02/01/02
63	02/08/02
64	02/08/02
65	02/08/02
66	02/08/02
67	02/08/02
68	02/08/02
69	02/08/02
70	02/12/02

M 020030	01/23/02	12	Tax Issue
M 020029	02/04/02	24	Rate 2-2
M 020033	01/25/02	2	Statement
M 020031	02/04/02	12	Rate 2-2
M 020032	02/04/02	12	Rate 2-2
M 020035	01/31/02	2	Statement
M 020034	02/01/02	3	Rate 2-2
M 020036	02/05/02	4	Rate 2-2
M 020037	02/05/02	4	Rate 2-2
M 020055	02/05/02	4	Tax Inquiry
M 020046	02/05/02	4	Rate Issue
M 020038	02/07/02	6	Statement
M 020049	02/07/02	6	Statement
M 020039	02/07/02	6	Statement
M 020044	02/07/02	6	Statement
M 020045	02/07/02	6	Statement
M 020040	02/07/02	6	Statement
M 020052	02/07/02	6	Statement
M 020053	02/07/02	6	Statement
M 020054	02/07/02	6	Statement
M 020038	02/07/02	6	Statement
M 020041	02/07/02	6	Statement
M 020042	02/07/02	6	Statement
M 020043	02/07/02	6	Statement
M 020047	02/07/02	6	Rate Issue
M 020050	02/07/02	6	Statement
M 020051	02/07/02	6	Statement
M 020057	02/13/02	12	Rate Issue
M 020056	02/13/02	12	Rate Issue
M 020063	02/08/02	0	Statement
M 020059	02/08/02	0	Rate 2-2
M 020060	02/08/02	0	Rate 2-2
M 020061	02/08/02	0	Inq
M 020062	02/08/02	0	Statement
M 020058	02/08/02	0	Rate 2-2
M 020064	02/09/02	1	10 Statements
M 020066	02/13/02	1	Rate 2-2

71	02/12/02				M 020065	02/13/02	1	Rate2-2
72	02/14/02				M 020068	02/15/02	1	Rate 2-2
73	02/14/02				M 020069	02/15/02	1	Rate 2-2
74	02/14/02				M 020067	02/15/02	1	Rate 2-2
75	02/14/02				M 020070	02/16/02	2	Rate 2-2
76	02/14/02				M 020071	02/16/02	2	Rate 2-2
77	02/14/02				M 020072	02/19/02	5	Rate 2-2
78	02/21/02				M 020073	02/23/02	2	Mtr Inq
79	02/28/02				M 020075	02/28/02	0	Statement
80	02/28/02				M 020076	03/01/02	1	Rate 2-2
81	02/28/02				M 020074	03/02/02	2	Rate 2-2
82	02/28/02				M 020077	05/01/02	62	Inquiry
83	03/01/02				M 020078	03/02/02	1	9 Statements
84	03/01/02				M 020080	03/04/02	3	7 Statements
85	03/01/02				M 020079	03/04/02	3	9 Statements
86	03/01/02				M 020084	03/14/02	13	Billing
87	03/01/02				M 020084	03/14/02	13	Billing
88	03/01/02				M 020081	03/14/02	13	Rate 6
89	03/01/02				M 020081	03/14/02	13	Billing
90	03/01/02				M 020083	04/03/02	33	Billing
91	03/01/02				M 020083	04/03/02	33	Billing
92	03/01/02	Briar Wyck Apts	8625 Van Wyck Expressway	10460/30310	M 020082	06/19/02	110	Billing
93	03/01/02	F Trump	2940 Ocean Parkey	23117/24510	M 020085	06/24/02	115	Billing
94	03/05/02				M 020086	03/11/02	6	Statement
95	03/07/02				M 020087	03/11/02	4	Rate 2-2
96	03/12/02				M 020088	05/01/02	50	Rate 4
97	03/14/02				M 020089	03/15/02	1	Rate Inq
98	03/14/02				M 020090	03/15/02	1	Rate Inq
99	03/15/02				M 020091	03/15/02	0	Tax Inq
100	03/15/02				M 020093	03/25/02	10	13 Statements
101	03/15/02				M 020092	04/11/02	27	Billing
102	03/19/02				M 020096	03/26/02	7	Statement
103	03/19/02				M 020098	03/26/02	7	Statement
104	03/19/02				M 020097	03/26/02	7	Statement
105	03/19/02				M 020100	03/26/02	7	Statement
106	03/19/02				M 020099	03/26/02	7	Statement
107	03/19/02				M 020094	03/26/02	7	Statement

108	03/19/02	M 020095	03/26/02	7	Statement
109	03/25/02	M 020101	03/29/02	4	Rate Inq
110	04/03/02	M 020105	04/11/02	8	Statement
111	04/03/02	M 020105	04/11/02	8	Statement
112	04/03/02	M 020105	04/11/02	8	Statement
113	04/03/02	M 020105	04/11/02	8	Statement
114	04/09/02	M 020103	04/11/02	2	Statement
115	04/09/02	M 020103	04/11/02	2	Statement
116	04/09/02	M 020104	04/11/02	2	Statement
117	04/09/02	M 020102	04/19/02	10	Statement
118	04/09/02	M 020102	04/19/02	10	Statement
119	04/10/02	M 020106	04/15/02	5	Statement
120	04/10/02	M 020107	04/24/02	14	Rate 6 Issue
121	04/16/02	M 020109	04/16/02	0	Statement
122	04/16/02	M 020208	04/16/02	0	Statement
123	04/16/02	M 020110	04/24/02	8	3 Statements
124	04/16/02	M 020117	05/17/02	31	Billing
125	04/17/02	M 020111	04/29/02	12	Fixed Factor
126	04/19/02	M 020114	04/29/02	10	Statement
127	04/19/02	M 020113	04/29/02	10	Statement
128	04/19/02	M 020112	04/29/02	10	Statement
129	04/23/02	M 020115	04/30/02	7	Rate 2
130	04/23/02	M 020116	04/30/02	7	Rate 2
131	04/24/02	M 020118	04/29/02	5	Rate Inq.
132	04/30/02	M 020119	05/01/02	1	Statement
133	04/30/02	M 020120	05/06/02	6	Rate 2
134	05/01/02	M 020135	05/17/02	16	Rate 4
135	05/02/02	M 020124	05/03/02	1	Statement
135	05/02/02	M 020125	05/03/02	1	Statement
137	05/02/02	M 020126	05/07/02	5	Tax iss
138	05/02/02	M 020121	05/07/02	5	Question
139	05/02/02	M 020123	05/08/02	6	Rate 4
140	05/02/02	M 020122	05/08/02	6	Rate 6
141	05/03/02	M 020127	05/07/02	4	Rate 2
142	05/06/02	M 020132	05/17/02	11	Rate 6
143	05/07/02	M 020128	05/07/02	0	Statement
144	05/07/02	M 020129	05/07/02	0	Statement

145	05/07/02
146	05/07/02
147	05/13/02
148	05/13/02
149	05/13/02
150	05/14/02
151	05/16/02
152	05/21/02
153	05/21/02
154	05/21/02
155	05/22/02
156	05/22/02
157	05/29/02
158	05/29/02
159	05/29/02
160	05/29/02
161	05/30/02
162	05/31/02
163	06/03/02
164	06/03/02
165	06/03/02
166	06/03/02
167	06/03/02
168	06/04/02
169	06/04/02
170	06/07/02
171	06/07/02
172	06/07/02
173	06/11/02
174	06/11/02
175	06/17/02
176	06/17/02
177	06/17/02
178	06/19/02
179	06/24/02
180	06/24/02
181	06/24/02

M 020131	05/15/02	8	Rate 2
M 020130	05/15/02	8	Rate2
M 020134	05/14/02	1	Statement
M 020136	06/06/02	24	48 Rate 6
M 020136	06/06/02	24	Rate Crged
M 020133	05/14/02	0	Statement
M 020137	06/06/02	21	Rate 2
M 020138	06/04/02	14	Statement
M 020139	06/05/02	15	Statement
M 020153	06/11/02	21	Rate 4
M 020140	06/04/02	13	Statement
M 020141	06/04/02	13	Statement
M 020144	06/04/02	6	Statement
M 020145	06/04/02	6	Statement
M 020143	06/04/02	6	Statement
M 020142	06/04/02	6	Statement
M 020146	06/11/02	12	Rate 6
M 020147	06/12/02	12	Rate 6
M 020148	06/04/02	1	Statement
M 020152	06/07/02	4	Statement
M 020151	06/07/02	4	Statement
M 020150	06/07/02	4	Statement
M 020149	06/04/02	4	Statement
M 020154	06/11/02	7	Statement
M 020155	06/11/02	7	Statement
M 020157	06/07/02	0	Statement
M 020156	06/11/02	4	Statement
M 020158	06/14/02	7	Rate 6
M 020159	06/11/02	0	Statement
M 020160	06/14/02	3	Rate 2 Inq
M 020161	06/17/02	0	Rate 6
M 020162	06/25/02	8	Rate 6
M 020161	07/01/02	14	Rate 6
M 020163	06/25/02	6	Rate 2
M 020163	06/28/02	4	Rate 2
M 020165	06/28/02	4	Rate 2
M 020166	07/10/02	16	Billing

182	06/24/02		M 020166	07/15/02	21	Billing
183	06/25/02		M 020168	06/27/02	2	Statement
184	06/25/02		M 020167	06/27/02	2	Statement



December 6, 2001

Mr. Douglas DiCeglio
Urac Corp
119 North Park Ave.
Rockville Center, New York 11570

Re: Katz Realty Group
Cinderella Realty Co.
3435 76 Street
Queens, New York 11237

Account Number 07126/32220

Dear Mr. Douglas DiCeglio

This is to acknowledge receipt of your inquiries dated November 28, 2001 regarding the above accounts. We have begun the process of compiling the information necessary to respond to these inquiries. If we need additional information regarding your inquiry we will contact you. If you should have any questions during our review, please contact me at (718) 403-2250.

Sincerely,



Richard D. Mills
Consumer Relations



One MetroTech Center
Brooklyn, New York 11201-3850

February 28, 2002

Mr. Douglas DiCeglio
Urac Corp
119 North Park Ave.
Rockville Center, New York 11570

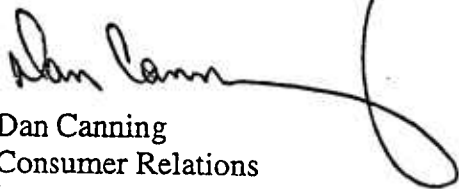
Re: Trump Management

Account Number(s) 23117/24510
23117/24501
10460/03010
31226/17710

Dear Mr. Douglas DiCeglio

This is to acknowledge receipt of your inquiries dated February 20, 2002 regarding the above accounts. We have begun the process of compiling the information necessary to respond to these inquiries. If we need additional information regarding your inquiry we will contact you. If you should have any questions during our review, please contact me at (718) 403-5022.

Sincerely,



Dan Canning
Consumer Relations

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1 1 1 1

(718) 403-5022

July 3, 2002

Mr. Douglas DiCeglio
URAC Corporation
119 North Park Ave.-Suite 409
Rockville Center, New York 11570

Re: Katz Realty Group
Cinderella Realty Co.
3435 76 Street
Queens, New York 11372

Account Number-07126/32220

Dear Mr. DiCeglio:

A review of your client's account revealed that your client Cinderella Realty Co does qualify for Service Classification 6M3 as of September 2000.

The Service Classification on your client's account was changed to reflect the correct rate. Your client's bills have been recalculated from September 29, 2000 through May 30, 2002. This recalculation resulted in a credit due to your client in the amount of \$4,474.07 on which interest was applied in the amount of \$796.83

If I can be of further assistance on this matter, please contact me at 403-5022

Sincerely,



Dan Canning
Consumer Relations



MetroTech Center
Brooklyn, New York 11201-3850
(718) 403-5022

June 20, 2002

Mr. Douglas DiCeglio
URAC Corporation
119 North Park Ave.-Suite 409
Rockville Center, New York 11570

Re: Briar Wyck Apts.
8625 Vanwyck Expressway
Queens NY 11435

Account Number-10460/03010

Dear Mr. DiCeglio:

A review of the above referenced account was made to determine if your client was over-billed for the period, January 28, 2000 through February 28, 2000, during a meter exchange. You also indicated that the calendar year 2000 showed an increase in gas consumption.

My review of your client's account indicates that the bill for the period January 28, 2000 through February 28, 2000 was estimated. Keyspan was not able to obtain an actual reading until September 26, 2000, since the meter readings are accumulative and the September 2000 reading was much higher than the February estimate, we can agree that the gas was used. However we can not determine the actual gas consumption between January 28, 2000 through February 28, 2000.

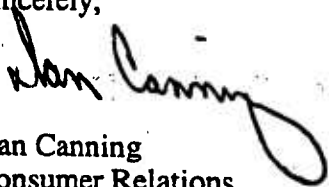
On February 15, 2000, Keyspan replaced the corrector on meter number 9224551 with an updated version. The corrector is there to measure temperature, pressure or both. The gas meter was not changed on February 15, 2000. The head of the meter was changed to allow for the updated corrector.

My review of your client's account does show an increase in gas consumption for the calendar year 2000. This increase is in line with higher degree-days for that period. It also shows that gas consumption in the calendar year 2001 is lower and consistent with previous years and degree-days.

(Attached, you will find a degree-day and consumption comparison chart)

If I can be of further assistance on this matter, please contact me at 403-5022

Sincerely,



Dan Canning
Consumer Relations

KEYSPAN
Energy Delivery

On Tech Center
Brooklyn, New York 11201-3850

(718) 403-5022

June 21, 2002

Mr. Douglas DiCeglio
URAC Corporation
119 North Park Ave.-Suite 409
Rockville Center, New York 11570

Re: Trump Village Sect #1
2940 Ocean Pkwy
Brooklyn NY 11235

Account Number-23117/24501

Dear Mr. DiCeglio:

A review of the above referenced account was made to determine if your client was over billed for the period 07/28/2000 through 10/11/2001.

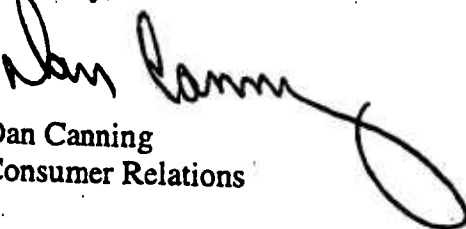
Your client's account does show inconsistency and numerous estimates, this is due to the Industrial Metering Unit (IMU) readings and the corrector readings did not match. On February 2, 2001 It was determined that the corrector was set up to pulse 10 times for every digit change, however the IMU was set up to understand that every pulse was a digit change on the corrector. Therefore the IMU was recording gas usage ten times more than actual (reading on the corrector). At this time the IMU was set up to accept pulsing at 10 to 1. This corrected the problem, please note that the meter was recording accurately, it was only the corrector that malfunctioned.

On March 13, 2001 Keyspan's Field Representative verified that the IMU was reading the corrector properly.

As per your request, I have attached service history and meter reading history which includes meter exchange information.

If I can be of further assistance on this matter, please contact me at 403-5022

Sincerely,



Dan Canning
Consumer Relations