



June 8, 2020

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Proposed Tariff Revisions – Billing of Changes in Rates

Dear Secretary Phillips,

National Fuel Gas Distribution Corporation (“Distribution” or the “Company”) hereby submits the following revisions to its tariff, P.S.C. No. 9 – GAS:

<u>Section No.</u>	<u>Leaf No.</u>	<u>Revision No.</u>	<u>Superseding Revision No.</u>
0	54	2	1

This revision relates to a planned implementation of programming changes to the Company’s SAP billing system. Currently, SAP utilizes a linear proration methodology to allocate usage when a rate changes during a customer’s billing period. Total usage is allocated between the effective rate periods based on the number of days in the billing period that are before and after the effective date of the rate change. With the proposed change, an individual customer’s proration will be determined by its load profile. The customer’s non-heating base load will be prorated linearly, based on the number of days before and after the effective date of a rate change. The customer’s heating load would be prorated based on the number of degree days during the effective rate periods.

This “mixed-weighting” approach to proration is an accurate representation of customer usage during the billing period that accounts for weather impacts on heat-sensitive customers. Several of the Company’s peers have current tariff language that describes the use of degree days in proration calculations, making this change consistent with established practices within the state. These changes have a proposed initial effective date of October 1, 2020. A redline of the proposed tariff leaf is attached to this letter.

Concurrent with this filing, Distribution respectfully requests a waiver from the requirements of Public Service Law §66(12) and 16 NYCRR §720-8.1, pertaining to newspaper publication. The proposed tariff change is largely non-substantive in customer effect, and therefore the expense of publication would not serve the public interest.

If you have any questions regarding the Company’s tariff filing, please contact the

undersigned at (716) 857-7237 or Jeremy Barber at (716) 857-7226 at your convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Randy C. Rucinski". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Randy C. Rucinski
General Manager & Deputy General Counsel
Rates & Regulatory Affairs

Attachment

GENERAL INFORMATION (Cont'd)

II.13. REVISION

A. Modification of Agreement

The Service Classifications, rates, charges, general information, rules, regulations, terms and conditions, characteristics of service, forms of application and their provisions, contained in or referred to in any application or agreement for service or contained in this Rate Schedule or any amendatory leaf or leaves thereof are subject to such termination, change or modification, at any time as may be provided by lawful order of the Public Service Commission or in any schedule or amendatory leaf or leaves subsequently issued and in effect pursuant to law. The Company reserves the right, in any manner permitted by law and at any time to amend, add to or withdraw any of the Service Classifications or schedule leaves herein contained or hereafter promulgated or to modify any of the rules, regulations, terms and conditions or other requirements or provisions, contained in or applicable to any Service Classification.

B. Billing of Changes in Rates

The rates, charges and classifications of service set forth in this Rate Schedule or in amendments thereof by revised leaves hereafter duly filed and in effect shall, unless otherwise expressly stated therein, apply to service supplied to the customer commencing on the effective date set forth in such Rate Schedule or revised leaves thereof.

Whenever a rate change becomes effective during a billing period, unless otherwise specified, the Company will prorate any non-heating load consumption by the number of calendar days before and after the effective date of the rate change. Heating load will be prorated by the number of degree days in each effective rate period.

PSC NO: 9 GAS
NATIONAL FUEL GAS DISTRIBUTION CORPORATION
INITIAL EFFECTIVE DATE: ~~1005/01/20~~2017

SECTION: 0 LEAF: 54
REVISION: ~~21~~
SUPERSEDING REVISION: ~~10~~

~~ISSUED IN COMPLIANCE WITH ORDER IN CASE NO. 16-G-0257 DATED 04/20/17~~

GENERAL INFORMATION (Cont'd)

II.13. REVISION

A. Modification of Agreement

The Service Classifications, rates, charges, general information, rules, regulations, terms and conditions, characteristics of service, forms of application and their provisions, contained in or referred to in any application or agreement for service or contained in this Rate Schedule or any amendatory leaf or leaves thereof are subject to such termination, change or modification, at any time as may be provided by lawful order of the Public Service Commission or in any schedule or amendatory leaf or leaves subsequently issued and in effect pursuant to law. The Company reserves the right, in any manner permitted by law and at any time to amend, add to or withdraw any of the Service Classifications or schedule leaves herein contained or hereafter promulgated or to modify any of the rules, regulations, terms and conditions or other requirements or provisions, contained in or applicable to any Service Classification.

B. Billing of Changes in Rates

The rates, charges and classifications of service set forth in this Rate Schedule or in amendments thereof by revised leaves hereafter duly filed and in effect shall, unless otherwise expressly stated therein, apply to service supplied to the customer commencing on the effective date set forth in such Rate Schedule or revised leaves thereof.

Whenever a rate change becomes effective during a billing period, unless otherwise specified, the Company will prorate any non-heating load consumption by the number of calendar days before and after the effective date of the rate change. Heating load will be prorated by the number of degree days in each effective rate period. ~~the difference in billing under the old and new rates on the basis of the number of days within the billing period from and after the effective date related to the total number of days in the billing period.~~