



National Fuel

December 10, 2007

Hon. Jaclyn Brillling
Secretary
NYS Public Service Commission
Three Empire State Plaza
Albany, NY 12223

RE: Case 94-E-0952 – In the Matter of Competitive Opportunities Regarding Electric Service.
Case 00-E-0165 – In the Matter of Competitive Metering.
Case 02-M-0514 – Proceeding on Motion of the Commission to Investigate Competitive Metering for Gas Service.

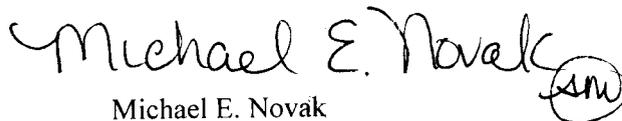
Dear Secretary Brillling:

For the above proceedings, National Fuel Gas Distribution Corporation (“Distribution”) hereby respectfully provides its response to Notice Seeking Comment (“Notice”) issued on October 10, 2007 by the New York State Public Service Commission (“Commission”). The Notice asserts that advanced metering infrastructure (“AMI”) proposals submitted by utilities should be measured against a clear and comprehensive standard for the functions the proposals are intended to achieve and that success of AMI systems further requires an open standard that enables multi-vendor, interoperable equipment. The Notice seeks comment upon the appropriateness of items included in a list of features and functions proposed for in an AMI systems standard proposed for adoption by the Commission.

Distribution reiterates its long held position that other than for perhaps its largest customers (annual consumption greater than 55,000 Mcf), AMI is not appropriate for gas customers. Items d), e) and f)¹ of the proposed list, dealing with data collection intervals, data storage and accessibility have no practical application in the gas market. While the proposed standards may or may not be helpful to the development of AMI for electric customers, they would service no practical purpose for gas customers and, in fact, would merely increase costs with no corresponding increase in value or performance.

In conclusion, if the Commission is to adopt AMI standards, such standards should not be applicable only to gas utilities.

Sincerely,



Michael E. Novak
Asst. General Manager

¹ From the Notice, d) Ability to provide time-stamped interval data, at hourly or shorter time intervals, e) On-board meter memory capable of storing at least 60 days of readings and f) Direct, real-time (defined as a time lag of five minutes or less) remote read-only access for customers and/or competitive providers to meter data.