



March 3, 2023

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

RE: Request to Consider Initiation of a CASE to Revise and Update New York Codes, Rules, and Regulations Associated with 16 NYCRR Part 229 Gas Standards.

Via Email

Dear Secretary Phillips:

The Northeast Gas Association¹ (NGA) on behalf of our New York State natural gas local distribution company members (“LDC’s”) respectfully submits a request to consider initiation of a CASE to revise and update New York Codes, Rules, and Regulations Associated with 16 NYCRR Part 229 Gas Standards. While the current Standard has served to provide a safety and measurement framework for decades, evolving from the period of manufactured gas supplies through the introduction of interstate pipeline supplies, sections of the current code are not reflective of current industry understanding and practices regarding gas quality and interchangeability, industry standards, and test methods. More specifically, current requirements and references for measurement, monitoring, and reporting of heating value, impurities, specific gravity, composition, additive gases, test stations, records, reports, and reference publications should be considered for revision.

While it is possible to comply with the intent of existing regulations, as a practical matter some of the specific requirements are either not achievable or no longer relevant due to the nature of evolving gas supplies. As a result, NGA requests a CASE be established to facilitate review and updating current requirements in §16 NYCRR Part 229.

¹ NGA is a regional trade association that focuses on education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA represents natural gas distribution companies, transmission companies, liquefied and compressed natural gas suppliers, and associate member companies. Its member companies provide natural gas service to over 13 million customers in 9 states (CT, ME, MA, NH, NJ, NY, PA, RI, VT).

For the purposes of this request, the LDCs are:

- Central Hudson Gas and Electric Corp.
- Consolidated Edison Company of New York, Inc.
- Corning Natural Gas Corp.
- Hamilton Municipal Gas
- Liberty Utilities
- National Fuel Gas Distribution Corp.
- National Grid
- New York State Electric and Gas Corp.
- Orange and Rockland Utilities, Inc.
- Rochester Gas and Electric Corp.
- Valley Energy Inc.

Conclusion

The LDCs and NGA appreciate the opportunity to work collaboratively with the Commission and the public to revise and update existing requirements in §16 NYCRR Part 229 Gas Standards.

Respectfully submitted,



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