



August 12, 2019

Honorable John B. Rhodes, Chair  
The New York State Public Service Commission  
3 Empire State Plaza, 20<sup>th</sup> Floor  
Albany, NY 12210

**Re: Request for an Investigation into National Grid's Denials of Natural Gas Services in Brooklyn NY.**

Dear Chair Rhodes:

We, the undersigned members of the New York State Senate Brooklyn Delegation ("Delegation"), write concerning the recent practice of Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corp d/b/a National Grid for Gas Service (collectively "National Grid") of denying natural gas connections in Brooklyn. We believe that the denials and their cumulative impacts upon our constituents and other Brooklyn residents and businesses, as we outline below, warrant an immediate investigation by the Public Service Commission.

The offices of members of the Delegation have received numerous emails, letters, and calls from constituents indicating that National Grid will not be providing them gas service. Our concerns about this issue are focused on four areas.

First, it appears that the practice of denying service, purportedly a result of long-term growth in demand, has been implemented without meaningful prior notice by National Grid to its customers or the general public. It is clear that significant expenditures have been made by residents and businesses who relied upon being able to get gas service.

Second, we are strongly concerned about the manner in which National Grid is making decisions regarding specific customers, including what qualifies as a "new service connection" and how the company decides whether or not to provide service when repairs are being made to existing connections. The perception that some of these decisions are being made capriciously is exacerbated by the short notice (or no notice) the company provides our constituents before denying service and a general lack of transparency in the decision making process.

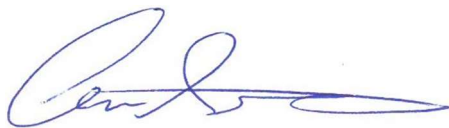
Third, beyond the effect on individual customers, we are concerned about the overall effect that service denials and uncertainty caused by the moratorium will have on the overall wellbeing of the people who live and work in our Borough. New businesses on the brink of opening, apartment buildings that are being built to house families and the elderly, and in some cases, buildings that were merely undergoing repairs all have been denied or may be subject to denial,

in a manner that may call into question the overall efficacy of investment in our economy. People are being deprived service and now face an uncertain path forward.

Fourth, we are concerned by the manner that the company has used its customers' contact information to encourage them to advocate for environmental approvals of gas pipelines—or face a future of no gas service. These appeals seem inappropriate for a public utility to the extent that they may use the contact information customers have provided for the sake of communicating with National Grid regarding their gas service, not for the purpose of being enlisted in National Grid's corporate lobbying campaign.

We believe that all of these concerns deserve immediate attention. We therefore request that you initiate a prompt investigation and public hearings so that our constituents have a formal venue to share their experiences with the Commission and express their views. We are aware that the Commission is already conducting an investigation into Consolidated Edison's gas moratorium in Westchester County under Case No. 19-G-0080. We believe that National Grid's actions in Brooklyn (and presumably its Queens and Long Island service areas as well) are equally worthy of investigation. We appreciate the Commission's attention to this request.

Sincerely,



cc: Kathleen H. Burgess, Secretary, the New York State Public Service Commission  
Thomas Congdon, Executive Deputy, the New York State Public Service Commission  
Eric Adams, Brooklyn Borough President  
Richard Berkley, Executive Director, The Public Utility Law Project