

October 20, 2006

**Via Hand Delivery and Electronic Mail**

Honorable Kristi Izzo  
Board of Public Utilities  
Two Gateway Center  
Newark, NJ 07101

Re: Proposed Readoption with Amendments: N.J.A.C. 14:6  
BPU Dkt. No. GX06060489

Dear Secretary Izzo:

Enclosed for filing please find an original and ten copies of the Division of Rate Counsel's ("Rate Counsel") comments in the above matter. **We are enclosing one additional copy of the materials transmitted. Please stamp and date the copy as "filed" and return it to our courier. Thank you for your consideration and assistance.**

The Board of Public Utilities ("Board") published the above-mentioned proposed regulations concerning the provision of natural gas service in the New Jersey Register at 38 N.J.R. 3245 on August 21, 2006. This public notice called for comments to be submitted by October 20, 2006.

Rate Counsel has reviewed the proposed regulations and supports the Board's efforts to update and improve the existing regulations. For clarity, Rate Counsel recommends that N.J.A.C. 14:6-2.4(a)(1) concerning the installation of service line shutoff valves be modified to add the words "service line" after "Every new" in the beginning of that proposed regulation. The sentence would then say, "Every new service line, as of (the effective date of these amendments), and every renewed service line; and . . ."

Respectfully submitted,

RONALD K. CHEN  
PUBLIC ADVOCATE OF NEW JERSEY

SEEMA M. SINGH, ESQ.  
Director, Division of Rate Counsel

By: \_\_\_\_\_  
Badrhn M. Ubushin  
Assistant Deputy Public Advocate

- c: President Jeanne M. Fox, (via hand delivery)  
Commissioner Connie O. Hughes, (via hand delivery)  
Commissioner Frederick F. Butler, (via hand delivery)  
Commissioner Joseph L. Fiordaliso, (via hand delivery)  
Commissioner Christine V. Bator, (via hand delivery)