



March 11, 2013

VIA ELECTRONIC FILING AND REGULAR MAIL

Ms. Kristi Izzo
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Re: Board Staff's Utility Consolidated Billing/Purchase of Receivables Proposal

Dear Secretary Izzo:

In response to the Notice of Opportunity to Comment (Board Notice) circulated by the Staff of the New Jersey Board of Public Utilities (BPU Staff), New Jersey Natural Gas Company (NJNG or the Company) is submitting this letter. NJNG also relies on the comments provided on May 11, 2011 in this matter.

1. Customer Eligibility-Class

NJNG currently provides eligibility for consolidated billing to all customer classes and will retain that policy.

2. Customer Eligibility – 12 month restriction

This is not applicable to NJNG since the Company does not drop customers from consolidated billing to dual billing.

3. Payment to TPS

NJNG will continue to provide payments to the third party suppliers (TPSs) twice a month.

4. Drop to Dual Billing

This is not applicable to NJNG.

5. Arrearage Reports

Since NJNG purchases the receivables from the TPSs without a discount and does not drop customer to dual billing, this is not applicable. There is no need for NJNG to provide an arrearage report to the TPS.

6. Discount Factors/Consolidated Billing Fees

NJNG is not seeking to change the current procedure related to the purchase of receivables but does reserve the right to address that issue, and any others

that may be related to this process, during a future base rate case.

NJNG reserves the right to provide reply comments in the time frame established in the Board Notice.

Respectfully submitted,



Tracey Thayer, Esq.

Director, Regulatory Affairs Counsel
New Jersey Natural Gas Company

c: Electronic Copy only to POR/PTC Working Group from the February 25, 2013 e-mail.