

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Standards for Business Practices of)
Interstate Natural Gas Pipelines) Docket No. RM96-1-041

**COMMENTS OF
THE INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA**

Pursuant to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) August 21, 2018 Notice of Proposed Rulemaking (“NOPR”)¹ issued in the above-referenced docket, the Interstate Natural Gas Association of America (“INGAA”) respectfully submits these comments. The NOPR proposes to amend 18 C.F.R. § 284.12 to incorporate, by reference, with certain enumerated exceptions, the latest version, Version 3.1, of the North American Energy Standard Board’s (“NAESB”) business practice standards. INGAA supports the NOPR but urges the Commission to ensure that implementation of a final rule in this proceeding does not occur before April 1, 2019, after the winter heating season.

INGAA is a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in the United States. INGAA’s 28 members represent the vast majority of interstate natural gas transmission pipeline companies in the U.S. INGAA’s members, which operate approximately 200,000 miles of interstate natural gas pipelines, serve as an indispensable link between natural gas producers and consumers. Its United States members are regulated by the Commission pursuant to the Natural Gas Act (“NGA”).²

¹ *Standards for Business Practices of Interstate Natural Gas Pipelines*, Notice of Proposed Rulemaking, 164 FERC ¶ 61,125 (2018)

² 15 U.S.C. §§ 717-717w.

COMMENTS

INGAA respectfully requests that FERC ensure implementation of a final rule in this proceeding does not occur prior to April 1, 2019, after the winter heating season. INGAA supports the NOPR and agrees with the Commission that “implementation of these standards and regulations will promote [the] efficiency and reliability” of the natural gas industry.³ However, INGAA members are concerned about the unintended consequences that could arise if the Commission moves quickly to a final rule, thereby requiring implementation during the winter heating season. Implementation of a final rule in this proceeding will require substantial time and effort from both pipelines and their customers to alter business systems, scheduling and coordination processes. It would not be prudent or efficient to require such changes to be made during the winter heating season, which is the most critical time period for gas transportation and market requirements. Accordingly, the Commission should ensure that implementation of a final rule in this proceeding is not required prior to April 1, 2019.

³ NOPR, *supra* n.1, at P 1.

CONCLUSION

WHEREFORE, for the above-mentioned reasons, INGAA respectfully requests the Commission avoid requiring implementation pursuant to a final rule in this proceeding prior to April 1, 2019, after the winter heating season.

Respectfully Submitted,



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