

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

Interstate and Intrastate Natural Gas Pipelines;)
Rate Changes Relating to Federal Income Tax Rate)

Docket No. RM18-11-000

**COMMENTS AND REQUEST FOR CLARIFICATION OF THE
AMERICAN GAS ASSOCIATION**

Pursuant to the Notice of Proposed Rulemaking (“NOPR”) issued March 15, 2018,¹ by the Federal Energy Regulatory Commission (“Commission”) in the above-referenced proceeding, the American Gas Association respectfully submits these comments. AGA commends the Commission for taking action in issuing the NOPR pursuant to the Natural Gas Act (“NGA”) to address the overall financial impacts of the Tax Cuts and Jobs Act of 2017 (“TCJA”) to ensure that interstate pipeline rates remain just and reasonable. AGA’s comments request that the Commission provide certain further clarifications regarding the NOPR proposal with respect to the interstate pipeline filings. Additionally, consistent with its light-handed regulation of Hinshaw pipelines and efforts to reduce the burdens with respect to Hinshaw pipeline interstate service, AGA comments on the NOPR’s proposed new section 284.123(i) regarding Hinshaw pipeline rate filings and requests clarification, as discussed in further detail herein.

I. EXECUTIVE SUMMARY

The NOPR proposes a process that will allow the Commission to determine which jurisdictional natural gas pipelines may be collecting unjust and unreasonable rates in light of the corporate tax rate reduction in the TCJA and changes to the Commission’s income tax allowance

¹ *Interstate and Intrastate Natural Gas Pipelines; Rate Changes Relating to Federal Income Tax Rate*, 162 FERC ¶ 61,226 (2018).

policies following the *United Airlines, Inc. v. FERC* decision, including the Revised Policy Statement on Treatment of Income Taxes (“Revised Policy Statement”).² AGA supports the efforts in the NOPR to ensure interstate pipeline rates are just and reasonable in light of the tax rate reduction. However, in circumstances where the interstate pipelines have addressed the TCJA impact in a recent rate case settlement or will address the TCJA impact pursuant to the terms of an existing settlement, then the Commission should provide for an exemption to the Form No. 501-G filing requirement or, in the alternative, such pipelines should be able to file a statement that filing Form No. 501-G is unnecessary with some explanation for the reason by describing the terms of the settlement. On behalf of its members, AGA requests that the Commission provide clarification concerning the proper reporting of income tax expenses when the upstream ownership of the interstate pipeline includes Master Limited Partnership(s) (“MLPs”). AGA also requests further clarification with respect to negotiated rate agreements that are based on an interstate pipeline’s tariffed rate, and the interaction of NOPR compliance filings and the 2015 Policy Statement on Modernization Trackers. Commission clarification in these areas will benefit AGA members, as shippers on the interstate pipelines, including in their review of Form No 501-G filings and/or in negotiating pre-packaged settlements.

Additionally, as part of the NOPR, the Commission addresses its regulations and policy regarding the rates charged by Natural Gas Policy Act of 1978 (“NGPA”)³ section 311 and Hinshaw⁴ pipelines, including a proposal to modify section 284.123 of the regulations to require

² *Inquiry Regarding the Commission’s Policy for Recovery of Income Tax Costs*, 162 FERC ¶ 61,227 (2018).

³ 15 U.S.C. 3372.

⁴ Section 1(c) of the NGA exempts from the Commission’s NGA jurisdiction pipelines which transport gas in interstate commerce if: (1) they receive natural gas at or within the boundary of a state; (2) all the gas is consumed within that state; and (3) the pipeline is regulated by a state commission. This exemption is referred to the “Hinshaw exemption” named after the congressman who introduced the bill that amended the NGA to include section 1(c).

all NGPA section 311 and Hinshaw pipelines to make a rate filing for the interstate services they may provide if their appropriate intrastate rates are reduced to reflect the TCJA. AGA member companies own and/or operate natural gas pipelines and local distribution systems, including systems classified as Hinshaw pipelines, some of which provide FERC-jurisdictional services to interstate customers under limited-jurisdiction certificates issued by the Commission under section 284.224 of the Commission's regulations. AGA's members are affected by and would be required to comply with the proposal to modify section 284.123 of the Commission's regulations. Given this, members have raised several questions on various aspects of the proposal, including the filing trigger; the timing of the filing; and the impact on the next subsequent five-year rate review. Commission clarification on these items will assist AGA members in complying with the requirements of a final rule. The specific requested clarifications are discussed in greater detail in these comments.

II. COMMUNICATIONS

All pleadings, correspondence and other communications filed in this proceeding should be addressed to:

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See also, ANR Pipeline Co. v. Federal Energy Regulatory Comm'n, 71 F.3d 897, 898 (1995) (*ANR v. FERC*) (which provides a brief summary of the history of the Hinshaw exemption).

III. IDENTITY AND INTERESTS

The AGA, founded in 1918, represents more than 200 state-regulated and municipal natural gas utility companies that deliver clean natural gas to more than 177 million Americans. AGA also advocates for the more than 74 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent – more than 70 million customers – receive their gas from AGA members. Today, natural gas meets more than one-fourth of the United States' energy needs.⁵

AGA member natural gas local distribution companies (“LDCs” or “gas utilities”) own and operate local natural gas distribution pipeline systems that typically receive natural gas supplies that have been transported on the interstate pipeline system. AGA members take service from virtually every interstate natural gas pipeline regulated by the Commission. As customers of jurisdictional pipelines, AGA members are directly affected by Commission rules and policies addressing or affecting the jurisdictional interstate pipeline rates. Additionally, AGA member companies own and/or operate natural gas pipelines and local distribution systems, including systems classified as Hinshaw pipelines some of which provide FERC-jurisdictional services to interstate customers under limited-jurisdiction certificates issued by the Commission under section 284.224 of the Commission's regulations. AGA member companies, therefore, have a direct and substantial interest in the issues raised in this proceeding.

IV. COMMENTS

AGA supports the efforts in the NOPR to obtain the information necessary regarding the impact of the TCJA and the Revised Policy Statement to ensure interstate pipeline rates are just and reasonable. In review of the NOPR proposal and in an effort to further understand the

⁵ For more information, please visit www.aga.org.

proposal, both as shippers on interstate pipelines and as owners and operators of Hinshaw pipelines and local distribution companies, AGA members have raised questions that form the basis of AGA's requested clarifications herein.

A. AGA's Requested Clarifications Regarding the NOPR's Proposal for Interstate Pipeline Informational Filings.

Further Guidance on Non-MLP Partnerships

In the Revised Policy Statement, the Commission stated it was only addressing the application of *United Airlines* to MLPs generically due to the court remand, but recognized that all partnerships ultimately would have to address the same double recovery issue. Specifically, the Revised Policy Statement found that while MLPs are no longer allowed to include an income tax allowance in their cost of service, the application of *United Airlines* to non-MLP partnerships would be addressed in future proceedings. The Commission stated:

While all partnerships seeking to recover an income tax allowance will need to address the double-recovery concern, the Commission will address the application of *United Airlines* to non-MLP partnership or other pass-through business forms as those issues arise in subsequent proceedings.⁶

For those partnerships that are not MLPs, the Commission will address such matters in subsequent proceedings.⁷

Notwithstanding the statements noted above, in light of the proposal in the NOPR for the One-time Reports and the need for shippers to be able to review and evaluate Form No. 501-G filings as well as participate in any settlement negotiations, AGA members seek guidance from the Commission at this time on a few details to prepare for any subsequent proceedings. Specifically, there is a question regarding the proper reporting on Form No. 501-G for an interstate pipeline formed as a tax pass-through entity or non-MLP partnership that is owned in

⁶ Revised Policy Statement at P 1.

⁷ *Id.* at P 8.

part by at least one MLP partnership and in part by one or more corporations. If the pipeline itself is not an MLP, but is also not a separate tax-paying entity (i.e., a non-MLP partnership), then AGA members seek confirmation that the proper way for the pipeline to report this on Form No. 501-G is for the pipeline to use a marginal tax rate of 0% for unit holders that are MLPs when calculating its weighted average federal and state income tax rates. Also, AGA requests that the Commission clarify whether a pipeline that is partially owned by one or more MLPs will be ineligible to have a tax allowance and, specifically, the percentage of ownership by MLPs that will trigger the policy. Further, there is a question regarding at what level in the pipeline's upstream ownership MLP ownership would be relevant to the application of the new policy; for example, the immediate upstream ownership level, an intermediate upstream ownership level, or the ultimate upstream parent level.

Negotiated Rate Agreements Based on Tariff Rates

Regarding the treatment of negotiated rate agreements, the NOPR states that, “unless a negotiated rate agreement expressly provides otherwise, the rates in such agreements will be unaffected by any reduction in the pipeline’s maximum rate reductions resulting from policies adopted in the rulemaking proceeding.”⁸ AGA requests the Commission to confirm that in the case where the interstate pipeline specifically required that the rate for capacity awarded under a negotiated rate agreement be no less than the interstate pipeline’s otherwise applicable tariff rate such that the negotiated rate is now equal to the otherwise applicable tariff rate, and the tariff rate is reduced pursuant to proceedings related to the TCJA, any such negotiated rate must be similarly reduced between the pipeline and the shipper, which is the party to the negotiated rate agreement (in all cases consistent with the applicable terms of the negotiated rate agreement).

⁸ NOPR at P 45.

Form No. 501-G Filings and 2015 Asset Modernization Policy Statement

The 2015 Policy Statement on Cost Recovery Mechanisms for Modernization of Natural Gas Facilities (“2015 Policy Statement”)⁹ sets forth the framework for interstate pipelines to establish simplified mechanisms – such as trackers or surcharges – to recover modernization costs to modernize aging and inefficient infrastructure. The 2015 Policy Statement describes that the Commission’s evaluation and approval requires the satisfaction of five standards, including a recent review of base rates. Specifically, any pipeline proposing a tracker mechanism must establish that the current base rates to which any surcharges would be added are just and reasonable such that the overall rate produced with the surcharge is just and reasonable and does not reflect over-recovery of costs that may have been occurring under preexisting base rates. In terms of the demonstration required, the Commission stated:

The pipeline could demonstrate its base rates are just and reasonable by filing a NGA section 4 general rate proceeding, a cost and revenue study in the form specified in section 154.313 of the Commission’s regulations, or through some other collaborative effort between the pipeline and its customers. In applying the Final Policy we decline to require that such rate review be conducted only through an NGA section 4 rate proceeding. The type of rate review necessary to determine whether a pipeline’s existing rates are just and reasonable is likely to vary from pipeline to pipeline. For example, it may be possible for some pipelines to demonstrate that their existing base rates are under-recovering their full cost of service and that a section 4 rate filing would likely lead to an increase in their base rates through a showing short of filing an NGA section 4 rate proceeding. Therefore, *we remain open to considering alternative approaches for a pipeline to justify its existing rates* (emphasis added).¹⁰

In light of the Form No. 501-G filings and the information to be reported therein, AGA requests clarification from the Commission on the interaction between these filings and the rate review discussed in the 2015 Policy Statement. Specifically, AGA urges the Commission to clarify that

⁹ *Cost Recovery Mechanisms for Modernization of Natural Gas Facilities*, 151 FERC ¶ 61,047 (2018) (2015 Policy Statement).

¹⁰ 2015 Policy Statement at P 52.

a Form No. 501-G filing would not be considered among the alternative approaches that the Commission would consider sufficient for a pipeline to justify its existing rates for purposes of meeting the 2015 Policy Statement.

B. AGA's Requested Clarifications Regarding the NOPR's Proposal for Hinshaw Pipeline Rate Filings.

The NOPR states that for intrastate natural gas pipelines performing interstate services pursuant to section 311 of the NGPA and Hinshaw pipelines performing interstate transportation pursuant to a limited jurisdiction certificate under section 284.224 of the Commission's regulations, existing regulations are generally sufficient to provide shippers reasonable rate reductions with respect to the TCJA and Revised Policy Statement.¹¹ However, the NOPR proposes modifications of FERC's regulations to require all NGPA section 311 and Hinshaw pipelines that provide interstate service under a blanket certificate to file a new rate election for interstate service not later than 30 days after their rates for intrastate service are reduced to reflect the TCJA. Specifically, the NOPR proposes a new rate re-filing requirement under proposed new section 284.123(i) applicable to either rate election option in the Commission's regulations – entities using state-approved rates for interstate services under the rate election in section 284.123(b)(1), or entities that have chosen a rate election option of using Commission-established cost-based rates for the provision of interstate services under section 284.123(b)(2).¹²

Proposed new section 284.123(i) is set forth below:

- (i) If an intrastate pipeline's rates on file with the appropriate state regulatory agency are reduced to reflect the reduced income tax rates adopted in the Tax Cuts and Jobs Act of 2017, the intrastate pipeline must file a new rate election pursuant to paragraph (b) of this section not later than 30 days after the reduced intrastate rate becomes effective. This requirement

¹¹ NOPR at P 55.

¹² NOPR at P 59.

applies regardless of whether the intrastate pipeline's existing interstate rates are based on § 284.123(b)(1) or (2).

As an initial matter, AGA understands the NOPR's proposal for a new rate election filing to apply to those intrastate entities that have Commission-approved interstate rates under section 284.123(b)(2). This is because certain entities that have interstate rates based on section 284.123(b)(1) already have the obligation to make a filing within 30 days after a change in state rates.¹³ In this regard, the regulatory text is confusing as proposed. AGA recommends that the text be modified to be clear that the rate election requirement only applies to intrastate entities whose rates are based on section 284.123(b)(2).

For AGA members that use Commission-established rates under section 284.123(b)(2), the NOPR proposal raises many questions that form the basis of AGA's requested clarifications with respect to their provision of certain interstate services subject to the Commission's limited-jurisdiction, as discussed below.

Background

In Order No. 781,¹⁴ the Commission explained that section 284.123 of the Commission's regulations applies to filings by: (1) intrastate pipelines providing interstate services pursuant to section 311 of the NGPA;¹⁵ and (2) Hinshaw pipelines providing interstate services subject to the Commission's NGA jurisdiction pursuant to blanket certificates issued under § 284.224 of the

¹³ NOPR at P 56 and P 57; and the Commission's regulations at section 284.123(g)(9)(iii).

¹⁴ *Revisions to Procedural Regulations Governing Transportation by Intrastate Pipelines*, 144 FERC ¶ 61,034 (2013) (Order No. 781).

¹⁵ Seeking to eliminate the regulatory barriers between the intrastate and interstate markets and to promote the entry of intrastate pipelines into the interstate market, Congress adopted NGPA section 311 authorizing the Commission to allow intrastate pipelines to transport gas "on behalf of" interstate pipelines or local distribution companies served by interstate pipelines "under such terms and conditions as the Commission may prescribe. NGPA section 601(a)(2) exempts section 311 transportation service from the Commission's NGA jurisdiction.

Commission's regulations.¹⁶ The authorization for Hinshaw pipelines to provide limited-jurisdiction service to customers in interstate services came about shortly after the adoption of the NGPA with the Commission providing for the ability of Hinshaw pipelines to apply for NGA section 7 certificate authority to provide interstate services in the same manner as section 311 pipelines may do under NGPA section 311, without subjecting the state-regulated facilities to the full extent of FERC's jurisdictional rules and regulations.¹⁷ The Commission thereafter determined that local distribution companies not qualifying as Hinshaw pipelines also were to obtain blanket certificates that would permit them to transport gas in interstate commerce.¹⁸

The Commission's regulation is intended to be light-handed for section 311, Hinshaw pipelines, and local distribution companies.¹⁹ In Order No. 781, without addressing local distribution companies per se, the Commission explained that as part of its regulation of section 311 and Hinshaw pipelines, it has a policy of requiring a rate review every five years²⁰ to ensure that rates remain fair and equitable because these pipelines are not subject to the same reporting requirements or level of rate review as interstate pipelines. However, the periodic rate review requirement itself was not included in the Commission's regulations, but was imposed in its orders approving each rate filing by an intrastate pipeline.²¹ In an effort to provide regulatory certainty and reduce regulatory burdens on intrastate pipelines, in Order No. 781 the

¹⁶ Order No. 781 at P 2.

¹⁷ *Certain Transportation, Sales and Assignments by Pipeline Companies not Subject to Commission Jurisdiction Under Section 1(c) of the Natural Gas Act*, Order No. 63, FERC Stats. & Regs. ¶ 30,118, at 30, 824-825 (1980).

¹⁸ *Sales and Transportation by Interstate Pipelines and Distributors; Expansion of Categories of Activities Authorized Under Blanket Certificate*, Order No. 319, FERC Stats. & Regs. ¶ 30,477, at 30,621 (1983).

¹⁹ *Revisions to Procedural Regulations Governing Transportation by Intrastate Pipelines*, 141 FERC ¶ 61,037 (2012)(Notice of Proposed Rulemaking) at P 7.

²⁰ The prior policy required a triennial rate review, but in Order No. 735, the Commission modified its rate review policy in order to decrease the frequency of review from three to five years from the date the approved rates took effect.

²¹ Now it is in the regulations at 18 CFR § 284.123(g)(9).

Commission implemented additional changes to the rate review policy, including revising the Part 284 regulations governing open access transportation service to include optional notice procedures that intrastate pipelines may elect to use when filing proposed rates or operating conditions pursuant to section 284.123 of the Commission's regulations, and to allow intrastate pipelines with unchanged state-approved rates to meet the periodic rate review requirement by certifying that their state-based rates continue to satisfy the requirements of § 284.123(b)(1) of the Commission's regulations for using state-based rates.

General Observations

AGA members provide interstate services under the Commission's regulations in Section 284.224 and would be affected by the NOPR's proposed new section 284.123(i). Upon review and consideration of the Commission's proposal, AGA provides some general feedback regarding the proposal as it relates to Hinshaw pipelines and local distribution companies. More specifically, in looking at how to comply with the proposal, several questions have been identified and AGA requests that the Commission clarify its proposal prior to adopting any final rule. Such clarifications are necessary to assist AGA members in complying with the requirements of any finalized new section 284.123(i).

As an initial matter, AGA believes that the requirements for Hinshaw pipelines adopted in any final rule should be consistent with the Commission's focus on reducing regulatory burdens on these entities not subject to full Commission-jurisdiction. In most cases, the interstate services provided by Hinshaw pipelines are very small in relation to the scale of services provided by the interstate pipelines. For example, one AGA member provides transportation service that is less than 20,000 Dth/day to one out-of-state customer. Given this and the Commission's efforts to reduce burdens on Hinshaw pipelines, AGA submits that any

final rule in this proceeding should be further streamlined to take into consideration the extent to which such entities enter into such transactions, the limited nature of such transactions, and the associated compliance costs. To be clear, AGA believes that the requirements applicable to Hinshaw pipelines (and local distribution companies) adopted in any final rule should not be greater than those imposed on the interstate pipelines. Specific suggestions and requested clarifications are discussed further below.

Filing Trigger

The regulatory text of proposed new section 284.123(i) states that “if an intrastate pipeline’s rates on file with the appropriate state regulatory agency are reduced to reflect the reduced income tax rates” in the TCJA, “the intrastate pipeline must file a new rate election....” AGA seeks clarification regarding whether the proposed section 284.123(i) rate election filing requirement would be triggered if there is a change to *any* state rate for intrastate service required by the state regulatory agency due to the TCJA. For example, it may be the case that there is not a comparable state rate for a service for which the Commission-established cost-based rate applies, or the applicable state rate may reference the Commission-established rate for the intrastate service. Having a clear understanding of the section 284.123(i) filing trigger will assist entities in ensuring that they comply with applicable rate election filing requirements within the appropriate period of time specified in any final rule in this proceeding.

Additionally, AGA seeks clarification from the Commission as to whether all section 224.224 certificate holders that use the section 284.224(e)(2) variation of the section 284.123(b)(1) rate election – which sets forth the manner in which a certificate holder without any state rates on file with the appropriate state regulatory agency for city-gate service may nonetheless make a rate election under section 284.123(b)(1) – also need to make a new rate

election filing pursuant to proposed new section 284.123(i) following a change to the state-level distribution rates from which the interstate rate is derived. The proposed text for new paragraph (i) only references “intrastate” pipelines. Therefore, the proposed text of paragraph (i) could be read to exclude section 284.224 certificate holders – Hinshaw pipelines and other local distribution companies; although it appears in the NOPR that the Commission intends to apply its requirements to intrastate pipelines and Hinshaw pipelines. AGA requests that the Commission clarify in any final rule in this proceeding whether Section 284.123(i) applies to Hinshaw pipelines and other local distribution companies.

Timing of Rate Election Filing

The proposed new section 284.123(i) would require entities to file a new rate election with the Commission “not later than 30 days after the reduced intrastate rate becomes effective.” Since any final rule amending the Commission’s regulations to add the proposed new section 284.123(i) would take effect after publication in the *Federal Register*, AGA seeks clarification regarding whether the Commission's proposal is intended to apply to intrastate pipelines (and any other intended entities) whose rates are reduced at the state level and become effective before the Commission issues a final rule. If this is the intent, then the Commission should be clear and set a compliance deadline that is triggered by the date of a final rule. However, if the Commission’s intent is not to require intrastate pipelines that have reduced their intrastate rates effective before the date of the final rule to file a new rate election, then the Commission should make this clear.

Additionally, LDCs with limited staff (which may be focused on the state proceeding(s) related to the TCJA) are likely to need more time to prepare and file the new rate election with the Commission. Therefore, AGA proposes that the Commission instead adopt a compliance deadline of not less than ninety (90) days after the latter of: the effective date of the final rule; or

the effective date of the reduced intrastate rate (if effective after the effective date of a final rule). In the case of an LDC subject to multiple state jurisdictions, AGA suggests that the 90-day compliance deadline apply following the completion of the state proceeding in the last state jurisdiction that is addressing the TCJA rate impact. While extension requests on the rate election compliance filing could be made, the NOPR does not specifically discuss extensions or the Commission's willingness to entertain them.

The proposal in the NOPR also does not address situations where an entity may have already filed a cost and revenue study with the Commission that may be currently pending, or entities that may be required to make a rate filing under the five-year cycle in the near future – specifically in 2018 or early in the first or second quarters of 2019. In these circumstances, AGA believes it would be administratively efficient and less burdensome on the Hinshaw pipeline to address the TCJA in the pending proceeding or upcoming required filing, as applicable, rather than requiring another filing to be made. Moreover, the NOPR does not address the situation where a party may have had rates recently approved under the Optional Notice Procedure filing process in section 284.123(g), such as in 2017 or even in 2018, prior to the effective date of any final rule in this proceeding.

Rate Election Filing Components

In terms of the actual components of the rate election filing requirement, the extent of the filing as proposed in the NOPR is unclear in terms of whether the Commission expects that a fully updated cost and revenue study would need to be performed and filed, or whether the out-of-cycle filing is intended to address rates simply on the limited issue of TCJA impact similar to what is afforded to the interstate pipelines.²² AGA believes that in order to reduce the burden on

²² NOPR at P 42.

Hinshaw pipeline filings, any final rule should be clear in terms of expectation for the rate election filing and that, unless it is made in the context of a regular five-year review, Hinshaw pipelines should have the option to simply re-file their rates on the limited issue of the TCJA impact. Additionally, as the NOPR provides interstate pipelines the option of rate settlement,²³ any final rule should also allow such settlement option to intrastate entities.

Filing Fee Waiver

Another issue regarding the filing burden for intrastate entities as a result of any final rule in this proceeding regards the filing fees. In order to reduce the burden on intrastate filings, AGA proposes that the Commission waive the filing fee for the filings required by a final rule that would be outside of the regular five-year review cycle.²⁴

Five-Year Periodic Rate Review Cycle Re-set

For entities that use a Commission-approved rate under section 284.123(b)(2), the proposed new rate election filing requirement will be, for some, outside the usual five-year periodic rate review cycle. AGA members presume that the filing of a rate election would serve to re-set a new five-year review period, but the NOPR does not address this. AGA thus seeks that the Commission confirm in any final rule that the filing of a rate election filing under 284.123(i) would re-set the currently applicable five-year review cycle for a Hinshaw pipeline that has rates set by the Commission under section 284.123(b)(2).

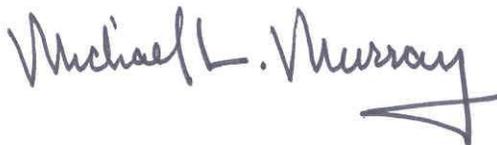
²³ *Id.* at P 27.

²⁴ Applicable filing fees as set forth in section 381.403 of the Commission's regulations provide: "The fee established for a petition for rate approval pursuant to § 284.123(b)(2) is \$13,500. Such fee must be submitted in accordance with subpart A of this part and § 284.123(b)(2)."

V. SUMMARY AND CONCLUSION

Wherefore, for the reasons stated above, the American Gas Association respectfully requests that the Commission consider these comments in this proceeding.

Respectfully submitted,

A handwritten signature in dark ink that reads "Michael L. Murray". The signature is written in a cursive style with a large, stylized initial "M".

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Document Content(s)

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