

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

Collection of Connected Entity Data from                    )  
Regional Transmission Organizations and                    )  
Independent System Operators                                    )                    Docket No. RP15-23-000

**COMMENTS OF THE AMERICAN GAS ASSOCIATION IN SUPPORT OF  
MOTION FOR TECHNICAL CONFERENCE  
AND REQUEST TO POSTPONE COMMENT DEADLINE**

Pursuant to Rule 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.213 (2015), the American Gas Association (“AGA”) respectfully submits these comments in support of the Motion for a Technical Conference and Request to Postpone Comment Deadline (“Motion”), filed by a group of “Affected Parties” on October 28, 2015, in the above-referenced docket regarding the Commission’s Connected Entity Data Notice of Proposed Rulemaking (“Connected Entity NOPR”).<sup>1</sup> In support thereof, AGA respectfully states as follows:

**I. COMMUNICATIONS**

Communications concerning this filing should be addressed as follows:

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<sup>1</sup> *Collection of Connected Entity Data from Regional Transmission Organizations and Independent System Operators*, 152 FERC ¶ 61,219 (2015), 80 Fed. Reg. 58,382, at 58,383 (September 29, 2015).

## **II. IDENTITY AND INTERESTS**

The AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 71 million residential, commercial and industrial natural gas customers in the U.S., of which 94 percent – more than 68 million customers – receive their gas from AGA members. AGA is an advocate for local natural gas utility companies and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international gas companies and industry associates. Today, natural gas meets almost one-fourth of the United States' energy needs. For more information, please visit [www.aga.org](http://www.aga.org).

## **III. COMMENTS IN SUPPORT**

The Connected Entity NOPR proposes to amend the Commission's regulations to require each regional transmission organization (RTO) and independent system operator (ISO) to electronically deliver to the Commission, on an ongoing basis, data required from its market participants that would, among other things, include a list of "Connected Entities," a newly proposed term, which includes entities that have a common ownership, employment, debt, or contractual relationship to the market participants, as specified in the NOPR. The Commission states that the information would assist the Commission in its screening and investigative efforts to detect market manipulation.

Since the issuance of the Connected Entity NOPR questions and uncertainty have arisen regarding the entities that may fall within the scope of proposed definition of “Connected Entity” in the NOPR. Given this, AGA supports the Motion and believes that a technical conference would afford parties the opportunity to discuss and better understand the key elements of the Connected Entity NOPR as well as the scope of the proposed definition of “Connected Entity.” This information would then facilitate the ability of parties to assess the potential impact of the Connected Entity NOPR and, if necessary, develop detailed and thoughtful comments for the Commission to consider in this proceeding. In order to facilitate the timing of the requested technical conference, AGA also supports the Motion’s request to postpone the comment deadline or, in the alternative, as requested by the Motion, if the Commission decides to require comments prior to holding a technical conference, to extend the comment deadline to January 29, 2015.

#### **IV. CONCLUSION**

In consideration of the above, AGA respectfully requests that the Commission grant the Motion for Technical Conference and Request to Postpone Comment Deadline in this proceeding.

Respectfully submitted,

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