

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

Promotion of a More Efficient Capacity Release Market)	Docket No. RM08-1-000
Iroquois Gas Transmission System, L.P.)	Docket No. RP08-454-000
Southern Star Central Gas Pipeline, Inc.)	Docket No. RP08-447-000

**MOTION TO INTERVENE AND PROTEST OF
THE NATURAL GAS SUPPLY ASSOCIATION**

The Natural Gas Supply Association (“NGSA”) hereby protests requests by Iroquois Gas Transmission System (“Iroquois”) and Southern Star Central Gas Pipeline, Inc. (“Southern Star”) for an extension of time to comply with Order No. 712.¹ Iroquois and Southern Star assert that additional time, until November 1, 2008, and September 30, 2008, respectively, is needed to comply with the requirements prescribed in Order No. 712 because upgrades to computer systems are required for compliance. NGSA urges the Federal Energy Regulatory Commission (“the Commission”) to not delay the effective date of the final rule. Instead, the Commission should provide pipelines with the ability to use transitional mechanisms for a period of time until compliance requirements can be met.

¹ *Promotion of a More Efficient Capacity Release Market*, Docket No. RM08-1-000, FERC Stats and Regs., Proposed Regs. ¶ 32,625, 72 Fed. Reg. 65,916 (2007)(“Capacity Release NOPR” or “NOPR”). On July 24, 2008, the Commission issued a notice of Iroquois' request for extension of time, filed originally in Docket No. RM08-1-000, and established Docket No. RP08-454-000 for that filing. The Commission has also issued a notice of Southern Star's related request for limited waiver under Docket No. RP08-447-000.

I. COMMUNICATIONS

NGSA represents integrated and independent companies that produce and market domestic natural gas. Established in 1965, NGSA encourages the use of natural gas within a balanced national energy policy, and promotes the benefits of competitive markets to ensure reliable and efficient transportation and delivery of natural gas and to increase the supply of natural gas to U.S. consumers.

Notices and communications concerning these comments should be addressed as follows:

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II. PROTEST

On May 20, 2008, NGSA sent a letter to Chairman Kelliher and each of the Commissioners urging expedited action to a final rule in Docket No. RM08-1-000. In that letter, NGSA stressed not only the utility and benefits of AMAs, but also the importance of getting the AMA-related rules in place as early as possible so that those benefits can be realized by market participants and the gas consuming public.² Since the vast benefits provided by the use of AMAs cannot be fully realized until the final rule is in effect, NGSA now urges the Commission to deny Iroquois' and Southern

²NGSA letter under Docket No. RM08-1-000, May 20, 2008.

Star's requests for an extension of time to comply with the final rule and to allow these rules to take effect on July 30, 2008 on all interstate natural gas pipelines.

NGSA appreciates the need for time to transition certain pipeline systems into compliance with the new capacity release rules. Therefore, NGSA supports providing pipelines with a transitional time to comply with the computer-related requirements associated with implementation of the final rule. At least with respect to AMA postings, NGSA urges the Commission to allow pipelines to use existing mechanisms to comply Order No. 712 until such time as their EBBs can be changed to permanently reflect the new regulations.³

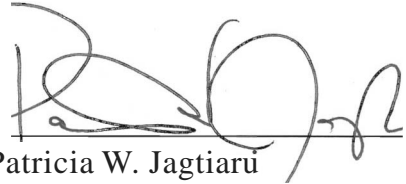
Pipelines already allow informational postings on their EBBs and information on pre-arranged releases associated with AMAs and other non-biddable releases authorized in Order No. 712 could easily be identified in those fields. All major interstate pipelines have sections on their website for posting capacity release transactions that allow for special comments. Releasing shippers could simply use this existing comment section or field to indicate that capacity is being released in the context of an AMA. Moreover, pipelines should be allowed to manually accept bids, for example via email, for releases which are not subject to the max rate until their systems can be adjusted to comply with Order No. 712. While there may be several aspects of an EBB that a pipeline company must change to implement the final rule, it is essential that the transition allow for shippers to engage in all of the types of transactions, in particular AMAs, which are allowed by the final rule.

³ It is noteworthy that only two pipelines have filed a request for an extension of time to comply with the final rule.

III. CONCLUSION

WHEREFORE, the Commission should reject Iroquois' and Southern Star's request for an extension of time and maintain a July 30 effective date for implementation of Order No. 712. NGSA does not oppose efforts to provide pipelines additional time to adjust their systems by allowing for transitional posting procedures provided that pipelines allow shippers to engage in the capacity release transactions, including AMAs, authorized under the final rule as of the intended effective date. There is, however, no need to delay implementation of the entire final rule when temporary posting formats are available.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Patricia W. Jagtiani', is written over a horizontal line. The signature is fluid and cursive.

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