



R. Skip Horvath
President & CEO

January 18, 2007

Mark Davidson
Editorial Director, U.S. Gas News
The McGraw-Hill Companies
Two Penn Plaza, 25th Floor
New York, NY 10121-2298

Re: *Gas Daily* Request for Comments Regarding Publishing 'Tier 3' Data

Dear Mr. Davidson:

In response to your December 20, 2006, request for comments, NGSA supports your proposal to publish monthly survey volume and deal count data for points with fewer than five trades and volumes below 25,000 MMBtu per day (i.e. 'tier 3 points'). With the increase in reporting and the decline in the number of 'tier 3' points, Platts' proposal to publish 'tier 3' data is an important opportunity to improve market transparency without harming underlying competition and market efficiency.

In addition to the publication of price, volume and deal count data for all points, you may wish to consider publishing a range (e.g. <5, 5-10, 10-20 or >20) for the number of entities that reported to form the index at a particular point. Doing so would further improve transparency by allowing market participants to evaluate market depth at a particular trading point. The use of ranges, instead of an exact number, could help to maintain the anonymity of the reporting entity or entities. Importantly, this information should not be confused with reporting the number of counterparties, which is commercially sensitive. NGSA remains opposed to the disclosure of counterparty information.

Platts' recent comments to FERC regarding the voluntary response to improving the overall level of price transparency were helpful in illustrating how far the market has come in the last couple of years. Platts' comments provided useful insight into the sectors not reporting and could help facilitate a dialogue that might help to further reduce some of those barriers.

Overall, we believe the natural gas commodity market is robust and functioning well. NGSA is supportive of many of the efforts Platts and the other publishers have taken to help restore confidence in the market. We are optimistic that we can continue to identify ways to enhance transparency and efficiency. NGSA looks forward to continuing to work with you on this issue, so please consider us a resource and do not hesitate to call if we can ever be of assistance.

Thank you for your consideration.

A handwritten signature in red ink that reads "R. Skip Horvath". The signature is written in a cursive, flowing style.

Skip Horvath
President, Natural Gas Supply Association