

February 20, 2004

The Honorable Pat Wood
Chairman
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket No. RM01-10-000 – Standards of Conduct for
Transmission Providers

Dear Chairman Wood:

The undersigned associations, representing a broad cross-section of the competitive energy industry and other industry stakeholders, wish to congratulate the Commission for approving Order No. 2004, the final rule governing standards of conduct between regulated transmission providers and their energy affiliates. We support the final rule and believe its implementation will help ensure confidence in the market by further restricting the potential for market power abuses.

For the past two-and-a-half years, the undersigned associations (either separately or as members of larger groups) have filed numerous rounds of comments and participated in conferences in this proceeding, urging the Commission to take these much-needed steps to enhance these rules and broaden their applicability to areas where market abuse could occur. (See list of comments attached.) Obviously, silence on rehearing from a large number of stakeholders signifies satisfaction with the direction of Order No. 2004.

As you proceed with deliberations over the pending requests for rehearing, we urge you to keep our prior comments and positions in mind, and refrain from taking any action that would serve to diminish this important initiative.

We commend your leadership in this important area and urge you to continue to support these important policy objectives through full implementation of these new standards of conduct.

Sincerely,

American Public Gas Association
American Public Power Association
Canadian Association of Petroleum Producers
Independent Petroleum Association of America
Independent Oil & Gas Association of West Virginia
National Association of State Utility Consumer Advocates
Natural Gas Supply Association
Process Gas Consumers
Transmission Dependent Utilities Systems¹

cc: Hon. Nora Mead Brownell, Commissioner, Federal Energy Regulatory Commission
Hon. Joseph T. Kelliher, Commissioner, Federal Energy Regulatory Commission
Hon. Suedeen G. Kelly, Commissioner, Federal Energy Regulatory Commission

¹ The Transmission Dependent Utilities Systems consists of Arkansas Electric Cooperative Corporation, Golden Spread Electric Cooperative, Kansas Electric Power Cooperative, Old Dominion Electric Cooperative, and Seminole Electric Cooperative.

LISTING OF COMMENTS FILED BY SIGNATORY ASSOCIATIONS

American Public Gas Association

Docket No. RM01-10:

June 5, 2003: Supplemental Comments of The Natural Gas Supply Association, The American Public Gas Association, and The Independent Petroleum Association of America in Response to Corporate Governance Concerns

December 20, 2001: Initial Comments of the American Public Gas Association

American Public Power Association

Docket No. RM01-10:

December 20, 2001: Initial Comments of the American Public Power Association

Independent Oil & Gas Association of West Virginia

Docket No. RM01-10:

December 29, 2003: Request for Rehearing of Order No. 2004

June 14, 2002: Comments following Technical Conference

December 20, 2001: Initial Comments

Docket No. PL00-1:

January 5, 2001: Summary of comments for public conference

Independent Petroleum Association of America

Docket No. RM01-10:

June 5, 2003: Supplemental Comments of The Natural Gas Supply Association, The American Public Gas Association, and The Independent Petroleum Association of America in Response to Corporate Governance Concerns

June 28, 2002: Comments of the Independent Petroleum Association of America and Cooperating Associations

December 21, 2001: Comments of the Independent Petroleum Association of America and Cooperating Associations

National Association of State Utility Consumer Advocates

Docket No. RM01-10:

December 29, 2003: National Association of State Utility Consumer Advocates' Request for Clarification and/or Rehearing (requesting that the Commission further strengthen the definition of energy affiliate)

December 29, 2003: Pennsylvania Office of Consumer Advocate's Request for Rehearing (applauding issuance of a strong rule governing affiliated transactions but requesting that the Commission limit the inclusion of LDC off-system sales in the definition of energy affiliate to only those off-system sales made on affiliated pipelines)

June 13, 2003: Additional Comments of National Association of State Utility Consumer Advocates

June 28, 2002: Supplemental Comments of National Association of State Utility Consumer Advocates

May 21, 2002: Byron Harris participated on a panel at FERC's Technical Conference on behalf of NASUCA supporting the proposed rule and asking that FERC adopt a strong rule with a broad definition of energy affiliates.

December 20, 2001: Comments of the National Association of State Utility Consumer Advocates

Natural Gas Supply Association

Docket No. RM01-10:

December 18, 2003: Letter to Pat Wood In Support of Final Rule

June 5, 2003: Supplemental Comments of The Natural Gas Supply Association, The American Public Gas Association, and The Independent Petroleum Association of America in Response to Corporate Governance Concerns

June 28, 2002: Initial Post-Conference Comments

May 21, 2002: John Poe, on behalf of NGSA, participated at FERC's Technical Conference

December 20, 2001: Initial Comments

Docket No. RM98-10:

March 10, 2000: Request for Rehearing of Order No. 637 (pages 10-22)

Docket No. PL00-1:

April 30, 2001: "Dialog Concerning Natural Gas Transportation Policies Needed to Facilitate Development of Competitive Natural Gas Markets": Initial Post-Technical Conference Comments

March 15, 2001: Mark Haskell, on behalf of NGSA, participated at FERC Conference

February 27, 2001: Letter to Chairman Hebert From the Pipeline Transportation Customer Coalition (PTCC)

January 5, 2001: Initial Comments and Request to Participate

Process Gas Consumers

Docket No. RM01-10:

June 17, 2002: Comments following technical conference of the Process Gas Consumers Group, American Forest and Paper Association, American Iron and Steel Institute, Georgia Industrial Group, Industrial Gas Users of Florida, Florida Industrial Gas Users, and United States Gypsum Company

December 20, 2001: Comments of the Process Gas Consumers Group, American Forest and Paper Association, American Iron and Steel Institute, Georgia Industrial Group, Industrial Gas Users of Florida, Florida Industrial Gas Users, and United States Gypsum Company