

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

**Storage Reporting Requirements of Interstate) Docket No. RM11-4-000
and Intrastate Natural Gas Companies)**

COMMENTS OF THE NATURAL GAS SUPPLY ASSOCIATION

The Natural Gas Supply Association (“NGSA”) hereby submits comments in response to the Federal Energy Regulatory Commission’s (“FERC” or “the Commission”) Notice of Inquiry regarding the semi-annual reporting requirements of interstate and intrastate natural gas storage companies.¹

NGSA is a trade association, which 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. customers. NGSA members are shippers on numerous interstate and intrastate natural gas storage systems throughout the United States and the result of this proceeding will have a significant impact on NGSA.

¹ *Storage Reporting Requirements of Interstate and Intrastate Natural Gas Companies*, Notice of Inquiry, 133 FERC ¶ 61236 (2010) (“NOI”).

I. COMMUNICATIONS

Any communications with respect to this pleading and this proceeding should be addressed to:

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II. COMMENTS

NGSA supports the Commission's efforts to balance the need to prevent overburdening regulated entities with improving the availability and accessibility of the data contained in existing interstate and intrastate storage reports. In comments recently filed in response to FERC's Notice of Inquiry on capacity transfers, NGSA stated "to prevent undue discrimination or loss of market transparency, the Commission should focus its efforts on ensuring that the transparency requirements that are already in place for... pipelines are effectively applied."² That same request applies here. In this proceeding, the Commission should ensure that all submissions of storage reports are made in a standardized format in order to allow shippers to readily access the information they need. This could be achieved by creating a new standardized quarterly form, which storage operators can use to report volumes and revenues by shipper, or by combining these semi-annual reports with other reporting requirements, such as the quarterly Form No. 549D.

² See NGSA's Comments on the NOI in Docket No. RM11-1 and Comments in Docket No. RP08-606.

As FERC explained in Order No. 678, the information reported by storage providers in semi-annual reports, combined with other mandatory reports and posting requirements, is intended to provide shippers and the Commission with the information necessary to ensure that capacity is not withheld.³ Moreover, the semi-annual storage reports are intended to allow shippers to assess what rates are being charged to other shippers before contracting for capacity, or whether rates they currently pay remain just and reasonable. However, despite these requirements, the lack of standardization of these reports often prevents shippers from obtaining pertinent storage information and data.

Shippers face numerous obstacles when attempting to find information in the storage reports that are required to be submitted to FERC. The first obstacle is that the shipper may simply not be able to locate the submitted information in FERC's *eLibrary* given that there is no specific "form" to search. In fact, many storage submissions are not even assigned a docket number, making them particularly difficult to track. Because of the lack of standardization of the reports, the information in mandatory storage reports is effectively not available to shippers.

To improve the usefulness of these reports, the Commission should require storage operators to report volumes and revenues by customer in a standardized format. In fact, instituting a specific FERC form for storage reporting will give shippers

³ Existing reporting requirements provide a wide range of information regarding storage service operations and rates. The Index of Customers filing under § 284.13(c) reports contract entitlements quarterly. The semi-annual storage report under § 284.13(e) filed at the end of the injection and withdrawal seasons identifies the capacity applicable to each storage customer, the actual volume injected or withdrawn, the revenues received, and any discounts permitted. The information in these reports, supplemented with ad-hoc staff inquiries will provide tools to identify potential unlawful withholding of storage capacity. (Order No. 678 p. 94, para 173)

the ability to actually locate the information on the Commission's *eLibrary* and more readily understand information that is reported in a standardized fashion. Absent changes to improve the transparency and availability of storage reports, these reports will continue to be of little use to storage customers.

IV. CONCLUSION

As stated above, NGSAs asks the Commission to ensure that the reports filed by both interstate and intrastate storage providers are transparent and readily available for inspection as needed.

Respectfully Submitted,

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