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February 15, 2008

Via US Mail and Email NAESB@NAESB.org

Ms. Rae McQuade
Director
North American Energy Standards Board
1301 Fannin, Suite 2350
Houston, TX 77002

RE: Order No. 698, Intraday Nomination Timeline Proposal

Dear Ms. McQuade:

Honeywell International Inc ("Honeywell") hereby provides the following comments to the North American Energy Standards Board's Wholesale Gas Quadrant ("WGQ") relating to the above-referenced natural gas topic. Honeywell understands that there is a proposal before the WGQ Business Practice Committee on FERC Order No. 698 that contemplates an increase in the number of intraday natural gas nomination cycles from two to four. Additionally, the proposal would modify the existing Intraday 1 and 2 Cycles to establish earlier nomination, confirming, scheduling and flow times. Further, bumping would be permitted during Cycle 2, but not during the new Cycles 3 and 4. Honeywell believes that there is a significant industry need, particularly within the industrial and electric generating sectors, for additional daily nomination cycles to better coordinate daily gas use with pipeline scheduling.

Honeywell is a diversified technology and manufacturing company. A Honeywell manufacturing plant in Hopewell, Virginia uses natural gas as a feedstock and process fuel. This plant operates seven days per week and twenty-four hours per day. Natural gas is delivered to the plant under a large, firm transportation contract. Honeywell's gas use varies throughout the day due to various conditions and factors including weather and gas quality fluctuations that are difficult to predict and make it most difficult to stay within scheduling tolerances. The current nomination cycles do not give Honeywell the opportunity to adjust its nominations to conform to its gas use after five p.m. of the gas day. Thus, no nomination adjustments are currently possible over a sixteen-hour window of plant operations.

Providing additional later nomination cycles would permit Honeywell to better manage its gas use, more closely align its daily nominations with its actual usage as the gas day progresses and enhance the value of its firm interstate pipeline capacity. Further, additional nominations cycles would enhance the reliability of firm service to those who are subject to varying gas use throughout the gas day. Although a modification of the Intraday Cycle 2 might cause some interruptible shippers to be bumped, it is widely understood that non-firm service is subject to interruption. Finally, communication technologies have advanced considerably since existing gas nomination cycles were

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established. Pipelines, producers, marketers, local distribution companies, end-users - including industrials and electric generators - and others have better communication tools to coordinate their actions. Correspondingly, the WGQ should provide natural gas firm shippers with more time-responsive nomination opportunities so that they might better manage their gas use. Honeywell recommends that the WGQ approve for submittal to the Federal Energy Regulatory Commission, a proposal, like the one mentioned above, providing for additional daily nomination cycles.

Please refer these comments to the FERC Order No. 698 WGC Intraday Nomination Committee and post this to the NAESB WGQ committee webpage.

Sincerely,



Joanne Horalek
Director-Energy Procurement
Honeywell International Inc

cc: Allan W. Anderson, Jr., Esq.
Sedesh Doobay, Esq.