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February 21, 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: Intra-day Nomination Timeline Proposals

Dear Ms. McQuade:

The Missouri Public Service Commission wishes to make the following comments part of the record in the pending NAESB Wholesale Gas Quadrant's ("WGQ") discussions relating to the above referenced topic.

It has come to our attention that a proposal has been sponsored that contemplates the inclusion of an additional Intra-day "bumping" cycle that would afford firm capacity holders an opportunity to insure that their daily nominations can be adjusted to be more closely aligned with the evening peak demands. The existing NAESB Timeline needs to be modified to incorporate additional nomination cycles to enable firm shippers an ability to better coordinate their nominations with their gas demands and with electric scheduling. An additional "bumping" nomination cycle is crucial to enhance reliability of service of Local Distribution Companies ("LDCs") and electric utility generators by providing greater access to their firm capacity.

The Missouri Public Service Commission believes that such a proposal will enhance the value of firm capacity and the reliability of pipeline service. We are supportive of the proposal for two additional nomination cycles. This would allow both gas LDC systems and electric LDC gas generation additional opportunities to adjust nominations intra-day to react to weather changes and changes to power demand. It is especially critical for electric LDC gas generation with respect to changing electric generation dispatches for power from gas turbines on the intra-day

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cycle. Moreover, additional value and flexibility will encourage the contracting of firm service and the related construction of necessary infrastructure.

Please post this letter to the NAESB WGQ committee webpage.

Sincerely,



Jeff Davis, Chairman
Missouri Public Service Commission