

Theresa Mead  
Lead Analyst, Pipeline System Planning  
3950 East Irvington Road  
Mailstop SC115  
PO Box 711, Tucson, Arizona 85702  
(520) 745-3315 Office  
(520) 571-4065 Fax  
tmead@tep.com



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Via US Mail and Email [NAESB@NAESB.org](mailto: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 Proposals**

Dear Ms. McQuade,

UniSource Energy Services ("UES") 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. UES, a subsidiary of UniSource Energy Corporation, provides natural gas services to 146,000 customers in Mohave, Yavapai, Coconino, Navajo and Santa Cruz counties and electric service to more than 94,000 customers in Mohave and Santa Cruz counties in Arizona,

It has come to our attention that a proposal has been sponsored that contemplates the inclusion of an additional Intraday "bumping" cycle that would afford firm capacity holders an opportunity to insure that its daily nominations can be adjusted to be more closely aligned with the evening peak demands. TEP believes that such a proposal will enhance the value of firm capacity and the reliability of pipeline service. Moreover, additional value and flexibility will encourage the contracting of firm service and the related construction of necessary infrastructure. If interruptible shippers wish to avoid being "bumped" they have the option of entering into contracts for firm service.

Please post this to NAESB WGQ committee webpage.

Sincerely,

A handwritten signature in black ink that reads "Theresa Mead". The signature is written in a cursive, flowing style.

Theresa Mead