

September 28, 2010

Wholesale Gas Quadrant (WGQ) Leadership and Interested Parties
North American Energy Standards Board (NAESB)
801 Travis Street
Suite 1675
Houston, TX 77002

RE: Recommendation R09014/2010 WGQ Annual Plan Item 6 - Create a section/heading under Informational Postings called Regulatory to include all filings made to the FERC

Dear Fellow Quadrant Members,

Iroquois will be making comments pertaining to 3 areas:

- Original Proposed Standard Recommendation from BPS
- Potential Proposed Standard Recommendation changes at the EC
- Segment Blocks

The standards under consideration are:

Proposed NAESB WGQ Standard No. 4.3.z1

To the extent a Transportation Service Provider posts regulatory filings on its Web site, such filings should be posted on the Informational Postings Web site pursuant to NAESB WGQ Standard No. 4.3.23.

Iroquois' Comments on Recommendation R09014/2010 WGQ Annual Plan Item 6

Proposed Modified NAESB WGQ Standard No. 4.3.23

Transportation Service Providers (TSP) should establish an Informational Postings Web site accessible via the Internet, which contains the following categories and subcategories for:

CATEGORIES	SUBCATEGORIES
Capacity	Operationally Available Unsubscribed Capacity Allocation Log (when applicable)
Gas Quality	
Index of Customers	
Notices	Critical Non-Critical Planned Service Outage Waste Heat
Posted Imbalances	
Regulatory (when applicable)	
Standards of Conduct {(when applicable)}	Affiliate Names & Addresses Affiliate Tariff Waivers Chief Compliance Officer Employee Transfers Implementation Procedures Information Disclosure Job Titles & Descriptions Potential Mergers Shared Facilities Voluntary Consent Title Sheet/Section Table of Contents Preliminary Statement Map Currently Effective Rates Rate Schedules General Terms and Conditions Form of Service Agreement Entire Tariff Sheet/Section Index
Tariff	
Transactional Reporting	

These categories and subcategories should appear in the order specified above and before any others. TSPs that are required by their tariff to post additional publicly available information should post such information on the Informational Postings Web site. Additionally, TSPs may voluntarily post other information on the Informational Postings Web site. In either case, such information should be posted in either the appropriate category listed above or should use other categories and subcategories, as necessary, to clearly identify the contents of the information posted.

Original Proposed Standards Recommendation from the BPS

Summary

Iroquois supports the recommended standards.

Background/Reasoning

These standards changes were discussed, drafted, and accepted by a super-majority of the participating entities in the Business Practice Subcommittee (BPS) meetings held on December 2, 2009 and December 16, 2009 as originally voted on in the August 19, 2010 Wholesale Gas Quadrant (WGQ) Executive Committee (EC) meeting. This standard provides improved service to the party that originally submitted the request and other entities and it is important to note that the standard was acceptable to the requesting party as a reasonable compromise.

Potential Proposed Standard Recommendation changes at the EC

Summary

Iroquois is not in support of material modifications to the BPS recommended standards at this time.

If material changes are requested to the recommended standards, Iroquois suggests that the request be sent back to BPS for further review/discussion.

Background/Reasoning

While Iroquois understands and supports the process which allows the Executive Committee to make changes to proposed standards that came out of subcommittee(s) where such changes are not significant, Iroquois believes that suggested significant changes should be sent back to the appropriate subcommittee(s) for consideration prior to the Executive Committee voting on such changes.

Furthermore, at the Wholesale Gas Quadrant Leadership Meeting on September 22, 2010, the Local Distribution Company (LDC) segment of the Wholesale Gas Quadrant stated that comments were currently being prepared and committed to submitting comments by Friday, September 24, 2010 to allow other parties time to respond to any proposed changes by the comment deadline of Tuesday, September 28, 2010. As no comments were filed/posted by the LDC segment (or indeed by any other party as of the date/time of the submission of these comments to NAESB) on NAESB's website, Iroquois can not respond to any specific requested changes and will not have sufficient time to prepare a response for next week's meeting due to other time/scheduling constraints if any suggested changes are submitted prior to or during next week's meeting.

Segment Blocks

Summary

Iroquois supports the ability of segments to reject (block) proposed/recommended standards.

If the LDC segment truly feels that no standard is better than the recommended standards changes, then Iroquois supports their right to reject such standards changes.

Background/Reasoning

NAESB is a standards organization and is not in the role of being an advocate for one party's position over another; however, NAESB is concerned with efficient standards development and created a policy in 2008 to minimize, not eliminate, the occurrence of segment blocks. Iroquois appreciates NAESB's efforts in that regard.

Iroquois is not opposed to the concept of a segment block. In fact, it is perfectly acceptable for the industry to decide that no standards changes are necessary as a result of a super-majority vote. The purpose of requiring a super-majority to approve new standards is to ensure that new/revised standards are acceptable to a majority of the industry and that one segment of the industry is not forced into complying with a standard(s) that a majority of its representatives did not agree with. Indeed, the FERC relies on this and has referenced the process in multiple orders incorporating NAESB standards over the past decade or more. Most recently, in Order No. 587-U, the Commission stated "adoption of consensus standards is appropriate because the consensus process helps ensure the reasonableness of the standards by requiring that the standards draw support from a broad spectrum of industry participants representing all segments of the industry". Iroquois believes that this process has worked and worked quite well for the natural gas industry over the past 15 years.

Sincerely,
Tom Gwilliam
Executive Committee Alternate
NAESB WGQ - Pipeline Segment
(203) 944-7049

IROQUOIS PIPELINE OPERATING COMPANY
as agent for
IROQUOIS GAS TRANSMISSION SYSTEM, L.P.