



## **Industrial Energy Consumers of America**

*The Voice of the Industrial Energy Consumers*

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January 30, 2017

The Honorable Cheryl A. LaFleur  
Acting Chairman  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

The Honorable Colette Honorable  
Commissioner  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

The Honorable Norman Bay  
Commissioner  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

***Re: Order Instituting Investigation and Setting Matter for Hearing Pursuant to Section Five of the Natural Gas Act: Natural Gas Pipeline Company of America LLC; Wyoming Interstate Company, L.L.C.***

Dear Acting Chairman LaFleur, Commissioner Bay and Commissioner Honorable:

On behalf of the Industrial Energy Consumers of America (IECA) and its member companies, we thank you for advancing Section 5 rate review cases directed towards Natural Gas Pipeline Company of America LLC and Wyoming Interstate Company, L.L.C., two interstate natural gas pipeline companies for over-recovering their costs, resulting in unjust and unreasonable rates.

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.0 trillion in annual sales, and with more than 1.6 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.

We are grateful that FERC is fully utilizing its authority to ensure that rates are just and reasonable. This is especially important given that the pipelines are monopolies.

As expressed to you previously, we would hope that FERC would automatically review rates of all interstate natural gas pipelines every three years. If the pipelines know they are going to be reviewed relatively frequently, then there is less likelihood that they will overcharge. Pipelines seem to only go before the FERC if they need a rate increase to cover increased costs or if challenged by a customer through an expensive and lengthy process that can cost the shipper

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millions of dollars per rate case and can take upwards of two years to be resolved. The current system places the burden on the shipper and the burden should be on the pipeline companies to regularly prove that their rates are just and reasonable.

We thank you for your leadership on this important issue and look forward to working with you.

Sincerely,

Paul N. Cicio

President

cc: Senate Committee on Energy and Natural Resources  
House Committee on Energy and Commerce