

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL REGULATORY ENERGY COMMISSION**

Enhanced Natural Gas Market Transparency

Docket No. RM13-1-000

**COMMENTS OF THE  
INDUSTRIAL ENERGY CONSUMERS OF AMERICA**

On behalf of the Industrial Energy Consumers of America (IECA), we express our support for the joint comments submitted by the American Forest & Paper Association, et al., in response to FERC's Notice of Inquiry issued November 15, 2012. We urge the Commission to not expand natural gas reporting requirements.

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.1 trillion in annual sales, over 1,000 facilities nationwide, and with more than 1.4 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: chemical, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, brewing, and cement.

Given FERC's limited jurisdiction over wholesale markets of natural gas, the proposal set forward will not improve market transparency, could undermine confidence in natural gas price formation and place an unfair burden on natural gas market participants. Furthermore, disclosure of commercially sensitive information could create the potential for competitive harm. As manufacturers whose competitiveness is dependent upon the cost of natural gas and natural gas-fired power generation, we ask you not to move forward with the proposal.

Dated: March 11, 2013

Respectfully Submitted,

Paul N. Cicio  
President  
Industrial Energy Consumers of America  
1155 15<sup>th</sup> Street, NW, Suite 500  
Washington, DC 20005  
[pcicio@ieca-us.org](mailto:pcicio@ieca-us.org)