

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

Interstate and Intrastate Natural Gas)
Pipelines; Rate Changes Related To)
Federal Income Tax Rate)

Docket No. RM18-11-000

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

Pursuant to notice of the Notice of Proposed Rulemaking (NOPR) issued by the Federal Energy Regulatory Commission (FERC or Commission) (83 Fed. Reg. 1288), the Industrial Energy Consumers of America (IECA) files these comments concerning the impact on interstate pipeline rates of the Tax Cuts and Job Act (Tax Act).

I. COMMUNICATIONS

Any communications regarding this pleading or this proceeding should be addressed to:

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II. STATEMENT OF INTEREST

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.0 trillion in annual sales, over 3,400 facilities nationwide, and with more than 1.7 million employees. 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.

III. COMMENTS

IECA supports the Commission's NOPR and the decision to avoid one-issue rate filings in order to permit interstate natural gas pipelines to voluntarily reduce their rates as soon as possible to reflect their lower federal income tax rate and expedite the flow of lower rates to consumers. In the event that they do not do so voluntarily, we urge quick and vigorous action by the Commission to secure justification as to why rates should not be adjusted downward. Consumers seek just and reasonable rates from all natural gas interstate pipelines.

IECA also urges the Commission to support in writing, a request to Congress to amend Section 5 of the Natural Gas Act, to give the Commission refund authority from the date of filing. If FERC had such authority, the Commission could have already set a refund date for all pipelines to adjust their rates to reflect the lower corporate tax rate.

IV. CONCLUSION

IECA supports the NOPR and urges the Commission to act promptly so that the benefits of lower corporate taxes will flow to the consumer, as Congress had intended.

Respectfully submitted,

Industrial Energy Consumers of America

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