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March 23, 2012

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington DC 20426

Re: Docket Nos. RM96-1-037 and AD12-12-000 – Comments on Questions Raised by
Commissioner LaFleur

Dear Ms. Kimberly D. Bose:

At the Commission's February 16, 2012 open meeting, Commissioner LaFleur invited comments on several questions related to gas-electric coordination. Commissioner LaFleur posed these questions during the Commission's discussion of the notice of proposed rulemaking in Docket No. RM96-1-037 ("NOPR"). Subsequently, Commissioner LaFleur's comments were published in an official statement issued in the NOPR docket.¹ At the same time, Commissioner LaFleur referenced the Commission's notice seeking comments on a broad range of gas-electric coordination issues in Docket No. AD12-12-000.² It appears that Commissioner LaFleur's questions are also relevant to Docket No. AD12-12-000.

¹ Statement of Commissioner Cheryl A. LaFleur on Standards for Business Practices for Interstate Natural Gas Pipelines, Docket No. RM96-1-037 (issued February 16, 2012).

² Notice Assigning Docket No. and Requesting Comments, Docket No. AD12-12-000 (issued February 15, 2012). *See also* Request for Comments of Commissioner Moeller on Coordination between the Natural Gas and Electricity Markets (dated February 3, 2012), *available at* <http://www.ferc.gov/about/com-mem/moeller/moellergaselectricletter.pdf>.

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The ISO/RTO Council (“IRC”)³ is not submitting comments in Docket No. RM96-1-037 but may submit comments in Docket No. AD12-12-000. The IRC believes that it would be most appropriate, and efficient, to submit comments in response to Commissioner LaFleur’s questions in Docket No. AD12-12-000 rather than RM96-1-037. To the extent that the Commission intended for Commissioner LaFleur’s question to be addressed in the latter docket, the IRC respectfully requests leave and reserves its rights to address them in Docket No. AD12-12-000.⁴

Respectfully Submitted,

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³ The IRC is comprised of the Alberta Electric System Operator (“AESO”), the California Independent System Operator Corporation (“CAISO”), Electric Reliability Council of Texas (“ERCOT”), the Independent Electricity System Operator of Ontario, Inc., (“IESO”), ISO New England, Inc. (“ISONE”), Midwest Independent Transmission System Operator, Inc., (“MISO”), New Brunswick System Operator (“NBSO”), New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and Southwest Power Pool, Inc. (“SPP”). The AESO, IESO, and NBSO are not subject to the Commission’s jurisdiction, and are not joining in these comments. ERCOT is subject to the Commission’s jurisdiction for reliability matters pursuant to Section 215 of the Federal Power Act. The IRC’s mission is to work collaboratively to develop effective processes, tools, and standard methods for improving the competitive electricity markets across North America. In fulfilling this mission, it is the IRC’s goal to provide a perspective that balances Reliability Standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers.

⁴ Similarly, to the extent that the Commission were to conclude that responses to Commissioner LaFleur’s questions in Docket No. AD12-12-000 would be untimely the IRC respectfully requests leave to submit them one week out of time.

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