

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

Standards for Business Practices	)	Docket No. RM96-1-041
of Interstate Natural Gas Pipelines	)	

**COMMENTS
OF
TENNESSEE VALLEY AUTHORITY**

Pursuant to the Federal Energy Regulatory Commission's (Commission's) request for comments on the Notice of Proposed Rulemaking (NOPR) on the Standards for Business Practices of Interstate Natural Gas Pipelines issued on August 21, 2018, Tennessee Valley Authority (TVA) hereby submits the following comments in the above captioned docket.

I. COMMUNICATIONS

Communications concerning these comments should be addressed as follows:

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II. COMMENTS

The Commission proposes to amend its regulations at 18 CFR 284.12 to incorporate by reference the latest version (Version 3.0) of business practice standards adopted by the Wholesale Gas Quadrant of the North American Energy Standards Board (NAESB) applicable to natural gas pipelines that NAESB reported to the Commission on September 29, 2017. According to the Commission, the implementation of these standards and regulations will promote the additional efficiency and reliability of the natural gas industries' operations thereby helping the Commission carry out its responsibilities under the Natural Gas Act. In addition, the Commission deems the proposed revisions to be necessary to establish more efficient coordination between the natural gas and electric industries.

TVA, as a public power entity that utilizes large quantities of gas-fired generation, supports NAESB standards that enhance this coordination between natural gas and electric industries. TVA has been actively involved in all phases of the development of these standards as a way to increase transparency and improve efficiency. Therefore, TVA fully supports these revisions as reported.

III. CONCLUSION

TVA respectfully requests that the Commission accept its comments herein.

Respectfully submitted,

/s/ Sherri R. Collins
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CERTIFICATE OF SERVICE

In accordance with Rule 2010 of FERC's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2018), I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Knoxville, Tennessee, this 26th day of September, 2018.

_____/s/ Sherri R. Collins_____
Sherri R. Collins