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June 16, 2011

VIA E-FILE AND HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

RE: Natural Gas Distribution Companies and Promotion of Competitive Retail Markets; Docket No. L-2008-2069114; **COMMENTS OF NGS PARTIES**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and fifteen (15) copies of the Comments of the NGS Parties (Shiple Energy Company, Dominion Retail, Inc. and Interstate Gas Supply, Inc.) to the Secretarial Letter dated June 9, 2011.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Todd S. Stewart
Counsel for NGS Parties (Shiple Energy Company, Dominion Retail, Inc., and Interstate Gas Supply, Inc.)

TSS/alw
Enclosure

cc: David E. Screven, Assistant Counsel (Via Electronic & Hand Delivery)
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Natural Gas Distribution Companies and :
Promotion of Competitive Retail Markets : Docket No. L-2008-2069114

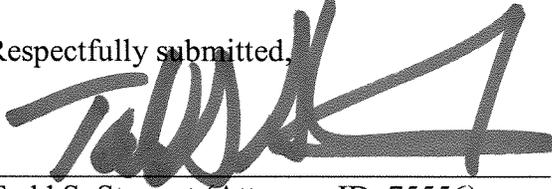
COMMENTS OF NATURAL GAS SUPPLIER PARTIES

Now come Shipley Energy Company (“Shipley”), Dominion Retail, Inc., (“Dominion Retail”) and Interstate Gas Supply, Inc. (“IGS”) (collectively “NGS Parties”), and hereby offer the following Comments in response to Secretarial Letter issued June 9, 2011, at this docket. (“Secretarial Letter”). The Secretarial Letter seeks comments with regard to several clarifications made to the Regulations that were promulgated by Order entered January 13, 2011, in this docket. The Regulations, as clarified, are attached to the Secretarial Letter as Annex A thereto.

The NGS Parties provided Comments to the Commission at several earlier stages of this rulemaking process and recently provided comments to the Independent Regulatory Review Commission (“IRRC”), prior to the Commission’s withdraw of these regulations from consideration by the IRRC on May 18, 2011. The NGS Parties support the clarifications contained in Annex A to the Secretarial Letter and believe that with these “fixes”, the regulations substantially correct the lack of clarity issues cited by commenters. The NGS Parties urge the Commission to restrict further revision to the Regulations as contained in Annex A, to minor clarification or “tweaking” of the provisions that were therein modified, and to not consider suggestions that might be raised by others that go beyond minor clarification. Not only would such further revision deprive parties such as the NGS Parties the opportunity to respond to any

such changes, but it could also further extend what has already been a fairly lengthy, rule making process. The NGS Parties are confident that the Commission will not allow this to happen.

Accordingly, the NGS Parties offer their support for the revisions made by the Secretarial Letter and Annex A thereto, issued June 9, 2011 and urge the Commission to seek expeditious approval of the revised regulations.

Respectfully submitted,


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DATED: June 16, 2011