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December 11, 2001

The Honorable Diane Munns
The Honorable Mark Lambert
Iowa Utilities Board
350 Maple Street
Des Moines, Iowa 50319
Via Express Mail

RE: Small Volume Gas Transportation Programs

Dear Commissioners:

The National Energy Marketers Association (NEM) would like to applaud the impending availability of choice for Iowa's small-volume gas consumers as announced in the press release dated October 25, 2001. NEM is a national, non-profit trade association representing a regionally diverse cross-section of both wholesale and retail marketers of energy and energy-related products, services, information and technology throughout the United States. NEM members include small regional marketers; large international wholesale and retail energy suppliers; energy consumers; billing firms, metering firms, Internet energy providers, energy-related software developers, risk managers, energy brokerage firms, customer service and information technology providers as well as providers of distributed generation and clean coal technologies. NEM's membership has come together to forge consensus and help eliminate as many issues as possible that would delay competition. NEM is committed to working with representatives of state and federal governments, large and small consumer groups and utilities to devise fair and effective ways to implement restructuring of natural gas markets.

NEM submitted comments in Docket NOI-98-3 on the draft small volume gas transportation tariffs filed by the utilities. Also, many NEM members actively participated in the IUB's small volume gas workshops. Given the varied and extensive experience encompassed in the membership of NEM, our organization would like to take an active role in assisting the IUB develop a successful program for the citizens of Iowa. This could include formal and informal meetings between the IUB staff, members of NEM and utility staff to discuss the essential elements of successful choice programs. We would also like to submit pro-forma tariffs, such as the ones our members have developed in working with the Ohio and Illinois stakeholders.

Attached with this letter are NEM policy guidelines entitled, "National Guidelines to Competitively Restructure the Market for Natural Gas and Related Products and Services," and, "National Energy Technology Policy." NEM asserts that these guidelines set forth the basis for the design of a proper small volume gas program. For instance, as noted in NEM's "National Energy Technology Policy," we urge the Iowa Utilities Board (IUB) and all states to implement the consensus positions set forth in the finalized sections of the Uniform Business Practices (UBP)¹ applicable to customer information, enrollment and switching, billing and payment processing and load profiling at the earliest possible date.

Please contact me to discuss how NEM can be most helpful in this process

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Craig Goodman", followed by a vertical line.

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¹ Uniform Business Practices for the Retail Energy Market, Sponsored by EEI, NEM, CUBR and EPSA.