

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

Edison Electric Institute

)

Docket No. AC18-59-000

**MOTION TO INTERVENE AND COMMENTS OF THE INTERSTATE NATURAL
GAS ASSOCIATION OF AMERICA**

Pursuant to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) March 20, 2018 Notice of Filing regarding an Edison Electric Institute (“EEI”) request for Commission approval for electric companies to conform to an accounting practice recently authorized by the Financial Accounting Standards Board (“FASB”),¹ and Rule 214 of the Commission’s Rules of Practice,² the Interstate Natural Gas Association of America (“INGAA”) respectfully submits this motion to intervene and associated comments.

INGAA is a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in the United States. INGAA’s 27 members represent the vast majority of interstate natural gas transmission pipeline companies in the United States. Its United States members are regulated by the Commission pursuant to the Natural Gas Act (“NGA”).³ INGAA’s members, which operate approximately 200,000 miles of interstate natural gas pipelines, serve as an indispensable link between natural gas producers and consumers.

MOTION TO INTERVENE

EEI’s motion petitions the Commission to grant blanket approval for public utilities and centralized holding companies to reclassify portions of accumulated deferred income tax

¹ *Edison Electric Institute*, Notice of Filing, Docket No. AC18-59-000 (Mar. 20, 2018).

² 18 C.F.R. § 385.214.

³ 15 U.S.C. §§ 717-717w.

(“ADIT”) from Uniform System of Accounts (“USofA”) Account 219 to USofA Account 439 in order to address stranded tax effects that may result from the Tax Cuts and Jobs Act of 2017 (“TCJA”). As discussed further below, interstate natural gas pipelines have a direct and significant interest in the Commission’s ultimate decision on how to address stranded tax effects involving ADIT resulting from the reduction in the corporate tax rate. Accordingly, as a representative of the interstate natural gas pipeline industry, INGAA has a direct and significant interest in the outcome of this proceeding, and such interest cannot be adequately represented or protected by any party hereto.

COMMUNICATIONS

Please direct all correspondence regarding this matter to the following individuals:

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Vice President & General Counsel

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COMMENTS

The Commission should grant EEI’s request in this proceeding, because it will allow FERC-jurisdictional entities, including interstate natural gas pipelines, to avoid stranded tax effects related to ADIT, which may be caused by the corporate tax rate reduction enacted through the TCJA. As EEI explained, FASB has already issued Accounting Standards Update No. 2018-02 –*Income Statement -Reporting Comprehensive Income (Topic 220) Reclassification of Certain Tax Effects from Accumulated Other Comprehensive Income*, which authorizes

entities subject to FASB to record a reclassification from accumulated other comprehensive income to retained earnings to avoid stranded tax effects resulting from the TCJA.⁴ Granting EEI's request for blanket approval would allow entities subject to the Commission's USofA to conform to this FASB-approved accounting practice. Furthermore, the blanket approval would avoid wasting both regulated entity and Commission resources needed to prepare and review individual requests. Therefore, the Commission should grant EEI's request in this proceeding and clarify that its approval applies to all Commission-regulated entities subject to USofA accounting, including interstate natural gas pipelines.

CONCLUSION

For the foregoing reasons, INGAA requests that the Commission accept this motion to intervene and accept EEI's Request in accordance with the comments filed hereto.

Respectfully Submitted,



Joan Dreskin
Vice President and General Counsel



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Regulatory Attorney

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DATE: April 17, 2018

⁴ EEI Request at 2.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon the parties designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission for the above-captioned docket in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 17th day of April, 2018.

A handwritten signature in black ink, appearing to read 'Ammaar Joya', written in a cursive style.

Ammaar Joya