Submitted Via E-mail to DataClearance@FERC.gov and Submitted Electronically Via Reginfo.gov

Debbie-Anne A. Reese
Secretary of the Commission
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

RE: Comments of the American Gas Association in Response to FERC's Notice on Commission Information Collection Activities, FERC-549B, and Comment Request in Docket No. IC26-18-000

Secretary Debbie-Anne A. Reese:

The American Gas Association ("AGA") appreciates the opportunity to provide these comments in response to the notice published by the Federal Energy Regulatory Commission ("FERC" or "Commission") on February 11, 2026, in the *Federal Register* titled "Notice on Commission Information Collection Activities (FERC-549B); Comment Request," under Docket No. IC26-18-000.[1] AGA submits these comments in response to the notice and respectfully requests that FERC consider the following comments in this proceeding. As discussed below, AGA supports the continued collection and posting of the information specified in 18 C.F.R. § 284.13(b), (c), and (d)(1)-(d)(2).

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 79 million residential, commercial, and industrial natural gas customers in the U.S., of which 94 percent — more than 74 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets one-third of the United States' energy needs.[2]

I. Background

On February 11, 2026, FERC published a notice titled "Commission Information Collection Activities (FERC-549B); Comment Request," soliciting public comment on the previously approved information collection, FERC-549B, Gas Pipeline Rates: Annual Capacity Reports and Index of Customers.

FERC described the request as a reinstatement of the FERC-549B information collection requirements with no changes to the reporting requirements. FERC-549B is comprised of information collection activities and posting requirements in 18 C.F.R. § 284.13(b)-(c) and 18 C.F.R. § 284.13(d)(1)-(d)(2). FERC stated that the purpose of these information collection activities is to provide reliable information about capacity availability and price that shippers need to make informed decisions in a competitive market, and to enable shippers and the Commission to monitor marketplace behavior to detect, and remedy anti-competitive behavior. Specifically, FERC sought comments on whether the collection of information is necessary for the proper performance of the

[1] *Commission Information Collection Activities (FERC–549B); Comment Request*, 91 Fed. Reg. 6208 (Feb. 11, 2026).
[2] For more information, please visit www.aga.org.

Matthew J. Agen, Chief Regulatory Counsel, Energy
400 N. Capitol St. NW, Washington, DC, 20001
P 202-824-7090 | **E** magen@aga.org | **W** **www.aga.org**

functions of the Commission, including whether the information will have practical utility and ways to enhance the quality, utility, and clarity of the information collection, among other things.

II. AGA's Comments

AGA supports the continuation of the existing requirements of the information collection activities for FERC-549B because these filings and posting requirements provide transparency to stakeholders, such as natural gas utilities. The information provided pursuant to the Commission's regulations regarding firm and interruptible service,[3] customer indices,[4] and capacity and flow information[5] are necessary for the proper performance of the functions of the Commission and have practical utility to stakeholders. At a time when natural gas service is critical to end-use customers and the utilities that provide life essential energy services to homes and businesses, transparency must remain a central consideration as the Commission evaluates the continuation of these reporting requirements in this proceeding. For example, information regarding the availability of transportation services and capacity release information are critical data points for natural gas utilities to assess as these service providers evaluate supply portfolio options to serve increasing demand. Moreover, information on planned and actual service outages or reductions in service capacity is essential for utilities that rely on interstate pipeline services to transport gas that is ultimately used in homes and businesses, including gas used for power generation. Additionally, the reports on services and the Index of Customers aid in ensuring transparent and non-discriminatory transportation services. Collectively, the filing requirements promote market efficiency, protect consumers from discrimination, and assist in data-driven oversight by the Commission, while ensuring transparency in the market. As the Commission explained in the notice, these information collection activities and posting requirements "provide reliable information about capacity availability and price that shippers need to make informed decisions in a competitive market, and to enable shippers and the Commission to monitor marketplace behavior to detect, and remedy anti-competitive behavior."[6] AGA agrees with these sentiments and supports the continuation of the reporting and disclosure requirements subject to the notice issued in this proceeding.

Additionally, AGA recommends that FERC consider improvements to the information collection activities that would increase the effectiveness, functionality and provide further transparency for the Commission and shippers. Specifically, the Commission should consider the following matters:[7]

- **Index of Customers** - Pipelines should post the Index of Customers data in a consistent, easy to use format, such as in a Microsoft Excel spreadsheet. Additionally, FERC should consider requiring pipelines to identify contracts for incremental service in the Index of Customers, similar to the existing identification of negotiated rates in the Index of Customers.[8] Clearly distinguishing incremental service contracts would provide additional transparency for natural gas utilities, particularly when preparing for rate cases, and would help all customers better understand the pricing and rate structure associated with specific capacity.

- **Operational Flow Orders** - FERC should consider requiring pipelines to post reports on system constraints, *i.e.*, Operational Flow Orders ("OFO"), for longer than 90 days. Specifically, pipelines

[3] 18 C.F.R. § 284.13(b).
[4] 18 C.F.R. § 284.13(c).
[5] 18 C.F.R. § 284.13(d)(1)-(d)(2).
[6] 91 Fed. Reg. 6208, at p. 6209.
[7] While some of the matters discussed herein could be addressed through industry collaboration via the North American Energy Standard Board, the Commission's input and direction would be instrumental in guiding such a process.
[8] 18 C.F.R. § 284.13(c)(1)-(2).

could be required to include this information in their periodic reports, at the end of 90 days, posted to their Electronic Bulletin Boards ("EBB") four times per year, to allow users to access and download the reports. In addition, pipelines should be required to provide summary reports of all OFOs or to maintain a dedicated location on their EBBs where customers can generate such reports. Currently, shippers must manually compile OFO information, which is time-consuming and inefficient. This task is further complicated when state commissions request historical OFO data as part of oversight or rate proceedings. Providing a centralized summary or reporting functionality would improve data accessibility, accuracy, and regulatory efficiency for both customers and the Commission.

- **Standardized Disclosures** - FERC should encourage the use of a standardized disclosure template across pipelines. Currently, pipelines do not post this information in a consistent format and some do not post the data in a way that can be easily sorted or filtered, which can limit accessibility, compatibility, and overall utility of the data for shippers. Encouraging the use of a standardized disclosure template would improve consistency and usability of posted information for all reports under 18 C.F.R. § 284.13(b)-(c) (Reports on firm and interruptible services and Index of Customers) and 18 C.F.R. § 284.13(d)(1)-(d)(2) (Capacity and flow information). A uniform format would significantly reduce the time and effort customers spend locating and interpreting data across multiple pipeline systems. Standardization would also improve comparability of information and could be developed or adopted through industry collaboration.

III. Conclusion

For the reasons discussed above, AGA supports the continuation of the current requirements and further emphasizes the transparency they provide for natural gas utilities, as described herein. AGA also recommends that FERC consider improvements to the information collection activities that would increase the utility of the data collected and transparency. AGA appreciates the opportunity to provide this input and respectfully requests that the Commission take into consideration these comments in this proceeding.

Respectfully submitted,

Matthew J. Agen
Chief Regulatory Counsel, Energy
American Gas Association
400 N. Capitol Street, NW
Washington, DC 20001
magen@aga.org