

**UNITED STATES OF AMERICA  
BEFORE THE  
COMMODITY FUTURES TRADING COMMISSION  
THE AMERICAN PUBLIC GAS ASSOCIATION  
PETITION ON BEHALF OF ITS MEMBERS  
TO REMAIN SUBJECT TO THE EXISTING PROVISIONS  
OF SECTION 2(h) OF THE COMMODITY EXCHANGE ACT**

**I. Requested Commission Action**

The American Public Gas Association (APGA) respectfully submits this petition to the U.S. Commodity Futures Trading Commission (the “Commission”) on behalf of its members (a listing of members is attached) and requests that the Commission, pursuant to Section 723(c) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”) allow its members to continue to rely on the exemptions set forth in § 2(h) of the Commodity Exchange Act (the “CEA”) for a period of one year after the Effective Date<sup>1</sup> of the Dodd-Frank Act, or for such other period as the Commission deems appropriate.

APGA is the national association for publicly-owned natural gas distribution systems. There are approximately 1,000 public gas systems in 36 states and over 720 of these systems are APGA members. Publicly-owned gas systems are not-for-profit, retail distribution entities owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities. The focus of a public gas system is to provide reliable and safe not-for-profit energy and to keep costs low and predictable for the particular community it serves.

**Supporting Arguments**

A. The Grandfather Provision of the Dodd-Frank Act Permits the Filing of this Petition

Section 723(c)(1) of the Dodd-Frank Act states that “a person may submit to the Commodity Futures Trading Commission a petition to remain subject to section 2(h) of the Commodity Exchange Act (7 U.S.C. 2(h)) (as in effect on the day before the date of enactment of this Act).” A petition for treatment under this “grandfather provision” is required to be

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<sup>1</sup> The date of enactment is July 21, 2010 (the “Enactment Date”) and the date of effectiveness is 360 days after the Enactment Date, or July 16, 2011 (the “Effective Date”).

submitted not later than 60 days after the Enactment Date, and the Commission, under Section 723(c)(2), may allow an APGA member to continue operating under CEA § 2(h) for up to a one year period.

B. Many APGA Members Currently Operate Under the Commodity Exchange Act § 2(h) Exemption

Many APGA members currently enter into, or have the risk management option to enter into, contracts, agreements and transactions in exempt commodities in both the over-the-counter bilateral contract markets (the “OTC markets”) and on exempt commercial markets. All of the contracts, agreements and transactions in exempt commodities are intrinsically related to the APGA member’s business of providing natural gas service to the local community.

APGA members do not speculate in contracts, agreements and transactions in exempt commodities. APGA members rely on these transactions to hedge the commercial risks associated with its business. This risk management activity in turn directly affects the price of energy to consumers in the communities the APGA member serves.

As an “end user” participant in the markets for contracts, agreements and transactions in exempt commodities, APGA members operate subject to the provisions of CEA § 2(h), and the related rules and regulations. The Dodd-Frank Act’s new compliance and reporting requirements will require changes to APGA member’s staffs, systems and structures, and the individual consumers in the APGA member community will directly bear all costs associated with these changes.

C. Granting this Petition Does Not Conflict with the Intent of the Dodd-Frank Act

Allowing the one-year extension of CEA § 2(h) does not contravene the intent of the Dodd-Frank Act. Rather, the extension is critical for affected end users transitioning to the new rules and regulations that will be promulgated under the Dodd-Frank Act. The Commission will be drafting and finalizing rules to accompany and implement each section of the new law. After the Effective Date, APGA members will require considerable additional time and resources to review and revise their commercial business and operating procedures in order to ensure compliance with the new regulatory scheme. Section 723(c) of the Dodd-Frank Act, the

“Grandfather Provision”, is a mechanism that offers market participants who have previously relied on CEA § 2(h) in conducting their commercial businesses legal certainty during the period of implementation of the new regulatory regime and its application not only to market professionals, but to end users. Granting this petition will not impede the goals of providing transparency and structure to the global derivatives markets. Rather, it will give APGA members the needed time to adapt and develop the additional staff, new systems and more complicated structures that will be required, thus ensuring the continued ability of the energy industry to effectively mitigate risk while maintaining system-wide reliability and stabilizing the prices for their local customers.

## II. Conclusion

APGA members currently rely on Section 2(h), and both time and resources will be required to implement the extensive changes to be made once the rules and regulations under the Dodd-Frank Act have been finalized. For this reason, APGA respectfully requests that the Commission grant this petition for continued exemption under CEA § 2(h) for the period of one year following the Effective Date, or such other period of time as the Commission deems adequate to carry out the intent of Section 723(c) of the Dodd-Frank Act, for its members.

Respectfully Submitted,

The American Public Gas Association

By: 

Title: President and CEO

Address: 201 Massachusetts Ave., NE Ste. C-4  
Washington, DC 20002

## APGA 2010 Members

Athens Utilities, AL  
Berry Gas Board, AL  
Boaz Gas Board, AL  
Brewton Natural Gas Department, AL  
Bridgeport Municipal Natural Gas, AL  
Brookside Municipal Gas Department, AL  
Camp Hill Utility Board, AL  
Cherokee Water & Gas, AL  
Childersburg Water/Sewer/Gas Board, AL  
City of Fultondale Gas Board, AL  
City of Lanett, AL  
City of Oneonta Utilities Board, AL  
City of Piedmont Gas Department, AL  
City of Roanoke Utility Board, AL  
City of Robertsdale, AL  
Clarke-Mobile Counties Gas District, AL  
Cullman-Jefferson Counties Gas Dist, AL  
Daphne Utilities Board, AL  
DeKalb-Cherokee Counties Gas Dist., AL  
Dora Water & Gas Board, AL  
East Central Alabama Gas Dist., AL  
Fairhope Public Utility, AL  
Fayette Gas Board, AL  
Floral Utility Board, AL  
Florence Gas & Water/ Wastewater, AL  
Geneva County Gas Dist., AL  
Gordo Gas Department, AL  
Huntsville Utilities, AL  
Jacksonville Water Works, Gas & Sewer Board, AL  
Maplesville Utilities Board, AL  
Marshall County Gas District, AL  
Moulton Gas Department, AL  
North Alabama Gas District, AL  
North Baldwin Utilities, AL  
Northwest Alabama Gas District, AL  
Pickens County Natural Gas District, AL  
Riviera Utilities, AL  
Rockford Gas Board, AL  
Russellville Gas Board, AL  
Scottsboro Water/Sewer/Gas Board, AL  
Sheffield Utilities, AL  
South Alabama Gas, AL  
South Alabama Utilities, AL  
Southeast Alabama Gas District, AL  
Sylacauga Utilities Board, AL  
Tallapoosa Gas Department, AL  
The Utilities Board of the City of Atmore, AL  
Town of Wadley, AL  
Town of Wedowee Water, Sewer & Gas Board, AL  
Trussville Utilities Board, AL  
Tuscumbia Gas Department, AL  
Utilities Board of Stevenson, AL  
Utilities Board of Union Springs, AL  
Vina Gas Board, AL  
Wilcox County Gas District, AL  
Wilton Gas System, AL  
Harrisburg Water & Gas Division, AR  
North Crossett Gas & Water, AR  
Benson Municipal Natural Gas Department, AZ  
City of Mesa, AZ  
City of Safford, AZ  
City of Willcox, AZ  
Graham County Utilities, AZ  
Navajo Tribal Utility Authority, AZ  
City of Palo Alto, CA  
City of Susanville Public Works, CA  
City of Vernon Light & Power Co., CA  
City of Victorville, CA  
Long Beach Gas and Oil, CA  
Aguilar Municipal Natural Gas Department, CO  
Center Municipal Gas System, CO  
City of Fort Morgan, CO  
City of Trinidad, CO  
Colorado Springs Utilities, CO  
Ignacio Municipal Gas, CO  
Town of Rangely Gas, CO  
Norwich Department of Public Utilities, CT  
City of Blountstown, FL  
City of Chattahoochee, FL  
City of Chipley, FL  
City of Gulf Breeze, FL  
City of Lake City, FL  
City of Leesburg, FL  
City of Live Oak, FL  
City of Madison, FL  
City of Marianna, FL  
City of Milton, FL  
City of Quincy, FL  
City of Starke, FL  
City of Williston, FL  
Clearwater Gas System, FL  
Crescent City Natural Gas, FL  
Defuniak Springs Natural Gas, FL  
Energy Services of Pensacola, FL  
Fort Meade Municipal Natural Gas Department, FL  
Fort Pierce Utilities Authority, FL  
Jasper Municipal Utilities, FL  
Jay Utilities, FL  
Lake Apopka Natural Gas, FL  
Okaloosa Gas District, FL  
Palatka Gas Authority, FL  
Reedy Creek Improvement District, FL  
Sunrise Gas Department, FL  
Tallahassee Gas Utility Department, FL  
Town of Century, FL  
Town of Havana Natural Gas System, FL  
Adel Natural Gas System, GA  
Austell Gas System, GA  
Byron Natural Gas Department, GA  
Cartersville Gas System, GA  
City of Adairsville, GA  
City of Americus Natural Gas Department, GA  
City of Andersonville, GA  
City of Ashburn, GA  
City of Bainbridge, GA  
City of Blakely, GA  
City of Bowman, GA  
City of Buford, GA  
City of Cairo, GA  
City of Camilla, GA  
City of Colquitt, GA  
City of Commerce, GA  
City of Cuthbert, GA  
City of Dawson Gas Department, GA  
City of Doerun, GA  
City of Dublin, GA  
City of Eatonton, GA  
City of Fort Gaines, GA  
City of Grantville, GA  
City of Hartwell, GA  
City of Hawkinsville Natural Gas System, GA  
City of LaFayette, GA  
City of LaGrange Gas Department, GA  
City of Lawrenceville, GA  
City of Louisville, GA

City of Lumpkin, GA	Union Point Natural Gas System, GA	Titonka Municipal Utilities, IA
City of Madison, GA	Vienna Natural Gas System, GA	Waukee Municipal Gas, IA
City of Meigs, GA	Winder Natural Gas Department, GA	Wayland Municipal Gas System, IA
City of Millen, GA	Wrens Gas System, GA	Wellman Municipal Gas System, IA
City of Monticello, GA	Bedford Municipal Gas System, IA	Whittemore Municipal Utility, IA
City of Moultrie, GA	Bloomfield Municipal Gas System, IA	Winfield Municipal Gas, IA
City of Pelham, GA	Brighton Municipal Gas & Water System, IA	Woodbine Municipal Natural Gas System, IA
City of Quitman, GA	Brooklyn Municipal Natural Gas Company, IA	Belle Rive Municipal Gas System, IL
City of Shellman, GA	Cascade Municipal Utilities, IA	Bluford Gas Department, IL
City of Sugar Hill, GA	Cedar Falls Utilities, IA	Bushnell Municipal Gas Utility, IL
City of Sylvester, GA	City of Fairbank, IA	Cairo Public Utility Company, IL
City of Talbotton, GA	City of Lineville, IA	City of Casey, IL
City of Thomasville Utilities, GA	City of Mapleton, IA	City of Creal Springs, IL
City of Toccoa, GA	City of Morning Sun, IA	City of Flora, IL
City of Unadilla, GA	City of Orange City, IA	City of Grand Tower, IL
City of Warner Robins, GA	City of Prescott, IA	City of Marshall Utilities, IL
City of Waynesboro, GA	City of Wall Lake, IA	City of Martinsville, IL
City of West Point, GA	City of West Bend, IA	City of Pinckneyville, IL
City of Woodland, GA	Clearfield Municipal Gas System, IA	City of Red Bud, IL
Claxton Natural Gas Company, GA	Consumers Energy Cooperative, IA	City of Roodhouse, IL
Cochran Natural Gas System, GA	Coon Rapids Municipal Utilities, IA	City of Salem, IL
Cordele Municipal Gas Department, GA	Corning Municipal Utilities, IA	Cobden Municipal Gas System, IL
Covington Natural Gas System, GA	Emmetsburg Municipal Utilities, IA	Crossville Gas Department, IL
Donalsonville Municipal Natural Gas Department, GA	Everly Municipal Gas Utility, IA	Divernon Gas Department, IL
Douglas Natural Gas, GA	Gilmore City, IA	Enfield Municipal Natural Gas Department, IL
Edison Municipal Natural Gas Department, GA	Graettinger Municipal Gas, IA	Equality Municipal Gas Department, IL
Elberton Utilities Natural Gas Division, GA	Guthrie Center Municipal Utilities, IA	Fairfield Municipal Gas Department, IL
Fitzgerald Water, Light & Bond Comm., GA	Harlan Municipal Utilities, IA	Findlay Gas Department, IL
Fort Valley Utility Comm., GA	Hartley Municipal Gas, IA	Flat Rock Municipal Gas, IL
Greensboro Municipal Natural Gas System, GA	Hawarden Municipal Utilities, IA	Geff Municipal Gas System, IL
Hogansville Municipal Natural Gas System, GA	Lake Park Municipal Utilities, IA	Jo-Carroll Energy, IL
Jointly Owned Natural Gas, GA	Lamoni Municipal Utilities, IA	Jonesboro Municipal Gas System, IL
Manchester Natural Gas Department, GA	Lenox Municipal Gas System, IA	Karnak Gas Company, IL
Monroe Water, Light & Gas Commission, GA	Lorimor Municipal Gas System, IA	New Boston Municipal Natural Gas Department, IL
Nashville Gas Department, GA	Manilla Municipal Utilities, IA	Pittsburg Municipal Natural Gas Department, IL
Ocilla Municipal Gas Department, GA	Manning Municipal Gas Department, IA	Pleasant Hill Municipal Natural Gas Department, IL
Perry Natural Gas System, GA	Montezuma Natural Gas, IA	Sullivan Gas Department, IL
Richland Gas System, GA	Moulton Municipal Gas System, IA	Tamms Gas Company, IL
Royston Gas Department, GA	Osage Municipal Utilities, IA	Thebes Municipal Gas Company, IL
Social Circle Municipal Gas Department, GA	Preston Municipal Gas Utility, IA	Village of Bethany, IL
Sparta Natural Gas System, GA	Remsen Municipal Utilities, IA	Village of Cisne, IL
Statesboro Gas Department, GA	Rock Rapids Municipal Utilities, IA	Village of Clay City, IL
Summerville Gas System, GA	Rolfe Municipal Gas, IA	Village of Dahlgren, IL
Sylvania Municipal Natural Gas Department, GA	Sabula Municipal Natural Gas Department, IA	Village of Edinburg, IL
Thomson Gas System, GA	Sac City Municipal Utilities, IA	Village of Franklin, IL
Tifton Natural Gas System, GA	Sanborn Municipal Gas System, IA	Village of Greenup, IL
Tri-County Natural Gas, GA	Sioux Center Municipal Gas Utility, IA	Village of Morton, IL
Trion Gas System, GA	Tipton Municipal Utilities, IA	Village of Rantoul, IL

Village of Sims, IL	Little River Municipal Natural Gas Department, KS	Greensburg Gas & Water, LA
Village of Stonington, IL	McFarland Gas Co., KS	Leonville Gas System, LA
Waterloo Municipal Gas System, IL	Milford Municipal Natural Gas, KS	Livingston Parish Gas District # 1, LA
Waverly Municipal Gas System, IL	Mulberry Municipal Natural Gas, KS	Plaquemine City Light & Water Plant, LA
Wayne City Municipal Gas, IL	Osage City Natural Gas Department, KS	Provençal Municipal Natural Gas Department, LA
Westville Gas & Water, IL	Partridge Gas Distribution System, KS	St. James Parish Utilities, LA
Bainbridge Municipal Utilities, IN	Reading Municipal Natural Gas, KS	St. Joseph & Newellton Joint Ops., LA
Batesville Water & Gas Utility, IN	Rozel Municipal Gas System, KS	St. Joseph Municipal Natural Gas Department, LA
Chrisney Municipal Natural Gas Department, IN	Sylvia Municipal Gas Department, KS	Town of Abita Springs, LA
Citizens Energy Group, IN	Viola Municipal Natural Gas Department, KS	Town of Columbia, LA
City of Rensselaer Gas Department, IN	Walton Municipal Natural Gas Department, KS	Town of Delcambre, LA
Grandview Municipal Gas Utility, IN	Windom Municipal Natural Gas Department, KS	Town of Grand Coteau, LA
Jasonville Gas Department, IN	Winfield Gas Utility, KS	Town of Livingston, LA
Jasper Municipal Gas Utility, IN	Arlington, KY	Town of Livonia, LA
Linton Municipal Gas, IN	Barlow Natural Gas System, KY	Town of Logansport, LA
Montezuma Natural Gas Department, IN	Carrollton Utilities, KY	Town of Madisonville, LA
Poseyville Municipal Gas Department, IN	City of Augusta, KY	Town of Melville, LA
Roachdale Municipal Gas Company, IN	City of Brooksville, KY	Town of Oberlin, LA
Agenda Gas System, KS	City of Columbia Utilities, KY	Town of Slaughter, LA
Altamont Municipal Gas System, KS	City of Guthrie, KY	Town of Sunset, LA
Aurora Municipal Natural Gas Department, KS	City of Leitchfield, KY	Town of Tangipahoa, LA
Burrton Municipal Gas System, KS	City of Pikeville, KY	Vernon Parish Gas District #1, LA
Chanute Municipal Gas, KS	Clay Natural Gas System, KY	Village of Clayton, LA
City of Abbyville, KS	Clinton Natural Gas System, KY	Village of Estherwood, LA
City of Alma, KS	Elizabethtown Natural Gas Department, KY	Village of Montpelier, LA
City of Argonia, KS	Ferguson Gas Company, KY	Village of Palmetto, LA
City of Attica, KS	Grayson Utilities Commission, KY	Village of Sicily Island, LA
City of Belleville, KS	Henderson Municipal Gas, KY	Woodworth Municipal Natural Gas Department, LA
City of Cassoday, KS	Kevil Natural Gas System, KY	Holyoke Gas & Electric Department, MA
City of Garden Plain, KS	La Center Natural Gas System, KY	Middleboro Gas & Electric Department, MA
City of Harveyville Gas System, KS	Liberty Natural Gas System, KY	Wakefield Municipal Gas and Light Department, MA
City of Havensville, KS	Livermore Gas Department, KY	Westfield Gas & Electric Light Department, MA
City of Isabel, KS	Morganfield Gas System, KY	Easton Utilities, MD
City of Jamestown, KS	Paintsville Utilities, KY	Town of Winstonville, MD
City of Longford, KS	Providence Natural Gas System, KY	Austin Utilities, MN
City of McLouth, KS	Richmond Utilities Board, KY	Centennial Utilities, MN
City of Morland, KS	Scottsville Gas Company, KY	City of Argyle, MN
City of Neodesha, KS	Vanceburg Utilities Gas Department, KY	City of Clarissa, MN
City of Palmer, KS	Wheelwright Utility Commission, KY	City of Clearbrook, MN
City of Sawyer, KS	Wickliffe, KY	City of Eagle Bend, MN
City of Sharon, KS	Carencro Gas System, LA	City of Hallock, MN
City of Spearville, KS	City of Denham Springs, LA	City of Henning, MN
City of Uniontown, KS	City of Eunice, LA	City of Morgan, MN
City of Wetmore, KS	East Baton Rouge Parrish, GUD #1, LA	City of Round Lake, MN
Denison Municipal Natural Gas Department, KS	Gas District # 1 East Feliciana Parish, LA	City of Stephen, MN
Ford City Utilities, KS	Gas Utilities District #1 WFL Parish, LA	Fairfax Natural Gas, MN
Kechi Municipal Gas System, KS	Gas Utility District #1 of Washington Parish, LA	Fosston Municipal Utilities, MN
Lebo Municipal, KS	Gas Utility District #2 - EFL Parish, LA	Goodhue Public Utilities, MN

Hawley Public Utilities, MN	City of Picayune, MS	Nebraska City Utilities, NE
Hutchinson Utilities Commission, MN	City of Rienzi, MS	Pender Municipal Systems, NE
Lake Park Public Utility, MN	City of Senatobia, MS	Ponca Public Utilities, NE
New Ulm Public Utilities, MN	Corinth Gas & Water Department, MS	Scribner Municipal Gas System, NE
New York Mills Municipal Gas, MN	Duck Hill Natural Gas System, MS	Stromsburg Gas Department, NE
Owatonna Public Utilities, MN	Gloster Municipal Gas System, MS	Superior Utilities, NE
Randall Municipal Utilities, MN	Holly Springs Municipal Natural Gas Departmen, MS	Wisner Natural Gas System, NE
Two Harbors Municipal Gas, MN	Iuka Natural Gas System, MS	Los Alamos County Utilities Department, NM
Tyler Municipal Light & Power, MN	Liberty Municipal Natural Gas Department, MS	Mountainair Natural Gas Department, NM
Westbrook Municipal Light & Power, MN	Mississippi River Gas, LLC, MS	Socorro Municipal Gas Department, NM
Bernie Municipal Gas System, MO	Moss Point Municipal Natural Gas System, MS	Village of Corona Gas System, NM
City of Berger, MO	Oakland Yalobusha Natural Gas District, MS	Wagon Mound Municipal Natural Gas Department, N
City of Clarence Municipal Gas System, MO	Pascagoula Municipal Natural Gas Department, MS	Bath Electric, Gas & Water System, NY
City of New Florence, MO	Roxie Natural Gas Department, MS	Woodhull Municipal Gas Company, NY
City of New Haven, MO	Shuqualak Municipal System, MS	City of Hamilton, OH
City of Paris, MO	Town of Ashland, MS	Lancaster Municipal Gas Department, OH
City of Perryville, MO	Town of Beaumont, MS	Village of Obetz, OH
City of Richland, MO	Town of Friars Point, MS	Village of Verona, OH
City of St. Robert, MO	Town of Metcalfe, MS	Williamsport Municipal Gas Co., OH
City of Waynesville, MO	Town of Tishomingo, MS	Afton Public Works Authority, OK
City of Wheaton, MO	Utica Municipal Gas, MS	Avant Utilities Authority, OK
City Utilities of Springfield, MO	Vicksburg Water & Gas Administration, MS	Billings Public Works Authority, OK
Cuba Municipal Utilities, MO	Walnut Grove Gas System, MS	Burbank Public Works Authority, OK
Frohna-Altenburg Joint Utilities Gas Department, MO	Weir Natural Gas System, MS	Burlington Municipal Natural Gas Department, OK
Grant City Gas Company, MO	West Lincoln Natural Gas District, MS	City of Kaw City, OK
Green City Municipal Natural Gas System, MO	Saco Municipal Gas, MT	Copan Light, Water & Gas System, OK
Hermann Municipal Utilities, MO	Shelby Gas Association, MT	Corn Municipal Natural Gas, OK
Kennett Municipal Gas System, MO	Sunburst City, MT	Covington Municipal Natural Gas Department, OK
Liberal Municipal Gas System, MO	Town of Kevin, MT	Dustin Public Works Authority, OK
Macon Municipal Utilities, MO	City of Bessemer City, NC	East Central Oklahoma Gas Authority, OK
Madison Municipal Gas System, MO	City of Kings Mountain, NC	Fairland Gas Authority, OK
Mercer Municipal Gas System, MO	City of Lexington, NC	Freedom Gas Distribution System, OK
Middletown Municipal Natural Gas System, MO	City of Monroe, NC	Grove Municipal Services Authority, OK
Montgomery City Public Utilities, MO	City of Rocky Mount, NC	Hardesty Municipal Gas AAuthority, OK
Oronogo Municipal Natural Gas System, MO	City of Shelby Utilities, NC	Jones City Gas Company, OK
Perry Municipal Gas System, MO	City of Wilson - Wilson Energy, NC	Keyes Utility Authority, OK
Potosi Natural Gas System, MO	Greenville Utilities Commission, NC	Kiefer Public Works Authority, OK
Shelbina Municipal Natural Gas System, MO	City of Fargo, ND	Minco Gas Authority, OK
St. James Municipal Utilities, MO	Portal City Utilities, ND	NE Oklahoma Public Facilities Authority, OK
Artesia Municipal Natural Gas Department, MS	Alma Natural Gas Department, NE	Oilton Public Works Authority, OK
Baldwyn Municipal Gas & Water System, MS	Central City Gas Department, NE	Orlando Public Works Authority, OK
Byhalia Municipal Gas System, MS	City of Lyons, NE	Ramona Public Works Authority, OK
Caledonia Natural Gas District, MS	City of Stuart, NE	Ripley Public Works, OK
Canton Municipal Utilities, MS	City of Wahoo Utilities, NE	Sperry Utility Service Authority, OK
Chickasawhay Natural Gas District, MS	Falls City Municipal Gas System, NE	Taloga Municipal Natural Gas Dept., OK
City of Bay Springs, MS	Fremont Department of Utilities, NE	Town of Cashion, OK
City of Booneville Gas, MS	Hastings Utilities Gas Department, NE	Town of Red Bird, OK
City of Olive Branch, MS	Metropolitan Utilities District, NE	Town of Willow, OK

Tuttle Public Works Authority, OK	Hardeman-Fayette Utility Dist., TN	Appleby Natural Gas System, TX
Vici Public Works Authority, OK	Harriman Utility Board, TN	Bay City Gas Company, TX
Wakita Utilities Authority, OK	Hawkins County Gas Utility, TN	Castroville Utility System, TX
Wann Public Works Authority, OK	Henning Municipal Natural Gas, TN	Chester Gas System, TX
Borough of Chambersburg, PA	Horton Highway Utility District, TN	Chireno Natural Gas, TX
Philadelphia Gas Works, PA	Humboldt Utilities Gas Dept., TN	City of Boerne, TX
Bamberg Board of Public Works, SC	Humphreys County Utility District, TN	City of Brackettville, TX
Chester County Natural Gas Authority, SC	Jackson Energy Authority, TN	City of Cushing, TX
City of Union Utility Department, SC	Jefferson-Cocke County Utility District, TN	City of Daisetta, TX
Greenwood Commission of Public Works, SC	Lafayette Gas Department, TN	City of Garrison, TX
Greer Commission of Public Works, SC	Lake County Utility District, TN	City of Goldsmith, TX
Lancaster County Natural Gas, SC	Lawrenceburg Utility Systems, TN	City of Joaquin, TX
Orangeburg Department of Public Utilities, SC	Lebanon Gas Department, TN	City of Lytle, TX
Town of Blacksburg, SC	Lenoir City Utilities Board, TN	City of Rockport, TX
York County Natural Gas Authority, SC	Lewisburg Gas Department, TN	City of Splendora, TX
Crooks Municipal Gas, SD	Lobelville Gas Company, TN	City of Spur, TX
Garretson Natural Gas, SD	Loudon Utilities, TN	City of Three Rivers, TX
Humboldt Gas Utility, SD	Marion Natural Gas System, TN	CPS Energy, TX
Watertown Municipal Utilities, SD	Maury City Gas Department, TN	Dal-Mar Energy, Inc., TX
Adamsville Utility, TN	Memphis Light, Gas & Water, TN	Easton Gas System, TX
Athens Utilities Board, TN	Middle Tennessee Natural Gas, TN	Falfurrias Utility Board, TX
Bedford County Utilities District, TN	Mount Pleasant Gas System, TN	Grandfalls Municipal Gas Department, TX
Brownsville Utility Department, TN	Newbern Gas System, TN	Grey Forest Utilities, TX
Citizens Gas Utility District, TN	Oak Ridge Utility District, TN	Hemphill City Gas Dept., TX
City of Clifton, TN	Obion Municipal Natural Gas Department, TN	Kountze Municipal Gas Department, TX
City of Gallaway, TN	Paris-Henry County Public Utility District, TN	Lefors City Gas Department, TX
City of Henderson Utility Dept., TN	Pikeville Natural Gas, TN	Pineland Municipal Gas Department, TX
City of Mason, TN	Powell-Clinch Utility District, TN	Rankin Gas System, TX
City of Munford, TN	Pulaski Natural Gas Department, TN	Sabinal Gas System, TX
City of Portland, TN	Ridgetop Natural Gas Department, TN	Southwest Texas Municipal Gas Corp., TX
Clarksville Water & Gas Department, TN	Ripley Gas Department, TN	Stinnett Municipal Gas Department, TX
Clay Gas Utility District, TN	Rockwood Natural Gas System, TN	Stockdale Natural Gas System, TX
Collinwood Gas Department, TN	Savannah Utilities, TN	Whiteface Municipal Gas Department, TX
Cookeville Gas Department, TN	Selmer Utility Division, TN	Winona Gas Department, TX
Crockett Public Utility District, TN	Sevier County Utility District, TN	City of Blanding, UT
Dunlap Natural Gas System, TN	Smyrna Natural Gas System, TN	Hildale City Gas Department, UT
Elk River Public Utility District, TN	Somerville Gas Department, TN	Nephi City Gas System, UT
Englewood Municipal Natural Gas System, TN	South Fulton Gas System, TN	City of Charlottesville Public Utilities, VA
Etowah Utilities, TN	Springfield Gas System, TN	Danville Water & Gas Distribution Department, VA
Fayetteville Public Utilities Gas Department, TN	Sweetwater Utilities Board, TN	Richmond Department of Public Utilities, VA
First Utility District of Tipton County, TN	Trimble Gas Department, TN	City of Ellensburg, WA
Friendship Gas Department, TN	Unicoi County Utility District, TN	City of Enumclaw Gas Department, WA
Gainesboro Natural Gas Department, TN	Upper Cumberland Gas Utility District, TN	Florence Utility Commission, WI
Gibson County Utility District, TN	Waynesboro Natural Gas Department, TN	Rock Energy Cooperative, WI
Greater Dickson Gas Authority, TN	West Tennessee Public Utility District, TN	