



# AMERICAN PUBLIC GAS ASSOCIATION

December 19, 2016

*Submitted via e-mail to: [reqs.comments@federalreserve.gov](mailto:reqs.comments@federalreserve.gov)*

Mr. Robert deV. Frierson

Secretary, Board of Governors of the Federal Reserve System

20th Street and Constitution Avenue, N.W.

Washington, D.C. 20551

Re: Docket Nos.: R-1547 and RIN 7100 AE-58

Request for an Extension of the Public Comment Period on the Board of Governors of the Federal Reserve System's Proposed Rulemaking, "Regulations Q and Y; Risk-Based Capital and Other Regulatory Requirements for Activities of Financial Holding Companies Related to Physical Commodities and Risk-Based Capital Requirements for Merchant Banking Investments"

Dear Mr. deV. Frierson:

The American Public Gas Association (APGA) requests that the public comment period for the Board of Governors of the Federal Reserve System's (Board) proposal, "Regulations Q and Y; Risk-Based Capital and Other Regulatory Requirements for Activities of Financial Holding Companies Related to Physical Commodities and Risk-Based Capital Requirements for Merchant Banking Investments," be extended through March 31, 2017.

APGA is the national association for publicly-owned natural gas distribution systems. There are approximately 1,000 public gas systems in 37 states and over 700 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.

Many public gas systems utilize large banks as counterparties for a number of transactions, including natural gas pre-pays, the purchase of natural gas via long term pre-paid purchase transactions. The continued participation of large banks in these transactions is critical. Therefore, APGA is very concerned about the Board's proposed rule which would place restrictions on physical commodity trading activities conducted by financial holding companies and amend risk-based capital requirements.

The proposed rule could have significant impacts upon APGA members. APGA request additional time to review the rule, engage in discussions with our member's counterparties on natural gas transactions, and develop substantive and constructive comments in response to this potentially significant rulemaking.

We thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Dave Schryver". The signature is written in a cursive, flowing style.

Dave Schryver  
Executive Vice President, APGA