

Kellie Martinec

From: Garrett, Bridgette <Bridgette.Garrett@fortworthtexas.gov>
Sent: Friday, August 22, 2014 10:45 AM
To: rulescoordinator
Cc: bridgette.garrett@fortworthtexas.gov
Subject: FW: Railroad Commission Letter
Attachments: FW RRC Rule Changes.pdf; ATT00001.htm

Re: City of Fort Worth, Texas comments from Mayor Betsy Price regarding Rate Case Expenses (proposed amendments to 16 TAC Sec.7.5530) and Discovery Limitations (16 TAC Secs.1.86 and 1.87).

Bridgette Garrett
Utility Administrator
City Attorney's Office
1000 Throckmorton St. Ft. Worth, TX 76102
(817) 392-8518
Bridgette.garrett@fortworthtexas.gov

City of Fort Worth – Working together to build a strong community.





Via E-Mail Rulescoordinator@rrc.tate.tx.us
Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Box Drawer 12967
Austin, Texas 78711-2967

August 22, 2014

I write to voice the City of Fort Worth's opposition to proposed Railroad Commission rules that would hinder the city's participation in natural gas rate cases by limiting discovery and changing the manner in which municipal rate case expenses are recovered.

State law authorizes Texas cities to participate in natural gas rate cases that are appealed to the Commission. It is our opinion that any changes to this state law should be the consideration of the State Legislature, not the Commission. As you know bills proposing similar changes were filed, and failed, during the 2013 Legislative Session.

It has been suggested that the proposed changes will increase efficiency and reduce costs in natural gas rate cases. However, Fort Worth and most other Texas cities are already doing just that by participating in rate cases, not as individual entities, but through large, multi-city coalitions. By representing Texas rate-paying citizens in this effective, efficient and cost-saving manner, city coalitions play a key role in the ratemaking process. These coalitions serve as a necessary counterpoint to the utility and ensure the company proves the requested rate increase is necessary.

The proposed rule amendments would have a chilling effect and undermine the current balanced process that the Legislature adopted, which allows for representation of the interests of both ratepayers and utilities in various rulemaking forums. The right of Fort Worth and other Texas cities to fully participate in natural gas rate cases under the Utility Code is vital, which is clearly why the Legislature adopted laws allowing such participation.

The proposed rules undermine the city's legal authority and go against the best interests of the citizens of Fort Worth and the State. The City of Fort Worth urges the Commission not to adopt the proposed rules.

Sincerely,

Betsy Price
Mayor
Fort Worth, Texas

cc:

Senator Kelly Hancock
Senator Wendy R. Davis



BETSY PRICE, MAYOR

CITY OF FORT WORTH ★ 1000 THROCKMORTON STREET ★ FORT WORTH, TEXAS 76102
(817) 392-6118 ★ FAX (817) 392-6187

FORT WORTH



Senator Jane Nelson
Senator Brian Birdwell
Senator Craig Estes
Representative Lon Burnam
Representative Stephanie Klick
Representative Jonathan Stickland
Representative Matt Krause
Representative Diane Patrick
Representative Nicole Collier
Representative Bill Zedler
Representative Craig Goldman
Representative Giovanni Capriglione
Representative Charlie Geren
Representative Chris Turner

BETSY PRICE, MAYOR

CITY OF FORT WORTH ★ 1000 THROCKMORTON STREET ★ FORT WORTH, TEXAS 76102
(817) 392-6118 ★ FAX (817) 392-6187