



Federal Energy Regulatory Commission



NARUC
National Association of Regulatory
Utility Commissioners

April 7, 2020

The Honorable Jerome Powell
Chairman
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Dear Chairman Powell:

The Federal Energy Regulatory Commission is an independent agency that, among other things, regulates the interstate transmission of electricity and of natural gas and oil by pipeline. The National Association of Regulatory Utility Commissioners is a non-profit organization that represents the interests of the state governmental agencies that regulate the utilities providing essential services such as energy, telecommunications, power, water and transportation. We are writing in support of the March 24, 2020 request by the Edison Electric Institute, the American Gas Association and the National Association of Water Companies to extend Commercial Paper Funding Facility (CPFF) purchasing to commercial paper programs that are rated at A2/P2/F2 Tier 2 by at least two of the major credit rating agencies.

We strongly support actions to combat the health and economic crisis that is unfolding due to the COVID-19 pandemic, and we believe that extending CPFF purchasing would be a constructive step toward ensuring a properly functioning, critically important short-term debt market during this challenging period. Tier 2 companies are active in sectors that represent essential infrastructure, and include electric, natural gas and water utilities that are providing important contributions to the country. Both their continued financial stability and their ability to continue to support the country's essential infrastructure are supported by ready access to short-term debt.

Thank you in advance for your consideration. Please do not hesitate to contact either of us, or ask your staff to contact Amery Pore (Amery.Pore@ferc.gov) or Jennifer Murphy (JMurphy@naruc.org) if you have any questions or need additional information.

Sincerely,

Neil Chatterjee
Chairman
Federal Energy Regulatory Commission

Brandon Presley
President
National Association of Regulatory Utility
Commissioners

cc: The Honorable Steven Mnuchin, U.S. Secretary of Treasury
Governors of the Federal Reserve System