

September 1, 2010

**Mr. David Stawick
Secretary
Commodity Futures Trading Commission
1155 21st Street, NW
Washington, DC 20581**

Re: Petitions under Section 723(c) of Dodd-Frank Act

Dear Mr. Stawick:

BG Americas & Global LNG ("BGA") is a business unit of BG Group plc ("BG"), a global natural gas company based in the United Kingdom and a major producer and supplier of natural gas to the United States. BGA is responsible for all of BG Group's operations in North and South America, the Caribbean, BG's global marine operations and BG's global liquefied natural gas ("LNG") operations. BG's subsidiary, BG Energy Merchants, LLC, is a major marketer of natural gas and electricity in the United States.

BGA is submitting this letter in support of the August 26, 2010 Petition by the Working Group of Commercial Energy Firms ("Working Group"). The Petition asks the Commission to act *sua sponte* and issue either:

- a blanket order pursuant to Section 723(c)(2) of the Act grandfathering all persons that transact, operate, or otherwise rely on the provisions of CEA Section 2(h) (as in existence on the day before the Enactment Date), as well as all transactions subject to this provision of the CEA, for a one year period commencing on the Effective Date or for a period deemed appropriate by the Commission; or
- formal guidance as soon as practicable regarding the procedural and substantive requirements for petitions submitted pursuant to Section 723(c)(1) of the Act.

Like the Working Group, BGA believes that issuance of a blanket order by the Commission will provide for an orderly transition of the implementation of Title VII of the Dodd-Frank Act and avoid harmful disruptions to the market. Issuance of a blanket order or, if not a blanket order, formal guidance will help market participants adapt their business transactions to the new regulatory regime with minimal adverse impacts to market liquidity.

BGA urges the Commission to act expeditiously as the legislation provides for Petitions under Section 723(c) to be filed by September 20, 2010.

Respectfully submitted,

/s/ Matt Schatzman
Matt Schatzman
Senior Vice President,
Energy Marketing
BG Americas & Global LNG

cc: Dan Berkovitz, General Counsel, Office of General Counsel
Terry Arbit, Deputy General Counsel, Office of General Counsel
David Van Wagner, Chief Counsel, Division of Market Oversight