



September 2, 2010

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

RE: *Petitions under Section 723(c) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the “Act”)*

Dear Mr. Stawick:

Gazprom Marketing & Trading USA, Inc., (“GM&T USA”), is a Houston based subsidiary of Gazprom Marketing & Trading Limited, a UK registered subsidiary of the Gazprom Group, the world's largest gas company, with other subsidiaries in Paris, Berlin, Singapore and Manchester and operations in numerous international markets across Europe in commodities such as natural gas, oil, carbon, power, LNG and coal. GM&T USA is a major marketer of natural gas throughout the United States.

GM&T USA is submitting this letter in support of the August 26, 2010 petition (the “Petition”) filed with the Commodity Futures Trading Commission (“Commission”) by the Working Group of Commercial Energy Firms (“Working Group”). Specifically, the Petition, based on public policy reasons, requests 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.

Such a blanket order will help the market to avoid disruption and facilitate an orderly transition to the requirements of the Title VII of the Act. In the event that a blanket order is not issued, formal guidance will assist market participants, such as GM&T USA, to adapt and adjust their business strategies to comply with the new regulatory regime.

Because there are only eighteen days until the sixty-day statutory deadline established by Section 723(c)(1) of the Act expires on September 20, 2010, GM&T USA urges the Commission to take expedited action and act on the Working Group’s Petition.

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Thank you for your consideration of this matter.

Sincerely,



David A. Webster
Senior Legal Counsel
Gazprom Marketing & Trading USA, Inc.

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