

**UNITED STATES OF AMERICA
BEFORE THE
COMMODITY FUTURES TRADING COMMISSION**

Petition of the Working Group
of Commercial Energy Firms

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Docket : Not Assigned

**ADOPTION OF PETITION
AND
NOTICE OF APPEARANCE**

On January 19, 2012, the Working Group of Commercial Energy Firms (the "WGCEF") filed a petition with the Commodity Futures Trading Commission (the "Commission") entitled, "*Petitions for Order to exempt Owned Non-financial Entities from Aggregation for Compliance with Position Limits and Order to Broaden and Clarify Rule 151.7(i)*" (the "Disaggregation Petition"). On February 7, 2012, most of the companies that historically participated as members of the the WGCEF reconstituted their collaboration as The Commercial Energy Working Group ("CEWG").

At the direction of CEWG, we hereby submit this notice of appearance as counsel to CEWG. Furthermore, on behalf of CEWG, we hereby adopt and restate the Disaggregation Petition in its entirety except for substituting CEWG for the WGCEF as the petitioner. We welcome the opportunity to work with the Commission and its staff in furtherance of the Disaggregation Petition.

Respectfully submitted,



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February 8, 2012