September, 2, 2013

International Accounting Standards Boards
30 Cannon Street
London EC4M 6XH
United Kingdom

RE: ED 2013/5 Regulatory Deferral Accounts

Dear Board Members,

Objective:

The objective of this working paper is to express Comgas views and answer some questions from Exposure Draft ED 05 2013.

Background

Comgás distributes piped gas in the State of São Paulo, Brazil, the Concession Agreement for the Exploration of Public Piped Gas Distribution Services was signed on May 31, 1999 by the new controlling shareholders and the conceding authority - represented by the São Paulo State Basic Sanitation and Energy Regulatory Agency (ARSESP former CSPE).

The questions and answers below, which affect the company and propose a solution through the replies sent.

Scope

Question 01

The Exposure Draft proposes to restrict the scope to those first-time adopters of IFRS that recognised regulatory deferral account balances in their financial statements in accordance with their previous GAAP.

Is the scope restriction appropriate? Why or why not?

It is our view that the scope must not be applied by first-time adopters of IFRS´s only. We believe that any company has to adopt this new rule for sake of comparison within the industry sector.

If this restriction remains in place it could become a significant obstacle to comparability because those Companies as profit and loss and balance sheet can be significantly different impacting ratios and indexes.

Presentation

Question 06

The Exposure Draft proposes that an entity should apply the requirements of all other Standards before applying the requirements of this [draft] interim Standard. In addition, the Exposure Draft proposes that the incremental amounts that are recognized as regulatory deferral account balances and movements in those balances should then be isolated by presenting them separately from the assets, liabilities, income and expenses that are recognized in accordance with other Standards (see paragraphs 6, 18-21 and BC55-BC62).

Is this separate presentation approach appropriate? Why or why not?

It is our view that impacts should be separate in the profit and loss and other comprehensive income according to the nature of the account and not shown on one line as presented in this ED. The origin of a deferral balance can be cost of gas or operating expenses or even interest rates, therefore demonstrating the impacts in one single line may not present a comprehensive picture of the impacts making more difficult comparisons between companies of the industry sector with other companies from other sectors.

Furthermore, paragraphs below of IAS 01already work in favor of separate lines for reporting.

According IAS 01 Presentation of Financial Statements in paragraphs:

"78 The detail provided in subclassifications depends on the requirements of IFRSs and on the size, nature and function of the amounts involved."

"85 An entity shall present additional line items, headings and subtotals in the statement(s) presenting profit or loss and other comprehensive income when such presentation is relevant to an understanding of the entity's financial performance."

Yours sincerely,

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Accounting Manager