

**Green Button/Energy Services Provider Interface (ESPI) Activities:** As announced in a recent NAESB press release, on November 1, 2021, a new regulation went into effect that calls on approximately sixty Ontario electric and natural gas utilities throughout the province to implement two programs based on Version 3.3 of the NAESB REQ.21 Energy Services Providers Interface Model Business Practices (ESPI). The November 1, 2023 implementation date set by Regulation 633/21: Energy Data also includes the requirement that utility provided Green Button implementations attain certification of the – Green Button Download My Data (DMD) and Green Button Connect My Data (CMD) programs through the Green Button Alliance.

Serving as the basis of Green Button, ESPI defines a communication protocol for the exchange of retail customer energy usage information. Since the ratification of ESPI in September of 2011, the standard has allowed consumers to better understand their usage information and make informed decisions regarding energy consumption. NAESB published the most recent version of ESPI on January of 2020 as part of Version 3.3 of the NAESB Retail Markets Quadrant Model Business Practices.

Beginning as a 2011 White House call-to-action, the Green Button Initiative has become an industry-led effort across North America and beyond. In the US, over 150 utilities and service providers have committed to provide more than 60 million U.S. households, altogether 100 million people, with access to their Green Button energy data. In 2012, the Green Button was introduced to Ontario with the support of the Ministry of Energy which committed to expanding Green Button throughout the province. More than half of Ontario-based consumers, totaling over 3 million residences and businesses have access to their energy usage information. Additionally, NAESB and the Korea Smart Grid Association have released a Korean translation of ESPI which is now available to South Korean entities implementing the Green Button.

NAESB has continued to coordinate efforts with the Green Button Alliance, a non-profit organization formed to foster the development, compliance, and global adoption of compliant Green Button implementations. The Green Button Alliance encourages consistent implementation through the use of ESPI and administers the Green Button testing and certification programs.

**Gas-Electric Harmonization:** On November 23, 2021, the NAESB Board Gas-Electric Harmonization (GEH) Committee will hold its next meeting to discuss the preliminary February 2021 Cold Weather Grid Operations Report issued by FERC, NERC, and Regional Entities. As you may know, the GEH Committee was reconvened by Michael Desselle for the purpose of discussing improvements to coordination between the natural gas and electric industries and also in response to the cold weather events noted during our April Board of Directors meeting and further discussed by the NAESB Board Strategy Committee in May. In June, the GEH Committee held an organizational kickoff meeting to review recent events and discuss possible activities and deliverables that the committee may recommend to the Board of Directors. On June 29th, at the request of the co-chairs of the GEH Committee, Valerie Crockett and Michael Desselle, the NAESB office distributed a request for comments, seeking feedback on several questions presented during the June meeting. By the July 21st conclusion of that comment period, ten comments were submitted by Skipping Stone, American Gas Association, BP Energy, joint pipeline segment members, American Electric Power, American Public Gas Association, the ISO/RTO Council Standards Review Committee and Electric Gas Coordination Task Force, Cheniere Energy, Southern Company, and joint producer segment board members.

After the comments were reviewed during the July meeting, it was noted that several commenters had recommended that further efforts by NAESB should be delayed until the FERC NERC Inquiry into 2021 Cold Weather Grid Operations report is issued. In August, the committee reviewed two work papers. The first contained the policy considerations and issues that were previously identified by the committee and presented to the FERC, and the second work paper detailed the NAESB Business Practices Standards previously developed to support gas and electric market coordination. On September 6, the committee voted to send both work papers to the team members of the FERC-NERC Joint Inquiry into 2021 Cold Weather Grid Operations through Howard Gugel of NERC. As stated above, the next meeting has been scheduled for November 23, 2021 and all interested parties are welcome to attend.
WEQ OASIS Subcommittee Activities: On November 9th, the WEQ OASIS Subcommittee will hold a meeting to address several standards development efforts. First, the participants will continue the development of a cross reference for the NAESB WEQ OASIS Business Practice Standards. The cross reference is intended to provide users with more granular information when researching standards that may be related or linked together. Additionally, the subcommittee will continue discussing proposed enhancements to the OASIS, including standards related to Consolidations, rollover functionality, profile changes resulting from the Preemption-ROFR process, and the release of point-to-point capacity in certain scenarios.

On November 4th, the ratification periods concluded for two recommendations developed through the WEQ OASIS Subcommittee and approved during the October WEQ Executive Committee. The recommendations include: (1) modifications to the OASIS Business Practice Standards to achieve consistency in the use of the defined terms, acronyms, and abbreviations; and (2) an enhancement to the standards to provide more specificity for the identification of all modifications of service made to an original reservation.

The WEQ Executive Committee also approved the no action recommendation in response to the November 25, 2020 FERC Order on Clarification re: Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM-05-5-028). In that Order, the Commission requested that the industry work through NAESB to “develop separate uniform standards governing redirects from conditional parents.” As explained in the no action recommendation, the modifications previously developed by the WEQ OASIS Subcommittee in response to FERC Order No. 676-I, as part Standards Request R20003, fulfill the Commission’s request in the FERC Order on Clarification.

The next WEQ OASIS Subcommittee meeting is scheduled for November 9, 2021. As with all NAESB subcommittee meetings, this meeting is open to all interested industry participants.

WGQ Contracts Renewable Natural Gas Effort: With its next meeting scheduled for November 11th, the WGQ Contracts Subcommittee is continuing its work on a Renewable Natural Gas Addendum to the NAESB Base Contract for Sale and Purchase of Natural Gas. After eight meetings, the subcommittee has now wrapped up its review of common terms and definitions used within the regulated and voluntary markets and is moving on to the General Term and Conditions that make up the body of the Addendum. Once the Addendum is complete, the next step will be to develop standards to support the digital/electronic use of the RNG Addendum.

As background, after a recommendation from the Board Task Force on Renewable and Sustainably Produced Natural Gas, the NAESB Board of Directors determined that NAESB should move forward with the RNG Addendum standards development effort. The WGQ Contracts Subcommittee held its kick-off meeting in February, with strong participation from every segment of the wholesale gas market. During the first call, the subcommittee heard a presentation on the NAESB standards development process, discussed the path and scope of the effort, and reviewed several submitted work papers. Throughout subsequent meetings, the subcommittee has refined the scope of the work and discussed use cases in efforts to define common terms and frequently utilized conditions. The subcommittee is on track to complete the effort within 2022.

Renewable Energy Certificates: In early October, the RMQ and WEQ Executive Committees approved the NAESB Base Contract for Sale and Purchase of Voluntary Renewable Energy Certificates (NAESB REC Base Contract) and an accompanying FAQ document for the contract. The contract was developed during a series of joint meetings of the WEQ and RMQ Business Practices Subcommittees (BPS) and approved by those subcommittees in early August. To facilitate the drafting of the contract, the subcommittees utilized the NAESB Base Contract for Sale and Purchase of Natural Gas as a starting point. One comment was submitted from Cheniere during the thirty-day formal comment period that concluded in early September and the subcommittees subsequently met to review the comments and develop late comments before the October Executive Committee meetings.

The approval of the contract and FAQ document is the first in a two-step effort, with the second step – the drafting of standards to support the digital/electronic use of the NAESB REC Base Contract – being the focus of the next joint subcommittee meeting which is scheduled for November 30, 2021. The technical implementation will include data dictionaries and code value dictionaries that allow the contract to be utilized across multiple electronic platforms, including distributed ledger technologies.

The REC process can be categorized into two major groups, compliance and voluntary. REC compliance instruments are used for state Renewable Portfolio Standards programs and, in contrast, voluntary RECs are often used to verify corporate renewable consumption claims. The NAESB Base Contract for Sale and Purchase of Voluntary Renewable Energy Certificates and its technical implementation focus on transactions and manual tracking methods in the voluntary market.

NAESB Quadrant Membership Analysis

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<thead>
<tr>
<th>Quadrant</th>
<th>Total Membership</th>
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<tbody>
<tr>
<td>Wholesale Gas Quadrant (WGQ)</td>
<td>115</td>
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<tr>
<td>Retail Markets Quadrant (RMQ)</td>
<td>36</td>
</tr>
<tr>
<td>Wholesale Electric Quadrant (WEQ)</td>
<td>130</td>
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<tr>
<td><strong>Total Membership</strong></td>
<td><strong>281</strong></td>
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NAESB New Member: Dominion Energy Questar Pipeline, LLC (WGQ, Pipeline)
**FERC Order No. 2222 and FERC Order No. 841**: The WEQ Business Practices Subcommittee (BPS) continues its standards development efforts to support the integration of energy storage resources and distributed energy resources, both in front and behind the meter, in the wholesale markets. This standards development activity directly supports FERC Order Nos. 841 and 2222 and the wholesale electric industry’s implementation of Commission directives within these orders. The subcommittee, which has been meeting since February, reached a consensus early on to focus initial efforts around the development of standards to establish information and reporting requirements for energy storage resources and distributed energy resources participating in the wholesale markets. To support this effort, the WEQ BPS has developed a use case identifying data elements that may be needed in the registration of a distributed energy resource aggregation and/or an individual resource comprising an aggregation.

The use case is envisioned to support the various entities associated with the registration with an ISO/RTO of a distributed energy resource aggregation/individual resource as a common set of information requirements and is intended to serve as a basis for drafting standards. The data elements identified as part of the use case include locational information such as geographic location, service location, and price node as well as operational characteristics such as type of aggregation, resource capacity, and metering information. The WEQ BPS is holding an informal comment period regarding the use case and is specifically seeking industry feedback regarding the identified data elements and if additional data elements may be of benefit. The informal comment period began on October 19th and closes on November 9th. The subcommittee will begin reviewing any informal comments during its meeting scheduled for November 10th from 1:00 to 4:00 PM Central.

Given the potential overlap between commercial and reliability issues regarding the participation of energy storage resources and distributed energy resources within the wholesale electric market, NAESB and NERC staff have been frequently communicating regarding the status of NAESB business practice development activities, including the informal comment request of the WEQ BPS, as well as current and future NERC projects addressing reliability guidance and standards related to batteries and distributed energy resources.

Earlier this year, NAESB made an informational status update with the FERC in Docket No. RM05-5-000 regarding the activities of the organization to support industry directives in FERC Order Nos. 841 and 2222. The report provided a high-level description of the areas of standards development being addressed by NAESB as well as an overview of the initial efforts of the WEQ BPS.

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**Cybersecurity**: As part of the recent NAESB update calls held on August 25 and October 20, NAESB invited two subject matter experts to provide insights regarding cybersecurity activities impacting the energy industry. During the August 25 call, Annie McIntyre with Ardua Strategies addressed the status of cybersecurity regulations for the bulk electric grid and pipeline security information handling as well as reviewed new regulations and directives in these areas. During the October 20 call, Robert Arnold from the Cybersecurity & Infrastructure Security Agency provided a presentation regarding recent activities of the Information and Communications Technology (ICT) Supply Chain Risk Management (SCRM) Task Force.

During its October 5th meeting, the WEQ Executive Committee approved two cybersecurity related recommendations developed by the WEQ Cybersecurity Subcommittee. First, the committee approved a recommendation proposing minor, non-substantive revisions to the WEQ-012 Public Key Infrastructure Business Practice Standards intended to support consistency in the use of defined terms, abbreviations, and acronyms within the WEQ Business Practice Standards. The ratification period for the revised standards ends on November 4, and, if ratified, will be incorporated into the next version of the WEQ publication. Additionally, as discussed in the NERC Coordination section of this bulletin, the WEQ Executive Committee also approved modifications to the **NAESB Accreditation Requirements for Authorized Certification Authorities (ACAs)** to incorporate requirements that must be followed by any NAESB ACA issuing a code signing certificate. The new version of the accreditation requirements became effective upon approval by the WEQ Executive Committee on October 5.

On October 21, 2021, at the request of the NAESB Board Strategy Committee, the NAESB office distributed a survey to NAESB Board of Directors and Advisory Council members to obtain feedback regarding actions that NAESB could take, working with the FERC and the Department of Energy, to expedite the process by which the industry develops, adopts, and implements standards. This is in response to an informal recommendation made by Sandia National Laboratories in the 2019 Surety Assessment. Over the course of several meetings, the NAESB Board Strategy Committee has identified several different possible proposals: maintaining all cybersecurity related requirements within a single suite of standards for each quadrant, developing cybersecurity related specifications for each quadrant, and/or creating a certification program specific to NAESB cybersecurity related standards. As part of the survey, respondents are asked to indicate a level of support for each proposal, including an option that NAESB take no further action at this time, as well as provide any additional comments or recommendations for consideration by the NAESB Board Strategy Committee. The committee will be meeting on November 30 to review the survey results and feedback in order to prepare a recommendation for consideration by the NAESB Board of Directors on how to proceed.
NERC Coordination: During the recent WEQ Executive Committee meeting, held on October 5, the committee took action to approve three recommendations for standards development in support of coordination efforts with NERC. The first recommendation approved by the WEQ Executive Committee proposed modifications to the definition of System Operating Limit in response to a request submitted by NERC to NAESB. The defined term System Operating Limit is used in both the NERC Reliability Standards and the NAESB Business Practice Standards and, where possible, NAESB seeks to align the definitions for shared terms with the NERC Reliability Standards to support consistency, promote clarity, and reduce potential confusion.

Next, the WEQ Executive Committee approved a recommendation, developed by the WEQ Business Practices Subcommittee (BPS), to the WEQ-005 Area Control Error (ACE) Equation Special Cases Business Practice Standards intended to complement the NERC Dynamic Transfer Reference Document – Version 4. These standards address how commercial elements, specifically joint operating units modeled as pseudo-ties or dynamic schedules, are accounted for in the ACE equation, which is maintained by NERC. The NERC Dynamic Transfer Reference Document provides non-mandatory industry guidance regarding the ACE equation. The modifications proposed by the WEQ BPS seek to provide greater clarity regarding the commercial aspects of the ACE equation, including ensuring the use of terminology in the standards consistent with the NERC Dynamic Transfer Reference Document. The ratification period for both sets of standards changes closes on November 4, 2021. If ratified, the revised standards will be incorporated into the next version of the publication.

Finally, at the October 5 meeting, the WEQ Executive Committee approved a new version of the NAESB Accreditation Requirements for Authorized Certification Authorities (ACA), which supports the NAESB ACA Certification Program and defines the technical requirements that a certificate authority must meet in issuing a digital certificate under the NAESB Public Key Infrastructure Business Practice Standards. The revisions to the accreditation document address requirements related to the issuance of code signing certificates by a NAESB ACA and are intended to be supportive of NERC Reliability Standard CIP-010 Cyber Security – Configuration Change Management and Vulnerability Assessments. The new version of the NAESB Accreditation Requirements for ACAs went into effect upon approval by the WEQ Executive Committee.

Beyond these recent standard development activities, NAESB and NERC continue to coordinate in a number of areas. Recently, as it does every year, the WEQ SRS performed a review of the Draft 2022-2024 NERC Reliability Standards Development Plan to identify any potential areas of coordination between the business practices and reliability standards. The subcommittee noted four ongoing NERC efforts that may be coordinated with NAESB standard development activities: NERC Project 2020-01 Modifications to MOD-032-1, NERC Project 2020-02 Transmission-connected Dynamic Reactive Resources, NERC Project 2020-03 Supply Chain Low Impact Revisions, and NERC Project 2021-03 CIP-002 Transmission Owner Control Centers. The feedback of the WEQ SRS was forwarded to the NAESB Managing Committee for consideration and subsequently submitted to NERC.

Additionally, as noted in the FERC Order No. 2222 and FERC Order No. 841 section of this bulletin, NAESB and NERC staffs are in frequent communication regarding the efforts within each organization to address energy storage resources/batteries and distributed energy resources.

Upcoming NAESB Courses: Throughout 2021, NAESB has continued to hold its popular industry webinars. These courses provide invaluable information to NAESB newcomers and veterans alike. As the dates for the webinars are scheduled, they will be made available on the NAESB Primers and Training Courses Page.

Understanding the NAESB WGQ Contracts Course – This webinar is taught by subject matter experts and designed as an in-depth review of the NAESB Base Contract for Sale and Purchase of Natural Gas (NAESB Base Contract). Along with a detailed explanation of the components of the contract, the attendees will also learn about the supporting addendums, including the Mexican and Canadian Addendums. Additionally, this webinar will cover the NAESB Trading Partner Agreement and deliver an overview of other NAESB WGQ contracts.

NAESB 101 Webinar – In this course, NAESB attorneys introduce attendees to the organization, its structure, and its American National Standards Institute (ANSI)-accredited standards development process. During this call, the participants will learn how to work within NAESB to support the goals of the wholesale and retail natural gas and electric industries.

NAESB Webinar for NARUC – Every year, NAESB coordinates with the National Association of Regulatory Utility Commissioners (NARUC) to schedule a closed webinar for interested State Commissioners, Commission staff, and members of the National Council on Electric Policy (NCEP). This course is similar to the NAESB 101 Webinar, but holds a specific focus on the activities within the retail markets.

Webinars in Response to Regulatory Actions – From time-to-time and based upon interest from the industry, NAESB holds classes on specific topics that may be related to regulatory actions taken on the NAESB Business Practice Standards or Model Business Practices. These courses assist those submitting comments in response to Notices of Proposed Rulemaking or considering the implementation of new standards. For example, past courses have included WQG Business Practice Standards: Updates and Changes Version 3.1 Course, WEQ Business Practice Standards: Updates and Changes Version 003.2 Course, and the NAESB Gas Electric Harmonization WebCast Course.
On December 9, 2021, NAESB will hold its next Board of Directors Virtual Meeting from 9:00 AM to 1:00 PM Central. During the meeting, the board members will review and consider the 2022 NAESB Budget and the proposed 2022 annual plans, in addition to reviewing its standing agenda items. Craig Enochs, Reed Smith, LLP, will provide a presentation concerning the state of the current hydrogen market and its potential for the future.

On November 30, 2021, the Board Strategy Committee and the Board Revenue Committee will meet to address items ahead of the December board meeting. During the August Board Strategy Committee Meeting, the participants reviewed the comments submitted on the 2021-2023 NAESB Strategic Plan, drafted the questions for the Cybersecurity Survey, and discussed the potential of NAESB undertaking standards development efforts to support the hydrogen market. As noted in the Cybersecurity section of this bulletin, the Board Strategy Committee distributed a survey in October to the NAESB Board of Directors and Advisory Council members to obtain feedback regarding the process by which NAESB adopts and maintains its cybersecurity related standards. The survey responses are due back on November 11th and will be discussed during the upcoming Board Strategy Committee meeting. During the November 30th call, the participants will also discuss a work paper concerning the hydrogen markets and review the results of the Cybersecurity Survey. The NAESB Board Revenue Committee will also meet on the last day of November to review communication activities, the current publication cycles, membership, and financial reports. Additionally, the participants will review any items in preparation for the December board meeting including a review of the proposed 2022 budget for the organization.

On October 12, 2021, the revised NAESB Certificate of Incorporation proposed by the NAESB Parliamentary Committee was ratified by NAESB membership. These revisions, along with modifications to the Bylaws and NAESB Operating Procedures were approved during the September 10, 2021 Board of Directors virtual meeting. As the approved action of the Board of Directors included modifications to the NAESB Certificate of Incorporation, a ratification ballot was distributed to the general membership in compliance with Article V, Section 3 of the Certificate of Incorporation. As required in the Certificate of Incorporation, the general membership voted in support sufficient to meet the ninety percent affirmative vote of the general membership.

As a background, from April of 2017 to May of this year, the Parliamentary Committee members met to discuss and review the NAESB Certificate of Incorporation, the NAESB Bylaws, and the NAESB Operating Procedures. As part of this process, the committee members reached consensus on updates and revisions that support the alignment of each of the NAESB Governing Documents with the following goals: consistency with Delaware corporate law, consistency with the document itself and the other NAESB Governance Documents, consistency with the original intent of the adopted provision and/or procedure, and consistency with the original intent of the adopted provision and/or procedure. The revised documents are now posted on the NAESB website.

Publications and Filings: Publication dates within each of the quadrants remain to be determined and will continue to be discussed during the November Board Revenue Committee meeting and the Board of Directors meeting. As you may remember, on July 15th and May 20th of this year, FERC took actions to revise its regulations through the issuance of two final orders that incorporated by reference recent NAESB Business Practice Standards publications. Also, the Government of Ontario revised its regulations to incorporate by reference REQ. 21, from the most recent RMQ Model Business Practices publication into its regulations. In the July 15th FERC Order No. 587-Z (Docket No. RM96-1-042), the Commission adopted new and modified standards from Version 3.2 of the WGQ Business Practice Standards. The new and modified standards included in the WGQ Version 3.2 publica- tion were developed between September 2017 and August 2020. The publication was released on August 15, 2020 and, on August 17, 2020, NAESB submitted an informational filing containing the standards to FERC.

On May 20th FERC Order No. 676-J (Docket Nos. RM05-5-029 and RM05-5-030) incorporated by reference, with certain exceptions, Version 003.3 of the NAESB WEQ Business Standards into the FERC regulations. Version 003.3 was developed over a period of about two years, from December of 2017 to March of 2020. NAESB published the version on March 30, 2020 and submitted an informational filing on the standards to FERC on the same day.

Version 3.3 of the NAESB Retail Model Business Practices was published on January 30, 2020. The status of the publications will be discussed during the upcoming board committee meetings in preparation for the December 9th NAESB Board of Directors Virtual Meeting.

NAESB Mail Subscriptions: Registration in the NAESB e-mail information distribution system (NAESB Mail) is a benefit of membership. By electing to participate in NAESB Mail, members will receive targeted e-mail messages from the NAESB Office about relevant NAESB events, including conference-calling information, as well as important documents. What you won’t receive are duplicate messages – no matter how many groups you subscribe to, when the same message is sent to multiple groups, you’ll receive only one copy.

Non-member Access/Participation: For our participants who are non-members, from the NAESB Home Page you can access one of the four quadrant squares – wholesale electric, retail electric, wholesale gas and retail gas, you are directed to the “NAESB Non-member Access: NAESB Committees, Subcommittees and Task Forces” web page. For more information, please go to NAESB Current Committee Activities or contact NAESB Staff (naesb@naesb.org) for additional information.
Copyright/NAESB Standards Access: As you are aware, NAESB copyrights its work products – a practice used by most standards organizations. The copyrights are considered a subset of intellectual property law, and NAESB retains the rights to the publication, reproduction, display, and distribution of all copyrighted material. NAESB members may obtain materials free of charge as part of their benefits, but these benefits do not extend to their agents, affiliates or subsidiaries without prior approval and waivers from the NAESB office. Damages for copyright infringement can be significant, including penalties of $100,000+, injunction, impounding of materials, seizure of property, and award of punitive damages. While NAESB does enforce its copyrights, the organization has developed policies intended to facilitate sharing information and has granted waivers to regulators and educational institutions depending on the intended use. NAESB also has a process by which anyone can request a three-day waiver to review the work products, as they consider whether they should purchase them. Waivers for longer periods can also be granted depending on use, such as for a government comment period. NAESB’s control of copyrighted material provides a small revenue stream which offsets some of its standards development expenses and thus those of its members in the creation of the work products. More importantly, as entities must come to NAESB for its standards material, it assures that they will have access to the most current version.

Resources for Additional Information: The following hyperlinks provide more information on standards development efforts and other activities within NAESB. Please log into the NAESB website to access the members only links.


NAESB Filings: June 21, 2021 - NAESB Informational Status Update on NAESB Standard Development Efforts to Support FERC Order Nos. 841 and 2222 (Docket No. RM05-5-000), March 19, 2021 NAESB Comments Submitted to FERC on NOPR issued February 18, 2021 for (WGQ Version 3.2).


Recommendations Approved During October Executive Committee Meetings: WGO Recommendation to Support Standards Request R21001, WGO BPS/RMQ BPS Recommendation Containing Base Contract for Sale and Purchase of Voluntary Renewable Energy Certificates, WGO OASIS Recommendation for 2021 WEQ Annual Plan Item 3.a.i – Review WEQ-001, WEQ-002, WEQ-003, and WEQ-013 and make modifications as needed for consistency in the use of the defined terms, acronyms, and abbreviations, WGO OASIS Recommendation for 2021 WEQ Annual Plan Item 3.e – Develop of industry business practice standards, as applicable, for identification of all modifications of service made to an original reservation in one location within OASIS, WGO CSS Recommendation for 2021 WEQ Annual Plan Item 3.a.ii – Review WEQ-004 and WEQ-022 and make modifications as needed for consistency in the use of defined terms, acronyms, and abbreviations, WGO CSS Recommendation for 2021 WEQ Annual Plan Item 3.a.iv – Review WEQ-012 and make modifications as needed for consistency in the use of defined terms, acronyms, and abbreviations, WGO SRS Recommendation for Standards Request R21002 – Request to review NAESB WEQ Business Practice Standards definition for System Operating Limit following NERC’s proposal to revise the definition for System Operating Limit in the NERC Glossary, WEQ BPS Recommendation for 2021 WEQ Annual Plan Item 1.a:Standards Request R21008 – Update WEQ-005 Area Control Error (ACE) Equation Special Cases to account for modifications to NERC Dynamic Transfer Reference Document V 4, WEQ BPS Recommendation for 2021 WEQ Annual Plan Item 3.a.iii – Review WEQ-005, WEQ-007, WEQ-009, and WEQ-023 and make modifications as needed for consistency in the use of defined terms, acronyms, and abbreviations, No Action WEQ OASIS Recommendation for 2021 WEQ Annual Plan Item 3.d – Review the NAESB WEQ OASIS Business Practice Standards addressing redirects and revise the standards as needed to support direction provided in the FERC Order on Clarification re: Standards for Business Practices and Communication Protocols for Public Utilities in Docket No. RM05-5-008, Recommendation for WEQ 2021 Annual Plan Item 4.a and 4.b – Review annually at a minimum, WEQ-012 and the accreditation requirements for Authorized Certification Authorities to determine if any changes are needed to meet market conditions, 4.b. Evaluate and modify standards as needed to support and/or complement the current version of the NERC Critical Infrastructure Protection Standards and any other activities of NERC and the FERC related to cybersecurity.

Board Gas-Electric Harmonization Committee Efforts: Correspondence from Michael Desselle to Howard Gugel, Considerations & Proposals Included in the Comments Submitted to the GEH Committee - Revised August 26, 2021 (clean), NAESB Standards Developed to Support Gas and Electric Market Coordination, Previously Identified NAESB GEH Committee Policy Considerations & Issues, Comments Submitted by G. Lander, Skipping Stone, Comments Submitted by M. Aizen, AGA, Comments Submitted by J. Minnis, BP Energy, Comments Submitted by M. Gracey on behalf of several WGQ Pipeline Segment members, Comments Submitted by S. Moneteth, AEP, Comments Submitted by R. Lani, APGA, Comments Submitted by B. Welch on behalf of the ISO- RTO Council (IRC) Standards Review Committee (SRC) and Electric Gas Coordination Task Force (EGCTF), Comments Submitted by K. Sappenfield on behalf of Cheniere Energy, Comments Submitted by JT Wood, Southern Company, Comments Submitted by C. Russo on behalf of the WGQ Producer Segment Board Members.