

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Standards for Business Practices of
Interstate Natural Gas Pipelines**)

Docket No. RM96-1-044

**COMMENTS OF THE
AMERICAN PUBLIC GAS ASSOCIATION**

Pursuant to the Notice of Proposed Rulemaking (“NOPR”) issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) on October 16, 2025, concerning Standards for Business Practices of Interstate Natural Gas Pipelines,¹ the American Public Gas Association (“APGA”) respectfully submits these comments in this proceeding.

I. COMMUNICATIONS

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II. IDENTITY AND INTEREST

APGA is the trade association for more than 730 communities across the U.S. that own and operate their retail gas distribution entities. Overall, there are approximately 1,000 publicly- and

¹ *Standards for Business Practices of Interstate Natural Gas Pipelines: Notice of Proposed Rulemaking*, 90 Fed. Reg. 52012 (Nov. 19, 2025).

community-owned systems in the United States. These include not-for-profit gas distribution systems owned by municipalities and other local government entities, all accountable to the citizens they serve. Public gas systems safely provide reliable, affordable, and sustainable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications, including electricity generation.²

A not-for-profit public gas system gives a community local control over how gas is provided to homes and businesses. Instead of being made in a distant city, decisions are made at the community-level through citizen participation by people who appreciate local issues and who are primarily focused on service, safety, reliability, and costs. Public gas systems are regulated by their consumer-owners through locally elected governing boards or appointed officials, which are accountable to the citizen ratepayers they serve and removable by them. Accordingly, community aid and quality service are the mandates for these utilities. The natural gas utility in a community is also an economic engine, and it is one of the most important tools in terms of a community's success in economic development. In fact, prospective commercial, institutional, and industrial facilities are more likely to locate in communities where reliable natural gas is available, which is valuable as job creation and retention in a community are paramount to the wellbeing of the local population. To promote economic growth and ensure affordable energy to homes and businesses alike, it is important for these communities to have access to a reliable natural gas supply.

APGA members safely and reliably distribute the natural gas transported by FERC-regulated pipelines to residential, commercial, and industrial customers. To serve the communities that govern them, APGA members purchase interstate natural gas transportation services from

² For more information, please visit www.apga.org.

pipelines at rates and under terms and conditions that are regulated by the Commission. Because access to reliable supply, especially during severe weather, is a cornerstone of reliable service to their communities, APGA has long engaged in gas-electric coordination efforts on behalf of our members, both at FERC and other organizations responsible for addressing gas-electric coordination challenges. APGA has a history of advocating for standards that could improve communication and coordination between various energy market participants to help ensure a resilient energy delivery system across the nation. This sentiment still stands. Therefore, APGA members and the communities they serve have an interest in FERC's incorporation of these updated gas-electric coordination standards.

III. BACKGROUND

In June 2021, North American Energy Standards Board (“NAESB”) Gas-Electric Harmonization (“GEH”) Forum requested comments that were intended to provide insight as to whether the response to severe winter weather events, specifically Winter Storm Uri, were well perceived. APGA’s comments³ noted that Winter Storm Uri and the extreme temperatures caused the average daily natural gas production in Texas to drop from 21 Bcf/d in January to 13 Bcf/d in February. The result of Winter Storm Uri was blackouts across the Texas Electric grid. Drawing from these observations, APGA recognized that there was a gap somewhere but recommended to the GEH Forum that the upcoming FERC/North American Electric Reliability Corporation (NERC) Joint Inquiry – which was actively being worked on for publication – would provide better insight. Accordingly, APGA recommended that NAESB speaking as to what that “gap” might be

³ APGA comments in response to the North American Energy Standards Board (NAESB) GEH Forum request for comments (Jul. 21, 2021).

would be premature. APGA, at the time, was engaged and hopeful that any information from the Joint Inquiry would lead to effective proposals to the existing GEH strategy.

In June 2024, APGA subsequently provided comments in response to the NAESB Joint WEQ, WGQ, RMQ Business Practices Subcommittees informal comment period. In these comments,⁴ APGA stated that its members have confirmed that there is a communication gap between various market participants leading up to and during winter weather events. This communication gap leads to uncertainty and potentially hazardous outcomes during these weather events. APGA stated that the best way to address this issue would be for NAESB to set standards that directly spoke to the communication gap issue.

Since then, on December 4, 2024, NAESB informed the Commission that it had modified Version 4.0 of the NAESB WGQ Business Practice Standards applicable to interstate natural gas pipelines. APGA is supportive of FERC's proposal to adopt these updated standards by incorporation into its relevant regulations.

IV. COMMENTS

FERC proposes to incorporate by reference into its regulations three (3) modifications to NAESB standards. These modifications are centered around gas-electric coordination.

- Modification 1 is a revision that requires the creation of a centralized location on pipelines' websites where transportation service providers can post publicly available data.

⁴ APGA comments in response to questions posed by the North American Energy Standards Board (NAESB) Joint Wholesale Electric Quadrant (WEQ), Wholesale Gas Quadrant (WGQ), and Retail Market Quadrant (RMQ) Business Practices Subcommittees (Jun. 7, 2024).

- Modification 2 helps pipelines post applicable scheduled quantity information so that grid operators can anticipate supply and needs of their customers.
- Modification 3 calls for the inclusion of clearer geographic information when posting critical notices.

The overall aim of FERC's proposed incorporation by reference of Version 4.0 of the Standards for Business Practices of Interstate Natural Gas Pipelines is to make data sharing and gas-electric coordination clearer and less ambiguous. FERC states that this will "improve the coordination between the natural gas pipelines and electric utilities [and that such] coordination is essential to maintaining reliability . . ., especially during periods when both systems have coincident peak requirements."⁵ APGA is especially supportive of the manner in which the information will be shared, as it will ensure all market participants have equal access to this critical information.

APGA appreciates NAESB's commitment to supporting grid communication and enhancing situational awareness during winter weather events, and APGA supports the Commission's incorporation of these modifications to facilitate that commitment. APGA believes the adoption of these new standards will help ensure more reliable access to energy for all Americans.

⁵ *Standards for Business Practices of Interstate Natural Gas Pipelines: Notice of Proposed Rulemaking*, 90 Fed. Reg. 52013 (Nov. 19, 2025).

V. CONCLUSION

APGA appreciates the opportunity to provide comments and voice its support for the adoption of these standards. APGA has a clear and present history of backing better gas-electric coordination. We respectfully request that the Commission take into consideration these comments in this proceeding.

Respectfully submitted,



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