

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

Standards for Business Practices of) Docket No. RM96-1-044
Interstate Natural Gas Pipelines)

**COMMENTS OF
THE INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA**

The Federal Energy Regulatory Commission (“Commission” or “FERC”) proposes to amend 18 C.F.R. § 284.12 to incorporate, by reference, the latest modifications to Version 4.0 of the North American Energy Standard Board (“NAESB”) Standards for Business Practices of Interstate Natural Gas Pipelines.¹ The Interstate Natural Gas Association of America (“INGAA”) supports the Commission’s proposal but urges the Commission to (1) if possible, time the issuance of a final rule in this proceeding so that the modifications’ effective date does not occur during the winter heating period and (2) to allow pipelines the flexibility to implement the modifications *on or before* 180 days from the date compliance filings are due in this proceeding.

INGAA is a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in the United States. INGAA’s 28 members represent the majority of interstate natural gas transmission pipeline companies in the U.S. INGAA’s members, which operate approximately 200,000 miles of interstate natural gas pipelines, serve as an indispensable link between natural gas producers and consumers. Its United States members are regulated by the Commission pursuant to the Natural Gas Act (“NGA”).

¹ See *Standards for Business Practices of Interstate Natural Gas Pipelines*, 193 FERC ¶ 61,041 (2025) (“Proposed Rule”).

COMMENTS

INGAA members developed the modifications in the Proposed Rule in 2024 with stakeholders in the NAESB Wholesale Gas Quadrant, Wholesale Electric Quadrant, and Retail Market Quadrant Business Practices Subcommittees. The Commission correctly notes that the Proposed Rule “would improve the coordination between the natural gas pipelines and electric utilities . . . essential to maintaining reliability . . . especially during periods when both systems have coincident peak requirements.”² INGAA appreciates NAESB convening the subcommittees to explore means of enhancing situational awareness during extreme weather events and all stakeholders’ work to advance the modifications.

INGAA has previously asked the Commission to delay deadlines to implement revisions to NAESB standards until after the winter heating period, and the Commission granted the request.³ The concerns that prompted prior INGAA’s request are still present. It would not be prudent or efficient to require changes to be made during the most critical period for gas transportation and market requirements. Further, requiring implementation to occur for the first gas day of the month is important for both pipelines and shippers. While pipelines update their software to accommodate the new NAESB version ahead of the implementation date, both pipelines and shippers need to ensure that contract, nomination, allocation, invoice, and other changes are fully in place and working properly with the start of the gas month. This is consistent with the industry’s monthly billing cycle and avoids the complications of a mid-month transition.

² Proposed Rule at P 1.

³ See, e.g., *Standards for Business Practices of Interstate Natural Gas Pipelines*, Order No. 587-AA, 189 FERC ¶ 61,135, P 23 (“As suggested by INGAA, we will delay implementation of this Final Rule until after the 2024-2025 winter heating period. . . . We are adopting this implementation schedule to give the interstate natural gas pipelines subject to these standards time to implement these changes.”).

While INGAA continues to assert that the need to avoid disruption during the winter heating period remains critical, INGAA recognizes in this case that the importance of the Proposed Rule's modifications to enhancing situational awareness during the winter heating period—when “both systems have coincident peak requirements”⁴—counsels against delaying the implementation of these changes until after winter. Rather than delay the modifications' effective date until after the winter heating period, INGAA asks that the Commission take two steps to minimize disruption to pipeline operations.

First, the Commission should expeditiously issue a final rule in this proceeding. If the Commission acts quickly, the modifications' effective date will fall earlier in the winter heating period when there is less risk of disruption.

Second, the Commission should provide pipelines with flexibility by requiring that Compliance filings to revise pipeline tariffs to reflect the changes in accordance with a final rule be filed with the Commission no later than 120 days after issuance of a final rule by the Commission in this proceeding or, if the compliance filing date falls on a weekend or holiday, on the first business day thereafter, with a proposed effective date **no later than** 180 days from the date compliance filings are due in this proceeding.

The emphasized language maintains the current proposed effective date but allows pipelines to implement the Proposed Rule earlier (if practical) at a time that minimizes disruptions.

CONCLUSION

For the reasons above, INGAA respectfully requests that the Commission (1) promptly issue a final rule in this proceeding and (2) require a proposed effective date for the Proposed

⁴ Proposed Rule at P 1.

Rule's modifications *no later than* 180 days from the date compliance filings are due in this proceeding.

Respectfully submitted,

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