

**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
UTILITY COALITION**

Pursuant to the Notice of Proposed Rulemaking (“NOPR”) issued by the Federal Energy Regulatory Commission (“Commission” or “FERC”) on October 16, 2025, National Grid USA (“National Grid”), on behalf of its electric transmission and natural gas delivery subsidiaries in New England and New York;¹ Consolidated Edison Company of New York, Inc. (“CECONY”) and Orange and Rockland Utilities, Inc. (“O&R” together with CECONY, “Con Edison”); Old Dominion Electric Cooperative (“ODEC”); and Washington Gas Light Company (“WGL”), (collectively, the “Utility Coalition”), hereby submit these comments in the above-referenced proceeding. As discussed more fully below, the Utility Coalition supports the National American Energy Standards Board’s (“NAESB”) proposed Business Practice Standards designed to enhance gas-electric coordination. The Utility Coalition also appreciates the opportunity to provide input on additional efforts the Commission could undertake to further improve gas-electric coordination and energy network reliability, including issuing a Notice of Inquiry (“NOI”) to examine options under the Commission’s existing authority to support and maintain natural gas pipeline service reliability.

¹ National Grid’s electric transmission and natural gas delivery subsidiaries in New England and New York include The Brooklyn Union Gas Company; KeySpan Gas East Corporation; Niagara Mohawk Power Corporation; Massachusetts Electric Company; Nantucket Electric Company; New England Power Company; Boston Gas Company; New England Electric Transmission Corporation; New England Hydro-Transmission Corporation; and New England Hydro-Transmission Electric Company, Inc.

I. UTILITY COALITION

A. National Grid

National Grid delivers power and heat to more than 20 million people across New York and New England. With almost 9,000 miles of electric transmission lines, 70,000 miles of electric distribution circuits, and 36,000 miles of gas pipelines in the U.S., National Grid helps heat and power homes and businesses and connect communities to the energy they need. National Grid takes service from approximately a dozen interstate natural gas pipelines regulated by the Commission under the Natural Gas Act (“NGA”). As customers of jurisdictional pipelines and providers of natural gas and electric distribution service to retail customers, National Grid is directly affected by the rates, terms, and conditions of the transportation and storage services provided by jurisdictional pipelines. Accordingly, National Grid has a substantial interest in the reliability of interstate natural gas infrastructure, and in ensuring predictable and consistent policies and regulations that affect that infrastructure.

B. Con Edison

CECONY is a combination gas, electric, and steam utility company whose retail rates and services are regulated by the Public Service Commission of the State of New York. O&R is a combination gas and electric utility company whose retail rates are regulated by the Public Service Commission of the State of New York and the New Jersey Board of Public Utilities. Collectively, Con Edison’s local gas distribution systems serve over 1.2 million customers in New York City, Westchester County, Orange County, and Rockland County in the State of New York.

Con Edison also takes service from multiple interstate natural gas pipelines regulated by the Commission under the NGA. As customers of jurisdictional pipelines and providers of natural gas and electric distribution service to retail customers, Con Edison is directly affected by the rates,

terms and conditions of the transportation and storage services provided by jurisdictional pipelines. Accordingly, Con Edison has a substantial interest in the reliability of interstate natural gas infrastructure, and in ensuring predictable and consistent policies and regulations that affect that infrastructure.

C. ODEC

ODEC is a member-owned, not-for-profit wholesale generation and transmission electric cooperative. ODEC supplies power for eleven not-for-profit retail distribution cooperatives in Virginia, Maryland and Delaware, serving 1.5 million people. ODEC's number one priority is serving members and their communities.

ODEC takes gas transmission service for its three generating stations from one pipeline owner at three different locations regulated by the Commission under the NGA.

D. WGL

WGL has been a foundational provider of energy service in the National Capital Region for more than 177 years. WGL's first service obligation included supplying gas to light the halls of the United States Capitol, followed shortly thereafter by service to the White House. Since that time, WGL has developed and maintained an interconnected pipeline network that serves the District of Columbia, Maryland, and Virginia, supporting residential, commercial, institutional, and governmental customers across the region. This long-standing role reflects WGL's responsibility to provide affordable, reliable, and safe energy to a diverse and mission-critical customer base.

Today, WGL delivers natural gas to more than 1.2 million customers and proudly helps to employ thousands across the region. WGL rates are regulated by the District of Columbia Public Service Commission, the Maryland Public Service Commission, and the Virginia State Corporation Commission. Customers are at the heart of everything WGL's does and is committed to evolving to meet the needs of the region for the next generation. WGL takes service from multiple interstate natural gas pipelines regulated by the Commission under the NGA. As customers of jurisdictional pipelines and providers of natural gas distribution service to retail customers, WGL is directly affected by the rates, terms and conditions of the transportation and storage services provided by jurisdictional pipelines. Accordingly, WGL has a substantial interest in the reliability of interstate natural gas infrastructure, and in ensuring predictable and consistent policies and regulations that affect that infrastructure.

II. BACKGROUND

Industry trends over the past decade of increased demand and extreme weather have placed more strain on reliable service for today's interstate transportation and storage infrastructure. These changes have resulted in less flexibility to address operational complications. Supply on the interstate natural gas delivery system has tightened year-over-year, driven by power generation, heating demand, and new large loads. In addition, extreme weather events—as evidenced by Winter Storms Elliott and Uri—are causing new operational challenges during coincident peak periods of electric and natural gas demand. As a result, reliability of service on the existing pipeline network becomes more important.

Cross-sector gas-electric coordination efforts have been on the rise over the past decade, as increased demand and extreme weather have placed greater strain on the nation's interdependent energy network. These efforts have resulted in insightful recommendations to improve the

reliability of the energy system, such as those recently published in the National Association of Regulatory Utility Commissioners' ("NARUC") Taskforce on Gas-Electric Alignment for Reliability ("GEAR") Final Report and the National Petroleum Council's ("NPC") *Reliable Energy: Delivering on the Promise of Gas-Electric Coordination Report*.²

In recent efforts to enhance system reliability during extreme cold weather events, NAESB was directed to evaluate and recommend improvements to communication protocols between natural gas and electric market participants. In response, NAESB submitted to the Commission a proposal containing three modifications to the Business Practice Standards applicable to interstate natural gas pipelines. The Commission is inviting public comment on NAESB's proposed revisions, and Commissioner Chang, in a separate concurring statement, has requested additional input on what further actions the Commission could take to strengthen gas-electric coordination.³

III. COMMENTS

The Utility Coalition supports the revised NAESB Business Practice Standards aimed at improving gas-electric coordination. These standards represent a meaningful advancement toward enhancing real-time operational transparency across the interdependent natural gas and electric systems. By addressing communication gaps and aligning business practices, NAESB's revisions will help ensure that market participants have timely and accurate information during critical

² NPC, *Reliable Energy: Delivering on the Promise of Gas-Electric Coordination* (Dec. 3, 2025), https://www.energy.gov/sites/default/files/2025-12/NPC_gas-electric_report_2025-12-3.pdf ("NPC Report").

³ Notice of Proposed Rulemaking, Standards for Business Practices of Interstate Natural Gas Pipelines, Docket No. RM96-1-044 (issued Oct. 16, 2024) (Comm'r Chang, concurring at P 3) ("Further, I would welcome input from stakeholders to help inform the Commission's next steps as we address this critical issue.").

periods, such as extreme cold weather events. Improved coordination reduces uncertainty, mitigates reliability risks, and strengthens the resilience of the energy system as a whole.

The Utility Coalition also commends the Commission, as well as the North American Electric Reliability Corporation (“NERC”), for initiating the gas-electric coordination efforts that culminated in these proposed standards. As part of this initiative, the Commission and NERC requested NAESB to convene the Gas-Electric Harmonization Forum, resulting in the July 2023 NAESB Gas-Electric Harmonization Report.

The subsequent Winter Storm Elliott Report, issued jointly by the Commission and NERC in November 2023, directed NAESB to further examine communication improvements during extreme cold weather. In response, NAESB incorporated these directives into its 2024 Annual Plan, tasking the Joint Wholesale Gas Quadrant, Wholesale Electric Quadrant, and Retail Markets Quadrant Subcommittees to review and revise the Gas-Electric Coordination Business Practice Standards.

Significant progress has been made over the past 20 years in enhancing gas-electric coordination, including the proposed standards in the instant proceeding. However, gas-electric coordination represents only one component of achieving reliable deliveries of natural gas. It is equally, if not more important, that service on interstate natural gas pipelines—the backbone to the nation’s natural gas delivery system—be as dependable as possible so that electric and gas markets have access to this critical resource. Thus, it is imperative that the Commission widen its aperture to look beyond gas-electric coordination and consider steps that can be taken to preserve and enhance interstate pipeline service reliability.

A. Response to Commissioner Chang's Concurrence and Request for NOI

The Utility Coalition supports the Commission's efforts to improve communication protocols between pipelines and their customers in this NOPR but agrees with Commissioner Chang that there are more improvements needed along the entire gas supply chain, especially before and during extreme weather events. In April 2025, The Utility Coalition submitted a letter to the Commission requesting it issue an NOI to seek input from industry stakeholders and examine additional measures the Commission could take, based on its existing authority under the NGA and the Federal Power Act ("FPA"), to preserve and further incentivize reliable deliveries of natural gas via the interstate pipeline network.⁴ The Utility Coalition reiterates this request in these comments.

In response to Commissioner Chang's concurrence, there are actions the Commission could take through its existing authority to improve upstream gas system reliability and consequently, gas-electric coordination in addition to the policies and practices already in place. First, the Commission could consider requiring interstate pipelines to submit annual reports on reliability metrics. Second, using its tariff authority, the Commission could revisit its policy regarding pipeline *force majeure* and reservation charge crediting provisions to rebalance risk sharing between pipelines and their customers and create strong incentives for pipeline service reliability. Third, under its NGA Section 7 authority, the Commission could require pipelines to consider whether facilities targeted for replacement or abandonment may still offer reliability benefits to customers as redundant facilities. Fourth, the Commission could consider greater standardization of pipeline scheduling and confirmation practices, as well as other mechanisms to

⁴ See Comments of Boston Gas Co., et al., Docket No. AD24-7-000 (filed Apr. 25, 2025) (requesting that the Commission issue an NOI concerning the reliability of service on interstate pipelines).

ensure customers who pay for firm service receive full contractual value in exchange for their long-standing financial commitments.

In addition, the July 2023 NAESB Gas-Electric Harmonization Report includes recommendations that could be explored through NOI feedback from stakeholders.⁵ Recommendations include the adoption of multi-day unit commitment processes and further alignment of the timelines between the Power Day and/or the day-ahead scheduling timelines with the gas day.

Moreover, both the NARUC GEAR Taskforce and NPC Reports identified actions that federal and state agencies can take to improve gas pipeline reliability and gas-electric coordination.⁶ The NPC Report finds that “the governance of the gas-electric interface is fragmented across multiple regulatory and operational entities. While the Commission and NERC oversee parts of the system, neither has comprehensive authority to enforce alignment between the two sectors.”⁷ The NPC Report therefore recommends that the Commission and the states, through the existing Federal and State Current Issues Collaborative, established in Docket No. AD24-7-000, publish a framework that identifies and defines the roles and responsibilities for reliability, resource adequacy, and fuel assurance.⁸

The Utility Coalition supports these efforts and sees these actions as important steps to improving the reliability and resiliency of interstate natural gas systems. Clearly defining the roles

⁵ See NAESB *Gas Electric Harmonization Forum Report* (July 28, 2023), https://www.naesb.org/pdf4/geh_final_report_072823.pdf

⁶ See NARUC, *GEAR Task Force Releases Final Report at NARUC Annual Meeting* (Nov. 12, 2025), <https://pubs.naruc.org/pub/BDD787ED-AF08-C29C-E66E-D991104B88DA>; see also NPC Report at 20.

⁷ NPC Report at 20.

⁸ *Id.*

of state and federal agencies is necessary to improve federal-state coordination on issues such as, but not limited to, permitting, extreme weather communication requirements, weatherization requirements, and reliability requirements. The issuance of an NOI would allow the Commission to hear from a diverse body of stakeholders, thereby supplementing the findings from the Federal and State Current Issues Collaborative and the American Gas Association's Natural Gas Readiness Forum and providing the Commission with an even more robust body of evidence showing the actions it can take to improve natural gas system reliability.

In further support of the timeliness of an NOI, the Utility Coalition notes that NAESB, in its 2026 Wholesale Gas Quadrant Annual Plan, included a provisional activity stating “[u]pon a request or as directed by NAESB Board or a relevant jurisdictional entity, consider developing and/or modifying business practice standards that reflect best practices that will provide stronger operating reliability from production/supply/transport, for example, during extreme weather conditions, and more clear communications and business processes around force majeure declarations during critical operating periods.”⁹ The Utility Coalition believes that the Commission should act upon this opportunity to direct NAESB to address key issues relating to pipeline reliability through the development or modification of business practice standards. Such direction would be complementary and in addition to action taken directly by the Commission to improve system reliability. The Utility Coalition believes that clear and well-defined direction from the Commission to NAESB would aid in the development or modification of business practice standards and that the issuance of an NOI would allow the Commission to collect the necessary information needed to provide clear guidance to NAESB.

⁹ See North American Energy Standards Board, *2026 Annual Plan for the Wholesale Gas Quadrant* (Dec. 11, 2025), at 1, http://www.naesb.org/pdf4/wgq_2026_annual_plan.docx

The Utility Coalition appreciates the opportunity to identify further action the Commission can take to enhance the reliability of a critical energy delivery system. The issuance of an NOI would allow the Commission to examine options under its existing authority under the NGA and FPA and identify additional key areas where the Commission can support and maintain interstate gas pipeline service reliability. This process would invite comment from all industry stakeholders on actions the Commission could take, or policy changes it could implement, as well as the potential impacts of any such policy changes. Such a process would promote clear guidance from the Commission on what it deems to be within its authority to maintain and improve interstate pipeline reliability.

V. CONCLUSION

The Utility Coalition appreciates the opportunity to submit these comments in support of NAESB's proposed Business Practice Standards designed to enhance gas-electric coordination. The Utility Coalition also appreciates the opportunity to provide input on additional efforts the Commission could undertake to further improve gas-electric coordination and energy network reliability, which, in the Utility Coalition's view, should include issuing an NOI to examine the full scope of options under the Commission's existing authority to support and maintain gas pipeline service reliability. The Utility Coalition looks forward to further engaging with the Commission on these important issues.

Respectfully submitted,

/s/ Matthew Satterwhite
Matthew Satterwhite
SVP, Head of US Policy & Regulatory Strategy
National Grid
1 Beacon Street
Boston, MA 02108
(781) 697-6610

matthew.satterwhite@nationalgrid.com

On Behalf of National Grid

/s/ Christopher Raup

Christopher Raup

Vice President, Energy Policy & Regulatory Affairs
Consolidated Edison Company of New York, Inc.

4 Irving Place

New York, NY 10003

(212) 460-3651

raupc@coned.com

On Behalf of Con Edison

/s/ Rachelle Whitacre

Rachelle Whitacre

Senior Vice President, Regulatory Affairs
Washington Gas

1000 Maine Avenue SW

Washington, DC 20024

(202) 578-8979

rachelle.whitacre@washgas.com

On Behalf of WGL

/s/ William Pezalla

William Pezalla

Vice President, Regulatory Affairs
Old Dominion Electric Cooperative

4201 Dominion Blvd.

Glen Allen, VA 23060

(804) 290-2193

bpezalla@odec.com

On Behalf of ODEC

IV. SERVICE LIST¹⁰

The following persons are designated to receive service for the Utility Coalition:

Andrew MacBride
Director, Wholesale Market Strategy
National Grid
170 Data Drive
Waltham, MA 02451
Phone: (781) 907-1791
andrew.macbride@nationalgrid.com

Amber Thornhill
Director, FERC and ISO Relations
& Market Policy
National Grid
801 Pennsylvania Ave., N.W., Suite 801
Washington, DC 20004
amber.thornhill@nationalgrid.com

Patrick Tarmey
Senior Counsel
National Grid
40 Sylvan Road
Waltham, MA 02451
(781) 907-2190
patrick.tarmey@nationalgrid.com

Dana Lazarus
Director, Federal Regulatory and Market Policy
Consolidated Edison Company of New York,
Inc.
4 Irving Place
New York, NY 10003
(212) 460-4515
lazarusd@coned.com

Maryann Stankovski
Lead Analyst, Wholesale Market Strategy
National Grid
300 Erie Blvd West
Syracuse, NY 13202
(315) 416-6976
maryann.stankovski1@nationalgrid.com

Sarah Rogers
Principal Analyst, Wholesale Market
Strategy
National Grid
300 Erie Blvd West
Syracuse, NY 13202
(315)-402-6125
sarah.rogers@nationalgrid.com

Greg Feeney
Senior Attorney
Consolidated Edison Company of New
York, Inc.
4 Irving Place
New York, NY 10003
(301)-741-1415
feeneyg@coned.com

Robert Haggart
Project Specialist, Federal
Regulatory and Market Policy
Consolidated Edison Company of New
York, Inc.
4 Irving Place
(704) 575-2069
haggatr@coned.com

¹⁰ The Utility Coalition respectfully requests waiver of Rule 203(b)(3) (18 C.F.R. § 385.203(b)(3) (2022)) of the Commission's Rules of Practice and Procedure to permit the named persons to be included on the official service list of this proceeding.

William Pezalla
Vice President, Regulatory Affairs
Old Dominion Electric Cooperative
4201 Dominion Blvd.
Glen Allen, VA 23060
(804) 290-2193
bpezalla@odec.com

Rachelle Whitacre
Senior Vice President, Regulatory Affairs
Washington Gas
1000 Maine Avenue SW
Washington, DC 20024
(202) 578-8979
Rachelle.Whitacre@washgas.com

Laura Storino
Director, Federal Regulatory Strategy
Washington Gas
6801 Industrial Road
Springfield, VA 22151
(703) 750-5261
Laura.Storino@washgas.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington, D.C., this 20th day of January, 2026.

/s/ Gregory Feeney

Document Content(s)

RM96-1-044 Utility Coalition Comments.pdf1