

To: Michael Desselle

From: Tori Kuykendall, NAESB Board Member WGQ, ConocoPhillips

Date: January 15<sup>th</sup>, 2026

Re: Request for Comments due January 19<sup>th</sup> by Michael Desselle

Re: NPC recommendations for GHG standards-setting

We appreciate the opportunity to provide input on the topic of GHG standards-setting. With other efforts already underway to provide a framework for GHG measurement, the lack of sufficient market development signals from buyers and regulatory bodies, and continued uncertainty around global regulations, the uncertainties surrounding this nascent market would be impediments to near-term mechanism development. Additionally, the make-up of NAESB membership does not allow for a broad pool of participants within its membership and would require significant non-NAESB member participation. For these reasons, while this is an issue that will eventually need to be addressed, other venues and entities are likely better positioned to manage this effort until the environment becomes more constructive for standards development.

Re: Commissioner Chang's requests for improved GEC communication

We appreciate the opportunity to provide input on the topic of improving communication between gas pipelines and electricity generators and system operators. Extensive work has been undertaken in multiple efforts including NAESB, NARUC/GEAR, NPC, and Reliability Alliance recommendations. Between the work products that have already been completed and the existence of the Natural Gas Readiness Forum, there is no need for new work to be done by NAESB in this space at this time. Intrastate pipelines and LDCs are free to adopt the recommendations and new practices of the interstate pipeline operators to ensure wider adoption and coverage across all parts of the grid, so targeted standards are not needed.