**From:** Minnis, Jennifer

**Sent:** Tuesday, July 20, 2021 11:00 AM  
**To:** naesb <naesb@naesb.org>  
**Cc:** Tomalty, Sarah ; Constantin, Dawn M ; Busch, James G   
**Subject:** NAESB GEH Request for Comments

Please see comments below:

1. Is there specific action to support gas and electric market coordination that NAESB GEH Committee should recommend to the Board of Directors in response to recent events and/or the energy grid transformation?  These actions may include, but are not limited to:

(a)          a review of the existing NAESB gas-electric coordination standards for possible changes,

(b)          the development of new market coordination standards,

(c)           a review of coordination processes with external organizations, and

(d)          any other activities within the scope of NAESB.

bp does not support NAESB reconvening its Gas Electric Harmonization (GEH) Committee to address gas-electric coordination.  It would be premature and inefficient to try to develop solutions to potential gas-electric harmonization problems until there is a clearer understanding of the events that led to widespread power outages last winter.

2. Are there current activities underway within the industry that would preclude or delay action by NAESB related to gas and electric market coordination at this time, including but not limited to the FERC and NERC Joint Inquiry into 2021 Cold Weather Grid Operations?

Given that NAESB is not a policy-setting organization, NAESB should await the final findings of the FERC-NERC Joint Inquiry and the results of other investigations and regulatory/legislative actions before considering any work to assess whether standards development is needed.  The FERC-NERC Joint Inquiry Final Report, expected November 2021, should more clearly define the issues and concerns that need to be addressed and should help resolve whether NAESB has a beneficial role.  Also, the Texas Power Grid Stability Bill (SB3), among other things, directs the Texas Energy Reliability Council (TERC) to study how to ensure the state’s natural gas and electric reliability needs are met.  Finally, there are open investigations assessing whether illegal actions contributed to the widespread power outages.  It would be premature to discuss new standards setting before these analyses are complete.

3. Are there other directions the Board of Directors should consider to support gas-electric market coordination?

Again, any action by NAESB to reconvene the Gas Electric Harmonization (GEH) Committee is premature.

*Jennifer*

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