**Comments on GEH from NAESB Pipeline Group**

**July 20, 2021**

***Below please find comments, as requested, from the below signed Wholesale Gas Quadrant (WGQ) Pipeline Segment members regarding the reconvening of the NAESB Gas Electric Harmonization (GEH) Committee.***

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.

***The WGQ pipelines recommend that the NAESB Board of Directors take no specific action at this time. The two recent events which were the catalyst for NAESB Chairman Desselle to call for the reconvening of the GEH Committee – Winter Storm Uri / Texas Freeze and Colonial Pipeline Cyber Attack – are being addressed by multiple other governing bodies. It is preliminary for NAESB to consider and invest resources into developing standards in response to these two events before any specific direction or guidance is provided by said governing bodies. As Mr. Desselle stated during a recent meeting, NAESB’s mission is “to support regulatory decisions” and these regulatory decisions have not yet been made.***

***The Energy grid transformation and Cybersecurity are multi-faceted and such broad topic areas that it would be better for NAESB to permit those areas to develop and be present when standards development is ready and needed for the industries.***

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?

***Yes. Currently there are multiple governing bodies that are actively evaluating the identified events and determining actions that could/should be taken to prevent the events from reoccurring in the future.***

***With respect to the Winter Storm Uri, the FERC and NERC Joint Inquiry is a significant effort, which has collected much data from many participants of both the gas and electric industries. FERC/NERC expects to have a final report by December 2021. Additionally, the NERC Electric-Gas Working Group is developing a guidance document for coordination; however, they have not recommended NAESB take any action at this time. Furthermore, since there are other agencies that govern the functioning and security of the physical assets, this aspect is not within the scope of NAESB.***

***With respect to the Cybersecurity Event, multiple governing bodies are actively reviewing energy industry Cybersecurity, and any action taken on cybersecurity by NAESB, at this point, would be premature and could likely be inconsistent with requirements eventually imposed by such governing bodies. For example, the Transportation Security Administration (TSA) is issuing its own set of directives related to cybersecurity on the pipeline system. TSA has not sought assistance from NAESB related to this effort, and it would be an unnecessary redundant use of resources to attempt to address these issues in the GEH Committee. NAESB addressed concerns across all quadrants in response to the most recent Surety Assessment conducted by Sandia Laboratories and on Thursday, July 15, 2021, FERC issued an order for NAESB WGQ V3.2, which will implement these new and updated cybersecurity standards for the WGQ. Each quadrant also has an Annual Plan Item to review their respective standards and ensure they meet current cybersecurity guidelines/requirements. Additionally, NAESB’s existing Digital Committee is designed to monitor and address current issues on the digital front, as needed, and the Digital Committee would be responsible for assigning Cybersecurity review tasks to individual subcommittee(s).***

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

***Until we receive further direction from the governing bodies, there are no other actions to consider at this time.***

***Wholesale Gas Quadrant Pipeline Segment Members***

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| **Energy Transfer**    Panhandle Eastern Pipe Line Company, LP    Trunkline Gas Company, LLC    Sea Robin Pipeline Company, LLC    Southwest Gas Storage Company    Lake Charles LNG Company, LLC    Rover Pipeline LLC    Florida Gas Transmission, LLC    ETC Tiger Pipeline, LLC    Fayetteville Express Pipeline LLC    Gulf States Transmission LLC    Transwestern Pipeline Company, LLC1300 Main StreetHouston TX 77002 | **TC Energy Corporation**    ANR Pipeline Company    ANR Storage Company    Bison Pipeline LLC    Blue Lake Gas Storage Company    Columbia Gas Transmission, LLC    Columbia Gulf Transmission, LLC    Crossroads Pipeline Company    Gas Transmission Northwest LLC    Great Lakes Gas Transmission Limited Partnership    Hardy Storage Company, LLC    Millennium Pipeline Company, LLC    North Baja Pipeline, LLC    Northern Border Pipeline Company    Portland Natural Gas Transmission System    Tuscarora Gas Transmission Company700 LouisianaHouston TX 77002 |
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