**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***

|  |  |
| --- | --- |
| Boardwalk Pipelines  Kim Van Pelt  Manager, Regulatory Compliance  713-479-8065  [Kim.VanPelt@bwpipelines.com](mailto:Kim.VanPelt@bwpipelines.com) | Eastern Gas Transmission & Storage, Inc.  Rachel A. Hogge  Manager – Pipeline Commercial Policy & Compliance  804-310-4283  [Rachel.Hogge@bhegts.com](mailto:Rachel.Hogge@bhegts.com) |
| Enbridge (U.S.) Inc.  Megan Miller  Manager FERC Compliance  [713- 627-4910](tel:+1%20(713)%206274910)  [Megan.Miller@enbridge.com](mailto:Megan.Miller@enbridge.com)  Christopher Burden  Specialist, Standards and Regulatory Compliance  713-627-5704  [Christopher.Burden@enbridge.com](mailto:Christopher.Burden@enbridge.com) | Kinder Morgan Interstate Pipes  Gene Nowak  VP, Transportation/Storage Services  713-369-9329  Gene\_Nowak@kindermorgan.com |
| Energy Transfer  Debbie Bradbury  Sr. Director, Regulatory Tariffs & Reporting  713-989-7571  [Debbie.Bradbury@energytransfer.com](mailto:Debbie.Bradbury@energytransfer.com) | TC Energy Corporation  Steve McCord  Manager, NAESB, Compliance and Reporting  832-320-6046  [Steven\_McCord@TCEnergy.com](mailto:Steven_McCord@transcanada.com) |
| Southern Star Central Gas Pipeline  Ronnie Hensley  Business Analyst  270-852-4658  [Ronnie.C.Hensley@southernstar.com](mailto:Ronnie.C.Hensley@southernstar.com) | Iroquois Gas Transmission System, L.P.  Tom Gwilliam  Commercial Regulations and Standards Manager  203-944-7049  [Tom\_Gwilliam@iroquois.com](mailto:Tom_Gwilliam@iroquois.com) |
| Northern Natural Gas  Micki Hoffee  Sr. Business Systems Analyst  402-398-7653  [Micki.Hoffee@nngco.com](mailto:Micki.Hoffee@nngco.com) |  |

|  |  |
| --- | --- |
| **Boardwalk Pipelines**      Boardwalk Storage Company, LLC      Gulf South Pipeline Company, LLC      Texas Gas Transmission, LLC  9 Greenway Plaza  Houston TX 77046 | **Eastern Gas Transmission & Storage, Inc.**      Eastern Gas Transmission & Storage, Inc.      Cove Point LNG, LP      Carolina Gas Transmission, LLC  6603 W Broad Street  Richmond VA 23226 |
| **Enbridge (U.S.) Inc**.      Algonquin Gas Transmission, LLC      Big Sandy Pipeline, LLC      Bobcat Gas Storage      East Tennessee Natural Gas, LLC      Egan Hub Storage, LLC      Garden Banks Gas Pipeline, LLC      Gulfstream Natural Gas System, L.L.C.      Maritimes & Northeast Pipeline, L.L.C.      Mississippi Canyon Gas Pipeline, LLC      Nautilus Pipeline Company, L.L.C.      NEXUS Gas Transmission, LLC      Ozark Gas Transmission, L.L.C.      Sabal Trail Transmission, LLC      Saltville Gas Storage Company L.L.C.      Southeast Supply Header, LLC      Steckman Ridge, LP      Texas Eastern Transmission, LP  5400 Westheimer Court  Houston TX 77056 | **Kinder Morgan Interstate Pipes**  Arlington Storage Company, LLC      Cheyenne Plains Gas Pipeline Company, L.L.C.      Colorado Interstate Gas Company, L.L.C.      Elba Express Company, L.L.C.      El Paso Natural Gas Company, L.L.C.      Horizon Pipeline Company, L.L.C.      Kinder Morgan Illinois Pipeline LLC      Kinder Morgan Keystone Gas Storage, LLC      Kinder Morgan Louisiana Pipeline LLC      Midcontinent Express Pipeline LLC      Mojave Pipeline Company, L.L.C.      Natural Gas Pipeline Company of America LLC      Ruby Pipeline, L.L.C.      Sierrita Gas Pipeline, LLC      Southern LNG Company, L.L.C.      Southern Natural Gas Company, L.L.C.  Stagecoach Pipeline & Storage Company LLC      Tennessee Gas Pipeline Company, L.L.C.      TransColorado Gas Transmission Company LLC      Wyoming Interstate Company, L.L.C.      Young Gas Storage, Ltd.  1001 Louisiana St  Houston TX 77002 |
| **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, LLC  1300 Main Street  Houston 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 Company  700 Louisiana  Houston TX 77002 |
| **Southern Star Central Gas Pipeline**  4700 Highway 56  Owensboro KY 42301 | **Iroquois Gas Transmission System, L.P**.  1 Corporate Drive, Suite 600  Shelton CT 06484 |
| **Northern Natural Gas**  1111 S 103rd Street  Omaha NE 68124 |  |