Southern Company NAESB GEH Committee Comments

July 21, 2021

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:
	1. a review of the existing NAESB gas-electric coordination standards for possible changes,
	2. the development of new market coordination standards,
	3. a review of coordination processes with external organizations, and
	4. any other activities within the scope of NAESB.

It would be very difficult to design NAESB standards without the appropriate regulatory guidance. Southern is not convinced that additional rules and coordination standards from NAESB is the most appropriate solution at this time.

1. 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?

The FERC and NERC reports should give guidance to NAESB in this endeavor. Southern believes that it would seem reasonable to wait until the FERC and NERC reports are completed before starting NAESB standards.

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

Southern is not aware of any other directions the GEH Committee should consider and should not take any action until FERC and NERC complete their investigation. Again, Southern is not convinced that additional rules and coordination standards from NAESB is the most appropriate solution at this time.