Survey Results Addendum

Gas-Electric Harmonization Forum Report

*Presented to the NAESB Board of Directors on April 7, 2016*

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| Page | **TABLE OF CONTENTS** |
| 3 | Understanding the Survey Results |
| 7 | Survey Results Summary |
| Appendices: | |
| 12 | Survey Aggregate Results Table 1: *Not Actionable* |
| 23 | Survey Aggregate Results Table 2: *Not actionable, but if there are actions, they should occur through FERC and /or pipeline service offerings* |
| 36 | Survey Aggregate Results Table 3: *Not actionable, because this is an observation* |
| 55 | Survey Aggregate Results Table 4: *Actionable by NAESB in the current environment for those pipelines offering such services* |
| 58 | Survey Aggregate Results Table 5: *Actionable by NAESB in the current environment* |
| 76 | Survey Aggregate Results Table 6: *Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016* |
| 85 | Survey Aggregate Results Table 7: *Actionable by NAESB to the extent FERC Orders and/or pipelines offer the provision of enhanced scheduling services* |
| 92 | Survey Aggregate Results Table 8: *A better industry understanding is needed to determine if there are applicable/relevant lessons for improving the gas scheduling process* |
| 96 | Survey Aggregate Results Table 9: *A better industry understanding is needed to determine if there are issues that could be identified for later policy review* |

**Understanding the Survey**

At the request of the NAESB Gas-Electric Harmonization (“GEH”) Forum, the NAESB office distributed a survey to the NAESB GEH Forum distribution list, the NAESB membership and the NAESB Advisory Council on March 24, 2016. The survey was designed to solicit responses to nine questions as they relate to XX specific issues.[[1]](#footnote-1) Both the questions and identified issues were developed by the Forum meeting participants over the course of three meetings held on February 18-19, 2016, March 7-8, 2016 and March 21-22, 2016. All survey responses were submitted to the NAESB office by the close of business on March 31, 2016 through a web-based survey platform provided by SurveyMonkey.® In total, the NAESB office received ninety-three responses. The results of the survey have been analyzed in aggregate by respondents who attended one or more of the 2016 NAESB GEH Forum face-to-face meetings either in person or by phone, by respondents that are members of the NAESB Board of Directors and in total. A table providing the breakdown of survey responses can be found following.

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Responses Received to the GEH Forum Survey – March 31, 2016 | | | | | | | | | | |
| Quadrant/Segment | | All Submitters | | | GEH Forum Attendees | | | Board Member Responses | | |
| # | Q | T | # | Q | T | # | Q | T |
| WEQ | Transmission | 3 |  |  | 3 |  |  | 1 |  |  |
|  | Generation | 7 |  |  | 7 |  |  | 1 |  |  |
|  | Distribution/LSE | 4 |  |  | 3 |  |  | 0 |  |  |
|  | Merchant or Marketer | 3 |  |  | 2 |  |  | 0 |  |  |
|  | Independent Grid Operators | 5 |  |  | 5 |  |  | 1 |  |  |
|  | Marketer/Broker | 2 |  |  | 2 |  |  | 1 |  |  |
|  | Technical and Services | 0 |  |  | 0 |  |  | 0 |  |  |
|  |  |  | 24 |  |  | 22 |  |  | 4 |  |
| WGQ | Producers | 6 |  |  | 6 |  |  | 2 |  |  |
|  | Pipelines | 29 |  |  | 22 |  |  | 4 |  |  |
|  | Distributor/LDCs | 12 |  |  | 9 |  |  | 1 |  |  |
|  | Services or Technology Company | 7 |  |  | 7 |  |  | 4 |  |  |
|  | Marketers | 5 |  |  | 5 |  |  | 0 |  |  |
|  | End User | 8 |  |  | 8 |  |  | 2 |  |  |
|  |  |  | 67 |  |  | 57 |  |  | 13 |  |
| RMQ | Retail Gas Market Interests | 1 |  |  | 1 |  |  | 0 |  |  |
|  |  |  | 1 |  |  | 1 |  |  |  |  |
| Other |  | 1 |  |  | 0 |  |  | 0 |  |  |
|  |  |  | 1 |  |  | 0 |  |  |  |  |
|  |  |  |  | 93 |  |  | 80 |  |  | 17 |

As indicated in the table above, responses to the survey were predominantly submitted by those that attended the GEH Forum meetings in February and March 2016, or submitted comments for those meetings; totaling roughly eighty-six percent of responses. Additionally, eighteen percent of the total responses were submitted by members of the NAESB Board of Directors.

Per the survey instructions, respondents were asked to provide responses to the nine questions as they relate to forty-three of the fifty- nine of the issues identified by the Forum participants. Issue numbers 3-10, 12-16, 24, 27 and 40 were not included in the survey as they were identified by the Forum participants as a fact/observation. The questions presented to the respondents can be found following.

1a) Is this issue within the scope of the Commission's request and directly responsive to the Board’s directive to the GEH Forum?

1b) Is this issue within the scope of NAESB's purview, without necessarily suggesting any action be taken by NAESB?

2a) Would pursuing this issue lead to more uniformity or streamlining that would meet the Commission's request and be directly responsive to the Board’s directive to the GEH Forum?

2b) Can this issue be economically pursued?

2c) Is there a benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing this issue?

3) Do you concur that this issue would not benefit from a national standard due to one or more of the following reasons (non-FERC policy issue, operational issue, service issue, etc.)?

4) Do you concur that additional uniformity with respect to this issue may not be needed because this issue falls into a potential area where, for example, tools could be used to address the Commission's request?

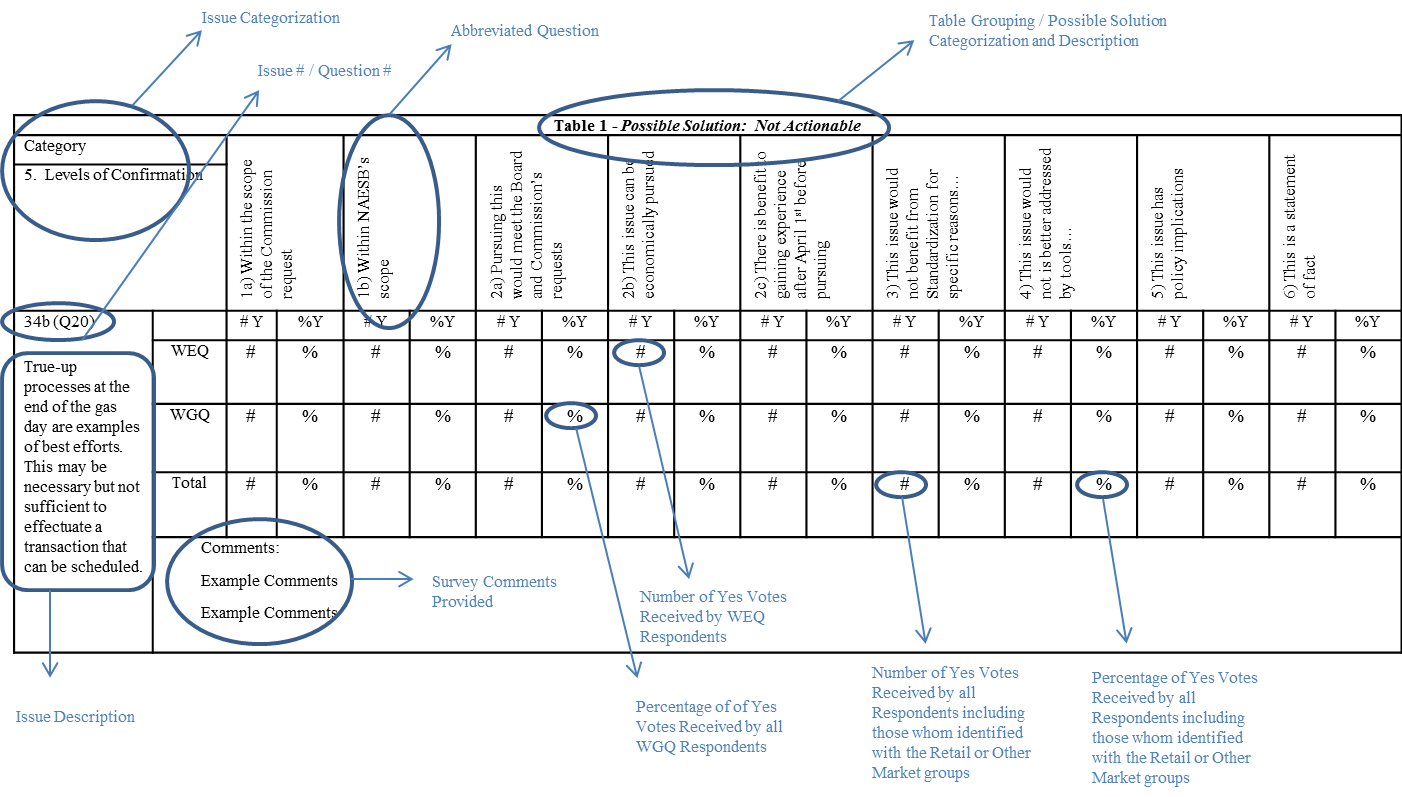
5) Does this issue have policy implications that would require Commission direction before NAESB (or others) were to proceed further, or where there are other issues that stand in the way of moving forward at present?

6) Is this issue a statement of fact/observation?

All issues included in the survey were categorized by the participants of the GEH Forum into twelve groupings and then further grouped by possible solution as actionable or not actionable by NAESB. This categorization of the issues was included in the report reviewed by the NAESB Board of Directors on April 7, 2016.[[2]](#footnote-2) In total there were twelve groupings of the issues and nine groupings of possible solutions. The categories can be found in the table below.

| **ISSUE CATEGORIES** | | **POSSIBLE SOLUTION CATEGORIES** | |
| --- | --- | --- | --- |
| 1. | No-notice Service Offerings | 1. | Not Actionable |
| 2. | Non-ratable Takes | 2. | Not actionable, but if there are actions, they should occur through FERC and /or pipeline service offerings |
| 3. | Observations | 3. | Not actionable, because this is an observation |
| 4. | Support for Multiple Versions of Standards | 4. | Actionable by NAESB in the current environment for those pipelines offering such services |
| 5. | Levels of Confirmations | 5. | Actionable by NAESB in the current environment |
| 6. | Additional Nomination Cycles | 6. | Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016 |
| 7. | Scheduling Issues Surrounding Interconnects | 7. | Actionable by NAESB to the extent FERC Orders and/or pipelines offer the provision of enhanced scheduling services |
| 8. | Access to Scheduling During Non-business Hours | 8. | A better industry understanding is needed to determine if there are applicable/relevant lessons for improving the gas scheduling process |
| 9. | Communications | 9. | A better industry understanding is needed to determine if there are issues that could be identified for later policy review |
| 10. | Inconsistencies in Electric-Industry Day-Ahead Markets |  |  |
| 11. | Data Issues, Data-Transfer Issues, Field Testing and Modeling |  |  |
| 12. | New Service Offerings |  |  |

As noted in the report, no votes were taken on the categorizations of either the issues or solutions by the Forum participants, and nothing developed by the participants is intended to represent a consensus of the group. The record of issues and solutions identified and categorized by the Forum is only a collection of the comments provided by the participants. As a result, several of the issues received multiple, and sometimes conflicting, categorizations. The data collected through the survey has been aggregated by quadrant and organized into the format provided on the following page. If comments were repeated by respondents for a given issue, they were only provided once.



Description of the Aggregate Survey Results in Tables 1-9:

**Survey Results Summary**

To facilitate analysis of the survey results and clearly highlight issues that garnered substantive support for consideration by the NAESB Board of Directors, the following summary has been prepared. This summary is not intended to suggest specific action or to be considered as a recommendation from the co-chairs of the GEH Forum or the Forum participants. It only identifies issues that garnered 50% or more yes responses to questions 1a, 1b, 2a and 2b from the respondents in a given quadrant or in total and were categorized as actionable, with or without conditions, by the GEH Forum participants during the March 21-22, 2016 meeting. All issues that were considered actionable by one or more of the GEH Forum participants can be found in Tables 4, 5, 6 and 7. As previously stated, no votes were taken on the categorizations of either the issues or possible solutions during the GEH Forum process; however, the issues noted in this summary were identified by at least one participant in the March 21-22, 2016 Forum meeting as actionable by NAESB.

Responses for questions 1a/1b and 2a/2b/2c may provide insights for the board as it determines which, if any, issues should be included in the annual plans for 2016 or subsequent years. For actionable issues (those contained in tables 4, 5, 6 and 7), the board may find it helpful to first review the responses to the scope questions and then questions specific to possible NAESB action – 1a and 1b for scope, and 2a and 2b for possible NAESB efforts. If the majority of the responses to 1a/1b and 2a/2b are favorable, then the timing question 2c should be reviewed. For ease of access to the specific issues, a page reference is given to the first time the issue appears in Tables 4, 5, 6 or 7. Responses to questions 3, 4, 5 and 6 are also provided in the tables, as well as comments which provide additional context for consideration.

The results from the survey show that:

(1) A majority of the respondents were favorable to pursuing action by NAESB for five issues -- 22, 25, 26, 33 and 36.

(2) A majority of the WEQ respondents were favorable to pursuing action by NAESB for five additional items – 17, 35, 37, 38 and 57. Three of these issues, 17, 35 and 28, were favorable for the scope questions 1a and 1b, and also favorable for meeting the board and FERC requests (question 2a), but did not have favorable responses to the economic related question (2b) from the WGQ respondents.

This summary presents information about each of those issues mentioned in the two previous issues. But first, the summary highlights the survey results of the four issues that were solely identified as actionable in the current environment by the GEH Forum participants during the March 21-22, 2016 meeting (issues 17, 22, 33 and 36), specifically noted in the GEH Forum report to the Board of Directors on April 7.

As a note, there were two issues – 23 and 49, on pages 56 and 66 of the tables -- that garnered a majority of support from the WEQ to questions 2a and 2b, indicating that the majority agreed that pursuing this issue could lead to more uniformity or streamlining that could meet the Commission's request and be directly responsive to the Board’s directive to the GEH Forum, and that the issue could be economically pursued, yet did not receive a favorable majority for either 1a or 1b – the scope questions for the Commission’s request or for NAESB’s scope. They are not included in the following summaries though as they did not meet the scope questions. As the scope of NAESB efforts is the purview of the board, they are mentioned here for the board’s consideration.

Also, all issues in tables 4, 5, 6 and 7 that garnered a favorable response for the scope questions 1a and 1b received a favorable response from at least one of the quadrants for action by NAESB (questions 2a and 2b).

**The Four Issues Specifically Noted in the GEH Forum Report**

*Issue 17 – Levels of Confirmation*

* This issue was found by 80% or more of the 91 total survey respondents in the combined WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 62% of the WEQ respondents responded that the issue could be economically pursued; however, only 36 % of the WGQ respondents agreed.
* Regarding timing, half of the WEQ respondents and 41% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 58 in Table 5.

*Issue 22 – It would be desirable to have a set of terminology agreed upon by participants to characterize shapes, profiles, ratable, non-ratable, and so forth to facilitate discussion*

* This issue was found by 52% or more of the survey respondents in the combined WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 75% of the WEQ respondents and 64% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, less than 41% of the WEQ and WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 68 in Table 5.

*Issue 33 – Use of multiple confirmation methods in addition to traditional confirmations for intraday nominations. There is currently a good definition of Confirmation by Exception (CBE) in NAESB standards. CBE however, may not be available everywhere but there may also be additional confirmation methods that could benefit from standardization.*

* This issue was found by 95% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 61% of the WEQ respondents and 53% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 55% of the WEQ respondents and 37% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 60 in Table 5.

*Issue 36 – Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation.*

* This issue was found by 90% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 59% of the WEQ respondents and 63% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 52% of the WEQ respondents and 40% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 62 in Table 5.

The Five Issues that Garnered 50% or More Yes Responses to Questions 1a, 1b, 2a and 2b from All Respondents

*Issue 22 – It would be desirable to have a set of terminology agreed upon by participants to characterize shapes, profiles, ratable, non-ratable, and so forth to facilitate discussion*

* This issue was found by 52% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 75% of the WEQ respondents and 64% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, less than 41% of the WEQ and WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 68 in Table 5.

*Issue 25 – Communication protocols with LDCs, gas generator operators and natural gas marketing companies*

* This issue was found by 62% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 75% of the WEQ respondents and 48% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 60% of the WEQ respondents and 68% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 69 in Table 5.

*Issue 26 – Improve efficiency of critical information sharing (related to issues 22 and 25)*

* This issue was found by 50% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 71% of the WEQ respondents and 52% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 50% of the WEQ respondents and 39% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 70 in Table 5.

*Issue 33 – Use of multiple confirmation methods in addition to traditional confirmations for intraday nominations. There is currently a good definition of Confirmation by Exception (CBE) in NAESB standards. CBE however, may not be available everywhere but there may also be additional confirmation methods that could benefit from standardization.*

* This issue was found by 95% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 61% of the WEQ respondents and 53% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 55% of the WEQ respondents and 37% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 60 in Table 5.

*Issue 36 – Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation.*

* This issue was found by 90% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 59% of the WEQ respondents and 63% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 52% of the WEQ respondents and 40% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 62 in Table 5.

The Five Additional Issues that Garnered 50% or More Yes Responses to Questions 1a, 1b, 2a and 2b from WEQ Respondents

*Issue 17 – Levels of Confirmation*

* This issue was found by 80% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 62% of the WEQ respondents responded that the issue could be economically pursued; however, only 36 % of the WGQ respondents agreed.
* Regarding timing, half of the WEQ respondents and 41% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 58 in Table 5.

*Issue 25 – Communication protocols with LDCs, gas generator operators and natural gas marketing companies*

* This issue was found by 62% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 75% of the WEQ respondents and 48% of the WGQ respondents answered that the issue could be economically pursued.
* Regarding timing, 59% of the WEQ respondents and 68% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 69 in Table 5.

*Issue 35 – Lining up the processes and timeframes that occur within the confirmations/scheduling window to gain efficiency of data exchange*

* This issue was found by 77% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 58% of the WEQ respondents answered that the issue could be economically pursued; however, only and 31% of the WGQ respondents agreed.
* Regarding timing, 59% of the WEQ respondents and 89% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 61 in Table 5.

*Issue 37 – Investigate the need to define the number of iterations to support confirmation, including on a best-effort basis. Defined iterations needed to support confirmations, including best efforts. Taking a look at these issues does not necessarily presume there is a magic number of iterations, in part to changing market conditions and because of respecting the goal of maximizing flow*

* This issue was found by at least 67% of the WEQ respondents to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum; however, less than 21% of WGQ respondents agreed with all three scoping questions.
* 56% of the WEQ respondents answered that the issue could be economically pursued; however, only and 11% of the WGQ respondents answered yes to the same question.
* Regarding timing, 59% of the WEQ respondents and 55% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 63 in Table 5.

*Issue 38 – Further standardize methods and processes (for example, standardizing time frames for the different elements of the processes) employed to support confirmations. Standardization could clarify the steps and expectations among parties surrounding default actions that may arise from different time periods in the process*

* This issue was found by 76% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization, within the scope of the Commission’s request and within the scope of the directives of the NAESB Board of Directors to the GEH Forum.
* 53% of the WEQ respondents answered that the issue could be economically pursued; however, only and 36% of the WGQ respondents agreed.
* Regarding timing, 57% of the WEQ respondents and 79% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 64 in Table 5.

*Issue 57 – Could eTag be applied to the gas industry to mimic the significant number of transactions processed on the power grid that use eTag in short processing windows, and if so, can it result in a streamlined scheduling process for natural gas?*

* This issue was found by 66% or more of the survey respondents in the WEQ and WGQ quadrants to be within the scope of NAESB as an organization and within the scope of the Commission’s request and the board’s; however, only 37% of the WGQ respondents answered that pursuing the issue would lead to more uniformity or streamlining that would meet the Commission's request and be directly responsive to the Board’s directive to the GEH Forum.
* 56% of the WEQ respondents answered that the issue could be economically pursued; however, only and 4% of the WGQ respondents agreed.
* Regarding timing, 56% of the WEQ respondents and 78% of the WGQ respondents answered that there is benefit to waiting until more experience has been gained after the April 1st 2016 implementation of the changes to the nomination timeline before pursuing the issue.
* Responses to the other questions and comments on the issue can be found on page 86 of Table 7.

**Appendix: Table 1**

Possible Solution: Not Actionable

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 1. No-notice Service Offerings | |
| 1 (Q1)  No-notice needs for capacity to support anticipated usage of services purchased, which may or may not be scheduled (e.g., if no notice is not scheduled, such capacity can be made available to other shippers). This issue is one way to address the potential for greater flexibility. Pipelines forecast the amount of no-notice service they expect to provide on a next-day basis and then utilize any projected unused capacity on a interruptible basis to serve other shippers including gas fired electric generators with non-ratable demand. This is a foundational concept for Order 636. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 4 | 19.05% | 8 | 36.36% | 13 | 59.09% | 5 | 33.33% | 13 | 72.22% | 12 | 70.59% | 10 | 52.63% | 14 | 70.00% | 14 | 70.00% |
| WGQ | 6 | 9.38% | 6 | 9.23% | 6 | 9.52% | 6 | 13.04% | 31 | 52.54% | 57 | 96.61% | 27 | 72.97% | 36 | 61.02% | 41 | 70.69% |
| Total | 11 | 12.64% | 15 | 16.85% | 20 | 22.99% | 12 | 19.05% | 45 | 56.96% | 70 | 89.74% | 38 | 66.67% | 52 | 64.20% | 56 | 70.00% |
| Comments:  The wording of the question is not clear but the answer applies to any discussion of no-notice service.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Dominion Transmission Inc. currently offers no-notice service.  No-Notice capacity needs to be reserved for the entire Gas Day. Shippers pay a greater demand charge for the right to this service.  Art of Scheduling  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Standard not appropriate to direct TSPs on how to operationally handle systems - Pipeline Presentation "Art of Scheduling".  2b calls for speculation | | | | | | | | | | | | | | | | | | |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 19 (Q6)  Manual confirmation processes |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 13 | 61.90% | 14 | 66.67% | 14 | 66.67% | 10 | 55.56% | 13 | 61.90% | 9 | 60.00% | 6 | 37.50% | 10 | 58.82% | 13 | 81.25% |
| WGQ | 18 | 30.51% | 15 | 25.42% | 10 | 18.87% | 6 | 17.14% | 23 | 44.23% | 45 | 88.24% | 20 | 76.92% | 16 | 34.78% | 43 | 87.76% |
| Total | 31 | 38.27% | 29 | 35.80% | 24 | 32.00% | 16 | 29.63% | 36 | 48.65% | 54 | 81.82% | 26 | 61.90% | 27 | 42.19% | 58 | 86.57% |
| Comments:  This item is vague and provides no proposal upon which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  The confirming parties that still use a manual confirmation process are those smaller pipelines or other entities that are not under FERC jurisdiction. Any standardization would be voluntary for those entities.  This was an observation that some entities still manually confirm with the pipeline due to small size and other reasons. And some pipelines manually confirm certain meters to accommodate netting if gas flowing both directions at an interconnect.  This issue is not clearly stated or represented.  Art of Scheduling  2b) Unsure Pipelines should not confirm manually with parties who are willing to transact confirmations electronically.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This is a topic not a question or statement or issue  No opinion - item 19 is too vague to comment on.  Establish a standards to move the natural gas industry from a manual system to an automated timely system for electronic confirmations | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 34b (Q20)  True-up processes at the end of the gas day are examples of best efforts. This may be necessary but not sufficient to effectuate a transaction that can be scheduled. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 25.00% | 10 | 50.00% | 10 | 47.62% | 10 | 55.56% | 12 | 60.00% | 9 | 52.94% | 7 | 43.75% | 6 | 9.38% | 18 | 94.74% |
| WGQ | 6 | 10.34% | 7 | 11.67% | 5 | 8.93% | 3 | 7.50% | 21 | 40.38% | 46 | 90.20% | 24 | 88.89% | 22 | 27.50% | 40 | 90.91% |
| Total | 11 | 13.92% | 17 | 20.99% | 15 | 19.23% | 13 | 22.03% | 33 | 45.21% | 56 | 81.16% | 31 | 72.09% | 29 | 33.33% | 59 | 92.19% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  True-up (also known as clean-up) nomination cycles are vital for pipelines, LDCs, and other entities to enable them to close each day of gas business in good order. Nothing must be permitted to disturb these valuable nomination opportunities.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed. | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 37\* (Q23)  Investigate the need to define the number of iterations to support confirmation, including on a best-effort basis. Defined iterations needed to support confirmations, including best efforts. Taking a look at these issues does not necessarily presume there is a magic number of iterations, in part to changing market conditions and because of respecting the goal of maximizing flow. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 14 | 66.67% | 14 | 66.67% | 15 | 68.18% | 10 | 55.56% | 13 | 59.09% | 6 | 40.00% | 5 | 29.41% | 9 | 13.43% | 4 | 33.33% |
| WGQ | 11 | 18.97% | 12 | 20.34% | 8 | 14.55% | 5 | 11.36% | 30 | 54.55% | 45 | 84.91% | 23 | 74.19% | 16 | 21.62% | 8 | 20.00% |
| Total | 25 | 31.25% | 26 | 32.10% | 23 | 29.49% | 15 | 23.81% | 43 | 55.13% | 52 | 75.36% | 28 | 58.33% | 26 | 30.95% | 12 | 22.64% |
| Comments:  Don't understand the intent well enough to respond.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  These 'iterations' are specific to a pipeline's business systems and are not subject to standardization.  Pipelines know best on how many times they want to run their models and go thru the confirmation process within the deadlines required. If this changes, less iterations may lead to less gas scheduled as pipelines may not be able to get a view of optimal flow on their pipeline.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Don't understand the intent well enough to respond.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  No comment/opinion.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 39 (Q25)  Addressing the communication of characteristics of the information in the confirmation process could require a fundamental redesign, with potential changes to make confirmations more efficient. (Reasonable) commercial confidentiality issues must be respected. Note that some pipeline practices already may include this kind of information in the confirmation process. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 9 | 47.37% | 9 | 47.37% | 9 | 47.37% | 7 | 46.67% | 9 | 47.37% | 5 | 31.25% | 4 | 26.67% | 13 | 18.31% | 14 | 77.78% |
| WGQ | 10 | 16.39% | 11 | 18.03% | 9 | 16.67% | 7 | 17.07% | 17 | 31.48% | 39 | 81.25% | 20 | 68.97% | 24 | 29.27% | 27 | 58.70% |
| Total | 19 | 23.46% | 20 | 24.69% | 18 | 24.32% | 14 | 24.56% | 26 | 35.14% | 45 | 69.23% | 24 | 54.55% | 38 | 39.58% | 41 | 63.08% |
| Comments:  This appears to be an observation and has no specific proposal upon which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This set of issues was addressed in Order 787.  Receipt point operators should be able to confirm their own markets by commercial counterparty as well as other working interest partners markets in aggregate without knowledge of partners commercial counterparty(s).  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 56 (Q41)  Compress confirmations by expediting verification of nominations. Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 6 | 46.15% | 3 | 23.08% | 1 | 11.11% | 7 | 53.85% | 7 | 70.00% | 6 | 66.67% | 10 | 14.71% | 15 | 78.95% |
| WGQ | 4 | 7.14% | 5 | 8.77% | 1 | 2.0% | 0 | 0.00% | 21 | 43.75% | 44 | 95.65% | 25 | 92.59% | 20 | 25.64% | 41 | 78.85% |
| Total | 11 | 15.49% | 11 | 15.49% | 4 | 6.25% | 1 | 2.08% | 28 | 45.16% | 52 | 91.23% | 31 | 86.11% | 31 | 34.83% | 56 | 77.78% |
| Comments:  Cannot provide meaningful answers when item contains a solution and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  Although AEP believes this action does fall within the purview of NAESB, it will not be achieved unless so ordered by FERC due to gas industry resistance.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Cannot provide meaningful answer when item contains two separate components - simulation vs. issue  No comment/opinion.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 34b (Q20)  True-up processes at the end of the gas day are examples of best efforts. This may be necessary but not sufficient to effectuate a transaction that can be scheduled. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 25.00% | 10 | 50.00% | 10 | 47.62% | 10 | 55.56% | 12 | 60.00% | 9 | 52.94% | 7 | 43.75% | 6 | 9.38% | 18 | 94.74% |
| WGQ | 6 | 10.34% | 7 | 11.67% | 5 | 8.93% | 3 | 7.50% | 21 | 40.38% | 46 | 90.20% | 24 | 88.89% | 22 | 27.50% | 40 | 90.91% |
| Total | 11 | 13.92% | 17 | 20.99% | 15 | 19.23% | 13 | 22.03% | 33 | 45.21% | 56 | 81.16% | 31 | 72.09% | 29 | 33.33% | 59 | 92.19% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  True-up (also known as clean-up) nomination cycles are vital for pipelines, LDCs, and other entities to enable them to close each day of gas business in good order. Nothing must be permitted to disturb these valuable nomination opportunities.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed. | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 8. Access to Scheduling During Non-business Hours | |
| 21\* (Q8)  Computerized scheduling and confirmations for nomination of subscribed services during non-traditional business hours processes |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 17 | 73.91% | 17 | 73.91% | 17 | 73.91% | 11 | 57.89% | 14 | 63.64% | 10 | 45.45% | 9 | 50.00% | 10 | 14.71% | 5 | 38.46% |
| WGQ | 30 | 49.18% | 35 | 57.38% | 19 | 35.85% | 7 | 15.91% | 45 | 75.00% | 37 | 68.52% | 18 | 64.29% | 22 | 27.50% | 8 | 17.39% |
| Total | 47 | 55.29% | 52 | 61.18% | 36 | 46.75% | 18 | 28.13% | 59 | 71.08% | 48 | 62.34% | 27 | 58.70% | 33 | 36.26% | 13 | 21.67% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Even with computer assistance, after-hours nominations and confirmations would require expensive, round-the-clock scheduling teams to be available at each LDC. This is a non-starter.  Our understanding is that this is a fact-based issue related to one pipeline and one end-user and as such, we have no opinion on questions 1 through 6.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This issue is a specific problem between one Shipper who has subscribed to an enhanced service and the Pipeline offering that service.  If pipelines aren't meeting current standards during non-traditional business hours, then not sure how more standards would resolve the issue. But do agree, scheduling and confirmation should occur during non-traditional business hours per current standards and timelines.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  At GEH Forum, this issue arose out of one shipper/pipeline service dispute and is not appropriate for national standards  Clarification to #3: This issue could benefit from a national standard.  This could be worth following up after April changes can be observed and any lessons learned.  2b and 2c calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 39 (Q25)  Addressing the communication of characteristics of the information in the confirmation process could require a fundamental redesign, with potential changes to make confirmations more efficient. (Reasonable) commercial confidentiality issues must be respected. Note that some pipeline practices already may include this kind of information in the confirmation process. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 9 | 47.37% | 9 | 47.37% | 9 | 47.37% | 7 | 46.67% | 9 | 47.37% | 5 | 31.25% | 4 | 26.67% | 13 | 18.31% | 14 | 77.78% |
| WGQ | 10 | 16.39% | 11 | 18.03% | 9 | 16.67% | 7 | 17.07% | 17 | 31.48% | 39 | 81.25% | 20 | 68.97% | 24 | 29.27% | 27 | 58.70% |
| Total | 19 | 23.46% | 20 | 24.69% | 18 | 24.32% | 14 | 24.56% | 26 | 35.14% | 45 | 69.23% | 24 | 54.55% | 38 | 39.58% | 41 | 63.08% |
| Comments:  This appears to be an observation and has no specific proposal upon which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This set of issues was addressed in Order 787.  Receipt point operators should be able to confirm their own markets by commercial counterparty as well as other working interest partners markets in aggregate without knowledge of partners commercial counterparty(s).  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 1 - *Possible Solution: Not Actionable*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 56 (Q41)  Compress confirmations by expediting verification of nominations. Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 6 | 46.15% | 3 | 23.08% | 1 | 11.11% | 7 | 53.85% | 7 | 70.00% | 6 | 66.67% | 10 | 14.71% | 15 | 78.95% |
| WGQ | 4 | 7.14% | 5 | 8.77% | 1 | 2.00% | 0 | 0.00% | 21 | 43.75% | 44 | 95.65% | 25 | 92.59% | 20 | 25.64% | 41 | 78.85% |
| Total | 11 | 15.49% | 11 | 15.49% | 4 | 6.25% | 1 | 2.08% | 28 | 45.16% | 52 | 91.23% | 31 | 86.11% | 31 | 34.83% | 56 | 77.78% |
| Comments:  Cannot provide meaningful answers when item contains a solution and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  Although AEP believes this action does fall within the purview of NAESB, it will not be achieved unless so ordered by FERC due to gas industry resistance.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Cannot provide meaningful answer when item contains two separate components - simulation vs. issue  No comment/opinion.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

**Appendix: Table 2**

Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 1. No-notice Service Offerings | |
| 29 (Q14)  Generators rely on flexibility for a number of operational issues on the electric side. (Electric systems may require very-short periods of gas use to address perturbations on the systems, and electric systems also need to address forecasting error for flexible power-plant operations.) Interruptible services are needed because firm service doesn’t always provide for all of the flexibility attributes needed for reliability of power system operations. There are no-notice services, but they are limited. It is challenging to generators that flexibility elements of services are themselves interruptible. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 4 | 20.00% | 6 | 33.33% | 5 | 29.41% | 2 | 18.18% | 10 | 58.82% | 8 | 53.33% | 7 | 53.85% | 14 | 19.44% | 18 | 90.00% |
| WGQ | 6 | 9.68% | 6 | 9.84% | 5 | 8.47% | 7 | 15.91% | 31 | 53.45% | 51 | 91.07% | 20 | 66.67% | 46 | 44.23% | 44 | 78.57% |
| Total | 10 | 12.05% | 12 | 15.00% | 10 | 12.99% | 9 | 16.07% | 41 | 53.95% | 60 | 83.33% | 27 | 62.79% | 61 | 51.26% | 62 | 80.52% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required. We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO supports furthering flexible service options, enabling gas service offerings to better match the changes now occurring on the electric generation side.  New service offerings tailored specifically for the gas fired generation market which allow for firm, flexible (non-ratable) gas flow over either a full 24 hour basis or shorter blocks of hours during the day will be one of the most important assets needed to increase generator and grid reliability. | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 2. Non-ratable Takes | |
| 2 (Q2)  Non-ratable flexibility, both required to support services purchased and on a best efforts basis. Pipelines that offer no-notice service forecast the amount of no-notice service they expect to provide on a next-day basis and then utilize any projected unused capacity on a interruptible basis to serve other shippers including gas fired electric generators with non-ratable demand. This is a foundational concept for Order 636. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 23.81% | 7 | 31.82% | 7 | 43.75% | 6 | 50.00% | 10 | 55.56% | 12 | 66.67% | 7 | 50.00% | 14 | 66.67% | 15 | 78.95% |
| WGQ | 6 | 9.52% | 7 | 10.77 | 4 | 6.78% | 7 | 17.07% | 25 | 43.86% | 55 | 94.83% | 23 | 69.70% | 42 | 71.19% | 44 | 80.00% |
| Total | 12 | 13.95% | 15 | 16.85% | 12 | 15.58% | 13 | 24.07% | 35 | 46.05% | 68 | 88.31% | 30 | 63.83% | 57 | 70.37% | 59 | 78.67% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Dominion Transmission Inc. currently offers no-notice service.  Art of Scheduling  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  2b calls for speculation  The ability for natural gas generators to obtain firm, flexible (non-ratable) services is paramount to achieving improved system reliability. | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 2. Non-ratable Takes | |
| 23\* (Q10)  For certain service types, the ability to provide a more granular (e.g., 24 hour) take pattern could alleviate/reduce reliance on intraday to achieve that take pattern. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 33.33% | 10 | 47.62% | 11 | 50.00% | 9 | 52.94% | 13 | 59.09% | 7 | 36.84% | 6 | 33.33% | 16 | 21.62% | 6 | 50.00% |
| WGQ | 12 | 18.46% | 11 | 17.19% | 10 | 16.13% | 7 | 14.58% | 32 | 51.61% | 50 | 81.97% | 25 | 69.44% | 34 | 36.96% | 13 | 28.89% |
| Total | 19 | 21.84% | 21 | 24.42% | 21 | 24.71% | 16 | 24.24% | 45 | 52.94% | 58 | 71.60% | 31 | 57.41% | 51 | 46.79% | 19 | 32.76% |
| Comments:  These services have to be tailored to each pipeline.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  The ability to do this is more dependent on the operational ability of a pipeline than on a service that may be offered.  Some of this should already be achieved by communication protocols established.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required.  Intra-cycle Nominations provide granularity but should NOT bump previously scheduled flows from latest standard intraday cycle.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This item could become more critical going forward as organized markets see greater renewables penetration.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 2. Non-ratable Takes | |
| 42 (Q27)  A field test for best-efforts scheduling may be able to give us information as to demand and utility of services supporting non-ratable service. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 4 | 21.05% | 4 | 25.00% | 5 | 29.41% | 4 | 28.57% | 9 | 52.94% | 11 | 73.33% | 6 | 54.55% | 12 | 17.14% | 10 | 71.43% |
| WGQ | 6 | 10.00% | 5 | 8.47% | 3 | 5.77% | 2 | 5.26% | 28 | 54.90% | 46 | 92.00% | 23 | 82.14% | 27 | 31.76% | 14 | 31.11% |
| Total | 10 | 12.50% | 9 | 11.84% | 8 | 11.43% | 6 | 11.32% | 37 | 53.62% | 58 | 87.88% | 29 | 74.36% | 40 | 40.82% | 24 | 40.00% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  No comment/opinion.  Unclear as to the issue, or the references to FERC and/or pipeline offerings | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 2. Non-ratable Takes | |
| 46\* (Q31)  Best-efforts scheduling could also be applied to day-ahead shaped flows. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 2 | 12.50% | 5 | 31.25% | 3 | 23.08% | 1 | 11.11% | 9 | 64.29% | 9 | 75.00% | 5 | 62.50% | 12 | 17.14% | 10 | 76.92% |
| WGQ | 9 | 14.75% | 9 | 14.75% | 7 | 12.50% | 6 | 16.67% | 29 | 53.70% | 48 | 88.89% | 23 | 79.31% | 34 | 36.96% | 18 | 43.90% |
| Total | 11 | 14.10% | 14 | 17.95% | 10 | 14.29% | 7 | 15.22% | 38 | 55.07% | 58 | 86.57% | 28 | 75.68% | 47 | 44.76% | 28 | 50.91% |
| Comments:  NAESB should not use resources to set standards before wider industry adoption of day-ahead shaped flows.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This approach could better reflect gas fired generation usage requirements, particularly during summer months when core demand is low. Maybe consider something seasonal here?  No comment/opinion.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 34a (Q19)  There are non-bumping best-efforts nomination opportunities with streamlined confirmations as an intra-cycle nomination subject to operating conditions of the pipeline. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 13 | 61.90% | 13 | 65.00% | 13 | 61.90% | 9 | 50.00% | 11 | 52.38% | 8 | 47.06% | 6 | 46.15% | 11 | 15.94% | 13 | 81.25% |
| WGQ | 11 | 18.64% | 11 | 18.03% | 7 | 12.07% | 6 | 13.33% | 17 | 29.82% | 48 | 84.21% | 21 | 67.74% | 29 | 33.33% | 29 | 69.05% |
| Total | 24 | 29.63% | 24 | 29.27% | 20 | 25.00% | 15 | 23.44% | 28 | 35.44% | 57 | 76.00% | 27 | 61.36% | 41 | 41.41% | 43 | 72.88% |
| Comments:  Any standardization of intra-cycle confirmation must include the concept that it shall not bump flowing gas from the prior intraday cycle.  FERC has already addressed bumping. This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined  This item requires EITHER FERC action or pipeline service offerings to be placed before further action is taken.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This discussion was for additional services and nomination windows.  Any standardization of intra-cycle confirmations must include the concept that they shall not bump flowing gas from prior standard intraday cycle.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  NGSA Comment: Any standardization of Intra cycle confirmation must include concept that it shall not bump flowing gas from prior Intraday cycle. | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 34a (Q19)  There are non-bumping best-efforts nomination opportunities with streamlined confirmations as an intra-cycle nomination subject to operating conditions of the pipeline. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 13 | 61.90% | 13 | 65.00% | 13 | 61.90% | 9 | 50.00% | 11 | 52.38% | 8 | 47.06% | 6 | 46.15% | 11 | 15.94% | 13 | 81.25% |
| WGQ | 11 | 18.64% | 11 | 18.03% | 7 | 12.07% | 6 | 13.33% | 17 | 29.82% | 48 | 84.21% | 21 | 67.74% | 29 | 33.33% | 29 | 69.05% |
| Total | 24 | 29.63% | 24 | 29.27% | 20 | 25.00% | 15 | 23.44% | 28 | 35.44% | 57 | 76.00% | 27 | 61.36% | 41 | 41.41% | 43 | 72.88% |
| Comments:  Any standardization of intra-cycle confirmation must include the concept that it shall not bump flowing gas from the prior intraday cycle.  FERC has already addressed bumping. This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined  This item requires EITHER FERC action or pipeline service offerings to be placed before further action is taken.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This discussion was for additional services and nomination windows.  Any standardization of intra-cycle confirmations must include the concept that they shall not bump flowing gas from prior standard intraday cycle.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  NGSA Comment: Any standardization of Intra cycle confirmation must include concept that it shall not bump flowing gas from prior Intraday cycle. | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 42 (Q27)  A field test for best-efforts scheduling may be able to give us information as to demand and utility of services supporting non-ratable service. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 4 | 21.05% | 4 | 25.00% | 5 | 29.41% | 4 | 28.57% | 9 | 52.94% | 11 | 73.33% | 6 | 54.55% | 12 | 17.14% | 10 | 71.43% |
| WGQ | 6 | 10.00% | 5 | 8.47% | 3 | 5.77% | 2 | 5.26% | 28 | 54.90% | 46 | 92.00% | 23 | 82.14% | 27 | 31.76% | 14 | 31.11% |
| Total | 10 | 12.50% | 9 | 11.84% | 8 | 11.43% | 6 | 11.32% | 37 | 53.62% | 58 | 87.88% | 29 | 74.36% | 40 | 40.82% | 24 | 40.00% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  No comment/opinion.  Unclear as to the issue, or the references to FERC and/or pipeline offerings | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 41\* (Q26)  Would the ability to reserve current contracted primary FT capacity for use tomorrow, address issues related to inability to use FT contracts to serve intermittent electric generation? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 2 | 11.76% | 6 | 35.29% | 7 | 43.75% | 6 | 50.00% | 7 | 46.67% | 7 | 63.64% | 5 | 50.00% | 15 | 20.55% | 5 | 41.67% |
| WGQ | 5 | 7.81% | 5 | 7.81% | 7 | 11.86% | 5 | 11.36% | 28 | 49.12% | 50 | 90.91% | 23 | 74.19% | 50 | 46.30% | 11 | 23.40% |
| Total | 7 | 8.54% | 11 | 13.41% | 14 | 18.42% | 11 | 19.30% | 35 | 47.95% | 58 | 86.57% | 28 | 68.29% | 66 | 53.23% | 16 | 26.67% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Assuming the reason for not using FT for intermittent generators is that their use is not consistent with the FT tariff service rights. If day ahead nominations could also lock in flexibility required, then this should be explored.  The CAISO relies heavily on gas-fired generation as the primary backstop for renewable resources so this consideration would be valuable to our market. | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 43 (Q28)  Observation: the current set of firm offerings is not meeting the demands of generators in some parts of the country. The suggestion is that it is not necessary to change the existing services, but rather to add new services (for example, one could add a block of capacity, e.g. a seasonal block in which a shipper could take x quantity and y quantity for day). This is similar to the type of offering that some pipelines now offer (e.g. revenue banking). Of course physical capabilities of pipeline systems must be taken into account. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 4 | 21.05% | 4 | 25.00% | 3 | 21.43% | 3 | 25.00% | 10 | 71.43% | 9 | 69.23% | 5 | 55.56% | 15 | 20.55% | 14 | 73.68% |
| WGQ | 7 | 10.77% | 6 | 9.52% | 6 | 10.17% | 5 | 13.51% | 31 | 54.39% | 51 | 86.44% | 26 | 78.79% | 44 | 43.14% | 31 | 63.27% |
| Total | 11 | 12.94% | 10 | 12.50% | 9 | 12.16% | 8 | 16.00% | 41 | 56.94% | 61 | 83.56% | 31 | 73.81% | 60 | 50.85% | 45 | 65.22% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required. We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO would find further discussion of this topic quite valuable, likely in another forum however.  See comments to Question No. 14 | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 44\* (Q29)  Volumetric service to support electric generation akin to SGS (Small Generation Service) on a best-efforts basis may meet expressed needs. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 25.00% | 5 | 29.41% | 4 | 26.67% | 4 | 33.33% | 12 | 80.00% | 11 | 78.57% | 7 | 70.00% | 15 | 20.55% | 12 | 80.00% |
| WGQ | 6 | 9.52% | 6 | 9.52% | 5 | 8.93% | 4 | 11.76% | 25 | 50.00% | 52 | 92.86% | 21 | 75.00% | 39 | 40.21% | 17 | 39.53% |
| Total | 11 | 13.10% | 11 | 13.58% | 9 | 12.50% | 8 | 17.02% | 37 | 56.06% | 64 | 90.14% | 28 | 73.68% | 55 | 48.67% | 29 | 49.15% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Weighing future electric generation needs against historic service is a futile and pointless exercise. The new gas-fired generation that will be constructed as a means to comply with federal environmental policy will not be a fleet of peaker plants. We are entering an age of gas-fired baseload generation unlike anything we have previously observed. Until FERC resolves the model disconnect between the electric and gas industries, appropriate service for electric generators likely will not be available as we build out for environmental reasons.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This could also be discussed further in a different forum.  See comments to Question No. 14 | | | | | | | | | | | | | | | | | | |

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| **Table 2 - *Possible Solution: Not Actionable, but if there are actions, they should occur through FERC and/or service offerings*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 48\* (Q33)  There could be benefits that flow from better matching the efficiency of gas scheduling to the provision of electric-market ancillary services (e.g., addressing short term imbalances, frequency regulation, flexible capacity) by gas generators. Because scheduling of gas is a process and electric ancillary services are products, it would be helpful to analyze what components of the scheduling process could be helpful in accommodating the provision of ancillary service. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 6 | 28.57% | 10 | 47.62% | 7 | 35.00% | 7 | 46.67% | 13 | 68.42% | 12 | 66.67% | 8 | 66.67% | 15 | 20.55% | 7 | 53.85% |
| WGQ | 10 | 15.38% | 17 | 26.56% | 7 | 12.28% | 7 | 15.22% | 43 | 74.14% | 51 | 87.93% | 26 | 81.25% | 47 | 44.76% | 18 | 41.86% |
| Total | 16 | 18.39% | 27 | 31.40% | 14 | 17.95% | 14 | 22.58% | 56 | 71.79% | 64 | 83.12% | 34 | 77.27% | 63 | 52.07% | 26 | 45.61% |
| Comments:  The Commission's request to NAESB should be interpreted within the context of its objectives to enhance gas/electric coordination, market efficiency and reliability.  If gas is going to become the primary generation fuel, the electric industry should consider having the grid operator provide ancillary services and socialize the related costs, which in the case of gas services involve the purchase of premium no-notice services that gas LDCs purchase and pay for today.  The focus needs to be kept on scheduling and confirmation processes until the FERC directive is met.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  There could also be benefits from matching the provision of electric-market ancillary services to the existing gas scheduling processes. NAESB should not be involved in the creation of or promotion of electric-market ancillary services.  A better understanding is needed, but if action occurs, it should also be available to marketers who serve electric load.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  Although actions in this arena could be managed through NAESB processes, AEP believes they likely will require FERC intervention.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO agrees with this observation, which could include future analysis.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

**Appendix: Table 3**

Possible Solution: Not Actionable, because this is an observation

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 18\* (Q5)  Nomination errors requiring manual intervention for mismatches during the confirmation process |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 9 | 45.00% | 10 | 50.00% | 10 | 58.82% | 9 | 64.29% | 8 | 47.06% | 8 | 61.54% | 7 | 43.75% | 6 | 46.15% | 16 | 100% |
| WGQ | 15 | 25.00% | 18 | 29.51% | 11 | 20.00% | 5 | 14.29% | 24 | 42.86% | 49 | 90.74% | 20 | 66.67% | 11 | 22.92% | 51 | 89.47% |
| Total | 24 | 29.63% | 28 | 34.15% | 21 | 28.77% | 14 | 28.00% | 32 | 43.24% | 58 | 85.29% | 27 | 58.70% | 18 | 28.57% | 68 | 91.89% |
| Comments:  This is an observation which contains no proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Without manual intervention to correct customer errors, a nomination would be rejected, and therefore not scheduled.  This is an extra effort that the pipelines use to ensure most gas flows as possible. Not sure changes would be helpful. This is a customer service that the pipelines provide but not all pipelines offer this extra effort.  Art of Scheduling  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Manual Process  this is a topic not a question or statement or issue | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 28 (Q13)  Tight execution windows for gas markets |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 1 | 5.56% | 2 | 11.11% | 1 | 7.69% | 0 | 0.00% | 8 | 61.54% | 7 | 58.33% | 5 | 45.45% | 11 | 15.94% | 20 | 90.91% |
| WGQ | 1 | 1.82% | 2 | 3.57% | 1 | 1.92% | 0 | 0.00% | 25 | 49.02% | 43 | 93.48% | 16 | 80.00% | 32 | 35.56% | 55 | 94.83% |
| Total | 2 | 2.70% | 4 | 5.33% | 2 | 3.03% | 0 | 0.00% | 33 | 50.77% | 51 | 86.44% | 21 | 67.74% | 44 | 43.14% | 76 | 93.83% |
| Comments:  The observation may not be accurate.  This is an observation which contains no proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Out of scope -- this is just an observation or fact.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 30 (Q15)  Decreasing operational flexibility provided by IT service when providing the possibility of more frequent opportunities for FT and IT through additional nominations/scheduling cycles. The status quo has certain rights and benefits that have been baked into expectations about the amount of flexibility that is available under different services. Changes ahead in either the gas or electric industries may disrupt the flexibility that has worked in the past and may not in the future. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 2 | 13.33% | 5 | 33.33% | 5 | 33.33% | 2 | 20.00% | 10 | 66.67% | 8 | 66.67% | 8 | 61.54% | 13 | 18.31% | 19 | 100% |
| WGQ | 8 | 13.79% | 8 | 13.79% | 4 | 7.41% | 2 | 5.26% | 25 | 47.17% | 42 | 91.30% | 17 | 68.00% | 25 | 30.12% | 58 | 93.55% |
| Total | 10 | 13.51% | 13 | 17.57% | 9 | 12.86% | 4 | 8.16% | 35 | 50.72% | 51 | 86.44% | 25 | 65.79% | 39 | 40.21% | 78 | 95.12% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 4: Answer is irrespective of tools.  We understand the caution noted here and recommend further discussion.  It's true that more frequent opportunities for FT and IT through additional nom cycles could reduce the flexibility historically available in the current nom cycle schedules. However, that flexibility becomes less critical when the time between the cycles is decreased. The additional cycles would mitigate the need for the flexibility within a single cycle.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO continues to stress that the generation business model is evolving and that products and services should be explored that can support these changes. We also understand that this topic may be better suited for another forum.  Out of scope -- this is just an observation or fact.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  While there may be benefits to increasing the ability for more frequent intraday nominations, there is also the risk of negatively impacting scheduling flexibility which is reason for caution when implementing changes. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 31 (Q16)  Coordination/timing challenges |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 9 | 47.37% | 10 | 52.63% | 9 | 47.37% | 8 | 47.06% | 14 | 82.35% | 8 | 72.73% | 5 | 55.56% | 13 | 18.31% | 19 | 90.48% |
| WGQ | 8 | 15.09% | 8 | 15.09% | 5 | 10.64% | 3 | 9.38% | 20 | 43.48% | 34 | 89.47% | 13 | 72.22% | 17 | 22.67% | 59 | 98.33% |
| Total | 17 | 23.29% | 18 | 24.66% | 14 | 20.90% | 11 | 22.00% | 34 | 53.13% | 43 | 86.00% | 18 | 66.67% | 31 | 34.83% | 79 | 96.34% |
| Comments:  This item is an observation and provides no proposal upon which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Issue identified which impacts faster computerized scheduling.  Item 31 is too generic a statement to meaningfully answer any of the questions.  This item is vague and provides no proposal upon which to submit meaningful answers.  Out of scope -- this is just an observation or fact.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 32 (Q17)  Forcing pipelines to process quicker may decrease operational flexibility because there may be less time to determine if interruptible transportation is available. Shorter timeframes may inadvertently introduce too much rigidity. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 9 | 52.94% | 10 | 62.50% | 5 | 33.33% | 4 | 33.33% | 9 | 75.00% | 11 | 91.67% | 6 | 54.55% | 13 | 18.31% | 19 | 100% |
| WGQ | 11 | 20.00% | 11 | 20.00% | 9 | 17.65% | 3 | 8.82% | 21 | 43.75% | 35 | 79.55% | 16 | 76.19% | 22 | 27.50% | 60 | 96.77% |
| Total | 20 | 27.40% | 21 | 29.17% | 14 | 20.90% | 7 | 14.89% | 30 | 49.18% | 47 | 82.46% | 22 | 68.75% | 36 | 38.30% | 80 | 97.56% |
| Comments:  This item is an observation and provides no proposal upon which to submit meaningful answers  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Observation that faster computerized scheduling may not achieve the goal of more flexibility for power generators and may have opposite effect.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  It's true that more frequent opportunities for FT and IT through additional nom cycles could reduce the flexibility historically available in the current nom cycle schedules. However, that flexibility becomes less critical when the time between the cycles is decreased. The additional cycles would mitigate the need for the flexibility within a single cycle.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO hopes that technology could be leveraged to manage shorter timelines (at some point in the future), and still allow the flexibility to be retained.  Out of scope -- this is just an observation or fact.  See response to Question No. 15 | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 45 (Q30)  Intra-cycle capacity releases may improve best efforts scheduling. Conversely best-efforts scheduling may improve the effectiveness of existing intraday capacity releases. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 4 | 26.67% | 7 | 46.67% | 5 | 41.67% | 1 | 11.11% | 9 | 69.23% | 9 | 75.00% | 5 | 62.50% | 14 | 19.44% | 16 | 88.89% |
| WGQ | 8 | 12.70% | 9 | 14.29% | 5 | 8.77% | 4 | 11.11% | 27 | 50.00% | 46 | 88.46% | 23 | 82.14% | 37 | 38.95% | 35 | 67.31% |
| Total | 12 | 15.19% | 16 | 20.25% | 10 | 14.29% | 5 | 10.87% | 36 | 52.94% | 56 | 86.15% | 28 | 77.78% | 52 | 47.27% | 51 | 71.83% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 47 (Q32)  Episodic analysis of daily flows suggests that more opportunities to schedule may provide additional flexibility to generators and electric consumers’ benefits. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 29.41% | 5 | 31.25% | 2 | 16.67% | 3 | 27.27% | 9 | 69.23% | 7 | 58.33% | 5 | 62.50% | 13 | 18.31% | 20 | 100% |
| WGQ | 11 | 20.00% | 22 | 40.00% | 18 | 36.00% | 4 | 11.76% | 32 | 64.00% | 28 | 70.00% | 17 | 77.27% | 25 | 30.12% | 55 | 91.67% |
| Total | 16 | 21.92% | 27 | 37.50% | 20 | 31.75% | 7 | 15.22% | 41 | 64.06% | 36 | 67.92% | 22 | 73.33% | 39 | 40.21% | 76 | 93.83% |
| Comments:  An erroneous observation, in our view, if applied to the grid in general.  This is an observation which does not provide an opportunity for meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  The 'episodic analysis' presented was based on a very narrow sample of transactions and is some cases, inaccurate.  While this is indeed a statement of fact, it is the core underpinning of the current FERC docket. This was the assignment.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  this is an opinion  Unless the additional opportunities to schedule flow reduces the pipelines ability to provide best efforts services  Assessing this topic after studying the impacts of April's changes could be an option.  Out of scope -- this is just an observation or fact.  See the comments to Question No. 15 | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 52 (Q37)  How to address less time to validate nomination data that would not lead to errors or legal risks? Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 5 | 41.67% | 4 | 36.36% | 1 | 11.11% | 9 | 75.00% | 8 | 100% | 7 | 70.00% | 12 | 17.14% | 18 | 94.74% |
| WGQ | 5 | 8.62% | 4 | 7.02 | 2 | 3.92% | 0 | 0.00% | 20 | 40.00% | 42 | 93.33% | 26 | 89.66% | 21 | 26.58% | 51 | 94.44% |
| Total | 12 | 16.44% | 9 | 12.86% | 6 | 9.52% | 1 | 2.04% | 29 | 46.03% | 51 | 94.44% | 33 | 84.62% | 34 | 36.96% | 70 | 94.59% |
| Comments:  Cannot provide meaningful answers when item contains an open ended question and an observation the regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  It would seem that using electronic modeling software to schedule nomination cycles with less data validation time would, in fact, reduce risk rather than increase it, when weighed against manual processes.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Cannot provide meaningful answer when item contains two separate components - simulation vs. issue  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 53 (Q38)  How to address tighter deadlines that hamper gas controllers ability to account for shifts in volume. Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 4 | 36.36% | 4 | 36.36% | 1 | 11.11% | 9 | 81.82% | 8 | 100% | 7 | 70.00% | 12 | 17.14% | 18 | 94.74% |
| WGQ | 5 | 8.62% | 4 | 7.02% | 2 | 3.92% | 0 | 0.00% | 21 | 42.00% | 43 | 95.56% | 26 | 89.66% | 21 | 26.58% | 50 | 92.59% |
| Total | 12 | 16.44% | 8 | 11.59% | 6 | 9.52% | 1 | 2.13% | 30 | 48.39% | 52 | 96.30% | 33 | 84.62% | 34 | 36.96% | 69 | 93.24% |
| Comments:  Cannot provide meaningful answers when item contains an open ended question and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  It would seem that using electronic modeling software to schedule nomination cycles with less data validation time would, in fact, reduce risk rather than increase it, when weighed against manual processes.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 54 (Q39)  By adding more schedules, are tools available or currently in use that support both the gas controllers and the gas fired generators? Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 4 | 36.36% | 5 | 41.67% | 2 | 20.00% | 9 | 75.00% | 8 | 100% | 7 | 70.00% | 12 | 17.14% | 18 | 94.74% |
| WGQ | 5 | 8.62% | 4 | 7.02% | 2 | 3.92% | 0 | 0.00% | 19 | 38.78% | 43 | 95.56% | 25 | 86.21% | 21 | 26.58% | 51 | 94.44% |
| Total | 12 | 16.44% | 8 | 11.59% | 7 | 10.94% | 2 | 4.17% | 28 | 45.16% | 52 | 96.30% | 32 | 82.05% | 34 | 36.96% | 70 | 94.59% |
| Comments:  Cannot provide meaningful answers when item contains an open ended question and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  This also speaks to the core of FERC's intent in this docket.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 7. Scheduling Issues Surrounding Interconnects | |
| 11 (Q3)  Physical assistance agreed upon between interconnecting parties. OBAs and similar type of arrangement (the implementing devices), seem to be working well. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 27.78% | 3 | 20.00% | 2 | 20.00% | 1 | 16.67% | 6 | 60.00% | 8 | 80.00% | 5 | 71.43% | 10 | 83.33% | 20 | 95.24% |
| WGQ | 6 | 10.17% | 5 | 8.62% | 1 | 1.89% | 3 | 8.33% | 19 | 40.43% | 50 | 94.34% | 19 | 76.00% | 17 | 34.69% | 57 | 96.61% |
| Total | 11 | 14.10% | 8 | 10.81% | 3 | 4.69% | 4 | 9.30% | 25 | 43.10% | 59 | 92.19% | 24 | 75.00% | 28 | 45.16% | 78 | 96.30% |
| Comments:  This is an observation which contains no proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Art of Scheduling  OBA's may or may not be working well but confirmations between pipelines do not always work well from a shipper perspective.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact.  Concepts are operational in nature and standardization would not be beneficial - Pipeline Presentation "Art of Scheduling".  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 7. Scheduling Issues Surrounding Interconnects | |
| 20 (Q7)  Availability of capacity at interconnection points. There is currently uncertainty as to impact of tighter timeframes on the scheduling of capacity for the later cycles. (At present, the schedules tend to come out early.) |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 16 | 72.73% | 16 | 72.73% | 13 | 65.00% | 11 | 57.89% | 14 | 63.64% | 8 | 44.44% | 6 | 35.29% | 10 | 66.67% | 13 | 81.25% |
| WGQ | 9 | 16.07% | 17 | 29.82% | 5 | 10.20% | 3 | 7.89% | 28 | 57.14% | 39 | 90.70% | 17 | 77.27% | 16 | 35.56% | 53 | 96.36% |
| Total | 25 | 31.65% | 33 | 41.25% | 18 | 25.71% | 14 | 24.14% | 42 | 58.33% | 48 | 77.42% | 23 | 58.97% | 27 | 44.26% | 67 | 93.06% |
| Comments:  This is an observation which contains no proposal for which to submit meaningful answers.  Question 4: Answer is irrespective of tools.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 50 (Q35)  How to support through efficient scheduling, a better coordination of gas supplies, transport services, ISOs and RTOs needs and needs of power generators? Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 8 | 53.33% | 5 | 45.45% | 6 | 50.00% | 1 | 14.29% | 9 | 75.00% | 7 | 77.78% | 6 | 54.55% | 13 | 18.31% | 15 | 83.33% |
| WGQ | 5 | 8.47% | 5 | 8.47% | 3 | 5.66% | 1 | 2.50% | 25 | 47.17% | 41 | 91.11% | 26 | 83.87% | 25 | 30.12% | 43 | 82.69% |
| Total | 13 | 17.33% | 10 | 14.08% | 9 | 13.64% | 2 | 4.17% | 34 | 51.52% | 49 | 89.09% | 32 | 76.19% | 39 | 40.21% | 58 | 81.69% |
| Comments:  The focus needs to be kept on scheduling and confirmation processes until the FERC directive is met.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation.  An effective simulation across all pipelines would appear to be cost prohibitive.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  CAISO agrees with the observation.  Out of scope -- this is just an observation or fact.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 51 (Q36)  Through efficient nominations and scheduling, addressing service interruptions in the supply chain. Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 8 | 53.33% | 5 | 41.67% | 4 | 36.36% | 0 | 0.00% | 7 | 58.33% | 7 | 87.50% | 6 | 60.00% | 12 | 17.14% | 16 | 88.89% |
| WGQ | 5 | 8.33% | 4 | 6.78% | 2 | 3.77% | 0 | 0.00% | 21 | 41.18% | 44 | 93.62% | 27 | 87.10% | 23 | 28.40% | 51 | 94.44% |
| Total | 13 | 17.11% | 9 | 12.50% | 6 | 9.23% | 0 | 0.00% | 28 | 43.75% | 52 | 92.86% | 33 | 80.49% | 36 | 38.30% | 68 | 93.15% |
| Comments:  Addressing service interruptions should not be part of the process at this time. The focus needs to be kept on scheduling and confirmation processes until the FERC directive is met.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 52 (Q37)  How to address less time to validate nomination data that would not lead to errors or legal risks? Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 5 | 41.67% | 4 | 36.36% | 1 | 11.11% | 9 | 75.00% | 8 | 100% | 7 | 70.00% | 12 | 17.14% | 18 | 94.74% |
| WGQ | 5 | 8.62% | 4 | 7.02 | 2 | 3.92% | 0 | 0.00% | 20 | 40.00% | 42 | 93.33% | 26 | 89.66% | 21 | 26.58% | 51 | 94.44% |
| Total | 12 | 16.44% | 9 | 12.86% | 6 | 9.52% | 1 | 2.04% | 29 | 46.03% | 51 | 94.44% | 33 | 84.62% | 34 | 36.96% | 70 | 94.59% |
| Comments:  Cannot provide meaningful answers when item contains an open ended question and an observation the regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  It would seem that using electronic modeling software to schedule nomination cycles with less data validation time would, in fact, reduce risk rather than increase it, when weighed against manual processes.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Cannot provide meaningful answer when item contains two separate components - simulation vs. issue  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 53 (Q38)  How to address tighter deadlines that hamper gas controllers ability to account for shifts in volume. Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 4 | 36.36% | 4 | 36.36% | 1 | 11.11% | 9 | 81.82% | 8 | 100% | 7 | 70.00% | 12 | 17.14% | 18 | 94.74% |
| WGQ | 5 | 8.62% | 4 | 7.02% | 2 | 3.92% | 0 | 0.00% | 21 | 42.00% | 43 | 95.56% | 26 | 89.66% | 21 | 26.58% | 50 | 92.59% |
| Total | 12 | 16.44% | 8 | 11.59% | 6 | 9.52% | 1 | 2.13% | 30 | 48.39% | 52 | 96.30% | 33 | 84.62% | 34 | 36.96% | 69 | 93.24% |
| Comments:  Cannot provide meaningful answers when item contains an open ended question and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  It would seem that using electronic modeling software to schedule nomination cycles with less data validation time would, in fact, reduce risk rather than increase it, when weighed against manual processes.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 54 (Q39)  By adding more schedules, are tools available or currently in use that support both the gas controllers and the gas fired generators? Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 50.00% | 4 | 36.36% | 5 | 41.67% | 2 | 20.00% | 9 | 75.00% | 8 | 100% | 7 | 70.00% | 12 | 17.14% | 18 | 94.74% |
| WGQ | 5 | 8.62% | 4 | 7.02% | 2 | 3.92% | 0 | 0.00% | 19 | 38.78% | 43 | 95.56% | 25 | 86.21% | 21 | 26.58% | 51 | 94.44% |
| Total | 12 | 16.44% | 8 | 11.59% | 7 | 10.94% | 2 | 4.17% | 28 | 45.16% | 52 | 96.30% | 32 | 82.05% | 34 | 36.96% | 70 | 94.59% |
| Comments:  Cannot provide meaningful answers when item contains an open ended question and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  This also speaks to the core of FERC's intent in this docket.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

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| **Table 3 - *Possible Solution: Not Actionable, because this is an observation*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data Transfer Issues, Field Testing and Modeling | |
| 55 (Q40)  Need for role playing. Using simulation to recreate “The Art of Scheduling” tools of software models could support more efficient and effective decision making. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 0 | 0.00% | 0 | 0.00% | 1 | 9.09% | 1 | 11.11% | 8 | 72.73% | 7 | 100% | 6 | 100% | 5 | 7.94% | 20 | 95.24% |
| WGQ | 1 | 1.79% | 1 | 1.79% | 1 | 1.96% | 0 | 0.00 | 21 | 42.00% | 43 | 95.56% | 26 | 89.66% | 19 | 24.68% | 52 | 94.55% |
| Total | 1 | 1.49% | 1 | 1.49% | 2 | 3.17% | 1 | 2.13% | 29 | 46.77% | 51 | 96.23% | 32 | 91.43% | 25 | 30.12% | 73 | 94.81% |
| Comments:  Cannot provide meaningful answers when item contains a suggestion and an observation regarding simulation.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  An interesting concept, but not sure who would pay for such a simulation  This also speaks to the core of FERC's intent in this docket. AEP believes such simulations should only be used as a means to train schedulers for the actual electronic/automated procedures.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Cannot provide meaningful answer when item contains two separate components - simulation vs. issue  Out of scope -- this is just an observation or fact. | | | | | | | | | | | | | | | | | | |

**Appendix: Table 4**

Possible Solution: Actionable by NAESB in the current environment for those pipelines offering such services

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| **Table 4 - *Possible Solution: Actionable by NAESB in the current environment for those pipelines offering such services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 2. Non-ratable Takes | |
| 23\* (Q10)  For certain service types, the ability to provide a more granular (e.g., 24 hour) take pattern could alleviate/reduce reliance on intraday to achieve that take pattern. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 7 | 33.33% | 10 | 47.62% | 11 | 50.00% | 9 | 52.94% | 13 | 59.09% | 7 | 36.84% | 6 | 33.33% | 16 | 21.62% | 6 | 50.00% |
| WGQ | 12 | 18.46% | 11 | 17.19% | 10 | 16.13% | 7 | 14.58% | 32 | 51.61% | 50 | 81.97% | 25 | 69.44% | 34 | 36.96% | 13 | 28.89% |
| Total | 19 | 21.84% | 21 | 24.42% | 21 | 24.71% | 16 | 24.24% | 45 | 52.94% | 58 | 71.60% | 31 | 57.41% | 51 | 46.79% | 19 | 32.76% |
| Comments:  These services have to be tailored to each pipeline.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  The ability to do this is more dependent on the operational ability of a pipeline than on a service that may be offered.  Some of this should already be achieved by communication protocols established.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required.  Intra-cycle Nominations provide granularity but should NOT bump previously scheduled flows from latest standard intraday cycle.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This item could become more critical going forward as organized markets see greater renewables penetration.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 4 - *Possible Solution: Actionable by NAESB in the current environment for those pipelines offering such services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 2. Non-ratable Takes | |
| 46\* (Q31)  Best-efforts scheduling could also be applied to day-ahead shaped flows. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 2 | 12.50% | 5 | 31.25% | 3 | 23.08% | 1 | 11.11% | 9 | 64.29% | 9 | 75.00% | 5 | 62.50% | 12 | 17.14% | 10 | 76.92% |
| WGQ | 9 | 14.75% | 9 | 14.75% | 7 | 12.50% | 6 | 16.67% | 29 | 53.70% | 48 | 88.89% | 23 | 79.31% | 34 | 36.96% | 18 | 43.90% |
| Total | 11 | 14.10% | 14 | 17.95% | 10 | 14.29% | 7 | 15.22% | 38 | 55.07% | 58 | 86.57% | 28 | 75.68% | 47 | 44.76% | 28 | 50.91% |
| Comments:  NAESB should not use resources to set standards before wider industry adoption of day-ahead shaped flows.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This approach could better reflect gas fired generation usage requirements, particularly during summer months when core demand is low. Maybe consider something seasonal here?  No comment/opinion.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

**Appendix: Table 5**

Possible Solution: Actionable by NAESB in the current environment

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 17 (Q4)  Levels of confirmation |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 16 | 80.00% | 18 | 85.71% | 11 | 64.71% | 8 | 61.54% | 8 | 50.00% | 4 | 28.57% | 2 | 13.33% | 7 | 10.77% | 5 | 41.67% |
| WGQ | 54 | 88.52% | 58 | 95.08% | 48 | 84.21% | 12 | 36.36% | 24 | 41.38% | 11 | 21.15% | 12 | 36.36% | 13 | 18.31% | 7 | 13.21 |
| Total | 70 | 85.37% | 76 | 91.57% | 59 | 78.67% | 20 | 42.55% | 32 | 42.67% | 16 | 23.88% | 15 | 30.61% | 21 | 26.58% | 12 | 18.18% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  This item is vague and provides no proposal upon which to submit meaningful answers.  Cost is unknown and would vary depending on the unique circumstances of each pipeline.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  The answer to 2b was left blank because cost is an unknown factor, depending on the unique circumstances of each pipeline.  As a shipper who moves gas between multiple pipelines, uniformity in the level of confirmation (contract, package ID, DUNS, etc.) would be helpful.  Refer to Questions 18 & 22  This issue is not clearly stated or represented.  Confirmations is an area where enhancements to process would benefit all industry participants responsible for this activity.  2b) Unsure  4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  This is not a question or statement or issue  2b calls for speculation & 2c unclear at this time | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 33 (Q18)  Use of multiple confirmation methods in addition to traditional confirmations for intraday nominations. There is currently a good definition of Confirmation by Exception (CBE) in NAESB standards. CBE however, may not be available everywhere but there may also be additional confirmation methods that could benefit from standardization. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 21 | 95.45% | 21 | 95.45% | 21 | 95.45% | 11 | 61.11% | 12 | 54.55% | 2 | 10.53% | 2 | 13.33% | 9 | 13.43% | 5 | 38.46% |
| WGQ | 61 | 96.83% | 63 | 98.44% | 60 | 96.77% | 19 | 52.78% | 23 | 37.10% | 2 | 3.57% | 7 | 21.88% | 10 | 14.71% | 8 | 17.02% |
| Total | 83 | 96.51% | 85 | 97.70% | 82 | 96.47% | 31 | 56.36% | 35 | 41.18% | 4 | 5.26% | 9 | 19.15% | 19 | 24.68% | 13 | 21.31% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  ISO New England comments: Confirmations are only as good as those parties on the confirming end. Since most of that part of the business is unregulated, this is the 'fly in the ointment" that somewhat trumps multiple confirmation methods.  Clearly a uniformity of the definition with policy direction for pipeline's services might provide benefits, however the impacts should not reduce flexibility or availability of capacity | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 35\* (Q21)  Lining up the processes and timeframes that occur within the confirmations/scheduling window to gain efficiency of data exchange. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 20 | 90.91% | 20 | 90.91% | 17 | 77.27% | 11 | 57.89% | 13 | 59.09% | 3 | 15.79% | 2 | 11.11% | 10 | 14.71% | 2 | 15.38% |
| WGQ | 59 | 92.19% | 60 | 92.31% | 50 | 79.37% | 11 | 30.56% | 55 | 88.71% | 17 | 28.81% | 11 | 31.43% | 16 | 21.62% | 7 | 14.58% |
| Total | 79 | 90.80% | 80 | 90.91% | 67 | 77.91% | 22 | 39.29% | 68 | 80.00% | 21 | 26.58% | 13 | 24.53% | 27 | 31.76% | 9 | 14.52% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  While there may be some benefit from waiting until sufficient experience has been gained and analyzed post-April, "sufficient" should not become a means to prolong or avoid entirely the analysis.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  I am not sure what the actual recommendation or observation is. | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 36 (Q22)  Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 19 | 90.48% | 19 | 90.48% | 16 | 76.19% | 10 | 58.82% | 11 | 52.38% | 2 | 13.33% | 1 | 5.88% | 9 | 13.43% | 6 | 40.00% |
| WGQ | 61 | 93.85% | 61 | 93.85% | 54 | 85.71% | 24 | 63.16% | 26 | 40.00% | 5 | 8.62% | 7 | 20.59% | 11 | 15.94% | 10 | 22.22% |
| Total | 81 | 93.10% | 81 | 93.10% | 71 | 83.53% | 35 | 62.50% | 37 | 42.53% | 7 | 9.46% | 8 | 15.69% | 20 | 25.64% | 16 | 26.23% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Greater standardization in confirmation levels would improve gas-electric harmonization. AEP believes that while the standardization is beneficial, that standardization should incorporate the most detailed existing confirmation levels. Standardizing to the lowest common denominator would not be helpful. And while this standardization does fall within NAESB purview, AEP does not believe it will occur until FERC so orders.  Confirmations is an area where enhancements to process would benefit all industry participants responsible for this activity.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  The pipelines suggested the opposite, that greater standardization could yield a less efficient outcome. The pipelines are the experts in the optimization of the pipeline with respect to the requirements associated with the Art of Scheduling. If standardization could more efficiently identify operational flexibility available on a best efforts basis, which would help the pipeline optimize their pipeline better with a minimal impact on costs, then this should be pursued.  Hopefully this could be explored further, though the CAISO does not have an expectation here.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 37\* (Q23)  Investigate the need to define the number of iterations to support confirmation, including on a best-effort basis. Defined iterations needed to support confirmations, including best efforts. Taking a look at these issues does not necessarily presume there is a magic number of iterations, in part to changing market conditions and because of respecting the goal of maximizing flow. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 14 | 66.67% | 14 | 66.67% | 15 | 68.18% | 10 | 55.56% | 13 | 59.09% | 6 | 40.00% | 5 | 29.41% | 9 | 13.43% | 4 | 33.33% |
| WGQ | 11 | 18.97% | 12 | 20.34% | 8 | 14.55% | 5 | 11.36% | 30 | 54.55% | 45 | 84.91% | 23 | 74.19% | 16 | 21.62% | 8 | 20.00% |
| Total | 25 | 31.25% | 26 | 32.10% | 23 | 29.49% | 15 | 23.81% | 43 | 55.13% | 52 | 75.36% | 28 | 58.33% | 26 | 30.95% | 12 | 22.64% |
| Comments:  Don't understand the intent well enough to respond.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  These 'iterations' are specific to a pipeline's business systems and are not subject to standardization.  Pipelines know best on how many times they want to run their models and go thru the confirmation process within the deadlines required. If this changes, less iterations may lead to less gas scheduled as pipelines may not be able to get a view of optimal flow on their pipeline.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Don't understand the intent well enough to respond.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  No comment/opinion.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 38\* (Q24)  Further standardize methods and processes (for example, standardizing time frames for the different elements of the processes) employed to support confirmations. Standardization could clarify the steps and expectations among parties surrounding default actions that may arise from different time periods in the process. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 19 | 90.48% | 19 | 90.48% | 16 | 76.19% | 9 | 52.94% | 12 | 57.14% | 2 | 13.33% | 1 | 5.88% | 6 | 9.38% | 1 | 9.09% |
| WGQ | 59 | 90.77% | 60 | 92.31% | 49 | 77.78% | 14 | 35.90% | 52 | 78.79% | 12 | 21.05% | 8 | 22.86% | 13 | 18.31% | 4 | 9.30% |
| Total | 78 | 89.66% | 79 | 90.80% | 65 | 76.47% | 23 | 40.35% | 64 | 72.73% | 15 | 20.55% | 9 | 17.31% | 20 | 25.64% | 5 | 9.09% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  AEP believes this action falls squarely within the set of issues this docket seeks to address. It is a core issue that should receive NAESB attention at the earliest possible time. If NAESB members choose not to pursue this line of action voluntarily, AEP believes FERC will provide mandatory direction toward this goal.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 18\* (Q5)  Nomination errors requiring manual intervention for mismatches during the confirmation process |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 9 | 45.00% | 10 | 50.00% | 10 | 58.82% | 9 | 64.29% | 8 | 47.06% | 8 | 61.54% | 7 | 43.75% | 6 | 46.15% | 16 | 100% |
| WGQ | 15 | 25.00% | 18 | 29.51% | 11 | 20.00% | 5 | 14.29% | 24 | 42.86% | 49 | 90.74% | 20 | 66.67% | 11 | 22.92% | 51 | 89.47% |
| Total | 24 | 29.63% | 28 | 34.15% | 21 | 28.77% | 14 | 28.00% | 32 | 43.24% | 58 | 85.29% | 27 | 58.70% | 18 | 28.57% | 68 | 91.89% |
| Comments:  This is an observation which contains no proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Without manual intervention to correct customer errors, a nomination would be rejected, and therefore not scheduled.  This is an extra effort that the pipelines use to ensure most gas flows as possible. Not sure changes would be helpful. This is a customer service that the pipelines provide but not all pipelines offer this extra effort.  Art of Scheduling  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Manual Process  this is a topic not a question or statement or issue | | | | | | | | | | | | | | | | | | |

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| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 49\* (Q34)  As the electric system continues to evolve into a peakier and a more renewable grid, the need for enhanced scheduling and flexibility from the gas transportation system will grow. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 8 | 42.11% | 9 | 45.00% | 10 | 50.00% | 9 | 52.94% | 10 | 58.82% | 8 | 47.06% | 6 | 46.15% | 15 | 20.55% | 15 | 93.75% |
| WGQ | 12 | 19.35% | 20 | 32.79% | 19 | 33.93% | 6 | 15.00% | 34 | 59.65% | 38 | 73.08% | 14 | 50.00% | 39 | 40.21% | 42 | 76.36% |
| Total | 20 | 24.39% | 29 | 35.37% | 29 | 37.66% | 15 | 25.86% | 44 | 58.67% | 47 | 67.14% | 20 | 48.78% | 55 | 48.67% | 58 | 80.56% |
| Comments:  Standards that are premised on the economic and technological trends in the energy sector will be more durable and beneficial.  There may be a need for increased flexibility on the gas grid but that can only come from infrastructure investment paid for by those causing the "peakier" electric grid -- electric consumers and generators. Enhanced scheduling will not address the problem of lack of infrastructure.  This is an observation without a proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Actionable if a pipeline offers enhanced services, but not sure all pipelines could provide a standard service.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required.  While this is a true statement in many instances, it is important to note a significant distinction between new gas capacity needed for additional peaker plants to offset renewables, and new capacity needed to serve electric baseload plants that will replace coal in the wake of new federal environmental policies. The needs of these two growth areas in the gas industry will not be the same.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This is an opinion  CAISO agrees, but this is simply an observation.  2b calls for speculation  See the comments to Question No. 14. | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 8. Access to Scheduling During Non-business Hours | |
| 21\* (Q8)  Computerized scheduling and confirmations for nomination of subscribed services during non-traditional business hours processes |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 17 | 73.91% | 17 | 73.91% | 17 | 73.91% | 11 | 57.89% | 14 | 63.64% | 10 | 45.45% | 9 | 50.00% | 10 | 14.71% | 5 | 38.46% |
| WGQ | 30 | 49.18% | 35 | 57.38% | 19 | 35.85% | 7 | 15.91% | 45 | 75.00% | 37 | 68.52% | 18 | 64.29% | 22 | 27.50% | 8 | 17.39% |
| Total | 47 | 55.29% | 52 | 61.18% | 36 | 46.75% | 18 | 28.13% | 59 | 71.08% | 48 | 62.34% | 27 | 58.70% | 33 | 36.26% | 13 | 21.67% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Even with computer assistance, after-hours nominations and confirmations would require expensive, round-the-clock scheduling teams to be available at each LDC. This is a non-starter.  Our understanding is that this is a fact-based issue related to one pipeline and one end-user and as such, we have no opinion on questions 1 through 6.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This issue is a specific problem between one Shipper who has subscribed to an enhanced service and the Pipeline offering that service.  If pipelines aren't meeting current standards during non-traditional business hours, then not sure how more standards would resolve the issue. But do agree, scheduling and confirmation should occur during non-traditional business hours per current standards and timelines.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  At GEH Forum, this issue arose out of one shipper/pipeline service dispute and is not appropriate for national standards  Clarification to #3: This issue could benefit from a national standard.  This could be worth following up after April changes can be observed and any lessons learned.  2b and 2c calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 9. Communications | |
| 22 (Q9)  It would be desirable to have a set of terminology agreed upon by participants to characteristics shapes, profiles, ratable, non-ratable, and so forth to facilitate discussion. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 11 | 52.38% | 14 | 66.67% | 16 | 72.73% | 15 | 75.00% | 9 | 40.91% | 6 | 27.27% | 5 | 29.41% | 8 | 12.12% | 8 | 66.67% |
| WGQ | 44 | 67.69% | 55 | 82.09% | 39 | 61.90% | 35 | 64.81% | 11 | 17.74% | 14 | 23.73% | 10 | 30.30% | 24 | 29.27% | 24 | 54.55% |
| Total | 55 | 63.22% | 69 | 77.53% | 55 | 63.95% | 50 | 66.67% | 20 | 23.53% | 21 | 25.61% | 15 | 30.00% | 33 | 36.26% | 32 | 56.14% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Agreed upon terminology should apply to confirmations, nominations, etc.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  A glossary should be defined in conjunction with proposed standards, not before.  Terminology and process consistency across both FERC and state pipes would facilitate greater integration of the larger process. | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 9. Communications | |
| 25\* (Q11)  Communication protocols with LDCs, gas generator operators and natural gas marketing companies |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 13 | 61.90% | 15 | 71.43% | 15 | 68.18% | 15 | 75.00% | 13 | 59.09% | 7 | 33.33% | 5 | 25.00% | 13 | 18.31% | 6 | 60.00% |
| WGQ | 47 | 77.05% | 46 | 75.41% | 38 | 65.52% | 20 | 47.62% | 41 | 68.33% | 20 | 35.09% | 18 | 54.55% | 30 | 34.09% | 11 | 28.21% |
| Total | 60 | 72.29% | 61 | 73.49% | 53 | 65.43% | 35 | 55.56% | 54 | 65.06% | 28 | 35.44% | 23 | 43.40% | 44 | 43.14% | 17 | 34.00% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  We see no issues with current protocols.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  We take no position on this item, as it does not appear to be an item that impacts us.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  Requires Commission action to assure coordination with Order 787 with respect to communication with LDCs, generators and others.  I am not sure what the actual recommendation or observation is.  Write the standards and they shall come, if they want to work with a interstate pipeline regulated by FERC.  PJM's intent here is to stress the importance of establishing formal communication protocol between the ISO/RTO, the interstate pipelines, LDCs and generators which follows the guiding principles of FERC Order 787. These efforts improve the reliability of the electric grid through improved planning processes. | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 9. Communications | |
| 26\* (Q12)  Improve efficiency of critical information sharing (related to items 22 and 25) |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 11 | 50.00% | 13 | 59.09% | 14 | 60.87% | 12 | 70.59% | 10 | 50.00% | 7 | 36.84% | 6 | 33.33% | 11 | 15.94% | 5 | 45.45% |
| WGQ | 44 | 67.69% | 48 | 73.85% | 39 | 61.90% | 24 | 52.17% | 24 | 38.71% | 20 | 33.90% | 18 | 52.94% | 34 | 36.96% | 12 | 27.27% |
| Total | 55 | 62.50% | 61 | 69.32% | 53 | 60.92% | 36 | 56.25% | 34 | 40.96% | 28 | 35.44% | 24 | 46.15% | 46 | 44.23% | 17 | 30.36% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Pipeline EBBs are FERC-approved methods of information sharing. They provide information rapidly to all interested parties simultaneously. If an individual pipeline is not meeting its obligation, that is a matter for FERC. If a party wishes to impose additional obligations on pipelines that is also a FERC matter.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  To the extent Item 26 relates to Item 25, the same Commission action required with respect to Order 787 is a pre-requisite to #26.  Conceptually information is shared now, often in a timely manner. RTOs change dispatch directives in the real time and this limits the amount of time available for proactively sharing reliable information.  Standardizing how flow reductions are communicated would help everyone, particularly organized, who deal across multiple pipeline systems.  Ties in with Question No. 12 | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 35\* (Q21)  Lining up the processes and timeframes that occur within the confirmations/scheduling window to gain efficiency of data exchange. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 20 | 90.91% | 20 | 90.91% | 17 | 77.27% | 11 | 57.89% | 13 | 59.09% | 3 | 15.79% | 2 | 11.11% | 10 | 14.71% | 2 | 15.38% |
| WGQ | 59 | 92.19% | 60 | 92.31% | 50 | 79.37% | 11 | 30.56% | 55 | 88.71% | 17 | 28.81% | 11 | 31.43% | 16 | 21.62% | 7 | 14.58% |
| Total | 79 | 90.80% | 80 | 90.91% | 67 | 77.91% | 22 | 39.29% | 68 | 80.00% | 21 | 26.58% | 13 | 24.53% | 27 | 31.76% | 9 | 14.52% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  While there may be some benefit from waiting until sufficient experience has been gained and analyzed post-April, "sufficient" should not become a means to prolong or avoid entirely the analysis.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  I am not sure what the actual recommendation or observation is. | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 36 (Q22)  Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 19 | 90.48% | 19 | 90.48% | 16 | 76.19% | 10 | 58.82% | 11 | 52.38% | 2 | 13.33% | 1 | 5.88% | 9 | 13.43% | 6 | 40.00% |
| WGQ | 61 | 93.85% | 61 | 93.85% | 54 | 85.71% | 24 | 63.16% | 26 | 40.00% | 5 | 8.62% | 7 | 20.59% | 11 | 15.94% | 10 | 22.22% |
| Total | 81 | 93.10% | 81 | 93.10% | 71 | 83.53% | 35 | 62.50% | 37 | 42.53% | 7 | 9.46% | 8 | 15.69% | 20 | 25.64% | 16 | 26.23% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Greater standardization in confirmation levels would improve gas-electric harmonization. AEP believes that while the standardization is beneficial, that standardization should incorporate the most detailed existing confirmation levels. Standardizing to the lowest common denominator would not be helpful. And while this standardization does fall within NAESB purview, AEP does not believe it will occur until FERC so orders.  Confirmations is an area where enhancements to process would benefit all industry participants responsible for this activity.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  The pipelines suggested the opposite, that greater standardization could yield a less efficient outcome. The pipelines are the experts in the optimization of the pipeline with respect to the requirements associated with the Art of Scheduling. If standardization could more efficiently identify operational flexibility available on a best efforts basis, which would help the pipeline optimize their pipeline better with a minimal impact on costs, then this should be pursued.  Hopefully this could be explored further, though the CAISO does not have an expectation here.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 38\* (Q24)  Further standardize methods and processes (for example, standardizing time frames for the different elements of the processes) employed to support confirmations. Standardization could clarify the steps and expectations among parties surrounding default actions that may arise from different time periods in the process. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 19 | 90.48% | 19 | 90.48% | 16 | 76.19% | 9 | 52.94% | 12 | 57.14% | 2 | 13.33% | 1 | 5.88% | 6 | 9.38% | 1 | 9.09% |
| WGQ | 59 | 90.77% | 60 | 92.31% | 49 | 77.78% | 14 | 35.90% | 52 | 78.79% | 12 | 21.05% | 8 | 22.86% | 13 | 18.31% | 4 | 9.30% |
| Total | 78 | 89.66% | 79 | 90.80% | 65 | 76.47% | 23 | 40.35% | 64 | 72.73% | 15 | 20.55% | 9 | 17.31% | 20 | 25.64% | 5 | 9.09% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  AEP believes this action falls squarely within the set of issues this docket seeks to address. It is a core issue that should receive NAESB attention at the earliest possible time. If NAESB members choose not to pursue this line of action voluntarily, AEP believes FERC will provide mandatory direction toward this goal.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 48\* (Q33)  There could be benefits that flow from better matching the efficiency of gas scheduling to the provision of electric-market ancillary services (e.g., addressing short term imbalances, frequency regulation, flexible capacity) by gas generators. Because scheduling of gas is a process and electric ancillary services are products, it would be helpful to analyze what components of the scheduling process could be helpful in accommodating the provision of ancillary service. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 6 | 28.57% | 10 | 47.62% | 7 | 35.00% | 7 | 46.67% | 13 | 68.42% | 12 | 66.67% | 8 | 66.67% | 15 | 20.55% | 7 | 53.85% |
| WGQ | 10 | 15.38% | 17 | 26.56% | 7 | 12.28% | 7 | 15.22% | 43 | 74.14% | 51 | 87.93% | 26 | 81.25% | 47 | 44.76% | 18 | 41.86% |
| Total | 16 | 18.39% | 27 | 31.40% | 14 | 17.95% | 14 | 22.58% | 56 | 71.79% | 64 | 83.12% | 34 | 77.27% | 63 | 52.07% | 26 | 45.61% |
| Comments:  The Commission's request to NAESB should be interpreted within the context of its objectives to enhance gas/electric coordination, market efficiency and reliability.  If gas is going to become the primary generation fuel, the electric industry should consider having the grid operator provide ancillary services and socialize the related costs, which in the case of gas services involve the purchase of premium no-notice services that gas LDCs purchase and pay for today.  The focus needs to be kept on scheduling and confirmation processes until the FERC directive is met.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  There could also be benefits from matching the provision of electric-market ancillary services to the existing gas scheduling processes. NAESB should not be involved in the creation of or promotion of electric-market ancillary services.  A better understanding is needed, but if action occurs, it should also be available to marketers who serve electric load.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  Although actions in this arena could be managed through NAESB processes, AEP believes they likely will require FERC intervention.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO agrees with this observation, which could include future analysis.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 5 - *Possible Solution: Actionable by NAESB in the current environment*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 49\* (Q34)  As the electric system continues to evolve into a peakier and a more renewable grid, the need for enhanced scheduling and flexibility from the gas transportation system will grow. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 8 | 42.11% | 9 | 45.00% | 10 | 50.00% | 9 | 52.94% | 10 | 58.82% | 8 | 47.06% | 6 | 46.15% | 15 | 20.55% | 15 | 93.75% |
| WGQ | 12 | 19.35% | 20 | 32.79% | 19 | 33.93% | 6 | 15.00% | 34 | 59.65% | 38 | 73.08% | 14 | 50.00% | 39 | 40.21% | 42 | 76.36% |
| Total | 20 | 24.39% | 29 | 35.37% | 29 | 37.66% | 15 | 25.86% | 44 | 58.67% | 47 | 67.14% | 20 | 48.78% | 55 | 48.67% | 58 | 80.56% |
| Comments:  Standards that are premised on the economic and technological trends in the energy sector will be more durable and beneficial.  There may be a need for increased flexibility on the gas grid but that can only come from infrastructure investment paid for by those causing the "peakier" electric grid -- electric consumers and generators. Enhanced scheduling will not address the problem of lack of infrastructure.  This is an observation without a proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Actionable if a pipeline offers enhanced services, but not sure all pipelines could provide a standard service.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required.  While this is a true statement in many instances, it is important to note a significant distinction between new gas capacity needed for additional peaker plants to offset renewables, and new capacity needed to serve electric baseload plants that will replace coal in the wake of new federal environmental policies. The needs of these two growth areas in the gas industry will not be the same.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This is an opinion  CAISO agrees, but this is simply an observation.  2b calls for speculation  See the comments to Question No. 14.Q | | | | | | | | | | | | | | | | | | |

**Appendix: Table 6**

Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 35\* (Q21)  Lining up the processes and timeframes that occur within the confirmations/scheduling window to gain efficiency of data exchange. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 20 | 90.91% | 20 | 90.91% | 17 | 77.27% | 11 | 57.89% | 13 | 59.09% | 3 | 15.79% | 2 | 11.11% | 10 | 14.71% | 2 | 15.38% |
| WGQ | 59 | 92.19% | 60 | 92.31% | 50 | 79.37% | 11 | 30.56% | 55 | 88.71% | 17 | 28.81% | 11 | 31.43% | 16 | 21.62% | 7 | 14.58% |
| Total | 79 | 90.80% | 80 | 90.91% | 67 | 77.91% | 22 | 39.29% | 68 | 80.00% | 21 | 26.58% | 13 | 24.53% | 27 | 31.76% | 9 | 14.52% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  While there may be some benefit from waiting until sufficient experience has been gained and analyzed post-April, "sufficient" should not become a means to prolong or avoid entirely the analysis.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  I am not sure what the actual recommendation or observation is. | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 38\* (Q24)  Further standardize methods and processes (for example, standardizing time frames for the different elements of the processes) employed to support confirmations. Standardization could clarify the steps and expectations among parties surrounding default actions that may arise from different time periods in the process. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 19 | 90.48% | 19 | 90.48% | 16 | 76.19% | 9 | 52.94% | 12 | 57.14% | 2 | 13.33% | 1 | 5.88% | 6 | 9.38% | 1 | 9.09% |
| WGQ | 59 | 90.77% | 60 | 92.31% | 49 | 77.78% | 14 | 35.90% | 52 | 78.79% | 12 | 21.05% | 8 | 22.86% | 13 | 18.31% | 4 | 9.30% |
| Total | 78 | 89.66% | 79 | 90.80% | 65 | 76.47% | 23 | 40.35% | 64 | 72.73% | 15 | 20.55% | 9 | 17.31% | 20 | 25.64% | 5 | 9.09% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  AEP believes this action falls squarely within the set of issues this docket seeks to address. It is a core issue that should receive NAESB attention at the earliest possible time. If NAESB members choose not to pursue this line of action voluntarily, AEP believes FERC will provide mandatory direction toward this goal.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  2b) calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 8. Access to Scheduling During Non-business Hours | |
| 21\* (Q8)  Computerized scheduling and confirmations for nomination of subscribed services during non-traditional business hours processes |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 17 | 73.91% | 17 | 73.91% | 17 | 73.91% | 11 | 57.89% | 14 | 63.64% | 10 | 45.45% | 9 | 50.00% | 10 | 14.71% | 5 | 38.46% |
| WGQ | 30 | 49.18% | 35 | 57.38% | 19 | 35.85% | 7 | 15.91% | 45 | 75.00% | 37 | 68.52% | 18 | 64.29% | 22 | 27.50% | 8 | 17.39% |
| Total | 47 | 55.29% | 52 | 61.18% | 36 | 46.75% | 18 | 28.13% | 59 | 71.08% | 48 | 62.34% | 27 | 58.70% | 33 | 36.26% | 13 | 21.67% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Even with computer assistance, after-hours nominations and confirmations would require expensive, round-the-clock scheduling teams to be available at each LDC. This is a non-starter.  Our understanding is that this is a fact-based issue related to one pipeline and one end-user and as such, we have no opinion on questions 1 through 6.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This issue is a specific problem between one Shipper who has subscribed to an enhanced service and the Pipeline offering that service.  If pipelines aren't meeting current standards during non-traditional business hours, then not sure how more standards would resolve the issue. But do agree, scheduling and confirmation should occur during non-traditional business hours per current standards and timelines.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  At GEH Forum, this issue arose out of one shipper/pipeline service dispute and is not appropriate for national standards  Clarification to #3: This issue could benefit from a national standard.  This could be worth following up after April changes can be observed and any lessons learned.  2b and 2c calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 9. Communications | |
| 25\* (Q11)  Communication protocols with LDCs, gas generator operators and natural gas marketing companies |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 13 | 61.90% | 15 | 71.43% | 15 | 68.18% | 15 | 75.00% | 13 | 59.09% | 7 | 33.33% | 5 | 25.00% | 13 | 18.31% | 6 | 60.00% |
| WGQ | 47 | 77.05% | 46 | 75.41% | 38 | 65.52% | 20 | 47.62% | 41 | 68.33% | 20 | 47.62% | 18 | 54.55% | 30 | 34.09% | 11 | 28.21% |
| Total | 60 | 72.29% | 61 | 73.49% | 53 | 65.43% | 35 | 55.56% | 54 | 65.06% | 28 | 35.44% | 23 | 43.40% | 44 | 43.14% | 17 | 34.00% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  We see no issues with current protocols.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  We take no position on this item, as it does not appear to be an item that impacts us.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  Requires Commission action to assure coordination with Order 787 with respect to communication with LDCs, generators and others.  I am not sure what the actual recommendation or observation is.  Write the standards and they shall come, if they want to work with a interstate pipeline regulated by FERC.  PJM's intent here is to stress the importance of establishing formal communication protocol between the ISO/RTO, the interstate pipelines, LDCs and generators which follows the guiding principles of FERC Order 787. These efforts improve the reliability of the electric grid through improved planning processes. | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 9. Communications | |
| 26\* (Q12)  Improve efficiency of critical information sharing (related to items 22 and 25) |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 11 | 50.00% | 13 | 59.09% | 14 | 60.87% | 12 | 70.59% | 10 | 50.00% | 7 | 36.84% | 6 | 33.33% | 11 | 15.94% | 5 | 45.45% |
| WGQ | 44 | 67.69% | 48 | 73.85% | 39 | 61.90% | 24 | 52.17% | 24 | 38.71% | 20 | 33.90% | 18 | 52.94% | 34 | 36.96% | 12 | 27.27% |
| Total | 55 | 62.50% | 61 | 69.32% | 53 | 60.92% | 36 | 56.25% | 34 | 40.96% | 28 | 35.44% | 24 | 46.15% | 46 | 44.23% | 17 | 30.36% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Pipeline EBBs are FERC-approved methods of information sharing. They provide information rapidly to all interested parties simultaneously. If an individual pipeline is not meeting its obligation, that is a matter for FERC. If a party wishes to impose additional obligations on pipelines that is also a FERC matter.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  To the extent Item 26 relates to Item 25, the same Commission action required with respect to Order 787 is a pre-requisite to #26.  Conceptually information is shared now, often in a timely manner. RTOs change dispatch directives in the real time and this limits the amount of time available for proactively sharing reliable information.  Standardizing how flow reductions are communicated would help everyone, particularly organized, who deal across multiple pipeline systems.  Ties in with Question No. 12 | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 35\* (Q21)  Lining up the processes and timeframes that occur within the confirmations/scheduling window to gain efficiency of data exchange. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 20 | 90.91% | 20 | 90.91% | 17 | 77.27% | 11 | 57.89% | 13 | 59.09% | 3 | 15.79% | 2 | 11.11% | 10 | 14.71% | 2 | 15.38% |
| WGQ | 59 | 92.19% | 60 | 92.31% | 50 | 79.37% | 11 | 30.56% | 55 | 88.71% | 17 | 28.81% | 11 | 31.43% | 16 | 21.62% | 7 | 14.58% |
| Total | 79 | 90.80% | 80 | 90.91% | 67 | 77.91% | 22 | 39.29% | 68 | 80.00% | 21 | 26.58% | 13 | 24.53% | 27 | 31.76% | 9 | 14.52% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  While there may be some benefit from waiting until sufficient experience has been gained and analyzed post-April, "sufficient" should not become a means to prolong or avoid entirely the analysis.  2b) Unsure  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  I am not sure what the actual recommendation or observation is. | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 38\* (Q24)  Further standardize methods and processes (for example, standardizing time frames for the different elements of the processes) employed to support confirmations. Standardization could clarify the steps and expectations among parties surrounding default actions that may arise from different time periods in the process. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 19 | 90.48% | 19 | 90.48% | 16 | 76.19% | 9 | 52.94% | 12 | 57.14% | 2 | 13.33% | 1 | 5.88% | 6 | 9.38% | 1 | 9.09% |
| WGQ | 59 | 90.77% | 60 | 92.31% | 49 | 77.78% | 14 | 35.90% | 52 | 78.79% | 12 | 21.05% | 8 | 22.86% | 13 | 18.31% | 4 | 9.30% |
| Total | 78 | 89.66% | 79 | 90.80% | 65 | 76.47% | 23 | 40.35% | 64 | 72.73% | 15 | 20.55% | 9 | 17.31% | 20 | 25.64% | 5 | 9.09% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  AEP believes this action falls squarely within the set of issues this docket seeks to address. It is a core issue that should receive NAESB attention at the earliest possible time. If NAESB members choose not to pursue this line of action voluntarily, AEP believes FERC will provide mandatory direction toward this goal.  2b) Unsure  4) Not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 6 - *Possible Solution: Actionable by NAESB after sufficient experience has been gained and analyzed after April 2016*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 48\* (Q33)  There could be benefits that flow from better matching the efficiency of gas scheduling to the provision of electric-market ancillary services (e.g., addressing short term imbalances, frequency regulation, flexible capacity) by gas generators. Because scheduling of gas is a process and electric ancillary services are products, it would be helpful to analyze what components of the scheduling process could be helpful in accommodating the provision of ancillary service. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 6 | 28.57% | 10 | 47.62% | 7 | 35.00% | 7 | 46.67% | 13 | 68.42% | 12 | 66.67% | 8 | 66.67% | 15 | 20.55% | 7 | 53.85% |
| WGQ | 10 | 15.38% | 17 | 26.56% | 7 | 12.28% | 7 | 15.22% | 43 | 74.14% | 51 | 87.93% | 26 | 81.25% | 47 | 44.76% | 18 | 41.86% |
| Total | 16 | 18.39% | 27 | 31.40% | 14 | 17.95% | 14 | 22.58% | 56 | 71.79% | 64 | 83.12% | 34 | 77.27% | 63 | 52.07% | 26 | 45.61% |
| Comments:  The Commission's request to NAESB should be interpreted within the context of its objectives to enhance gas/electric coordination, market efficiency and reliability.  If gas is going to become the primary generation fuel, the electric industry should consider having the grid operator provide ancillary services and socialize the related costs, which in the case of gas services involve the purchase of premium no-notice services that gas LDCs purchase and pay for today.  The focus needs to be kept on scheduling and confirmation processes until the FERC directive is met.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  There could also be benefits from matching the provision of electric-market ancillary services to the existing gas scheduling processes. NAESB should not be involved in the creation of or promotion of electric-market ancillary services.  A better understanding is needed, but if action occurs, it should also be available to marketers who serve electric load.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  Although actions in this arena could be managed through NAESB processes, AEP believes they likely will require FERC intervention.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO agrees with this observation, which could include future analysis.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

**Appendix: Table 7**

Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services

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| **Table 7 - *Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 57 (Q42)  Could eTag be applied to the gas industry to mimic the significant number of transactions processed on the power grid that use eTag in short processing windows, and if so, can it result in a streamlined scheduling process for natural gas? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 15 | 71.43% | 14 | 70.00% | 13 | 59.09% | 10 | 55.56% | 10 | 55.56% | 10 | 55.56% | 10 | 50.00% | 14 | 19.44% | 4 | 28.57% |
| WGQ | 40 | 65.57% | 43 | 70.49% | 20 | 37.04% | 2 | 4.44% | 43 | 78.18% | 28 | 57.14% | 22 | 70.97% | 35 | 37.63% | 12 | 25.53% |
| Total | 55 | 66.27% | 57 | 69.51% | 33 | 42.86% | 12 | 18.75% | 53 | 71.62% | 39 | 57.35% | 32 | 62.75% | 50 | 46.30% | 16 | 25.81% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  The question includes an assumption that is not supported by fact. Power grid scheduling processes often take longer than gas-side processing.  Question 4: Answer is irrespective of tools.  There are confidentiality issues as well as economical concerns that would need to be considered before pursuing eTag as a viable solution.  A better understanding is needed on the tool and ensure confidentiality of all parties in the chain of flow.  We are interested in advancing discussions on this issue.  (2b) NOT currently. Down the road, further exploration of this concept could develop into efficiencies in scheduling and conformation process.  4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  Could be worth exploring further.  Agree we need a better understanding  2b) calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 7 - *Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 58\* (Q43)  Are there “lessons learned” in the electric industry that could benefit the gas industry as it considers the feasibility of modifying the scheduling process to make it more efficient? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 16 | 72.73% | 16 | 72.73% | 14 | 60.87% | 6 | 40.00% | 12 | 63.16% | 8 | 53.33% | 8 | 50.00% | 13 | 18.31% | 5 | 33.33% |
| WGQ | 12 | 21.43% | 14 | 25.00% | 8 | 16.33% | 4 | 10.81% | 20 | 42.55% | 30 | 76.92% | 14 | 66.67% | 23 | 28.40% | 31 | 67.39% |
| Total | 28 | 35.44% | 30 | 37.97% | 22 | 30.14% | 10 | 18.87% | 32 | 47.76% | 39 | 70.91% | 22 | 59.46% | 37 | 38.95% | 36 | 58.06% |
| Comments:  Cannot provide meaningful answers to an open ended question.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This isn't really an issue as much as a follow-up question to Item 57.  A better understanding is needed as no one outlined what lessons were learned in the electric industry or discussed how they could be relevant to improving the gas scheduling process.  If FERC takes the same path on the gas side as they did on the electric side, there are lessons to be learned. This is the primary point AEP stressed in the first GEH Forum meeting. The electric industry went through this same process in the 1990s and responded much as the gas industry is responding now: that our existing policies and procedures worked fine, and automated processes to facilitate greater efficiencies were not only unneeded, but unachievable. We argued that the cost of such changes would be unbearable for smaller organizations, just as the gas industry is arguing now. FERC declined to accept that response and ordered the electric industry to comply with its intent. That intent was achieved, just as we would anticipate FERC's will regarding greater automation and standardization in the gas industry will likely be achieved in order to achieve greater gas electric harmonization. It may be costly, and it may result in some larger organizations acquiring smaller ones that cannot afford compliance. But the lesson learned is that FERC will likely fulfill its responsibility of protecting the reliability and integrity of the electric grid. To the extent that this responsibility results in changes required of the gas industry, those changes likely will come and resistance likely will only increase the cost of compliance.  Agree a better understanding is needed.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This question provides no proposal for action upon which to submit meaningful answers.  Overall this was the most unclear 'questionnaire' I have ever seen.  Out of scope -- this is just an observation or fact.  ISO-NE comments. Each industry can benefit from "lessons learned". It is not a one way street.  Note for all responses: No action should be pursued without a cost/benefit analysis first.  Agree a better understanding is needed | | | | | | | | | | | | | | | | | | |

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| **Table 7 - *Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 49\* (Q34)  As the electric system continues to evolve into a peakier and a more renewable grid, the need for enhanced scheduling and flexibility from the gas transportation system will grow. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 8 | 42.11% | 9 | 45.00% | 10 | 50.00% | 9 | 52.94% | 10 | 58.82% | 8 | 47.06% | 6 | 46.15% | 15 | 20.55% | 15 | 93.75% |
| WGQ | 12 | 19.35% | 20 | 32.79% | 19 | 33.93% | 6 | 15.00% | 34 | 59.65% | 38 | 73.08% | 14 | 50.00% | 39 | 40.21% | 42 | 76.36% |
| Total | 20 | 24.39% | 29 | 35.37% | 29 | 37.66% | 15 | 25.86% | 44 | 58.67% | 47 | 67.14% | 20 | 48.78% | 55 | 48.67% | 58 | 80.56% |
| Comments:  Standards that are premised on the economic and technological trends in the energy sector will be more durable and beneficial.  There may be a need for increased flexibility on the gas grid but that can only come from infrastructure investment paid for by those causing the "peakier" electric grid -- electric consumers and generators. Enhanced scheduling will not address the problem of lack of infrastructure.  This is an observation without a proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Actionable if a pipeline offers enhanced services, but not sure all pipelines could provide a standard service.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required.  While this is a true statement in many instances, it is important to note a significant distinction between new gas capacity needed for additional peaker plants to offset renewables, and new capacity needed to serve electric baseload plants that will replace coal in the wake of new federal environmental policies. The needs of these two growth areas in the gas industry will not be the same.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This is an opinion  CAISO agrees, but this is simply an observation.  2b calls for speculation  See the comments to Question No. 14. | | | | | | | | | | | | | | | | | | |

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| **Table 7 - *Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 58\* (Q43)  Are there “lessons learned” in the electric industry that could benefit the gas industry as it considers the feasibility of modifying the scheduling process to make it more efficient? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 16 | 72.73% | 16 | 72.73% | 14 | 60.87% | 6 | 40.00% | 12 | 63.16% | 8 | 53.33% | 8 | 50.00% | 13 | 18.31% | 5 | 33.33% |
| WGQ | 12 | 21.43% | 14 | 25.00% | 8 | 16.33% | 4 | 10.81% | 20 | 42.55% | 30 | 76.92% | 14 | 66.67% | 23 | 28.40% | 31 | 67.39% |
| Total | 28 | 35.44% | 30 | 37.97% | 22 | 30.14% | 10 | 18.87% | 32 | 47.76% | 39 | 70.91% | 22 | 59.46% | 37 | 38.95% | 36 | 58.06% |
| Comments:  Cannot provide meaningful answers to an open ended question.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This isn't really an issue as much as a follow-up question to Item 57.  A better understanding is needed as no one outlined what lessons were learned in the electric industry or discussed how they could be relevant to improving the gas scheduling process.  If FERC takes the same path on the gas side as they did on the electric side, there are lessons to be learned. This is the primary point AEP stressed in the first GEH Forum meeting. The electric industry went through this same process in the 1990s and responded much as the gas industry is responding now: that our existing policies and procedures worked fine, and automated processes to facilitate greater efficiencies were not only unneeded, but unachievable. We argued that the cost of such changes would be unbearable for smaller organizations, just as the gas industry is arguing now. FERC declined to accept that response and ordered the electric industry to comply with its intent. That intent was achieved, just as we would anticipate FERC's will regarding greater automation and standardization in the gas industry will likely be achieved in order to achieve greater gas electric harmonization. It may be costly, and it may result in some larger organizations acquiring smaller ones that cannot afford compliance. But the lesson learned is that FERC will likely fulfill its responsibility of protecting the reliability and integrity of the electric grid. To the extent that this responsibility results in changes required of the gas industry, those changes likely will come and resistance likely will only increase the cost of compliance.  Agree a better understanding is needed.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This question provides no proposal for action upon which to submit meaningful answers.  Overall this was the most unclear 'questionnaire' I have ever seen.  Out of scope -- this is just an observation or fact.  ISO-NE comments. Each industry can benefit from "lessons learned". It is not a one way street.  Note for all responses: No action should be pursued without a cost/benefit analysis first.  Agree a better understanding is needed | | | | | | | | | | | | | | | | | | |

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| **Table 7 - *Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 11. Data Issues, Data-Transfer Issues, Field Testing and Modeling | |
| 57 (Q42)  Could eTag be applied to the gas industry to mimic the significant number of transactions processed on the power grid that use eTag in short processing windows, and if so, can it result in a streamlined scheduling process for natural gas? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 15 | 71.43% | 14 | 70.00% | 13 | 59.09% | 10 | 55.56% | 10 | 55.56% | 10 | 55.56% | 10 | 50.00% | 14 | 19.44% | 4 | 28.57% |
| WGQ | 40 | 65.57% | 43 | 70.49% | 20 | 37.04% | 2 | 4.44% | 43 | 78.18% | 28 | 57.14% | 22 | 70.97% | 35 | 37.63% | 12 | 25.53% |
| Total | 55 | 66.27% | 57 | 69.51% | 33 | 42.86% | 12 | 18.75% | 53 | 71.62% | 39 | 57.35% | 32 | 62.75% | 50 | 46.30% | 16 | 25.81% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  The question includes an assumption that is not supported by fact. Power grid scheduling processes often take longer than gas-side processing.  Question 4: Answer is irrespective of tools.  There are confidentiality issues as well as economical concerns that would need to be considered before pursuing eTag as a viable solution.  A better understanding is needed on the tool and ensure confidentiality of all parties in the chain of flow.  We are interested in advancing discussions on this issue.  (2b) NOT currently. Down the road, further exploration of this concept could develop into efficiencies in scheduling and conformation process.  4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  Could be worth exploring further.  Agree we need a better understanding  2b) calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 7 - *Possible Solution: Actionable by NAESB to the extent FERC orders and/or pipelines offer the provision of enhanced scheduling services*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 49\* (Q34)  As the electric system continues to evolve into a peakier and a more renewable grid, the need for enhanced scheduling and flexibility from the gas transportation system will grow. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 8 | 42.11% | 9 | 45.00% | 10 | 50.00% | 9 | 52.94% | 10 | 58.82% | 8 | 47.06% | 6 | 46.15% | 15 | 20.55% | 15 | 93.75% |
| WGQ | 12 | 19.35% | 20 | 32.79% | 19 | 33.93% | 6 | 15.00% | 34 | 59.65% | 38 | 73.08% | 14 | 50.00% | 39 | 40.21% | 42 | 76.36% |
| Total | 20 | 24.39% | 29 | 35.37% | 29 | 37.66% | 15 | 25.86% | 44 | 58.67% | 47 | 67.14% | 20 | 48.78% | 55 | 48.67% | 58 | 80.56% |
| Comments:  Standards that are premised on the economic and technological trends in the energy sector will be more durable and beneficial.  There may be a need for increased flexibility on the gas grid but that can only come from infrastructure investment paid for by those causing the "peakier" electric grid -- electric consumers and generators. Enhanced scheduling will not address the problem of lack of infrastructure.  This is an observation without a proposal for which to submit meaningful answers.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Actionable if a pipeline offers enhanced services, but not sure all pipelines could provide a standard service.  We expect to see an increased reliance on natural gas resources ability to meet dynamic dispatch schedules. Current gas market design may not offer anticipated flexibility required.  While this is a true statement in many instances, it is important to note a significant distinction between new gas capacity needed for additional peaker plants to offset renewables, and new capacity needed to serve electric baseload plants that will replace coal in the wake of new federal environmental policies. The needs of these two growth areas in the gas industry will not be the same.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This is an opinion  CAISO agrees, but this is simply an observation.  2b calls for speculation  See the comments to Question No. 14. | | | | | | | | | | | | | | | | | | |

**Appendix: Table 8**

Possible Solution: A better industry understanding is needed to determine if here are applicable/relevant lessons for improving the gas scheduling process.

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| **Table 8 - *Possible Solution: A better industry understanding is needed to determine if here are applicable/relevant lessons for improving the gas scheduling process.*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmations | |
| 57 (Q42)  Could eTag be applied to the gas industry to mimic the significant number of transactions processed on the power grid that use eTag in short processing windows, and if so, can it result in a streamlined scheduling process for natural gas? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 15 | 71.43% | 14 | 70.00% | 13 | 59.09% | 10 | 55.56% | 10 | 55.56% | 10 | 55.56% | 10 | 50.00% | 14 | 19.44% | 4 | 28.57% |
| WGQ | 40 | 65.57% | 43 | 70.49% | 20 | 37.04% | 2 | 4.44% | 43 | 78.18% | 28 | 57.14% | 22 | 70.97% | 35 | 37.63% | 12 | 25.53% |
| Total | 55 | 66.27% | 57 | 69.51% | 33 | 42.86% | 12 | 18.75% | 53 | 71.62% | 39 | 57.35% | 32 | 62.75% | 50 | 46.30% | 16 | 25.81% |
| Comments:  Clarification for #3: This issue would benefit from a national standard.  The question includes an assumption that is not supported by fact. Power grid scheduling processes often take longer than gas-side processing.  Question 4: Answer is irrespective of tools.  There are confidentiality issues as well as economical concerns that would need to be considered before pursuing eTag as a viable solution.  A better understanding is needed on the tool and ensure confidentiality of all parties in the chain of flow.  We are interested in advancing discussions on this issue.  (2b) NOT currently. Down the road, further exploration of this concept could develop into efficiencies in scheduling and conformation process.  4) not answered because question is flawed.  Clarification to #3: This issue could benefit from a national standard.  Could be worth exploring further.  Agree we need a better understanding  2b) calls for speculation | | | | | | | | | | | | | | | | | | |

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| **Table 8 - *Possible Solution: A better industry understanding is needed to determine if here are applicable/relevant lessons for improving the gas scheduling process.*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 5. Levels of Confirmation | |
| 58\* (Q43)  Are there “lessons learned” in the electric industry that could benefit the gas industry as it considers the feasibility of modifying the scheduling process to make it more efficient? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 16 | 72.73% | 16 | 72.73% | 14 | 60.87% | 6 | 40.00% | 12 | 63.16% | 8 | 53.33% | 8 | 50.00% | 13 | 18.31% | 5 | 33.33% |
| WGQ | 12 | 21.43% | 14 | 25.00% | 8 | 16.33% | 4 | 10.81% | 20 | 42.55% | 30 | 76.92% | 14 | 66.67% | 23 | 28.40% | 31 | 67.39% |
| Total | 28 | 35.44% | 30 | 37.97% | 22 | 30.14% | 10 | 18.87% | 32 | 47.76% | 39 | 70.91% | 22 | 59.46% | 37 | 38.95% | 36 | 58.06% |
| Comments:  Cannot provide meaningful answers to an open ended question.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This isn't really an issue as much as a follow-up question to Item 57.  A better understanding is needed as no one outlined what lessons were learned in the electric industry or discussed how they could be relevant to improving the gas scheduling process.  If FERC takes the same path on the gas side as they did on the electric side, there are lessons to be learned. This is the primary point AEP stressed in the first GEH Forum meeting. The electric industry went through this same process in the 1990s and responded much as the gas industry is responding now: that our existing policies and procedures worked fine, and automated processes to facilitate greater efficiencies were not only unneeded, but unachievable. We argued that the cost of such changes would be unbearable for smaller organizations, just as the gas industry is arguing now. FERC declined to accept that response and ordered the electric industry to comply with its intent. That intent was achieved, just as we would anticipate FERC's will regarding greater automation and standardization in the gas industry will likely be achieved in order to achieve greater gas electric harmonization. It may be costly, and it may result in some larger organizations acquiring smaller ones that cannot afford compliance. But the lesson learned is that FERC will likely fulfill its responsibility of protecting the reliability and integrity of the electric grid. To the extent that this responsibility results in changes required of the gas industry, those changes likely will come and resistance likely will only increase the cost of compliance.  Agree a better understanding is needed.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This question provides no proposal for action upon which to submit meaningful answers.  Overall this was the most unclear 'questionnaire' I have ever seen.  Out of scope -- this is just an observation or fact.  ISO-NE comments. Each industry can benefit from "lessons learned". It is not a one way street.  Note for all responses: No action should be pursued without a cost/benefit analysis first.  Agree a better understanding is needed | | | | | | | | | | | | | | | | | | |

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| **Table 8 - *Possible Solution: A better industry understanding is needed to determine if here are applicable/relevant lessons for improving the gas scheduling process.*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 6. Additional Nomination Cycles | |
| 58\* (Q43)  Are there “lessons learned” in the electric industry that could benefit the gas industry as it considers the feasibility of modifying the scheduling process to make it more efficient? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 16 | 72.73% | 16 | 72.73% | 14 | 60.87% | 6 | 40.00% | 12 | 63.16% | 8 | 53.33% | 8 | 50.00% | 13 | 18.31% | 5 | 33.33% |
| WGQ | 12 | 21.43% | 14 | 25.00% | 8 | 16.33% | 4 | 10.81% | 20 | 42.55% | 30 | 76.92% | 14 | 66.67% | 23 | 28.40% | 31 | 67.39% |
| Total | 28 | 35.44% | 30 | 37.97% | 22 | 30.14% | 10 | 18.87% | 32 | 47.76% | 39 | 70.91% | 22 | 59.46% | 37 | 38.95% | 36 | 58.06% |
| Comments:  Cannot provide meaningful answers to an open ended question.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  This isn't really an issue as much as a follow-up question to Item 57.  A better understanding is needed as no one outlined what lessons were learned in the electric industry or discussed how they could be relevant to improving the gas scheduling process.  If FERC takes the same path on the gas side as they did on the electric side, there are lessons to be learned. This is the primary point AEP stressed in the first GEH Forum meeting. The electric industry went through this same process in the 1990s and responded much as the gas industry is responding now: that our existing policies and procedures worked fine, and automated processes to facilitate greater efficiencies were not only unneeded, but unachievable. We argued that the cost of such changes would be unbearable for smaller organizations, just as the gas industry is arguing now. FERC declined to accept that response and ordered the electric industry to comply with its intent. That intent was achieved, just as we would anticipate FERC's will regarding greater automation and standardization in the gas industry will likely be achieved in order to achieve greater gas electric harmonization. It may be costly, and it may result in some larger organizations acquiring smaller ones that cannot afford compliance. But the lesson learned is that FERC will likely fulfill its responsibility of protecting the reliability and integrity of the electric grid. To the extent that this responsibility results in changes required of the gas industry, those changes likely will come and resistance likely will only increase the cost of compliance.  Agree a better understanding is needed.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This question provides no proposal for action upon which to submit meaningful answers.  Overall this was the most unclear 'questionnaire' I have ever seen.  Out of scope -- this is just an observation or fact.  ISO-NE comments. Each industry can benefit from "lessons learned". It is not a one way street.  Note for all responses: No action should be pursued without a cost/benefit analysis first.  Agree a better understanding is needed | | | | | | | | | | | | | | | | | | |

**Appendix: Table 9**

Possible Solution: A better industry understanding is needed to determine if there are issues that could be identified for later policy review

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| **Table 9 - *Possible Solution: A better industry understanding is needed to determine if there are issues that could be identified for later policy review*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 41\* (Q26)  Would the ability to reserve current contracted primary FT capacity for use tomorrow, address issues related to inability to use FT contracts to serve intermittent electric generation? |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 2 | 11.76% | 6 | 35.29% | 7 | 43.75% | 6 | 50.00% | 7 | 46.67% | 7 | 63.64% | 5 | 50.00% | 15 | 20.55% | 5 | 41.67% |
| WGQ | 5 | 7.81% | 5 | 7.81% | 7 | 11.86% | 5 | 11.36% | 28 | 49.12% | 50 | 90.91% | 23 | 74.19% | 50 | 46.30% | 11 | 23.40% |
| Total | 7 | 8.54% | 11 | 13.41% | 14 | 18.42% | 11 | 19.30% | 35 | 47.95% | 58 | 86.57% | 28 | 68.29% | 66 | 53.23% | 16 | 26.67% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  Assuming the reason for not using FT for intermittent generators is that their use is not consistent with the FT tariff service rights. If day ahead nominations could also lock in flexibility required, then this should be explored.  The CAISO relies heavily on gas-fired generation as the primary backstop for renewable resources so this consideration would be valuable to our market. | | | | | | | | | | | | | | | | | | |

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| **Table 9 - *Possible Solution: A better industry understanding is needed to determine if there are issues that could be identified for later policy review*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 44\* (Q29)  Volumetric service to support electric generation akin to SGS (Small Generation Service) on a best-efforts basis may meet expressed needs. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 5 | 25.00% | 5 | 29.41% | 4 | 26.67% | 4 | 33.33% | 12 | 80.00% | 11 | 78.57% | 7 | 70.00% | 15 | 20.55% | 12 | 80.00% |
| WGQ | 6 | 9.52% | 6 | 9.52% | 5 | 8.93% | 4 | 11.76% | 25 | 50.00% | 52 | 92.86% | 21 | 75.00% | 39 | 40.21% | 17 | 39.53% |
| Total | 11 | 13.10% | 11 | 13.58% | 9 | 12.50% | 8 | 17.02% | 37 | 56.06% | 64 | 90.14% | 28 | 73.68% | 55 | 48.67% | 29 | 49.15% |
| Comments:  This item does not meet the FERC directive to explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  Weighing future electric generation needs against historic service is a futile and pointless exercise. The new gas-fired generation that will be constructed as a means to comply with federal environmental policy will not be a fleet of peaker plants. We are entering an age of gas-fired baseload generation unlike anything we have previously observed. Until FERC resolves the model disconnect between the electric and gas industries, appropriate service for electric generators likely will not be available as we build out for environmental reasons.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  This could also be discussed further in a different forum.  See comments to Question No. 14 | | | | | | | | | | | | | | | | | | |

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| **Table 9 - *Possible Solution: A better industry understanding is needed to determine if there are issues that could be identified for later policy review*** | | | | | | | | | | | | | | | | | | | |
| Category | | 1a) Within the scope of the Commission request | | 1b) Within NAESB’s scope | | 2a) Pursuing this would meet the Board and Commission’s requests | | 2b) This issue can be economically pursued | | 2c) There is benefit to gaining experience after April 1st before pursuing | | 3) This issue would not benefit from Standardization for specific reasons… | | 4) This issue would be better addressed by tools… | | 5) This issue has policy implications | | 6) This is a statement of fact | |
| 12. New Service Offerings | |
| 48\* (Q33)  There could be benefits that flow from better matching the efficiency of gas scheduling to the provision of electric-market ancillary services (e.g., addressing short term imbalances, frequency regulation, flexible capacity) by gas generators. Because scheduling of gas is a process and electric ancillary services are products, it would be helpful to analyze what components of the scheduling process could be helpful in accommodating the provision of ancillary service. |  | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y | # Y | %Y |
| WEQ | 6 | 28.57% | 10 | 47.62% | 7 | 35.00% | 7 | 46.67% | 13 | 68.42% | 12 | 66.67% | 8 | 66.67% | 15 | 20.55% | 7 | 53.85% |
| WGQ | 10 | 15.38% | 17 | 26.56% | 7 | 12.28% | 7 | 15.22% | 43 | 74.14% | 51 | 87.93% | 26 | 81.25% | 47 | 44.76% | 18 | 41.86% |
| Total | 16 | 18.39% | 27 | 31.40% | 14 | 17.95% | 14 | 22.58% | 56 | 71.79% | 64 | 83.12% | 34 | 77.27% | 63 | 52.07% | 26 | 45.61% |
| Comments:  The Commission's request to NAESB should be interpreted within the context of its objectives to enhance gas/electric coordination, market efficiency and reliability.  If gas is going to become the primary generation fuel, the electric industry should consider having the grid operator provide ancillary services and socialize the related costs, which in the case of gas services involve the purchase of premium no-notice services that gas LDCs purchase and pay for today.  The focus needs to be kept on scheduling and confirmation processes until the FERC directive is met.  Question 2b: More information is needed to form an opinion. Question 4: Answer is irrespective of tools.  There could also be benefits from matching the provision of electric-market ancillary services to the existing gas scheduling processes. NAESB should not be involved in the creation of or promotion of electric-market ancillary services.  A better understanding is needed, but if action occurs, it should also be available to marketers who serve electric load.  We are interested in advancing discussions on this issue and believe conversations from the NAESB GEH forum could be revisited at a separate forum.  Although actions in this arena could be managed through NAESB processes, AEP believes they likely will require FERC intervention.  2c) answer of yes does not mean respondent considers the issue to be within scope. 4) not answered because question is flawed.  The CAISO agrees with this observation, which could include future analysis.  2b calls for speculation | | | | | | | | | | | | | | | | | | |

1. The survey can be found through the following hyperlink: <https://www.naesb.org/pdf4/geh032416survey.docx> [↑](#footnote-ref-1)
2. The report can be found through the following hyperlink: <https://www.naesb.org//pdf4/geh_report_040516.docx> [↑](#footnote-ref-2)