

Submitted Via Email (naesb@naesb.org)

October 5, 2026

North American Energy Standards Board
1415 Louisiana Street, Suite 3460
Houston, Texas 77002

Re: Comments and Suggestions on the 2027 Annual Plan

North American Energy Standards Board:

The American Gas Association (“AGA”) appreciates the opportunity to provide these comments and suggestions in response to the September 14, 2026 Notice on the Preparation of the 2027 Annual Plans: Meeting Announcements, Agendas and Call for Comments. AGA supports efforts to improve coordination, communications, and business practices to ensure reliability. The 2027 Annual Plans for the Wholesale Gas Quadrant (“WGQ”), Wholesale Electric Quadrant (“WEQ”), and the Retail Markets Quadrant (“RMQ”) should continue to highlight the need for operating reliability for the natural gas system and the electric sector. AGA requests that the Annual Plan Subcommittees consider including the following items in the appropriate annual plans.

The 2026 WGQ Annual Plan includes Provisional Activity No. 3, which discusses the development and/or modification of business practice standards related to reliability. Specifically, Provisional Activity No. 3 in the 2026 WGQ Annual Plan states:

Upon a request or as directed by NAESB Board or a relevant jurisdictional entity, consider developing and/or modifying business practice standards that reflect best practices that will provide stronger operating reliability from production/supply/transport, for example, during extreme weather conditions, and more clear communications and business processes around force majeure declarations during critical operating periods.

The WEQ and RMQ 2026 Annual Plans include similar items. Provisional Activity No. 3(a) in the 2026 WEQ Annual Plan states:

Upon a request or as directed by NAESB Board or a relevant jurisdictional entity, consider developing and/or modifying business practice standards that reflect best practices that will provide stronger operating reliability from production/supply/transport during extreme weather conditions and more clear communications and business processes around force majeure declarations during critical operating periods.

Provisional Activity No. 7 in the 2026 RMQ Annual Plan states:

Upon a request or as directed by NAESB Board or a relevant jurisdictional entity, consider developing and/or modifying business practice standards that reflect best practices that will provide stronger operating reliability from production/supply/transport, for example,

during extreme weather conditions, and more clear communications and business processes around force majeure declarations during critical operating periods.

AGA requests that provisional items quoted above from the 2026 Annual Plans be carried over to the respective WGQ, WEQ and RMQ 2027 Annual Plans. AGA made similar requests in 2025 for the 2026 Annual Plans¹ and in 2024 for the 2025 Annual Plans. AGA supports efforts related to improving coordination, communications, and business practices to ensure reliability, and maintaining this provisional activity in the annual plan will ensure that this issue is ready to be worked on in 2027 if a request is made or as directed by the NAESB Board or a relevant jurisdictional entity.

Notably, in 2025 the National Petroleum Council (“NPC”), at the request of the Secretary of Energy Chris Wright,² issued two reports that focus on permitting³ and gas-electric coordination.⁴ Each report discusses reliability; however, as pertinent to this letter, the gas-electric coordination report includes ten recommendations intended to improve the reliability of the gas and electric systems. The report states that the energy system has a strong track record of reliability and adaptability;⁵ and the recommendations are intended to maintain the health of the systems. The report reinforces the importance of continued attention to gas-electric coordination and reliability activities in 2027.

Additionally, as noted by the Federal Energy Regulatory Commission, North American Electric Reliability Corporation, and its Regional Entities in the September 2026 report, titled “Winter 2026 Arctic Events A System Performance Review,”⁶ related to Winter Storm Fern, there has been improvements in reliability efforts. Specifically, the report stated, among other things, that:⁷

- “Across the natural gas supply chain, entities reported engaging in numerous activities both during and in advance of the winter season and the Winter 2026 Arctic Cold Period to improve resilience during severe cold weather.”
- “Pipelines and other natural gas entities frequently communicated with relevant electric entities to improve situational awareness during the event.”
- “Communication and coordination both within the natural gas system and with electric entities continued to build on improvements made in response to Winter Storm Uri.”
- AGA’s Natural Gas Readiness Forum also provides the industry an opportunity to periodically communicate, educate, and prepare for high natural gas demand periods throughout the year.

¹ Letter of AGA titled “Comments and Suggestions on the 2026 Annual Plan,” dated October 2, 2025, and Letter of AGA titled, “Comments/Suggestions on the 2025 Annual Plan,” dated October 4, 2024, both available at https://www.naesb.org/annual_plan.asp.

² DOE letter to NPC requesting two reports on permitting and gas electric coordination, dated June 30, 2025, available at https://www.npc.org/reports/2025-bottleneck-to-breakthrough/files/GE_Perm_Req_Ltr.pdf (last visited October 5, 2026).

³ NPC, “Bottleneck to Breakthrough: A Permitting Blueprint to Build,” 2025, available at <https://www.npc.org/reports/2025-bottleneck-to-breakthrough/> (last visited October 5, 2026).

⁴ NPC, “Reliable Energy: Delivering on the Promise of Gas-Electric Coordination,” 2025, available at <https://www.npc.org/reports/2025-reliable-energy/> (last visited October 5, 2026).

⁵ *Id.* at p. 4-1.

⁶ Federal Energy Regulatory Commission, North American Electric Reliability Corporation, and its Regional Entities “Winter 2026 Arctic Events A System Performance Review,” dated September 10, 2026, available at <https://www.ferc.gov/media/report-system-performance-review-winter-2026-arctic-cold-period> (last visited October 5, 2026).

⁷ *Id.* at p. 30.

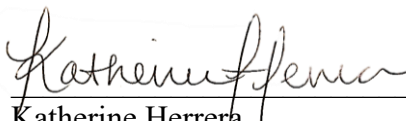
The report also stated that sustained reliability depends on a variety of factors and “[l]ooking ahead, continuing to strengthen system readiness—across planning, fuel assurance, and cold weather operating practices—will be essential to enhancing reliability during future multiday arctic cold events.”⁸ Therefore, reliability is a continuous and evolving effort.

The American Gas Association respectfully requests that the Annual Plan Subcommittees consider these comments and suggestions as the 2027 Annual Plans are finalized. AGA looks forward to continuing to work with NAESB on these important matters.

Respectfully submitted,



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⁸ *Id.* at p 36.