



Submitted Via Email (naesb@naesb.org)

October 4, 2024

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

RE: Comments/Suggestions on the 2025 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 4, 2024 Notice on the Preparation of the 2025 Annual Plans: Meeting Announcements, Agendas and Call for Comments. AGA requests that the Annual Plan Subcommittees consider including three items in the appropriate annual plans.

First, AGA is appreciative of the Wholesale Gas Quadrant (“WGQ”) Contracts Subcommittee’s efforts on the Renewable Natural Gas (“RNG”) Addendum to the NAESB Base Contract for Sale and Purchase of Natural Gas, adopted on March 8, 2023. AGA requests that the WGQ Annual Plan Subcommittee add updating the RNG Addendum to the WGQ Contracts Subcommittee work items. In the 2024 WGQ Annual Plan updating the RNG Addendum is a provisional item. On July 12, 2023, the Environmental Protection Agency (“EPA”) issued the final rule regarding the Renewable Fuel Standard (“RFS”) Program for 2023-2025 which finalized Biogas Regulatory Reform Rule (“BRRR”) regulations that include, but are not limited to, new requirements related to Renewable Identification Number (“RIN”) generation, assignment and separation, and proposing new regulatory requirements related to registration and recordkeeping. The compliance deadline for all parties to comply with the BRRR provisions is January 1, 2025. The parties impacted by the BRRR regulations that produce biogas, RNG, or renewable compressed natural gas and renewable liquified natural gas under the RFS program have been reviewing their contracts including for any required amendments. *See Renewable Fuel Standard (RFS) Program: Standards for 2023-2025 and Other Changes*, 88 Fed. Reg. 44468 (July 12, 2023). Since the BRRR regulations were finalized after the RNG Addendum was adopted, it is appropriate for the WGQ Contracts Subcommittee to perform a review of the BRRR regulations to determine if further action is necessary to update the RNG Addendum, and if an update is required, commence work on updates to the RNG addendum, as may be necessary and appropriate.

Second, AGA continues to support efforts related to improving coordination, communications, and business practices to ensure reliability. In the 2024 WGQ Annual Plan, Item No. 4 discusses the development and/or modification of business practice standards, upon request, in response to the FERC-NERC-Regional Entity Staff Report: February 2021 Cold

Weather Outages in Texas and the South Central United States or from the final report on Winter Storm Elliot. Furthermore, the 2024 WGQ Annual Plan includes Provisional Activity No. 1 related to the standards development resulting from the NAESB Gas-Electric Harmonization Forum. AGA supports continued efforts at NAESB to develop and/or modify business practice standards, as needed, in response to the FERC-NERC-Regional Entity Staff Report: February 2021 Cold Weather Outages in Texas and the South Central United States, from the final report on Winter Storm Elliot, or from the NAESB Gas-Electric Harmonization Forum Report. AGA supports improving coordination, communications, and business practices that would help ensure reliability and resilience of the gas and electric systems. Therefore, AGA recommends including Item No. 4 and Provisional Activity No. 1 from the 2024 WGQ Annual Plan in the 2025 Annual Plans for the WGQ, Wholesale Electric Quadrant, and the Retail Markets Quadrant, *i.e.*, carry those items over from 2024 to 2025.

Third, in addition to the foregoing, the 2025 Annual Plans for the WGQ, Wholesale Electric Quadrant, and the Retail Markets Quadrant should also further highlight the need for operating reliability for the gas system and the electric sector. As noted above, the 2024 Annual Plan includes Item No. 4 which discusses the development and/or modification of business practice standards related to reliability, which should continue in 2025. AGA requests that the following matter be added to Item No. 4 for 2025:

Develop and/or modify 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.

Similar to the item discussed above, AGA supports efforts related to improving coordination, communications, and business practices to ensure reliability. The additional sub-item for Item No. 4 will ensure that this issue is continued to be worked on at NAESB in 2025.

The American Gas Association respectfully requests that the Annual Plan Subcommittees consider these comments and suggestions as the 2025 Annual Plans are finalized. AGA looks forward to continuing to work with NAESB on these important matters.

Respectfully submitted,



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