

1. Discuss 2024 WEQ Annual Plan Item 6 / 2024 WGQ Annual Plan Item 4 / 2024 RMQ Annual Plan Item 3 – Gas-Electric Market Coordination:
 - *Review and modify the Gas / Electric Coordination Business Practice Standards and any corresponding standards to improve communication among the operators of production facilities (producers, gatherers, processors) and pipeline and storage facilities and the timely dissemination of this coordinated communication from the these facilities to and from relevant natural gas infrastructure entities, BAs, shippers, and end-use customers (i.e., Local Distribution Companies) as needed to enhance situational awareness during extreme cold weather events without endangering sensitive commercial information*
 - *Develop and/or modify business practice standards for the communication of information about operational issues (e.g. location, estimated duration of outage) to and from BAs, LDCs, and shippers in anticipation of critical notices, OFOs or force majeure notices during extreme weather*
 - *Develop and/or modify business practice standards for the communication of aggregated volume data or confirmed scheduled quantities for key upstream receipt points on the pipeline system during extreme cold weather events without endangering sensitive commercial information*

JOINT Comments: California ISO (CAISO), Independent Electricity System Operator (IESO), ISO New England (ISO-NE), Midcontinent ISO (MISO), New York ISO (NYISO), PJM, and Southwest Power Pool (SPP)

RE: NAESB WEQ-WGQ-RMQ BUSINESS PRACTICES SUBCOMMITTEES

The joint commenters appreciate the collaborative opportunity to work with NAESB and the natural gas industry to effectively enhance critical operational communications. It is important to recognize that substantial progress has been achieved over the past decade through the establishment of critical relationships between the ISO/RTO's and the interstate gas pipelines, as well as local gas distribution companies serving generation within their respective regions. These relationships have fostered more effective cross-coordination and the exchange of public and non-public (FERC Order 787) operational information, significantly enhancing situational awareness for both the gas and electric sectors. Recognizing the continuous need for efficiency gains and overall improvements in processes, the suggested communication enhancements are aimed to address these areas. It is essential to note, the suggested recommendations are not finalized but are proposed measures which are open for discussion and collaboration to further enhance gas and electric system reliability.

Simultaneously, ongoing discussions between various ISO/RTO's, interstate and intrastate pipelines on enhanced communications can be leveraged to explore potential options. In alignment with the objective of this effort, additional recommendations have been included to address improved communications during critical periods between upstream and downstream producers and users of natural gas sector. From the perspective of the IRC Electric Gas Coordination Task Force, given the increased reliance on natural gas fired generation in certain regions, improved communication in this sector is crucial to enhancing awareness of potential gas supply risks. This collaborative approach underscores the commitment to advancing the reliability of

both the gas and electric systems through joint efforts and communication enhancements.

A. Suggested Communication Enhancements

a. Upstream Natural Gas Entities (Production, Processing, Gathering)

i. Production

Referencing recommendation 5 from the Winter Storm Elliot report and subsequent NAESB WEQ-WGQ-RMQ Annual Plans, gas production facility operators are urged to proactively share information about adverse impacts on their operations during extreme weather events. Understanding the complex nature of the gas production network and the inherent challenges in providing advanced or emergent notices, especially with a level of accuracy regarding lost production volumes and discrete downstream impacts. With this acknowledgement, a potentially more effective approach would involve implementing a communication process not too dissimilar from a weather alert.

As an example, during periods of forecasted colder temperature conditions, producers could issue a “Level 1 Watch” notice indicating the potential risk of supply loss and higher demand within a geographic region based on historical observations during similar periods. This approach could resemble a Flood watch issued by the National Weather Service which indicates where and when conditions are conducive for impacts to occur even if they are not currently happening.

A “Level 2 Warning” would be the subsequent notice issued should actual production and/or pressure losses occur. These notices would also be posted for the respective geographic regions potentially impacted.

Neither of these notice levels would require the provision of specific volumes or any downstream impacts which are likely unknown by the producer(s). Even without this specificity, the availability of these watch/warning notices can provide a preliminary indication that the gas supply may be at risk.

ii. Processing

In instances where this is not already implemented, we may consider creating a communication framework from natural gas processing facilities to downstream natural gas transporters and users when a loss of processing capacity occurs. This framework would also encompass an assessment

of the potential supply loss impacts and estimated duration of event. Similar to the previously mentioned weather-like communication model, this approach aims to enhance transparency and awareness in the gas supply chain, allowing for timely responses and mitigations in the face of processing capacity challenges

iii. Gathering

In instances where this is not already implemented, to enhance coordination and communication between natural gas gathering pipelines, downstream natural gas transporters, and users, we may consider creating a communication framework. This framework would be activated when a planned or unplanned loss of gathering system capacity occurs, providing downstream entities with an assessment of the potential supply loss impacts and estimated duration of the event.

Additionally, with the increasing use of electrically driven gas compressor stations in certain regions and in instances where it has not already been implemented, we may consider gathering information regarding critical gas infrastructure subject to a loss of electricity. Upon receipt of the critical gas facilities, information should be shared with their respective electric service providers, ensuring natural gas infrastructure is deemed to be critical and not connected to or located on any predefined electrical circuits subject to load shedding. A review and confirmation of critical gas facilities should be done annually to ensure the information is current. This proactive measure aims to minimize the risk of these facilities from losing power and contributes to the overall system reliability during challenging conditions.

b. Interstate (and Intrastate) Natural Gas Pipelines

i. Improved Locational Information in Critical Notices (Primarily emergent issues)

Establish NAESB standard element(s) into the existing critical notice framework to enhance communication regarding the location that the critical event covers. The recommendation, in instances this has not already been implemented, is to introduce new elements that may include pipeline(s) impacted, capacity impact(s), inset of map showing the geographic location, the state, county and/or city where any emergent event and/or Force Majeure is declared. This addition would improve the clarity for downstream entities regarding the event's location. Currently, practices vary among pipelines: for instance, if a gas compressor station experiences

a failure, the notice may only identify the compressor station's name. While it is possible to use additional means to attempt to determine the facility's location, it would be far more efficient to have that included with the notice.

Additionally, to the extent there is a Force Majeure or other emergent event declared by the pipeline, the critical notice can include a list of generators directly served by the pipeline which fall within the zone of potential impact. There are legitimate market concerns from the pipelines with providing specific generator impact assessments, however the request here is that no specific generator impact will be provided but rather just a list of units served in the area of risk. Language could be added to this data to indicate the provision of this information in no way is meant to convey unit availability given other options that may be available to the generator.

Recognizing that each gas company has its own tariffs and specifying notice requirements, we recommend additional information to the notice whenever possible. This proactive step is crucial for maintaining downstream system reliability for both the gas and electric systems.

ii. More consistent approach of provision of Gas-Electric Coordination information

Currently, the Enbridge pipelines include a "Gas-Electric Coordination" section on their respective EBBs/website main menus. Within this section Enbridge consolidates and provides gas nomination data for all gas fired generators that they serve directly. They also segregate by ISO/RTO within their footprint. This nomination data is updated every nomination cycle. The suggested approach here would be for this to be adopted by all interstate pipelines. This segment could then be leveraged to provide additional data (to be determined) for communication to the ISO/RTO's as necessary. This could include, as an example, notices that are more pertinent compared to the broader notice postings.