



AMERICAN PUBLIC GAS ASSOCIATION

June 7, 2024

Submission via naesb@naesb.org

RE: Comments in Response to NAESB Joint WEQ, WGQ, RMQ Business Practices Subcommittees Informal Comment Period

The American Public Gas Association (APGA) has gathered responses to the questions posed by the NAESB Joint WEQ, WGQ, RMQ Business Practices Subcommittees during the informal comment period pertaining to a potential communication gap and the development of standards intended to improve gas-electric market coordination communications during critical events. This is in response to 2024 WEQ Annual Plan Item 6 / 2024 WGQ Annual Plan Item 4 / 2024 RMQ Annual Plan Item 3. These comments aim to bring awareness regarding the gap in communications between various market participants leading up to and during cold weather events, specifically on circumstances that might result in force majeure.

APGA is the trade association for more than 730 communities across the U.S. that own and operate their retail natural gas distribution entities. They include not-for-profit gas distribution systems owned by municipalities and other local government entities, all locally accountable to the citizens they serve. Public gas systems focus on providing safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.

APGA's members have confirmed that there is a communication gap that should be addressed. They have also voiced that the best way to address this communication gap is through standards set by NAESB.

Below are specific issues or insights that have been brought to our attention concerning communication gaps and how they could be improved. The specific items are as follows:

1. On occasion, it seems that some parties calling force majeure are reluctant to share certain information about the force majeure event with impacted counterparties. To ensure contracts are appropriately executed and the energy supply chain operates as efficiently and resiliently as possible, this information sharing gap should be addressed.

2. This past winter, the Transco pipeline implemented some helpful communication protocol by regional area for larger customers before, during, and after significant weather events. This was found to be helpful, and if practical, other pipelines could implement this as well.
3. APGA believes it would be helpful if pipelines and others in the energy value chain had standardized procedures for issuing notices and what type of information such notices must contain.
4. Timely notices are frequently seen for force majeure and other related communications from counterparties. To ensure awareness for all parties, an ICE platform or a similar platform may be a helpful communication tool to provide force majeure notices.

APGA would need additional time to be able to produce specific proposals or to review and give feedback if there are proposals from other customers and shippers. APGA would be happy to work with others to develop or be a part of any working group conversations. However, additional time is likely needed to develop specific proposals. Overall, in forming any proposal, it is important that NAESB ensure that when addressing these communications, public gas systems are not unduly burdened.

Thank you for your consideration of these comments. For questions regarding this submission, please do not hesitate to contact Sydney Novoa (snovoa@apga.org).

Respectfully submitted,

American Public Gas Association