

## Informal Comments

**Quadrant:** Joint WGQ, WEQ, RMQ

**Subcommittee:** Coordinate Interchange Scheduling Subcommittee

**Request:** NAESB Joint WEQ, WGQ, RMQ Business Practices Subcommittees Informal Comment Period

**Submitted By:** IESO, ISONE, NYISO, MISO, PJM, and SPP

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The joint parties appreciate the considerations of the previously submitted comments, and the efforts undertaken to resolve the challenges associated with determining delivery impacts through pipeline bulletin boards, emails, and verbal communications regarding system conditions.

As identified in the Gap whitepaper<sup>1</sup>, information regarding the production, gathering, and processing of natural gas remains an unresolved topic of discussion. We proposed approaches that may provide additional clarity through a communication framework, however no standards to address this gap currently exist. We offer several approaches that may address some of the issues outlined.

Regarding these two bullets, we suggest continued exploration of proposals:

- There is a lack of communication during extreme weather events of upstream supply issues, including invocations of force majeure, by parties with direct knowledge to critical stakeholders who are not part of the transactional and operational chain (e.g., Pipeline Operators, RTO/ISO). Consistent and ongoing communication primarily only occurs between parties with operational and/or contractual connections therefore, only directly affected parties understand their real-time positions and situations. except in instances where such information is part of pipeline Critical Notices.
- Because many end users purchase their gas from various parties and from aggregated pooling points rather than directly from producers, and such gas can be transacted multiple times (i.e. “daisy-chain”), certain transactional communications even ones as critical as force majeure, may take significant time (e.g., days) for information to flow through to all stakeholders.

This group could establish standardized data and formatting, as well as a centralized location for posting availability information. This effort would enable the sharing of operational issues affecting the production, gathering, and processing of natural gas, thereby enhancing system reliability for both the gas and electric systems.

With respect to both bullets, the first step is developing standard posting data from those parties similar to the successful implementations undertaken by the pipeline operators. During development of the standardized information, a data key could be utilized to address the daisy chain issues noted in bullet

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<sup>1</sup> [https://www.naesb.org/pdf4/weq\\_wgq\\_rm\\_q\\_bps050924reqcom\\_a1.docx](https://www.naesb.org/pdf4/weq_wgq_rm_q_bps050924reqcom_a1.docx)

two. It was indicated that parties must determine which downstream transactions are impacted by production declines, in part due to pooling of gas at hubs.

This posting of information could be through the NGInsight tool previously presented by Argonne National Labs or any other platform for near-real time communication, or through the formation of a NAESB Alert Portal. NAESB currently has a model to host a repository of electric industry data such as contact information, roles (e.g. transmission operator, marketer, generator owner, etc.), generation injection points, and delivery points.

To enhance collaboration between the gas and electric sectors, it would be beneficial to extend this communication to include all relevant stakeholders. By incorporating upstream supply information into a common communication channel, we can ensure that both sectors have the necessary information to maintain system reliability. This proactive approach will help us address potential issues more effectively and support the coordination efforts between gas and electric industries during critical periods.