**From:** Adrian Harris, MISO
**Sent:** Monday, June 10, 2024 6:55 AM
**Subject:** Questions submittal

**1.       There is a lack of communication during extreme weather events concerning 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, RTOs/ISOs).  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 situation, except in instances where such information is part of a critical notice issued by a pipeline operator.**

a.      Is this a communication gap that should be addressed? Yes

b.      Is this a communication gap that can be addressed through standards? If not, is there a more appropriate venue or process? Yes, there are already established standards in place that will address some of the identified gaps.

c.      Are there any barriers to sharing such information? Not to MISO’s Knowledge, No.

d.      Please provide any specific proposals, including draft standards language. Currently, we do not have any specific proposals or draft standards language to provide.

**2.      Because many end users purchase natural gas from various parties rather than directly from producers, and such natural 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.**

a.      Is this a communication gap that should be addressed? Yes

b.      Is this a communication gap that can be addressed through standards? If not, is there a more appropriate venue or process? NASEB already has a pre-defined framework in place, which producers might leverage based on previous standard creation efforts.

c.      Are there any barriers to sharing such information? Yes, there have been concerns from the Securities Exchange Commission, Commodity Futures Trading Commission, and issues with intraday distortions regarding transactional communication. Perhaps leveraging NG Insights or a common platform could make this communication readily available and protected.

d.      Please provide any specific proposals, including draft standards language. Currently, we do not have any specific proposals or draft standards language to provide.

**3.      Certain interstate pipeline operator informational postings lack specific location information that could help parties better understand the area covered by the posting.**

\* Yes, we could create maps that overlay generation facilities, county pipeline locations, and state-identified areas of concern. This would help provide more direct local insights during critical events. Pipelines should be clearly identified on maps for both state and county areas.

a.      Draft standards language related to this area has been proposed in the Interstate Natural Gas Pipeline Draft Standards Work Paper:   Are there any further revisions or modifications that are needed to the proposed draft language? We have nothing additional beyond what is listed in the attached workpaper. We believe the listed items are sufficient, but implementing an aggregate defining system for the industry could be helpful during critical events.

b.      Please provide any additional specific proposals, including draft standards language. No additional.  The workpaper addresses what is being proposed.

**4.**            **There may be limited stakeholder distribution and/or unclear and/or no communication of recovery timelines and expectations when supply is lost due to weather and/or operational disruptions.  For example, interstate natural gas pipeline operators may observe a difference between shipper nominations and actual gas flows or system pressure changes.  While the difference might indicate supply disruptions upstream, the difference does not indicate what is occurring or the anticipated length of the event.**

a.      Is this a communication gap that should be addressed? Yes

b.      Is this a communication gap that can be addressed through standards? If not, is there a more appropriate venue or process? NASEB already has a pre-defined framework in place, which producers might leverage based on previous standard creation efforts.

c.      Are there any barriers to sharing such information? Yes

d.      Please provide any specific proposals, including draft standards language. Currently, we do not have any specific proposals or draft standards language to provide.

**5.      There may be limited and/or delayed communication from end-users to pipeline operators of non-ratable or other consumption patterns that deviate from contractual commitments.**

a.      Is this a communication gap that should be addressed? Does not apply to MISOs operation, but we would support an enhanced communication from end-user to the pipeline operators.

b.      Is this a communication gap that can be addressed through standards? If not, is there a more appropriate venue or process? Pipeline operators would best identify what those potential gaps are.

c.      Are there any barriers to sharing such information? Not to MISO’s knowledge.

d.      Please provide any specific proposals, including draft standards language. Currently, we do not have any specific proposals or draft standards language to provide.

**6.      There may be limited understanding of pipeline operator-initiated confirmation and/or nomination reductions that are not captured in operational flow orders and/or underperformance notices.**

a.      Is this a communication gap that should be addressed? This would be better addressed by pipeline operators.

b.      Is this a communication gap that can be addressed through standards? If not, is there a more appropriate venue or process? Possibly, but would direct question to the pipeline operators for better explanation.

c.      Are there any barriers to sharing such information? Pipeline operators may be better equipped to address specific barriers to address information sharing.

d.      Please provide any specific proposals, including draft standards language. Currently, we do not have any specific proposals or draft standards language to provide.

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