



February 17, 2017

North American Energy Standards Board  
801 Travis Street  
Suite 1675  
Houston, TX 77002

Re: Request R 16007; 2016 WGQ AP Item 3(c)(iii), 2017 WGQ AP Item 3(b)(ii)

Dear NAESB Executive Committee:

The Environmental Defense Fund (EDF) respectfully submits this letter in support of the above-referenced standards: Proposed Definition of Shaped Nomination and NAESB WGQ Proposed Standard 1.3.z1.

Throughout the NAESB Gas Electric Harmonization and BPS processes, EDF collaboratively engaged with the gas and electric industry participants to discuss, develop and vet the proposed standards and the underlying concepts. We respectfully suggest that adding and defining a Shaped Nomination and communications protocol will foster beneficial clarity and transparency, and augment the nomination process for both service requesters and transportation service providers.

In addition, the proposed definition and standard will enhance efficiency in the energy markets by providing a transactional structure and means of communicating a Shaped Nomination. This will provide additional operational flexibility to service requesters and transportation service providers as well as improve coordination between the gas and electric markets, consistent with the goals of the Federal Energy Regulatory Commission. *See Standards for Business Practices for Interstate Natural Gas Pipelines*, 117 FERC ¶ 61,095 at P 23 (2006) (“Any standards that would allow better coordination between scheduling of gas and electric markets would be of benefit to both industries, and we encourage NAESB to continue its efforts to develop such standards.”). For the reasons stated above, EDF encourages members of the WGQ Executive Committee to approve, as presented, the Proposed Definition of Shaped Nomination and Proposed Standard 1.3.z1.

Sincerely,

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