-----Original Message-----

From: Christi Nicolay [<mailto:Christi.Nicolay@macquarie.com>]

Sent: Monday, January 30, 2017 9:19 AM

To: naesb; Elizabeth Mallett

Subject: FW: Revised NAESB Wholesale Gas Quadrant Request for Formal Comments on Recommendations to Support GEH Annual Plan Items – Due February 20, 2017

Macquarie Energy LLC's comments on each Recommendation are below.

Thank you,

Christi

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-----Original Message-----

From: [naesbmail@naesb.org](mailto:naesbmail@naesb.org) [<mailto:naesbmail@naesb.org>]

Sent: Monday, January 23, 2017 10:17 AM

To: Christi Nicolay <[Christi.Nicolay@macquarie.com](mailto:Christi.Nicolay@macquarie.com)>

Subject: Revised NAESB Wholesale Gas Quadrant Request for Formal Comments on Recommendations to Support GEH Annual Plan Items – Due February 20, 2017

Dear NAESB Wholesale Gas Quadrant (WGQ) Members and Interested Industry Participants,

The following announcement and the accompanying request for comments document were revised to include the description of 2016 WGQ Annual Plan Item 3(b)(v)/ 2017 WGQ Annual Plan Item 3(a)(v)( Parts 1- 3).

An industry comment period begins today, Friday, January 20, 2017 and ends at the close of business on Monday, February 20, 2017 for the following recommendations in response to the following 2016/2017 WGQ Annual Plan items.

Recommendations:

2016 WGQ Annual Plan Item 3(b)(i)/ 2017 WGQ Annual Plan Item 3(a)(i)– GEH Forum Issue 22: It would be desirable to have a set of terminology agreed upon by participants to characterize shapes, profiles, ratable, non-ratable, and so forth to facilitate discussion.

No Action Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3ai_rec.docx>.

Macquarie Energy LLC agrees with the No Action Recommendation.

2016 WGQ Annual Plan Item 3(b)(ii-iii)/ 2017 WGQ Annual Plan Item 3(a)(ii-iii)– GEH Forum Issue 25: Communication protocols with LDCs, gas generator operators and natural gas marketing companies, and GEH Forum Issue 26: Improve efficiency of critical information sharing (related to issues 22 and 25).

No Action Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3aii-iii_rec.docx>.

Macquarie Energy LLC agrees with the No Action Recommendation.

2016 WGQ Annual Plan Item 3(b)(iv)/ 2017 WGQ Annual Plan Item 3(a)(iv)– GEH Forum Issue 33: Use of multiple confirmation methods in addition to traditional confirmations for intraday nominations. There is currently a good definition of Confirmation by Exception (CBE) in NAESB standards. CBE however, may not be available everywhere but there may also be additional confirmation methods that could benefit from standardization.

No Action Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3aiv_rec.docx>.

Macquarie Energy LLC agrees with the No Action Recommendation.

2016 WGQ Annual Plan Item 3(c)(i)/ 2017 WGQ Annual Plan Item 3(b)(i) (R16003a, c, and d) (Part 1) – Develop business practices as needed to support R16003 and attachment: Special Efforts Scheduling Services for Natural Gas Pipeline Transportation - The proposed standard addresses certain business practices relating to Best Efforts scheduling for natural gas pipeline transportation that is: a) scheduled outside of the standard grid-wide nomination cycles, b) permits flow changes outside of standard schedule flow periods; and/or c) involves Shaped Flow Transactions (as defined in the proposed standard).

No Action Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3bi_r16003_part1_rec.docx>.

Macquarie Energy LLC agrees with the No Action Recommendation.

2016 WGQ Annual Plan Item 3(c)(iii)/ 2017 WGQ Annual Plan Item 3(b)(ii) – Develop business practices as needed to support R16007: Update the NAESB Nomination dataset and related datasets to support the ability for a service requester to submit a single nomination with hourly quantities when such a service is supported by the TSP, and 2016 WGQ Annual Plan Item 3(c)(i)/2017 WGQ Annual Plan Item 3(b)(i)- (R16003b) (Part 2)- Develop business practices as needed to support R16003 and attachment: Special Efforts Scheduling Services for Natural Gas Pipeline Transportation - The proposed standard addresses certain business practices relating to Best Efforts scheduling for natural gas pipeline transportation that is: a) scheduled outside of the standard grid-wide nomination cycles, b) permits flow changes outside of standard schedule flow periods; and/or c) involves Shaped Flow Transactions (as defined in the proposed standard).

Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3abii_r16007-wgq_2017_api_3bi_r16003_part2_rec.docx>

Macquarie Energy LLC supports this.

2016 WGQ Annual Plan Item 3(b)(v)/ 2017 WGQ Annual Plan Item 3(a)(v)( Part 1)- GEH Forum Issue 36: “Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation.”

Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3av_part1_rec.docx>.

Macquarie Energy LLC supports this.

2016 WGQ Annual Plan Item 3(b)(v)/ 2017 WGQ Annual Plan Item 3(a)(v)( Part 2)- GEH Forum Issue 36: “Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation.”

Recommendation: <https://www.naesb.org/pdf4/wgq_2017_api_3av_part2_rec.docx>.

Macquarie Energy LLC abstains.

2016 WGQ Annual Plan Item 3(b)(v)/ 2017 WGQ Annual Plan Item 3(a)(v)( Part 3)- GEH Forum Issue 36: “Level of confirmations: there is a wide range of data elements that are exchanged, from a minimum amount to a very large set of data. In the "Art of Scheduling," pipelines confirm at different levels, with potential for disparities. Greater standardization could produce confirming efficiencies. (For example, confirm at the shipper-to-shipper level. Or, if there are confirmations at a lower level of detail, it would be driven by model type.) See issue 17 in the first presentation.”

Recommendation: <https://www.naesb.org/member_login_check.asp?doc=wgq_2017_api_3av_part3_rec.docx>.

Macquarie Energy LLC abstains.

All interested parties, regardless of membership status within NAESB, are eligible to submit comments for consideration. The Wholesale Gas Quadrant Executive Committee will review the recommendation and comments during the next scheduled meeting following the end of the comment period and consider the recommendation for vote. This meeting is open and we encourage those who submit comments to attend.

All comments received by the NAESB office by end of business on February 20, 2017 will be posted on the Request and Standards Activity Applicable to Wholesale Gas Quadrant page: <http://naesb.org/wgq_request.asp> and forwarded to the Wholesale Gas Quadrant Executive Committee members for their consideration. If you have difficulty downloading the recommendations, please call the NAESB office at (713) 356-0060.

Best Regards,

Elizabeth Mallett

NAESB Deputy Director

cc: Rae McQuade, President

To change your contact information, or to modify your subscription(s) with the North American Energy Standard Board (NAESB) mail system click the link below or copy and paste it into the address bar of your web browser.

<http://www.naesb.org/>

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