

**To: NAESB Wholesale Gas Quadrant Business Practice Subcommittee**  
**Date: 08/18/2014**  
**Re: Request for Formal Comments on 2014 WGQ Annual Plan Item 11.c**

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The Southwest Power Pool (SPP) participated in the NAESB Gas Electric Harmonization Forum. During the meetings, a wide variety of opinions were expressed by stakeholders in the energy industry. The SPP was in support of both the FERC NOPR (Docket No. RM14-2-000) and the positions regarding a common gas day held members of the ISO/RTO Council (IRC) during the Gas Electric Harmonization Forum (GEHF).

One item that has yet to be addressed was the start of the gas day. The SPP continues to support the IRC proposal<sup>1</sup> for a 4:00 a.m. central time or earlier gas start day that was presented at the forum.

SPP and its member signatories on these comments expect the incorporation of additional intraday nomination cycles and the adjustment of the timely and evening nomination cycles may improve the ability to schedule gas. It is also anticipated that no harm will result from additional opportunities to schedule gas during the day, however it is understood these changes will have impacts on the gas industry.

Respectfully,

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Joshua H. Phillips  
Southwest Power Pool

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<sup>1</sup> ISO/RTO Council (IRC) Proposals Relative to FERC NOPR Docket No. RM 14-2-000  
([http://naesb.org/pdf4/geh042214iso\\_rto.pdf](http://naesb.org/pdf4/geh042214iso_rto.pdf))