



## NORTH AMERICAN ENERGY STANDARDS BOARD

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May 27, 2026  
via email

Commissioner Chang,

Once again, the North American Energy Standards Board (“NAESB”) would like to thank you for the comments you provided in your concurrence to the October 16, 2025 Notice of Proposed Rulemaking (“NOPR”) recommending adoption of the modifications made to Version 4.0 of the NAESB Wholesale Gas Quadrant (“WGQ”) Business Practices Standards to improve coordination between natural gas and electric market participants. Our relationship with the Commission over the last thirty years is a wonderful example of how private-public partnerships can work to implement regulatory policy through an effective and balanced process and ensure that industry resources are being directed to priorities identified by the Commission that support the greater good of the American public. It is central to our mission to foster this partnership and instill confidence in the NAESB process and work products, and therefore, we strive to address any and all requests made by the Commission or individual Commissioners in a deliberate and diligent manner.

Through a process captured in the record attached to this letter, the NAESB Board of Directors considered the requests made in the October 16, 2025 concurrence to the NOPR and determined that it is unlikely that a new standards development effort would be successful at this time without the materialization of certain precursors. Specifically, Board members noted that they would prefer to give recent external activities, such as the formation of the Natural Gas Readiness Forum and the Reliability Alliance as well as December’s publication of the Reliable Energy: Delivering on the Promise of Gas-Electric Coordination Study by the National Petroleum Council, an opportunity to further develop before initiating a standards effort within NAESB. It was also noted that a standards development effort could be initiated at any time under the NAESB procedures should a concrete proposal for the development of specific standards be brought forward.

I can assure you that this decision was not made without considerable debate and deliberation by our membership, as supporting natural gas and electric market coordination through standards-setting is still a top priority of our organization, and has been for the last twenty-five years; however, the executive level support necessary to initiate a new effort within NAESB appears insufficient at this time. As noted, I have attached a record of how the Board of Directors came to this decision. The record includes minutes from all meetings in which the recommendations included in your concurrence were discussed, written comments that were submitted in response to my request for feedback noted in the January 11, 2026 correspondence to you that I directed NAESB staff to deliver, and the voting record on the Board resolution to not take action in response at this time.

Thank you again for your support of our latest WGQ Business Practices Standards intended to improve gas and electric market coordination and for encouraging our organization to continue to work in this important area. We will continue to monitor the developments resulting from the many industry activities currently underway to support cross-market coordination and collaboration, and we look forward to reporting back to you and your staff as circumstances necessitate action by our Board.

If you or your staff have any questions or would like more information concerning this or any other NAESB activity, please feel free to contact the NAESB office at any time.

With Best Regards,

Michael Desselle, Chairman, North American Energy Standards Board

cc: Rae McQuade, President, North American Energy Standards Board  
Jonathan Booe, Executive Vice President & COO, North American Energy Standards Board

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### **Related Record**

The following tables contain hyperlinks to the relevant meeting minutes, comments, and voting record developed in consideration of action in response to Commissioner Chang's request in the October 17, 2025 concurrence

RELEVANT MEETINGS CONCERNING COMMISSIONER CHANG'S CONCURRENCE		
Date	Meeting	Meeting Notes/Minutes
12-4-25	NAESB Board Strategy Committee	<a href="https://naesb.org/pdf4/bd_strategy_120425mn.docx">https://naesb.org/pdf4/bd_strategy_120425mn.docx</a>
12-11-25	NAESB Board of Directors	<a href="https://naesb.org/pdf4/bd121125dm.docx">https://naesb.org/pdf4/bd121125dm.docx</a>
1-30-26	NAESB Board Strategy Committee	<a href="https://naesb.org/pdf4/bd_strategy_013026mn.docx">https://naesb.org/pdf4/bd_strategy_013026mn.docx</a>
2-7-26	NAESB Advisory Council	<a href="https://naesb.org/pdf4/advisory020726notes.docx">https://naesb.org/pdf4/advisory020726notes.docx</a>
3-16-26	NAESB Board Strategy Committee	<a href="https://www.naesb.org/pdf4/bd_strategy_031626mn.docx">https://www.naesb.org/pdf4/bd_strategy_031626mn.docx</a>
4-23-26	NAESB Board of Directors	<i>Draft Minutes to be Posted</i>
RELEVANT COMMENTS SUBMITTED CONCERNING COMMISSIONER CHANG'S CONCURRENCE		
Date	Requester/Submitter	Request/Comments
12-12-25	NAESB Board Chairman, Michael Desselle	Request for Comments: <a href="https://naesb.org/pdf4/md_correspondence_121225.docx">https://naesb.org/pdf4/md_correspondence_121225.docx</a>
1-15-26	ConocoPhillips	Comments: <a href="https://www.naesb.org/pdf4/bd_strategy_121225_ConocoPhillips.pdf">https://www.naesb.org/pdf4/bd_strategy_121225_ConocoPhillips.pdf</a>
1-16-26	NAESB Pipeline Segment Board Members	Comments: <a href="https://www.naesb.org/pdf4/bd_strategy_121225_wgq_pipelines.pdf">https://www.naesb.org/pdf4/bd_strategy_121225_wgq_pipelines.pdf</a>
1-19-26	BP, Chevron, ExxonMobil	Comments: <a href="https://www.naesb.org/pdf4/bd_strategy_121225_BP_Chevron_ExxonMobil.docx">https://www.naesb.org/pdf4/bd_strategy_121225_BP_Chevron_ExxonMobil.docx</a>
1-20-26	American Gas Association	Comments: <a href="https://www.naesb.org/pdf4/bd_strategy_121225_AGA.pdf">https://www.naesb.org/pdf4/bd_strategy_121225_AGA.pdf</a>
NOTATIONAL BALLOT, RESULTS, & COMMENTS ON BOARD RESOLUTION CONCERNING COMMISSIONER CHANG'S CONCURRENCE		
Date	Document	
3-23-26	Notational Ballot: <a href="https://www.naesb.org/pdf4/bd032326ballot.doc">https://www.naesb.org/pdf4/bd032326ballot.doc</a>	
	Proposed Resolution: <a href="https://www.naesb.org/pdf4/bd032326w2.docx">https://www.naesb.org/pdf4/bd032326w2.docx</a>	
4-6-26	Comments Submitted by M. Desselle, SPP: <a href="https://www.naesb.org/pdf4/bd032326ballot_SPP_Comments.docx">https://www.naesb.org/pdf4/bd032326ballot_SPP_Comments.docx</a>	
4-10-26	Comments Submitted by E. Pena, EPII: <a href="https://www.naesb.org/pdf4/bd032326ballot_EPII_Comments.doc">https://www.naesb.org/pdf4/bd032326ballot_EPII_Comments.doc</a>	
4-13-26	Notational Ballot Results: <a href="https://www.naesb.org/pdf4/bd032326ballot_results.doc">https://www.naesb.org/pdf4/bd032326ballot_results.doc</a>	