***Electric Power Supply Association***

Pre-Meeting Comments

Joint WEQ, WGQ, and RMQ BPS Meeting – Feb 15, 2024

**February 9, 2024**

As a participant in this project to review and modify the NAESB Gas/Electric Coordination Business Practice Standards as they address communications between the two systems, I had asked a question during the first meeting (January 31) which I think warrants attention at upcoming meetings and may help focus the work to be done.

As directed by FERC and NERC in the joint report on Winter Storm Elliott, the task before NAESB is to consider the timely dissemination of coordinated communications across the gas-power value chain in order to enhance situational awareness during extreme cold weather events (without endangering sensitive commercial information).

What remains unclear after the first meeting is whether there are identifiable gaps in the information or data currently being provided during these extreme weather events, and/or whether there is a problem with the timing, format, or breadth of information which is exchanged. Identifying specific communications/informational needs is critical to this project and likely the place to start.

Some fundamental questions that may help the group focus on whether and what revisions may be needed are:

1. Are there specific pieces of information or operational data that are needed by any entity from another entity during these periods which are currently not shared or made available?
2. Is there information or operational data currently conveyed which is not sufficient, is not timely, or is not clear?
3. Can power system operators/BAs identify information or data that they need to have full situational awareness – is that data currently shared with other recipients (i.e., shippers like LDCs and natural-gas fired generators)?
4. If new or additional information is needed by power system operators/BAs, is that data available in any public or other fora?

Another issue that emerged in the first meeting is concern over whether or how communications either include or are assumed to include an assessment of the information exchanged – i.e., what is the impact of the information being conveyed, what is the extent of the impact, the location of the impact, expected duration of the impact, etc.

This may be outside the scope of the directives to NAESB from FERC and NERC, but it continues to come up and, fairly, poses critical questions about responsibility and decision-making for operations during these extreme periods.

Of note, I will not be able to participate in the Joint Subcommittee meetings of February 15 or February 29 due to a standing EPSA meeting – I may be able to call in for a short time at the top of the meeting if there are questions regarding my comments, etc.

*Please note that these comments are submitted on behalf of myself as an individual, not as a representative of EPSA as an organization or its individual members. My comments herein are guided by my professional background in both the gas and power industries, representation of competitive power generators and suppliers, and participation in multiple efforts and dialogues addressing gas-electric coordination for many years.*

Respectfully submitted,

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