**Spectra Energy Corp Comments on Wholesale Gas Quadrant 2014 Annual Plan Item 11.c**

**August 13, 2014**

In response to the NAESB Wholesale Gas request for formal comments, Spectra Energy Corp supports the NAESB Wholesale Gas Quadrant (WGQ) Recommendation for 2014 WGQ Annual Plan Item 11.c – Support FERC Notice of Proposed Rulemaking, Coordination of the Scheduling Process of Interstate Natural Gas Pipelines and Public Utilities. This recommendation reflects changes to the Wholesale Gas nomination timeline to address gas/electric issues and is an alternative to the timeline proposal by FERC in Docket No. RM14-2-000, Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities (March 20, 2014).

The proposed timeline provides some advantages that the FERC proposed timeline does not. The majority of the activity (business) takes place during the day when the markets are most liquid and staffing is available. Like the FERC proposed timeline, the Timely nomination deadline is at 1:00 PM Central Time, accommodating the electric utilities requirement to finalize schedules and to find gas supplies during the most liquid period of the gas market. While the FERC timeline had four Intra Day cycles, the proposed timeline reflects the outcome of the GEH Forum proposal and has three Intra Day cycles which are timed to provide adequate time during each cycle to complete the business processes required to confirm and schedule each nomination and insuring that there is time between all of the cycles for parties to respond to any scheduling changes. In accordance with FERC policy, the last Intra Day cycle of the proposed timeline is a no-bump cycle.

The proposed standards based on the proposed timeline are, as directed by the Board, neutral on the gas day start. All references to the 9 AM CCT gas day start were removed. This was a complicated and arduous process that required the vetting every standard to determine if changes to specific standards should be made to conform to the new timeline. In addition to the changes to the nomination deadlines proposed by the GEH Forum, the subcommittees made conforming changes to other deadlines including the Capacity Release timeline (NAESB WGQ Standard No. 5.3.2) which was changed to allow shippers to complete a capacity release process prior to the timely nomination deadline for that day, and the Capacity Recall/Reput timeline (NAESB WGQ Standard No. 5.3.44).

Spectra Energy Corp urges the NAESB’s Wholesale Gas Quadrant Executive Committee to approve the recommendation and also supports Interstate Natural Gas Association’s comments on Recommendation for 2014 WGQ Annual Plan Item 11.