



**NMPP** **MEAN** **NPGA** **ACE**

October 10, 2023

*Submitted via email to [naesb@naesb.org](mailto:naesb@naesb.org)*

Ms. Elizabeth Mallett  
NAESB Director, Wholesale Gas and Retail Markets Quadrants  
North American Energy Standards Board  
1415 Louisiana Street, Suite 3460  
Houston, TX 77002

**Re: Comments Pertaining to Standards Request R23001**

Ms. Mallett and Wholesale Gas Quadrant Executive Committee Members:

We respectfully request that the North American Energy Standards Board (NAESB) Wholesale Gas Quadrant (WGQ) Executive Committee (EC) vote to oppose the No Action Recommendation pertaining to Standards Request R23001, which deals with proposed revisions to the NAESB Base Contract for Sale and Purchase of Natural Gas (Base Contract) to improve the clarity associated with the force majeure provisions in the contract. Doing so will ensure that important conversations pertaining to the Base Contract's force majeure provisions can continue.

The National Public Gas Agency (NPGA) is a joint action agency representing 18 municipalities in Colorado, Kansas, Nebraska and Oklahoma. In order to serve the gas supply needs of these municipalities, it is imperative we have a standard base contract that is not only widely accepted by the industry, but that also adequately protects the interests of these publicly owned natural gas systems.

While not perfect, the standards request is a good starting point for important discussions on how to update NAESB contract language in order to best serve the changing needs of the industry.

The natural gas industry has done an impressive job in maintaining reliability and resiliency, but it is important that all market participants take responsibility for important preventative actions, such as region-dependent weatherization and clear communication. This will support planning purposes of all counterparties and ensure a well-functioning natural gas network in all but the worst-case scenarios. Accordingly, we are willing to consider unique solutions to find the best path forward.

As a member of the American Public Gas Association, we support their comments and echo the need for the WGQ EC to oppose the No Action Recommendation.

Thank you for your review and consideration of these comments, and we hope you oppose the No Action Recommendation.

Sincerely,

Robert L. Poehling  
Executive Director/CEO  
National Public Gas Agency