**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant (WEQ)

**Subcommittee:** Business Practices Subcommittee

**Recommendation:** No Action Recommendation for WEQ Annual Plan Items 7.a.i through 7.a.v

**Submitted By:** ISO RTO Council’s Standards Review Committee

**Date:** April 17, 2017

The ISO RTO Council’s Standards Review Committee[[1]](#footnote-1) appreciates the opportunity to comment on the outcome of NAESB’s Gas-Electric Harmonization (GEH) initiatives. Although the WEQ is recommending no-action on all GEH items, this is directly tied to the:

1. no-action recommendations created by the Wholesale Gas Quadrant’s (WGQ) Business Practices Subcommittee, which were then approved by the Executive Committee and,
2. failed recommendations, which occurred at the February 23 WGQ’s Executive Committee meeting. All of the failed recommendations from the WGQ Executive Committee passed on a balanced vote in the Business Practices Subcommittee; however, they failed due to a segment block in the Executive Committee (less than 40% in favor from an individual segment).

As the process was outlined in the WEQ Annual Plan, the actions of the WEQ were predicated on the WGQ taking action to develop standards to further coordinate activities. The no action recommendation from the WEQ should in no-way reflect that the entities in the Wholesale Electric Quadrant do not see a benefit in furthering GEH standards. Rather, we see that the electric and gas quadrants should seek out opportunities to further integrate the two industries.

1. IESO is not joining in the submission of these comments. [↑](#footnote-ref-1)