

Quadrant: Wholesale Electric Quadrant (WEQ), Wholesale Gas Quadrant (WGQ), Retail Markets Quadrant (RMQ)

Subcommittee: Joint Business Practice Subcommittees (BPS)

Request: WEQ 2022 Annual Plan Items 7.a.i and 7.a.iii, WGQ 2022 Annual Plan Items 5.a.i and 5.a.iii, and RMQ 2022 Annual Plan Items 3.a.i and 3.a.ii (R21006)

Submitted By: Standards Review Committee and Electric Gas Coordination Task Force of the ISO RTO Council ¹

Date: 05/26/2022

The Standards Review Committee (SRC) and Electric Gas Coordination Task Force (EGCTF) of the ISO/RTO Council (IRC) appreciate the opportunity to comment on the no action recommendation² approved by the North American Energy Standards Board (NAESB) joint WEQ, WGQ, and RMQ BPS regarding improving communications between the electric and gas industries during extreme weather events under standards request R21006³.

I. INTRODUCTION

As wide-area electric grid operators, we monitor, manage, and respond to supply conditions on a daily basis, but this becomes more challenging on extreme load days. As seen during Winter Storm Uri, extreme temperatures caused loads to begin trending higher at the same time the output from generating resources was declining. Under these circumstances, we

¹ Participants in these comments include the following: California Independent System Operator Corporation (California ISO), the Independent Electricity System Operator of Ontario, Inc., (IESO), ISO New England, Inc. (ISO-NE), Midcontinent Independent System Operator, Inc., (MISO), New York Independent System Operator, Inc. (NYISO), PJM Interconnection, L.L.C. (PJM) and Southwest Power Pool, Inc. (SPP).

² No Action Recommendation, NAESB, April 26, 2022, https://www.naesb.org/pdf4/weq_2022_api_7ai_7aiii_wgq_2022_api_5ai_5aiii_rmq_2022_api_3ai_3aii_r21006_rec_042622.docx

³ Standards Request R21006, NAESB, November 23, 2021, <https://www.naesb.org/pdf4/r21006.docx>

experience increasingly tighter operating conditions and an increasing reliance on natural gas-fired generation. As evidenced within the *February 2021 Cold Weather Outages in Texas and the South Central United States*⁴, better communication, coordination and awareness by both industries could have lessened the impact on consumers.

The standards development activity proposed under R21006 could enhance communication through improved understanding of critical infrastructure and their locations and improve communications between the electric grid operators and gas pipeline operators.

II. COMMENTS

During the five Joint BPS meetings, participants reviewed activities underway at the North American Electric Reliability Corporation (NERC) and existing electric-gas communication processes. It was confirmed that while potentially complementary, NERC is understandably not addressing communications between wholesale gas market participants and wholesale electric market participants. As a result, several communication issues were raised during these Joint BPS meetings related to gas pipeline critical notice procedures including, improving the consistency of pipeline critical notices; inclusion of the cause for the critical notices; and the geographical location covered by the critical notice.

While current critical notices often provide information for understanding impacts to gas pipeline operations, there were differences discussed during the Joint BPS meetings in the format and content of such notices. Consistently including the cause for the critical notices will improve the ability to interpret these messages. This would also be useful for entities receiving

⁴ [The February 2021 Cold Weather Outages in Texas and the South Central United States | FERC, NERC and Regional Entity Staff Report | Federal Energy Regulatory Commission](#), November 16, 2021

these notices when evaluating risks to gas fired generation portfolios during extreme operating conditions like winter storm Uri.

Presentations provided during the Joint BPS meetings highlighted that electric grid operators need to understand what caused a critical notice. While some pipelines do include this information, others do not, or if it is included, it is often not easily discernable from other critical notices. This results in ambiguity for those relying on the notice to understand risks to reliability for gas fired generation and the estimated duration of those risks associated with temporal events such as weather. Enhancing the language in critical notices, or better understanding the existing language, would help those who are impacted better understand the information in the notice, however standardization may be addressed at a later date with a more refined request.

Additionally, presentations highlighted concerns that the notices may benefit from a standard method for communicating impacted geographical locations. Certain entities include location details as a data element in the header of the notice while others may place this information within the body of the message. The approach results in additional time being needed to interpret where the impacts to the gas supply are occurring. This presents an opportunity for enhancing coordination between ISO/RTOs and pipeline operations to educate and inform both sets of parties on the importance of timely decision-making and situational awareness.

III. CONCLUSION

We are appreciative of the time provided by all attendees to the Joint BPS meetings. Through the NAESB process, both WGQ and WEQ have shared valuable information and fostered improved understanding of the operations for both gas pipelines and ISOs and RTOs. Several opportunities for communication improvement were recognized over the course of the NAESB Joint BPS meetings, and we support further consideration of working together to develop solutions to these issues. We are hopeful that if further cooperative efforts to improve upon existing gas/electric coordination practices identify more refined recommendations for NAESB standards, such recommendations will be considered in the NAESB process.