

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Standards for Business Practices of)
Interstate Natural Gas Pipelines)
)**

Docket No. RM96-1-044

COMMENTS OF THE ISO/RTO COUNCIL

Pursuant to the Federal Energy Regulatory Commission’s October 16, 2025 Notice of Proposed Rulemaking (NOPR), the ISO/RTO Council (IRC)¹ hereby submits these comments in the above-captioned proceeding.² The NOPR proposes to amend the Commission’s regulations to incorporate by reference changes to the latest version (Version 4.0) of Standards for Business Practices of Interstate Natural Gas Pipelines adopted by the Wholesale Gas Quadrant (WGQ) of the North American Energy Standards Board (NAESB). The NOPR states NAESB’s revisions in Version 4.0 of the standards streamline the process for accessing publicly available gas-electric coordination data during extreme cold weather or emergency events. The IRC recognizes the interdependence of the bulk electric system and gas transmission and distribution systems and supports efforts to enhance the ability of responsible entities to identify, assess, and respond to risks to those systems. The IRC supports the NOPR’s proposal.

¹ The IRC comprises the following independent system operators (“ISOs”) and regional transmission organization (“RTOs”): Alberta Electric System Operator (“AESO”); California Independent System Operator Corporation (“CAISO”); Electric Reliability Council of Texas, Inc. (“ERCOT”); the Independent Electricity System Operator (“IESO”) of Ontario; 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”). AESO and IESO are not joining these comments.

² 18 C.F.R. §§ 385.212, 385.213.

I. The Commission should approve the proposed rule to amend the Commission’s regulations to incorporate by reference changes to the latest version of Standards for Business Practices of Interstate Natural Gas Pipelines adopted by the WGQ of NAESB.

As described in the NOPR, the changes to Version 4.0 of the WGQ standards include:

- (1) A new standard to support a natural gas transportation service provider posting scheduled quantity information for power plants directly connected to the pipeline.
- (2) Revisions to an existing standard to establish a central location on an Informational Postings Website where a transportation service provider can post publicly available data, including scheduled quantity information, to help RTOs/ISOs and other parties access these data.
- (3) A new standard to support the inclusion of geographic information when a natural gas transportation service provider issues a critical notice, such as geographic information of impacted areas, locations, and pipeline facilities.

The IRC supports the incorporation by reference of each of these changes into the Commission’s regulations. As part of its efforts to advance such coordination, the IRC has formed an Electric Gas Coordination Task Force that participates in gas and electric coordination discussions occurring at NAESB and in other venues. Members of the IRC Electric Gas Coordination Task Force participated in the discussions facilitated by NAESB that led to these proposed changes. The IRC acknowledges the positive collaboration that occurred during those discussions to improve and enhance existing communication protocols between the natural gas industry and downstream users, particularly the electric markets, which have become increasingly reliant on the availability of natural gas supply and transportation. Although work remains to be done to increase the reliability goals of both the electric and gas sectors and to

meet the rapidly increasing demand on both systems, the changes proposed by the NOPR will improve situational awareness for ISOs/RTOs and other Transmission Providers. These changes to the NAESB standards will provide more timely and actionable information about gas system constraints and disruptions that may impact electric system reliability. The standardized protocols for centralized data posting and real-time communication will help enable more effective coordination of operational decisions across the gas-electric systems, helping to reduce the risk of potential impacts on both gas and electric system reliability.

II. The Commission should consider targeted gas-electric coordination proposals that advance reliability and continue to facilitate discussions to improve information-sharing

In a separate statement issued in connection with the NOPR, Commissioner Chang solicits comments on areas where additional improvements to gas-electric coordination would be valuable, particularly regarding information-sharing along the chain of entities that physically control or have financial rights to natural gas deliveries, starting at the wellhead and ending at generators or local distribution gas companies. The IRC encourages the Commission to support targeted enhancements to gas-electric coordination that entities submit for consideration, especially proposed rules or practices that can enhance reliability of electric and gas transmission and distribution systems. With respect to information-sharing, the IRC encourages the Commission to facilitate discussion among industry participants. To date, Commission staff have facilitated discussions ahead of the summer and winter seasons among ISOs/RTOs and national gas industry associations that have provided valuable information sharing opportunities. The Commission could expand these dialogues to include other entities involved in natural gas supply from the wellhead to the generator or local distribution company delivery points to better

assess how to improve situational awareness and understand constraints that may affect reliability of the electric and gas transmission systems.

III. Conclusion

The IRC respectfully requests that the Commission consider these comments in the adoption of any final rule in this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 20th day of January 2026.

(s/Ariana Rebancos

Ariana Rebancos