



July 25, 2022

Mr. Michael Desselle, Chairman
Mr. Jonathon Booe, Executive Vice President & Chief Operating Officer
North American Energy Standards Board
1415 Louisiana Street
Suite 3460
Houston, TX 77002

Dear Messrs. Desselle and Booe,

On November 16, 2021, the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) published a FERC, NERC, and Regional Entity Staff Report on the February 2021 Cold Weather Outages in Texas and the South Central United States (Report). In addition to describing the severe cold weather event that occurred between February 8 and 20, 2021, the Report also included recommendations for proposed revisions to mandatory electric reliability standards and policy actions to weatherize natural gas production and distribution.

Coinciding with the November 16, 2021 publishing of the Report, Mr. Michael Desselle, Chairman of the North American Energy Standards Board (NAESB), submitted a proposal to the NAESB Gas-Electric Harmonization Committee requesting the development of draft joint standards for both the Wholesale Electric Quadrant and the Wholesale Gas Quadrant. Additionally, Mr. Desselle stated his belief that NAESB can play an important and integral role in supporting the findings and recommendations included in the Report – specifically the recommendation that FERC consider establishing a forum to identify actions that will improve the reliability of the natural gas infrastructure system as necessary to support the bulk electric system (BES) and to address recurring challenges stemming from natural gas-electric infrastructure interdependency (Key Recommendation 7).¹

Moreover, we agree with Mr. Desselle that, as an established American National Standards Institute-accredited convener of both the natural gas and electric markets with representation from all segments of the supply chain, NAESB is uniquely positioned to

¹ FERC, NERC and Regional Entity Staff Report, *The February 2021 Cold Weather Outages in Texas and the South Central United States* (November 2021), <https://www.ferc.gov/media/february-2021-cold-weather-outages-texas-and-south-central-united-states-ferc-nerc-and>.



provide support in addressing the Report recommendation. NAESB’s long history with the industry demonstrates its ability to analyze challenging issues concerning market coordination while delivering balanced, consensus-based solutions that lead to improved operations in both markets.

We encourage NAESB to take steps to expeditiously convene the forum discussed in the Report and others like it (such as the 2014 Polar Vortex report²). We also encourage NAESB to coordinate with FERC and NERC staff, and the National Association of Regulatory Utility Commissioners, who all have BES regulatory and reliability expertise and experience with gas-electric cooperation.

If we can be of further assistance regarding the convening of this forum, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Glick".

Richard Glick
Chairman
FERC

A handwritten signature in blue ink, appearing to read "Jim Robb".

Jim Robb
President and CEO
NERC

² NERC, *Polar Vortex Review* (September 2014), https://www.nerc.com/pa/rrm/January%202014%20Polar%20Vortex%20Review/Polar_Vortex_Review_29_Sept_2014_Final.pdf.