

ISO/RTO Council (IRC) Proposals Relative to FERC NOPR Docket No. RM14-2-000

Coordination of the Scheduling Processes of Interstate
Natural Gas Pipelines and Public Utilities

The following proposal is an initial IRC position for consideration in the development of an industry consensus proposal. The IRC looks forward to discussing this proposal and working with others to attempt to achieve a consensus proposal consistent with the NAESB process.

IRC Members

ISO-New England

NYISO

PJM

OIESO*

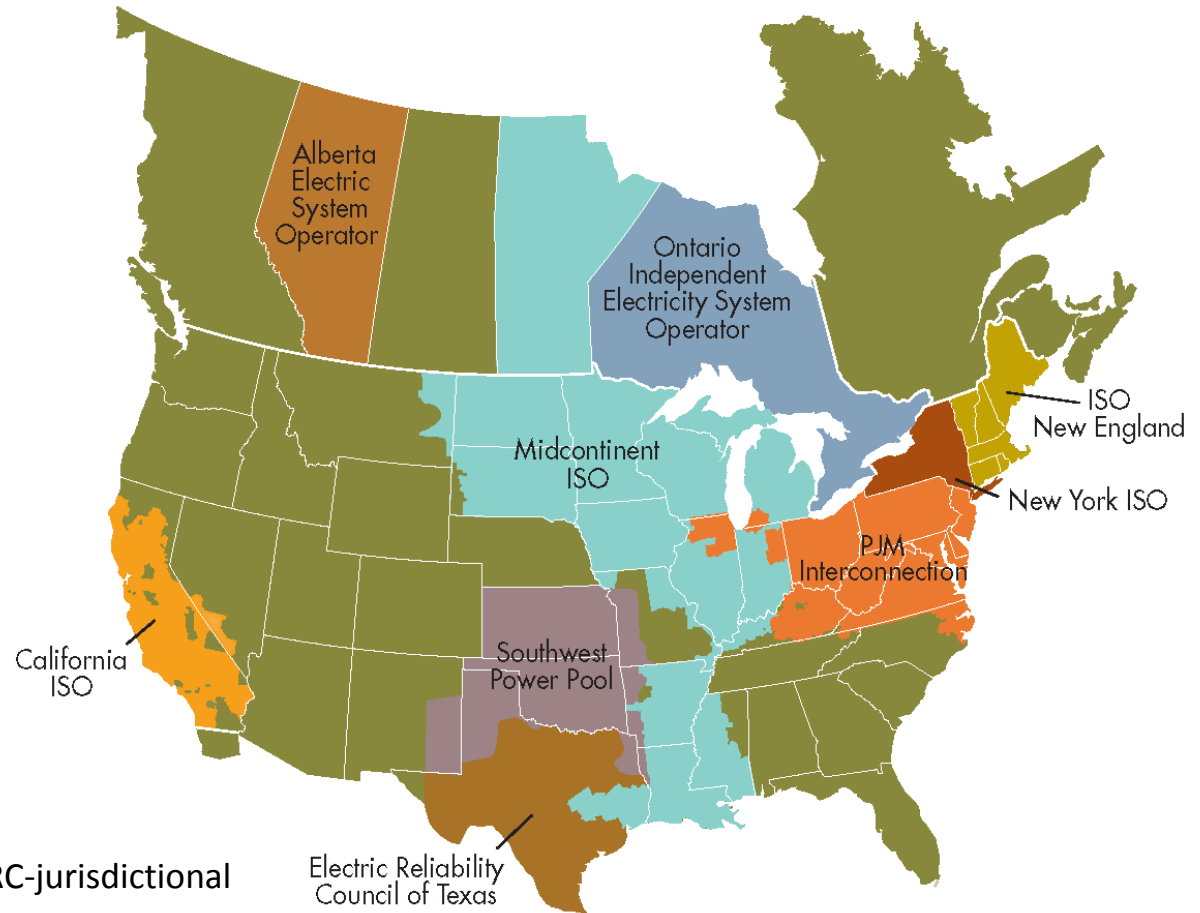
MISO

SPP

ERCOT

CAISO

AESO*



*OIESO, AESO and ERCOT are not FERC-jurisdictional

Serves 2/3 of consumers in the US and 1/2 of consumers in Canada

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Gas Day Timing

Present: Start/end at 9:00AM Central

NGC Proposal: No change

FERC NOPR: Start/end at 4:00AM Central

IRC Proposal: No later than 4:00AM Central

IRC Rationale

- Need to move the Gas Day away from the peak electric morning ramp (4AM – 9AM Local Time)
 - Morning ramp is now in 2 Gas Days
 - Invites derating of units at the most inopportune time
 - Winter ramps are the most severe (steepest) of the operating year

Timely Nomination

- Present: 9:30AM Central
- NGC: 1:00PM Central
- FERC NOPR: 1:00PM Central
- IRC: 2:00PM Central

IRC Rationale

- Need to have electrical commitment known prior to submitting timely gas nomination
 - Limits risks to the generator (and hence) the system operator—higher probability of delivery
 - Later time provides for greater liquidity for the generators to acquire commodity

Intraday Nominations

- Present: 10AM, 5PM
- NGC: Add 3rd Intraday at 12 Midnight
- FERC: 4 Intradays, at 8:00AM, 10:30AM, 4:00PM, and 7:00PM
- IRC: 4 Intradays as proposed by FERC

All times Central

IRC Rationale

- Increased intraday cycles are helpful and can provide increased liquidity

Other Issues – Apart from the NOPR

- Increased liquidity and transparency
 - Need to extend access to gas market platforms during weekend periods (especially during 3 day weekends as occurred during MLK weekend)