



***Electric Power Supply Association  
Edits to Strawman Recommendations and Comments***

**NAESB GEH Forum – Chairs Recommendations  
(June 9 Strawman Document)**

**July 10, 2023**

**OVERVIEW COMMENTS:** As EPSA outlined in comments submitted to the Forum on February 27, it remains important to emphasize that the near-term imperative to improve electric-gas coordination is to focus on the needs and capabilities of the two systems to support each other during events in which demand is expected to rise sharply for both electricity and natural gas – likely extreme weather events or critical periods. Thus, that is specified in several of the recommendations below.

Importantly, there are information needs for both electric system operators and end users of the gas system that require greater levels of standardization or formatting. But further, the gas system should look at technological investments, advances, and/or improvements that may be necessary to interact with and support the electric system as needed going forward – particularly as this interdependence increases as the resource mix for power generation continues to evolve.

As electric system market participants, it is incumbent on EPSA to urge that recommendations should focus on market-based services or products in order to support continued market efficiency for energy, capacity, and ancillary services for all electric system resources. It is understood that this Forum has been convened in part to address the unexpected critical periods that truly test both systems. Within that context, however, all means should be taken to develop market-based solutions which maintain market integrity and also represents the best method to signal additional developments or reforms that can address emerging concerns impacting electric reliability.

*See additional comments below specific to certain draft strawman recommendations. We have included a clean edit of each standard, with an appendix of redlined versions of the recommendations based on the Chairs' June 9 Strawman document.*

Respectfully submitted,

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## **CLEAN EDITS WITH COMMENTS**

**Recommendation 1:** FERC should direct the natural gas and electric industries to assess and report on what additional or standardized interstate pipeline information data may be necessary to assist regional power system operators to maintain system reliability. If needed, FERC could urge NAESB to revise the business practice standards related to the timely reporting and formatting of informational website posting data to reflect any additional information needed, outline more specific timelines for reporting, or require greater standardization for use by customers as well as system operators.

**EPSA Comment:** Based on the discussion across multiple GEH Forum meetings, what is needed is clarity from BPS operators regarding what (additional) information they need going into a critical period to ensure sufficient situational awareness. Additionally, natural gas supply and transportation information must be clear and usable by system operators and end use customers alike – thus likely needing more standardization in both format and terminology. And importantly, while not sufficiently discussed during the Forum, along with informational clarity the natural gas industry should be directed to assess technological advances or investments needed to facilitate its role in ensuring electric power reliability.

**Recommendation 2:** Argonne National Laboratory, with the direction and funding of a governmental agency, such as the Department of Energy, should work with the natural gas pipelines and Bulk Electric System operators to fully develop and expand upon the NGinsight tool to provide improved situational awareness and communication between the gas pipeline system and the Bulk Electric System operators and to make it broadly accessible and useable to market participants. This may require standardization of formatting or terminology among interstate and intrastate pipelines.

**EPSA Comment:** Related to Recommendation 1, natural gas supply and transportation information needs to be clear and usable by system operators and end use customers alike – likely requiring more standardization in both format and terminology.

**Recommendation 3:** Owners and operators of natural gas production facilities should work with BPS operators to adopt best practices for sharing near or real-time operational information concerning production facilities that will improve communications and situational awareness for Bulk Electric System operators, including identifying information needed by market participants. This could potentially be addressed through the Argonne National Laboratory's Nginsight tool.

**Recommendation 4:** FERC should direct the natural gas and electric industries to find ways to encourage greater use of capacity release or asset management arrangements (AMAs) in order to allow for more timely information about, and thus access to, unutilized interstate pipeline capacity not needed by firm capacity holders which may be used by other shippers to relieve fuel supply concerns.

**Recommendation 5:** Similar to FERC's action in Order No. 712 to support the use of asset management agreements, FERC should consider whether there is value in proposing policy



modifications that may be necessary to better facilitate advanced voluntary agreements between two end users in which one party's scheduled gas is transferred to another party to assist in extraordinary circumstances during a critical event. This assessment should include a close review of whether there are sufficient opportunities for localized exchanges that can be operationally accommodated by pipelines and sufficient volumes to support generation.

*EPSA Comment:* We support NGSAs' proposed redline of this recommendation.

**Recommendation 6:** State public utility commissions and applicable state authorities in states with competitive energy markets should engage with producers, marketers, and intrastate pipelines to ensure that the natural gas markets are fully functioning on a basis equitable to BPS operations and interstate pipeline operations in preparation for and during events in which demand is expected to rise sharply for both electricity and natural gas, including weekends and holidays. Per current FERC regulations, interstate pipelines schedule and operate on a 24/7 basis to support the wholesale natural gas market. In instances where state authorities lack enabling authority to take such actions, the FERC should adopt regulations to achieve, to the greatest extent possible within its jurisdiction, the needed operational access to natural gas transportation during critical periods.

*EPSA Comment:* Because the reliability of each industry is dependent on the other, it is critical that there be a level of functionality across the full supply and delivery chain to support each system. Thus, states need to ensure an equitable level of operability and transparency from intrastate pipelines though this could be limited to critical periods or the expectation of a critical period.

**Recommendation 7:** The Independent System Operators (ISOs) and Regional Transmission Organizations (RTOs), through stakeholder processes, or the FERC, through rulemaking or policy proceedings, should consider whether changes to either the Power Day or regional day-ahead electric scheduling practices would better align with the natural gas day and thus allow for earlier notification of successful bids, to ensure that schedules are known and made available to allow natural gas-fired generators to procure natural gas and pipeline capacity in periods when the market is most liquid.

*EPSA Comment:* As demonstrated in Winter Storm Elliott in PJM,<sup>1</sup> the best indicator that a gas-fired generator can run with a firm fuel supply when called is being scheduled Day-Ahead in the energy market. Because the electric power day varies by time zone, and electric scheduling timelines vary by market, each regional market should assess whether changes to either the Power Day itself or its scheduling timeline will offer generators sufficiently better knowledge, improving their ability to procure natural gas supply and transportation on a timely basis and when commodity markets are most liquid.

**Recommendation 8:** To better enable gas-fired generators to prepare for and provide reliable service during events in which demand is expected to rise sharply for both electricity

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<sup>1</sup> PJM presentation to Operating Committee, March 9, 2023, *Winter Storm Elliott Continued Outage Analysis*, slides 14-15, available here: <https://pjm.com/-/media/committees-groups/committees/oc/2023/20230309/20230309-item-04a---winter-storm-elliott-outage-data-review.ashx>



and natural gas, FERC should direct regional system operators to consider or develop market-based mechanisms or products which offer improved opportunities to recover fuel costs for purchases made to ensure availability during a critical period. For example, regional system operators could consider multiday reserve products that can commit generators in anticipation of a defined critical period, and could consider the potential need for limited, backstop cost-based recovery mechanisms for net losses incurred due to the procurement of fuel days in advance over a weekend or holiday that coincides with a multiday critical period.

*EPSA Comment:* While it is important to consider the possible net losses to generators which procure fuel in anticipation of an extreme critical multi-day period, it is important to rely on market-based mechanisms in every circumstance when at all possible to sustain critical market prices and signals. Avoiding cost recovery through uplift which is antithetical to competitive market efficiency and transparency is an important consideration to address lost fuel costs. That noted, there may be consideration of a multiday unit commitment mechanism for critical periods though pros and cons must be addressed – including the impact to uplift costs – and balanced before a region adopts such a process.

**Recommendation 9:** State public utility commissions should encourage local distribution companies within their jurisdictions to structure incentives for the development of natural gas demand response programs, and/or voluntary natural gas conservation public service announcements for residential, commercial, and industrial customers in preparation for and during events in which demand is expected to rise sharply for both electricity and natural gas.

**Recommendation 10:** State public utility commissions or regional system operators that rely on integrated resource planning or equivalent planning requirements should consider ways to improve upon cross-market, long-term planning by expanding collaboration with relevant gas and electric market parties and considering an increased focus on fuel adequacy.

**Recommendation 11:** FERC, regional system operators, state public utility commissions and applicable state authorities in states with competitive energy markets should assess whether current market mechanisms are adequate to ensure that gas-fired generators have the necessary incentives to support investment in fuel assurance and any storage or transportation services that enable operations during extreme cold weather events/critical periods. If current market mechanisms are found to be inadequate, it should be determined what market improvements are needed and, if market-based mechanisms or products are not feasible, whether limited non-market solutions are warranted as a last resort to ensure natural gas storage and transportation services are available during emergency conditions.

*EPSA Comment:* As written this recommendation seems pointed at financial support of natural gas infrastructure as needed to support the electric system. While clearly an important consideration, it must be noted that such support is based on fuel assurance for generators – this is not necessarily achieved through “firm contracts” (which are often not “firm” during periods of system stress) and thus such terminology which does not indicate “available when needed during critical periods” should not be used. EP (Environmental Protection) SA (State Agency) believes it is too far afield to suggest “customer funded” approaches as part of this recommendation.



**Recommendation 12:** Applicable state authorities should consider legislation, regulations, or other actions that can be taken to create a secondary market for unutilized natural gas pipeline capacity or support bilateral agreements between end users. In instances where state authorities lack enabling authority to take such actions, the FERC should adopt regulations to achieve this objective for section 311 pipelines within its jurisdiction.

**Recommendation 13:** Applicable state authorities should consider establishing informational posting requirements for intrastate natural gas pipelines to enhance transparency for intrastate natural gas market participants regarding operational capacity data, similar to the reporting and posting requirements mandated by the FERC for interstate natural gas pipelines as part of 18 CFR §284.13. In instances where state authorities lack enabling authority to take such actions, the FERC should adopt regulations to achieve this transparency objective.

**Recommendation 14:** Applicable state authorities should consider the development of weatherization guidelines appropriate for their region to support the protection and continued operation of gas production, processing, and gathering system facilities during extreme weather events. Consideration of cost recovery opportunities may be necessary to address mandates or requirements that specify non-standard or exceptional equipment or operational installations in order to weatherize for the most extreme weather conditions or periods. This effort should include transparency protocols concerning weatherization efforts of jurisdictional entities.

*EPSA Comment:* Winterization requirements that are based on the most extreme possible conditions and are not established as performance or incentive-based requirements or obligations should include the opportunity to recover costs. We acknowledge that the vehicles to do so are not clear cut, but the issue of cost recovery needs to be addressed when establishing new mandates.

## **RECOMMENDATIONS FOR STUDIES**

**Recommendation 15:** The U.S. Department of Energy should conduct, fund, and/or direct efforts to develop a comprehensive study that evaluates, by region, whether there is adequate natural gas infrastructure in place to support new gas usage patterns affected by flexible gas generation resource requirements as the latter resources are increasingly called upon for more frequent and/or steeper ramping to balance the increased use of variable energy resources. This study should be conducted in conjunction with an industry advisory group made up of diverse interests to ensure there is broad support that the study results are credible and unbiased. Currently, there are no comprehensive regional assessments that examine whether regions have sufficient natural gas infrastructure to support new usage patterns of gas generators, yet this information is essential for policymakers to have so that they can make informed policy decisions and take steps to avoid any potential reliability and resilience risks that accompany the transition to a lower emissions energy future.

**Recommendation 16:** An appropriate government agency should undertake efforts to conduct a comprehensive study to examine whether current market-based incentives in





organized power markets are sufficient to assist in the support of strategic natural gas storage facilities, to address natural gas supply shortfalls during extreme cold weather events, and to preserve such facilities for use during extreme cold weather events. The study should explore whether new market-oriented solutions are needed to secure sufficient storage investments and should consider whether public sources of funding are a potential fallback solution.

**Recommendation 17:** An appropriate government agency should undertake efforts to conduct a comprehensive study to determine whether additional financial incentives for the natural gas infrastructure system, including infrastructure to provide services which support firm transportation capacity, is necessary to support the Bulk Electric System to winterize or otherwise prepare to perform during extreme cold weather events or to provide system ramping needs which will increase as the power system resource mix expands to include greater weather-dependent intermittent resources.

#### **RECOMMENDATIONS/ENDORSEMENTS OF ACTIVITIES CURRENTLY UNDERWAY**

**Recommendation 18:** On May 3, 2023, a request for standards development was submitted to NAESB to consider modifications to the NAESB Base Contract for Sale and Purchase of Natural Gas to, among other things, encourage weatherization actions. As this specific topic area was identified and discussed by the NAESB Gas-Electric Harmonization (GEH) Forum as a potential recommendation, we endorse this evaluation by the NAESB Wholesale Gas Quadrant.

**Recommendation 19:** Many generalized recommendations for resource adequacy, generator accreditation, and additional market reforms to bolster reliability were offered throughout the NAESB GEH Forum activities. Based upon information provided by representatives from the ISO and RTO segment, steps are being taken within the organized markets to consider these constructs through their stakeholder processes. As recommendations in this area were identified and discussed by the NAESB GEH Forum, we endorse market-by-market evaluations of resource adequacy and accreditation requirements by all ISOs and RTOs and encourage the review of the Forum record.

#### **LONG-TERM CONSIDERATIONS**

**Considerations:** Throughout the NAESB GEH Forum activities, comments, discussion, and recommendations were offered to consider reforms to the current permitting and certification process for new natural gas infrastructure, including pipeline capacity, storage, and LNG expansion. In fact, the importance of having sufficient natural gas infrastructure in place to support and maintain the reliable operations of the BPS was strongly acknowledged by all segments throughout the Forum and is thus interwoven throughout the above recommendations. However, the Forum recognizes that recommendations on reforms to the permitting and certification processes that advance the buildout of new infrastructure is a multi-year process and that additional capacity and storage cannot be realized within the timeframe suggested through the FERC and NERC request of the NAESB GEH Forum. It was also recognized that the consideration of reforms to the permitting and certification processes for new natural gas infrastructure is currently taking place in other venues. We



encourage participants in those venues to review the record created by the NAESB GEH Forum.

EPSA Comment: We support NGSAs proposed redline of this recommendation.

### **ADDITIONAL TOPIC AREAS DISCUSSED**

Recommendations were brought forward through the NAESB GEH Forum activities related to collaborative forecasting processes, requirements for firm fuel/transportation, dual fuel and fuel switching, critical event planning, and emergency waivers; however, specific actions in these areas are not recommended at this time. Record summaries related to these areas have been provided below and additional information is included in the full record.

Relevant Record Summaries:

- Collaborative Forecasting
- Requirements for Firm Fuel/Transport and Dual Fuel
- Requirements for Fuel Switching
- Critical Event Planning
- Emergency Waivers

### **APPENDIX:**

#### **REDLINE VERSION OF EDITS (RECOMMENDATIONS ONLY)**

**Recommendation 1:** ~~In a manner similar to the Federal Energy Regulatory Commission (“FERC”) Notice of Proposed Rulemaking (“NOPR”) concerning the Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities issued on March 20, 2014 (Docket No. RM14-2-000), the~~ FERC should direct the natural gas and electric industries to revise assess and report on what additional or standardized pipeline information data may be necessary to assist regional power system operators to maintain system reliability. If needed, FERC could urge NAESB to revise the business practice standards developed by NAESB related to the timely reporting and formatting of informational website posting data to reflect any additional information needed, outline more specific timelines for reporting, or require greater standardization for use by customers as well as system operators, such as operationally available capacity and total scheduled quantity, to make the data and any changes available, and communicate the data and any changes, as soon as possible to Bulk Electric System operators.

**Recommendation 2:** Argonne National Laboratory, with the direction and fundingsupport of a governmental agency, such as the Department of Energy, should work with the natural gas pipelines and Bulk Electric System operators to fully develop and expand upon the NGinsight tool to provide improved situational awareness and



communication between the gas pipeline system and the Bulk Electric System operators and to make it broadly accessible and useable to market participants. This may require standardization of formatting or terminology among interstate and intrastate pipelines.

**Recommendation 3:** Owners and operators of natural gas production facilities should work with BPS operators the producing community through the Natural Gas Supply Association and the Independent Petroleum Association of America to adopt best practices for sharing near or real-time operational information concerning production facilities that will improve communications and situational awareness for Bulk Electric System operators, including identifying information needed by market participants. [and market participants], including, potentially, This could potentially be addressed through the Argonne National Laboratory's NGinsight tool.

**Recommendation 4:** In a manner similar to the FERC NOPR concerning the Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities issued on March 20, 2014 (Docket No. RM14-2-000), the FERC should direct the natural gas and electric industries to find ways to encourage greater use of capacity release or asset management arrangements (AMAs) in order to allow for more timely information about, and thus access to, unutilized interstate pipeline capacity not needed by firm capacity holders which may be used by other shippers to relieve fuel supply concerns, revise the business practice standards developed by NAESB to improve the efficiency and transparency of the processes to report, transact, and facilitate capacity release.

**Recommendation 5:** The Similar to FERC's action in Order No. 712 to support the use of asset management agreements, FERC should consider whether there is value in proposing policy modifications that may be necessary to better facilitate advanced voluntary agreements between two end users in which one party's scheduled gas is transferred to another party to assist in extraordinary circumstances during a critical event. This assessment should include a close review of whether there are sufficient opportunities for localized exchanges that can be operationally accommodated by pipelines and sufficient volumes to support generation, and providers of natural gas supply and delivery capacity similar to those adopted as part of FERC Order No. 712 to support the use of asset management agreements.

**Recommendation 6:** State public utility commissions and applicable state authorities in states with competitive energy markets should engage with producers, marketers and intrastate pipelines to ensure that the natural gas markets are fully functioning on a basis equitable to BPS operators and interstate pipelines 24/7 basis in preparation for and during events in which demand is expected to rise sharply for both electricity and





natural gas, including weekends and holidays. Per current FERC regulations, interstate pipelines schedule and operate on a 24/7 basis to support the wholesale natural gas market. In instances where state authorities lack enabling authority to take such actions, the FERC should adopt regulations to achieve, to the greatest degree possible within its jurisdiction, the needed operational access to natural gas transportation during critical periods-identical outcomes.

**Recommendation 7:** The Independent System Operators (ISOs) and Regional Transmission Organizations (RTOs), through stakeholder processes, or the FERC, through initiating and conducting proceedings, should consider whether changes to either the Power Day or adopt changes to align regional day-ahead electric scheduling practices would better align with the natural gas day and thus allow for, including earlier notification of successful bids, to ensure that schedules are known and made available to allow natural gas-fired generators to procure natural gas and pipeline capacity in periods when the market is most liquid.

**Recommendation 8:** ~~If not already under consideration through stakeholder processes, ISOs and RTOs or the FERC, through initiating and conducting proceedings, should adopt multiday unit commitment processes to better enable gas-fired generatorsthe industry~~ to prepare for and provide reliable service during events in which demand is expected to rise sharply for both electricity and natural gas, FERC should direct regional system operators to consider or develop market-based mechanisms or products which offer improved opportunities to recover fuel costs for purchases made to ensure availability during a critical period. For example, regional system operators could consider multiday reserve products that can commit generators in anticipation of a defined critical period, and could consider the potential need for limited, backstop cost-based recovery mechanisms for net losses incurred due to the procurement of fuel days in advance over a weekend or holiday that coincides with a multiday critical period.-

**Recommendation 9:** State public utility commissions should encourage local distribution companies within their jurisdictions to structure incentives for the development of natural gas demand response programs, ~~such as those being piloted by National Grid USA and Southern California Gas Company,~~ and/or voluntary natural gas conservation public service announcements for residential, commercial and industrial customers in preparation for and during events in which demand is expected to rise sharply for both electricity and natural gas.

**Recommendation 10:** State public utility commissions or regional system operators that rely onwith integrated resource planning or equivalent planning requirements should consider ways to improve upon cross-market, long-term planning by expanding



collaboration requirements by relevant gas and electric market parties and considering an increased focus on fuel adequacy.

***Recommendation 11:*** FERC, regional system operators, state public utility commissions and applicable state authorities in states with competitive energy markets should ~~assess~~consider whether current market mechanisms are adequate to ensure that gas-fired~~jurisdictional~~ generators have the necessary incentives to support investment in fuel assurance and any storage or transportation services that enable operations arrangements for secure firm transportation and supply service and/or storage to avoid and/or mitigate natural gas supply shortfalls during extreme cold weather events/critical periods. If current market mechanisms are found to be inadequate, it should be, and if not, determined what market improvements are needed and, if market-based mechanisms or products are not feasible, -whether limited non-market solutions are warranted as a last resort to ensure natural gas storage and transportation services are available during emergency conditions., including funding mechanisms borne or shared by customers.

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***Recommendation 13:*** Applicable state authorities should consider establishing informational posting requirements for intrastate natural gas pipelines to enhance transparency for intrastate natural gas market participants regarding operational capacity data, similar to the reporting and posting requirements mandated by the FERC for interstate natural gas pipelines as part of 18 CFR §284.13. In instances where state authorities lack enabling authority to take such actions, the FERC should adopt regulations to achieve this transparency objective~~identical outcomes~~.

***Recommendation 14:*** Applicable state authorities should consider the development of weatherization guidelines appropriate for their region to support the protection and continued operation of gas production, well heads and processing, and gathering system facilities during extreme weather events, ~~and require transparency concerning weatherization efforts of jurisdictional entities.~~ Consideration of cost recovery opportunities may be necessary to address mandates or requirements that specify non-standard or exceptional equipment or operational installations in order to weatherize for



the most extreme weather conditions or periods. This effort should include transparency protocols concerning weatherization efforts of jurisdictional entities.

## **RECOMMENDATIONS FOR STUDIES**

***Recommendation 15:*** The U.S. Department of Energy ~~or FERC~~ should conduct, fund, and/or direct efforts to develop a comprehensive study that evaluates, by region, whether there is adequate natural gas infrastructure in place to support new gas usage patterns affected by flexible gas generation resource requirements as the latter resources are increasingly called upon for more frequent and/or steeper ramping to balance the increased use of variable energy resources. This study should be conducted in conjunction with an industry advisory group made up of diverse interests to ensure there is broad support that the study results are credible and unbiased. Currently, there are no comprehensive regional assessments that examine whether regions have sufficient natural gas infrastructure to support new usage patterns of gas generators, yet this information is essential for policymakers to have so that they can make informed policy decisions and take steps to avoid any potential reliability and resilience risks that accompany the transition to a lower emissions energy future.

***Recommendation 16:*** ~~FERC and NARUC should collaborate~~An appropriate government agency should undertake efforts to conduct, fund, and/or direct efforts to conduct a comprehensive study to ~~determine whether~~examine whether current market-based incentives in organized power markets are sufficient to assist in the support ~~of incentivized investments in~~ strategic natural gas storage facilities, ~~are sufficient~~ to address natural gas supply shortfalls during extreme cold weather events, and ~~if the level of investment is sufficient~~ to preserve such facilities for use during extreme cold weather events. The study should also explore whether new market-oriented solutions are needed to secure sufficient storage investments and should consider whether public sources of funding are ~~needed to secure sufficient storage~~a potential fallback solution.

***Recommendation 17:*** An appropriate government agency should undertake efforts~~FERC and NARUC should collaborate~~ to conduct, ~~fund, and/or direct efforts to conduct~~ a comprehensive study to determine whether additional financial incentives for the natural gas infrastructure system, including infrastructure to provide services which support additional firm transportation capacity, is necessary to support the Bulk Electric System to winterize or otherwise prepare to perform during extreme cold weather events or to provide system ramping needs which will increase as the power system resource expands to include greater weather-dependent intermittent resources.~~would help to address natural gas supply shortfalls during such events.~~



## RECOMMENDATIONS/ENDORSEMENTS OF ACTIVITIES CURRENTLY UNDERWAY

***Recommendation 18:*** On May 3, 2023, a request for standards development was submitted to NAESB to consider modifications to the NAESB Base Contract for Sale and Purchase of Natural Gas to, among other things, encourage weatherization actions. As this specific topic area was identified and discussed by the NAESB Gas-Electric Harmonization (GEH) Forum as a potential recommendation, we endorse this evaluation by the NAESB Wholesale Gas Quadrant.

***Recommendation 19:*** Many generalized recommendations for resource adequacy, generator and accreditation, and additional market reforms to bolster reliability were offered throughout the NAESB GEH Forum activities. However, based upon information provided by representatives from the ISO and RTO segment, steps are being taken within the organized markets to consider these constructs through their stakeholder processes. As recommendations in this area were identified and discussed by the NAESB GEH Forum, we endorse market by market evaluations of resource adequacy and accreditation requirements by all ISOs and RTOs and encourage the review of the Forum record.

## LONG-TERM CONSIDERATIONS

***Considerations:*** Throughout the NAESB GEH Forum activities, comments, discussion, and recommendations were offered to consider reforms to the current permitting and certification process for new natural gas infrastructure, including pipeline capacity, storage, and LNG expansion, to incentivize investment and meet the demands of the current energy transition. In fact, the importance of having sufficient natural gas infrastructure in place to support and maintain the reliable operations of the BPS was strongly acknowledged by all segments throughout the Forum and is thus interwoven throughout the above recommendations. However, the Forum it was recognized by the many proponents of these that recommendations on reforms to the permitting and certification processes that advance the buildout of new infrastructure is a multi-year process and that the benefits that additional capacity and storage will provide to the market would cannot be realized within the timeframe suggested through the FERC and NERC request of the NAESB GEH Forum. It was also recognized that the consideration of reforms to the permitting and certification processes for new natural gas infrastructure is currently taking place in other venues, and We encourage participants in those venues to review of the record created by the NAESB GEH Forum record is encouraged in those venues.