



July 10, 2023

North American Energy Standards Board
1415 Louisiana St., Suite 3460
Houston, TX 77001

Via Electronic Mail

Re: Range Resources – Appalachia, LLC’s Comments on NAESB GEH Forum Chairs’ Strawman Recommendations

To Whom It May Concern,

Please accept the following comments on behalf of Range Resources – Appalachia, LLC (“Range”) as comment on the North American Energy Standards Board (“NAESB”) Gas-Electric Harmonization (“GEH”) Forum Chairs’ Strawman Recommendations (“Recommendations”).

Range is a leading U.S. independent natural gas and NGL producer with our active operations occurring entirely in the Commonwealth of Pennsylvania. As a leading natural gas producer and the pioneer of the Marcellus Shale, we are proud of our long legacy of delivering energy solutions and value to our stakeholders.

Range encourages the GEH Forum to appreciate the need for increased infrastructure – both for natural gas transmission and electric transmission – as the Recommendations are considered. In our operational area, to the extent infrastructure is already available, it is being fully utilized during acute weather conditions. Improving the redundancy of infrastructure would improve the reliability of the natural gas and electric transmission systems during acute weather conditions.

We have reviewed the Recommendations and provide the following comments for consideration.

- I. Recommendation 3:** *Owners and operators of natural gas production facilities should work with 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 [and market participants], including, potentially, through the Argonne National Laboratory’s NGinsight tool.*

Recommendation 3 directs natural gas production facilities to work through two specific national trade associations to provide for sharing near or real-time operational information concerning production facilities for Bulk Electric System operators. This recommendation is worthwhile should it be effectuated to provide a macro view of production and transmission of natural gas for Bulk Electric System operators. Caution should be taken to ensure that any system utilized for information sharing does not impinge upon the competitive aspects of the natural gas production industry and that it does not lead to the divulgement of competitively sensitive data. It is worth noting that this near or real-time operational information is already handled bilaterally through agreements between the appropriate counterparties.



Furthermore, it is not clear why Recommendation 3 enumerates two specific national trade associations to effectuate the recommendation or the justification for the selection of these two specific national trade associations.

II. Recommendation 14: *Applicable state authorities should consider the development of weatherization guidelines appropriate for their region to support the protection and continued operation of well-heads and processing and gathering system facilities during extreme weather events and require transparency concerning weatherization efforts of jurisdictional entities.*

Upstream producers already have a strong economic incentive to weatherize their facilities to ensure continued production during any acute weather event – be it a cold weather event or otherwise. Because Range operates in the Commonwealth of Pennsylvania where acute weather events, such as winter weather events, can and do occur throughout the year, we have taken significant steps to ensure the winterization of our production sites in preparation for acute weather conditions while prioritizing safety. Range implemented a more formalized winterization program in and around 2014-15 that is reviewed and updated annually based upon operational experiences. From our experiences and learnings Range, has implemented a flexible and responsive winterization program which aligns with our goals as a company to maintain planned production levels and deliver those volumes to our customers.

Indeed, market and competitive forces already incentivize actions taken by upstream natural gas producers to provide for the consistent and continued production of natural gas. These market incentives to support natural gas production during acute weather events is proven effective and is preferable to a complex patchwork of rules and requirements. Range encourages the GEH Forum to discard this recommendation.

III. 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 18 endorses the pending request for standards development to consider modifications to the force majeure provisions in the NAESB Base Contract for Sale and Purchase of Natural Gas.

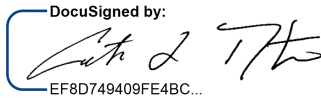
Existing force majeure provisions in the NAESB Base Contract for Sale and Purchase of Natural Gas strikes a fair balance between performance obligations and performance risk. They are further structured to recognize that these provisions exist to address circumstances beyond the parties' control. The commercial goals and market incentives of independent parties should drive the need, or lack thereof, for any modifications to the established terms in the Base Contract for Sale and Purchase of Natural Gas. Should any modifications be needed, the negotiating parties are free to negotiate such provisions (and do already) as are



commercially appropriate to address. This affords the negotiating parties the flexibility to evaluate any increased risk, costs, and obligations because of the proposed modified contract language.

Sincerely,

Range Resources – Appalachia, LLC

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Curtis Tipton
Vice President – Appalachia Division