



AMERICAN PUBLIC GAS ASSOCIATION

July 10, 2023

North American Energy Standards Board:

The American Public Gas Association (APGA) respectfully submits these comments in response to the North American Energy Standards Board's (NAESB) Gas Electric Harmonization (GEH) Forum's request for feedback on the Chairs' Strawman Recommendations.

APGA is the trade association representing more than 730 communities across the U.S. that own and operate their retail natural gas distribution entities. These include not-for-profit gas distribution systems owned by municipalities and other local government entities, all accountable to the citizens they serve. Public gas systems provide safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications, including electricity generation.¹

NAESB staff and Forum Chairs have worked tirelessly to coordinate meetings and collect feedback over the past year, including synthesizing countless comments and opinions into the Chairs' Strawman Recommendations. Before finalizing the recommendations for a vote, APGA offers the below feedback on several of the strawman recommendations:

- APGA and our members are concerned that **Recommendation 1** limits communication of the listed data to only Bulk Electric System operators. When only one type of market participant is privy to more data than others, significant concerns arise about how that may impact the markets, including the potential of creating unfair competition. APGA encourages NAESB and the Chairs to update this recommendation accordingly.
- **Recommendations 6, 9, 10, 11, 12, 13, 14** all refer to "state public utility commissions" or "applicable state authorities." As a reminder, almost all APGA member systems are governed at the local level, so changes by a state public utility commission or similar will often not have any impacts on public natural gas distribution systems. If this is not an intended outcome, the Chairs should consider revising the recommendations accordingly.
- Finally, and most importantly, APGA believes that the **Long-term Considerations**, which predominantly focus on the need for reforms to the current permitting and certification process for new natural gas infrastructure, should not only be included as a twentieth recommendation but, because of its importance, should be made the new Recommendation 1. While permitting reform and infrastructure development can both stretch over multiple years, that does not diminish their value. In fact, the long-term aspect of these activities should be a driver for why they are considered a formal recommendation, as if they are not undertaken soon, they may not be available when they are needed most. The Chairs' Strawman Recommendations also included Recommendations/Endorsement of Activities Currently Underway, so the rationale that permitting/infrastructure activities are happening in other venues is not reason enough to not include the critical (and well-supported) consideration from being included as a formal recommendation for vote.

¹ For more information, please visit www.apga.org.

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Thank you for your review and consideration of these comments as you work to finalize the recommendations that Forum participants will vote on. APGA and its members again thank NAESB for its efforts in convening this Forum and look forward to engaging in any next steps. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David Schryver". The signature is fluid and cursive, with the first name "David" and last name "Schryver" clearly distinguishable.

David Schryver

President & CEO
American Public Gas Association