



NORTH AMERICAN ENERGY STANDARDS BOARD

801 Travis, Suite 1675 • Houston, Texas 77002 • Phone: (713) 356-0060 • Fax: (713) 356-0067
email: naesb@naesb.org • Web Site Address: www.naesb.org

March 19, 2021
Filed Electronically

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20426

RE: Federal Energy Regulatory Commission Standards for Business Practices of Interstate Natural Gas
Pipelines Notice of Proposed Rulemaking (Docket No. RM96-1-042)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") voluntarily submits these comments in response to the Notice of Proposed Rulemaking ("NOPR") issued by the Federal Energy Regulatory Commission ("FERC" or "Commission") on February 18, 2021 in Docket No. RM96-1-042. These comments are submitted to provide clarifying information concerning WGQ Standard 4.3.60 and WGQ Standard 10.3.16, which have been proposed for incorporation by reference into the Commission's regulations.

The cover letter and comments are filed electronically in Adobe Acrobat® Portable Document Format (.pdf). The comments are also available on the NAESB web site (www.naesb.org). Please feel free to call the office at (713) 356-0060 or refer to the NAESB website (www.naesb.org) should you have any questions or need additional information regarding the standards development effort.

Respectfully submitted,

Ms. Rae McQuade
President & COO, North American Energy Standards Board

cc: Chairman Richard Glick, Federal Energy Regulatory Commission
Commissioner Neil Chatterjee, Federal Energy Regulatory Commission
Commissioner James Danly, Federal Energy Regulatory Commission
Commissioner Allison Clements, Federal Energy Regulatory Commission
Commissioner Mark C. Christie, Federal Energy Regulatory Commission

Mr. Matt Christiansen, General Counsel, Office of the General Counsel, Federal Energy Regulatory Commission

Mr. Joseph McClelland, Director, Office of Energy Infrastructure Security, Federal Energy Regulatory Commission

Ms. Jette Gebhart, Director, Office of Energy Market Regulation, Federal Energy Regulatory Commission

Ms. Jignasa Gadani, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Michael Desselle, Chairman and Chief Executive Officer, North American Energy Standards Board
Ms. Valerie Crockett, Vice Chairman, North American Energy Standards Board
Mr. Jonathan Booe, Executive Vice President and Chief Administrative Officer, North American Energy Standards Board
Mr. William P. Boswell, General Counsel, North American Energy Standards Board



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**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

**Standards for Business Practices
of Natural Gas Pipelines**

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Docket No. RM96-1-042

The North American Energy Standards Board (“NAESB”) respectfully submits these comments in response to the *Standards for Business Practices of Natural Gas Pipelines Notice of Proposed Rulemaking* (“NOPR”) issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) in Docket No. RM96-1-042 on February 18, 2021. In the NOPR, the Commission proposed to incorporate by reference NAESB Wholesale Gas Quadrant (“WGQ”) Standard 4.3.60 and 10.3.16. The Commission summarized these standards: “Moreover, NAESB revised existing Standards 4.3.60 and 10.3.16 to require multi-factor (e.g., two-factor) authentication on an individual basis and state that secure web sites should employ individual user credentials.”¹ NAESB submits these comments to clarify the record as WGQ Standards 4.3.60 and 10.3.16 do not require multi-factor authentication on an individual basis. WGQ Standard 4.3.60 states that a Customer Activities Web should be protected by HTTP Basic Authentication using transport layer security and require a single logon/password pair for each user session. Additionally, WGQ Standard 10.3.16 states that trading partners should implement HTTP Basic Authentication using transport layer security.

NAESB appreciates the opportunity to provide these informational comments to the Commission. If there are any questions or additional information is required, please do not hesitate to contact the NAESB office (713-356-0060 or naesb@naesb.org).

¹ *Standards for Bus. Practices of Interstate Nat. Gas Pipelines*, Notice of Proposed Rulemaking, 86 FR 12879, 12881 (Mar. 5, 2021), 174 FERC ¶ 61,103, at P 12 (2021).