**Quadrant:** Wholesale Gas Quadrant

**Recommendation:** 2014 WGQ Annual Plan Item 11.c – Support FERC Notice of Proposed Rulemaking, Coordination of the Scheduling Process of Interstate Natural Gas Pipelines and Public Utilities (NOPR Issued March 20, 2014 – RM 14-2-000)

**Submitted By:** Joshua Phillips (SPP)

**Date:** August 18, 2014

The IRC supports the proposed changes to the day-ahead gas nomination cycles, including the 1pm (Central Time) Timely Cycle close. The IRC also supports the proposed changes to the biddable Capacity Release timeline that will allow for biddable capacity release to be nominated in the day-ahead Timely Cycle.

While the IRC is supportive of the proposed intraday nomination cycles, we also recognize that additional intraday nomination cycles, including the four total intraday nomination cycles proposed in the FERC NOPR, could provide greater flexibility to gas-fired generators responding to real-time electric system conditions. During discussions held as part of the NAESB Gas Electric Harmonization Task Force, the IRC supported the proposed three Intraday nomination cycles, when they were considered as part of a package that included an earlier (e.g. 4am Central Time) start of the Gas Day.

Finally, the IRC continues to support the 4 a.m. CCT start to the gas operating day for the reasons set forth in the FERC NOPR and summarized in previous comments. CAISO and IESO, however, are supportive of all of the proposed Gas Day start times. During the NAESB discussions, the IRC was supportive of a 4 a.m. or earlier start of the Gas Day, and supported packages consistent with those Gas Day start times. The current start to the gas operating day requires generators to nominate gas over two electric days. Gas scheduled in the day-ahead Timely cycle covers the evening peak of one electric day, and the morning peak of a different electric day. Moving the gas operating day to an earlier time allows generators to nominate gas in the day-ahead Timely Cycle – i.e. the most liquid cycle – to cover the morning and evening peaks of the same electric day. This is especially helpful during extreme cold weather, when operating conditions on the gas pipeline can change drastically from one day to the next.