

Submitted via email to naesb@naesb.org

October 16, 2023

Ms. Elizabeth Mallett
NAESB Director, Wholesale Gas and Retail Markets Quadrants
North American Energy Standards Board
1415 Louisiana Street, Suite 3460
Houston, TX 77002

Re: Comments Pertaining to Standards Request R23001

Ms. Mallett and Wholesale Gas Quadrant Executive Committee Members:

We respectfully request that the North American Energy Standards Board (NAESB) Wholesale Gas Quadrant (WGQ) Executive Committee (EC) vote to oppose the No Action Recommendation pertaining to Standards Request R23001, which deals with proposed revisions to the NAESB Base Contract for Sale and Purchase of Natural Gas (Base Contract) to improve the clarity associated with the force majeure provisions in the contract. Doing so will ensure that important conversations pertaining to the Base Contract's force majeure provisions can continue.

Our organization uses the Base Contract, that is initiated by our multiple counterparties, to govern the terms of most of our supplies purchased for our member cities. The contract is critical to our business. We are a non-profit, joint action agency that represents 83 municipalities and our throughput in 2023 will be more than 120 BCF.

While not perfect, the standards request is a good starting point for important discussions on how to update NAESB contract language in order to best serve the changing needs of the industry.

The natural gas industry has done an impressive job in maintaining reliability and resiliency, but it is important that all market participants take responsibility for important preventative actions, such as region-dependent weatherization and clear communication. This will support planning purposes of all counterparties and ensure a well-functioning natural gas network in all but the worst-case scenarios. Accordingly, we are willing to consider unique solutions to find the best path forward.

As a member of the American Public Gas Association, we support their comments and echo the need for the WGQ EC to oppose the No Action Recommendation.

Thank you for your review and consideration of these comments, and we hope you oppose the No Action Recommendation.

Sincerely,



Tina Smith

Vice President

Municipal Gas Authority of Georgia