Gas-Electric Interdependence

Changes to the Gas Nomination Schedule to Improve Coordination of Natural Gas and Electricity Markets



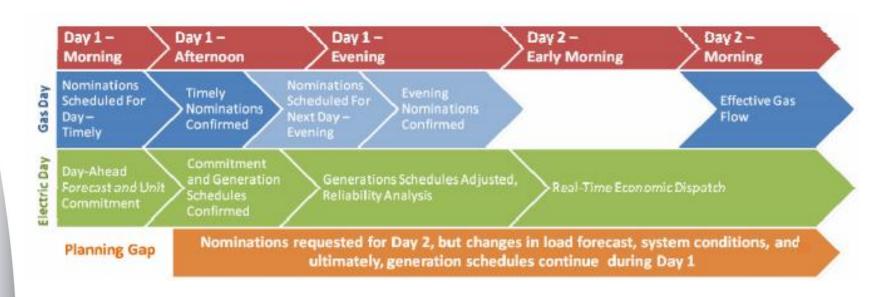


FERC's Outreach

- Gas-electric scheduling and market structure rules
- Communications and information-sharing
- Reliability



Natural Gas and Electric Operating Day



Source: NERC

FERC NOPR RM14-2-000

- FERC Proposal
 - Move the start of the gas day to 4:00 a.m. CT
 - Extend Timely Nomination Deadline to 1:00 p.m. CT
 - Provide for 4 standard intraday nomination cycles at
 - 8:00 a.m.; 10:30 a.m.; 4:00 p.m.; and 7:00 p.m.
 - Directed the natural gas and electricity industries, working through NAESB, to reach consensus on modifications to the gas nomination schedule

FERC NOPR RM14-2-000

| Gas Nomination Timeline (all times Central Clock Time) | | | | | | | | | |
|--|------------------------|---------------|--------------------|----------------------|----------------------|---------------------------|--|--|--|
| Cycles | Nomination Deadline | Confirmations | Schedule Issued | Start of Gas Flow | Remaining Gas Day | Firm Bumping Rights | | | |
| Timely | 1:00 p.m. | 4:00 p.m. | 4:30 p.m. | 4:00 a.m. | N/A | N/A | | | |
| Evening | 6:00 p.m. | 9:00 p.m. | 10:00 p.m. | 4:00 a.m. | N/A | Bumpable | | | |
| Intraday 1 | 8:00 a.m. | 10:30 a.m. | 11:00 a.m. | 12:00 noon | 16 hours | Bumpable | | | |
| Intraday 2 | 10:30 a.m. | 1:30 p.m. | 2:00 p.m. | 4:00 p.m. | 12 hours | Bumpable | | | |
| Intraday 3 | 4:00 p.m. | 5:30 p.m. | 6:00 p.m. | 7:00 p.m. | 9 hours | Bumpable | | | |
| Intraday 4 | 7:00 p.m. | 8:30 p.m. | 9:00 p.m. | 9:00 p.m. | 7 hours | No-bump | | | |

NAESB Process

- April, 2014 NAESB Board of Directors activated Gas Electric
 Harmonization Forum to consider alternative consensus proposals
- September, 2014 NAESB staff filed consensus standards to the FERC NOPR. If adopted by FERC, eventual inclusion in pipeline tariffs
 - 1 p.m. CT Timely and 6 p.m. CT Evening day-ahead nomination
 - Provide for 3 standard intraday nomination cycles at
 - 10 a.m.; 2:30 p.m.; and 7 p.m.
 - Retains No Bump Rule
 - Did not specify a Gas Day start time

NAESB Modified Standards

| Modified Gas Nomination Timeline (all times Central Clock Time) | | | | | | | | | |
|---|------------------------|---------------|--------------------|-------------------|--------------------------|--|--|--|--|
| Cycles | Nomination Deadline | Confirmations | Schedule Issued | Start of Gas Flow | Firm Bumping Right | | | | |
| Timely | 1:00 p.m. | 4:30 p.m. | 5:00 p.m. | start of gas day | N/A | | | | |
| Evening | 6:00 p.m. | 8:30 p.m. | 9:00 p.m. | start of gas day | Bumpable | | | | |
| Intraday 1 | 10:00 a.m. | 12:30 p.m. | 1:00 p.m. | 2:00 p.m. | Bumpable | | | | |
| Intraday 2 | 2:30 p.m. | 5:00 p.m. | 5:30 p.m. | 6:00 p.m. | Bumpable | | | | |
| Intraday 3 | 7:00 p.m. | 9:30 p.m. | 10:00 p.m. | 10:00 p.m. | No-bump | | | | |

Comments in Response to FERC NOPR RM14-2-000

- More than 80 parties and groups filed comments by November, 2014
- Widespread support for NAESB recommended standards
- Natural gas industry opposed 4:00 a.m. CCT
- Electric side was mixed

When will FERC issue the final rule?

Important takeaways

- As more and more natural gas is being used to generate electricity, investments must be made in a robust natural gas infrastructure.
- Little more can be gained in terms of electric reliability by improvements in the efficiency of the existing natural gas infrastructure.
- Organized electric markets must provide cost recovery mechanisms for investments in natural gas infrastructure.

Examination of Fuel Supply and Gas Infrastructure Issues

- ISOs/RTOs filed reports on the status of their efforts to address fuel assurance
- ISOs/RTOs directed to explain:
 - How its market rules address fuel assurance challenges
 - Identifying the fuel assurance issues most relevant to its markets
 - Describing set of actions it has already taken or propose to undertake to address these issues

Examination of Fuel Supply and Gas Infrastructure Issues

- RTOs/ISOs filed reports in February, 2015
- RTO/ISO Report Themes:
 - Regional and arise in different ways across the country
 - Each RTO/ISO addressing fuel assurance in their own way

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