

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

INVESTIGATION INTO ISO)	COMMENTS OF NORTHEAST ENERGY SOLUTIONS
ISO AND RTO SCHEDULING)	
PRACTICES AND ESTABLISHING)	
PAPER HEARING PROCEDURES)	
)	

Docket Nos.:

- RM14-2-000,
- EL14-22-000,
- EL14-23-000,
- EL14-24-000,
- EL14-25-000,
- EL14-26-000,
- EL14-27-000,
- RP14-442-000

Item Nos.: M-1, M-2, and M-3

Northeast Energy Solutions (NEES) supports the Federal Energy Regulatory Commission's (FERC) above-captioned Order and your correlating Notice of Proposed Rulemaking (NOPR) towards ameliorating the scheduling challenges between the natural gas and electricity markets. NEES is committed to working with federal and state officials and regional operators to devise workable operating day and scheduling practices for natural gas transportation. Primarily, NEES endorses reforms that better coordinate the timeframe for scheduling interstate natural gas transportation capacity with the electricity markets operated by independent system operators (ISOs).

NEES believes that reform is critical as reliance on natural gas as a fuel for electric generation is growing and is expected to cause greater interdependence between the natural gas and electric industries. NEES further believes that reforms may go a long way towards meeting natural gas needs in northeastern United States. As such, NEES will promote market operation reforms within FERC proceedings regarding proposed pipelines, as appropriate.

NEES believes that reforms should be implemented to correct the following concerns:

- The time difference between nationwide natural gas scheduling and regional electricity market scheduling.
- The current FERC policy prohibiting displacement of scheduled, firm transportation by another nomination. Pipelines should not be required to give scheduling priority to firm shippers over scheduled volumes for interruptible shippers.
- Lack of time for ISOs to post results of their day-ahead markets so that gas-fired generators may know their day-ahead commitments to timely submit for pipeline capacity.

NEES also encourages FERC to implement rules that adopt the following North American Electric Reliability Corporation's Polar Vortex Review (September 2014) recommendations:

- Update power plant weatherization programs, including procedures and staff training.

- Implement winter preparation site reviews at generation facilities.
- Impose internal processes to ensure accountability for the capability to secure necessary waivers of environmental and/or fuel restrictions.
- Improve operational awareness of the fuel status and pipeline system conditions for all generators.

NEES believes the aforementioned reforms will greatly improve communication, beyond currently available public information, between the natural gas and electric industries about fuel supply and operational issues. NEES also believes that these reforms will increase the interconnected operation and reliability of the natural gas and electric systems and, as such, will prevent capacity constraints and pricing spikes.

Respectfully Submitted,



On behalf of NEES

Vincent DeVito, Esquire
Bowditch & Dewey, LLP
1 International Place, 44th Floor
Boston, Massachusetts 02110
vdevito@bowditch.com
(617) 757-6500

Document Content(s)

B0494473.PDF.....1-3