



July 12, 2023

North American Energy Standards Board
1415 Louisiana Street, Suite 3460
Houston, TX 77002

Re: Gas-Electric Harmonization Forum – Strawman Recommendations

To Whom It May Concern:

The Marcellus Shale Coalition (MSC), a regional trade association with a national membership, appreciates the opportunity to submit the following comments regarding the strawman recommendations put forth by the Gas-Electric Harmonization Forum.

The MSC was formed in 2008 and is currently comprised of approximately 140 producing, midstream, transmission and supply chain members who are fully committed to working with local, county, state and federal government officials and regulators to facilitate the development of the natural gas resources in the Marcellus, Utica and related geological formations. Our members represent many of the largest and most active companies in natural gas production, gathering, processing, transmission and utilization, in the country, as well as the supply chain companies, contractors and professional service firms who work with the industry.

The MSC writes to express its support for the comments submitted on July 10, 2023, by the American Exploration and Production Council (AXPC). These comments underscore the importance of which our producer, midstream and transmission member companies take in ensuring that consumers have access to clean, affordable and reliable natural gas service and the steps industry members take to provide natural gas supplies in a timely, efficient and predictable manner.

To the extent that additional steps are necessary to align the functionality of both the gas delivery and electric generation marketplace, the comments offered by AXPC provide important context and details that ought to be considered by the Gas-Electric Harmonization Forum. The comments rightly focus on the important role that both regional transmission organizations as well as state public utility commissions play in addressing regional or state-specific needs and unique factors, including with respect to weatherization of production, processing and transmission services.

As the North American Energy Standards Board continues to examine the broader issues related to enhancing the reliability of natural gas infrastructure in support of the bulk electric grid, the MSC also reiterates our comments included in our letter of May 22, 2023.

On behalf of the MSC and its member companies, thank you for your consideration of these comments. As always, the MSC and its members stand ready to assist and serve as an industry

resource as you continue your important work of strengthening consumer access to reliable domestic energy resources.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Callahan". The signature is fluid and cursive, with a large initial "D" and "C".

David E. Callahan, President
Marcellus Shale Coalition

