

AMERICAN PUBLIC GAS ASSOCIATION

October 15, 2021

The Honorable Richard Glick Chairman Federal Energy Regulatory Commission 888 First Street NE Washington, DC 20246

Re: Ongoing Response to Winter Storm Uri and APGA's White Paper

Dear Chairman Glick:

During the Commission's September Open Meeting, FERC staff and representatives from the North American Electric Reliability Corporation (NERC) presented the preliminary findings and recommendations of the joint inquiry into the February 2021 cold weather grid operations. Subsequently, on September 28, you and your fellow commissioners appeared before the Senate Energy & Natural Resources (ENR) Committee for a hearing, during which some senators also inquired of the Commission's response to February's events.

APGA was disappointed with both the preliminary recommendations discussed at the FERC Open Meeting and responses provided during the ENR hearing, as both lacked a concrete path forward to protect American natural gas consumers from future price spikes that may result from extreme weather. As you know, February's Winter Storm Uri challenged the natural gas industry with an unprecedented crisis. The severe cold weather led to natural gas prices increasing over 300 percent, burdening consumers in a large part of the US with billions in gas costs and forcing even small municipal utilities to spend millions of dollars more than usual. As was referenced by one senator during the ENR hearing, many communities are still bearing the costs of the historic price spikes and will be doing so for years to come.

APGA has released a white paper, developed with the support of our community-owned natural gas utility members, that outlines issues experienced during the severe winter weather and potential solutions. In the hearing, you noted that some type of "circuit breaker" may help to alleviate the potential of similar substantial price fluctuations. On the stock exchanges, a circuit breaker stops trading. In a cold spell, more gas trading would help consumers, not less. Thus, in our white paper, we consider amendments to the Natural Gas Policy Act that are intended to prevent such significant price increases during future emergencies. As we engage Congress on this potential solution, the support of you and your colleagues would be appreciated. I have attached the white paper for reference and encourage you to review the document and its potential solutions, as bold action is required at the federal level to ensure that consumers are protected from another economic catastrophe in the future.

Thank you for your continued attention to this critical matter. As I'm sure you'd agree, consumers should not have to pay exorbitant energy prices to heat their homes, especially when it's needed most. APGA is

looking forward to working with you and the Commission to ensure appropriate protections are put in place. I'd be happy to further discuss our white paper or any related matters further.

Respectfully submitted,

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Dave Schryver President & CEO American Public Gas Association

cc: James Danly, FERC Commissioner Allison Clements, FERC Commissioner Mark Christie, FERC Commissioner

Attachment