



## Adelphia Gateway, LLC

### Gas & Electric Coordination

#### FERC ORDER 698

On June 25, 2007, the Federal Energy Regulatory Commission (FERC) issued a final order in Docket No. RM96-1-027 (Order 698), adopting standards<sup>1</sup> developed by the North American Energy Standards Board (NAESB) which address communication protocols between interstate pipelines and power plant operators and electric transmission system owners/operators. Communication protocols were adopted to improve the scheduling of gas-fired power generators and enhance overall reliability.

Adelphia Gateway, LLC (Adelphia), currently has 3.4 GW of gas fired electric generators within its footprint and electric generation is expected to continue growing. Natural gas continues to be the preferred fuel of choice for new generation and Adelphia is committed to continuously improving processes, coordination and communication between our natural gas operations and gas-fired electric generation.

Order No. 698 requires that communication procedures be established to facilitate the sharing of information of hourly gas flows between natural gas pipelines and their gas-fired power generator customers.

- NAESB Standards require gas-fired power plant operators to provide a daily burn profile.
- As required by the NAESB Standards, gas-fired power plant operators and pipelines are required to communicate material changes in circumstances that may affect hourly gas flows. This communication ensures that pipelines have relevant information to operate their systems.
- Pipelines are required to provide information to gas-fired power plant operators regarding whether hourly flow deviations can be honored.
- Electric transmission operators and gas-fired power plant operators are required to sign up with gas pipelines to receive critical notices and operational flow orders.

Adelphia strives to implement best practices for its customers and is committed to meeting electric generation needs, as reflected in contractual commitments. Adelphia has created a template Burn Profile for plant operators to provide the required daily burn information.

Adelphia continuously evaluates its processes to ensure their efficiency. As such, Adelphia encourages its customers to present suggestions for process improvements and more effective means of communication for the benefit of all involved. Our goal is to work in partnership with our customers.

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<sup>1</sup> Gas/Electric Communication Operational Communication standards 0.3.11 through 0.3.15 and the associated definitions 0.2.1 through 0.2.3 are incorporated by reference in Adelphia's FERC-approved Gas Tariff in Section 31 of the General Terms and Conditions (Part 6.31 NAESB Standards, 2.0.0).

## ADELPHIA BURN PROFILE PROCESS

To streamline communications between Adelphia and power generation customers, customized burn profile forms are required to be submitted according to the guidelines provided herein.

Consistent with the PJM day-ahead market timeline, as specified in PJM Manual 11, Section 2.3, Adelphia requires all power generation customers to adhere to the following process:

### DAY-AHEAD AWARDS

- Day-ahead Burn Profile Forms must be submitted to [AdelphiaScheduling@njresources.com](mailto:AdelphiaScheduling@njresources.com) by 2:00 PM Eastern time (ET).
- Details describing any discrepancies between nominated gas and burn profile estimates should be included with the submission of the Burn Profile Form.
- Adelphia will provide a response to submitted Burn Profile Form's by 3:30 PM (ET), or as soon as practicable.
- Adelphia is not obligated to confirm, or schedule nominated gas volumes when a Burn Profile Form has not been submitted and/or has not been approved.
- Per Section 36 of Adelphia's FERC Gas Tariff, unless otherwise agreed in advance, service will be provided at uniform rates over a twenty-four (24) hour period to the extent practicable. Operational flexibility may be provided if possible, on an interruptible basis, at Adelphia's discretion on a non-discriminatory basis.

### INTRA-DAY CHANGES

The following communication is requested around intra-day generation and/or supply needs:

- Burn Profile Forms should be revised and resubmitted as generation needs change throughout the gas day via email to [AdelphiaScheduling@njresources.com](mailto:AdelphiaScheduling@njresources.com)
- It is not Adelphia's intent to create an overly burdensome process. When it is not feasible to submit a revised Burn Profile Form, the Generator should communicate and coordinate a balancing plan with the Adelphia Scheduling Team via the following acceptable forms: email, telephone call, ICE Chat message, or text. As a follow-up, a revised Burn Profile should be submitted memorializing a change from previously submitted and approved profiles.
- When time constraints or market conditions do not allow for nominations to be updated within the next NAESB cycle, the Generator should notify the Adelphia Scheduling Team in a timely fashion via any of the communication forms listed above.
- Adelphia expects cycle by cycle updates if nominations do not match the most recent burn profile on record for the respective gas day.
  - Absent communication from the Generator, Adelphia is not obligated to confirm, or schedule changes to nominated gas volumes.
  - Firm transportation rights are guaranteed when nominated and scheduled during the timely nomination cycle. Intraday changes will be allocated and scheduled per Section 5 of the General Terms and Conditions of Adelphia's FERC Gas Tariff.

- Adelphia will accept operational updates via text messaging during after-hours and weekend time periods for ease in the communication process. However, Generators must memorialize the communication via a formal Burn Profile email submission the next business day following the after-hours or weekend activity.

Shippers shall monitor their hourly usage and ensure that actual deliveries conform to shippers' burn profile as submitted and approved by Adelphia.

