

# **Substantive Resolutions**

**Passed by the  
National Association of Regulatory Utility Commissioners  
Board of Directors**

at the

**November 9 - 12, 2025**

**NARUC Annual Meeting and Education Conference**

**in Seattle, Washington**

*If you are interested in this resolution, you should read the entire draft and not rely on the truncated description in the Table Contents.*

**I. Executive Committee**

**EC-1 Resolution on Gas-Electric Alignment for Reliability (GEAR) Recommendations.....4**

Sponsor: NARUC President Tricia Pridmore [10/27/2025 9:26 PM VZ from JR]

*Resolution outlines GEAR recommendations and urges NARUC to support them and the attached (See Appendix A) report. Passed Executive Committee 11/8.*

**II. Electricity Committee**

**EL-1 Resolution Urging the Federal Energy Regulatory Commission to Preserve and Affirm State Retail Regulatory Jurisdiction in its Large Load Interconnection Proceeding.....6**

Sponsor Commissioner Kelsey Bagot [10/27/2025 1:10 PM VZ from TC]

*Resolution urges FERC to preserve and affirm states' retail regulatory authority under the Federal Power Act, ensure that large load interconnections do not compromise grid reliability or impose undue costs on retail customers, and respect state tools for promoting system flexibility and equitable cost allocation. Passed Electricity Committee 11/10.*

**III. Gas Committee**

**GS-1 Natural Gas Plays a Foundational Role in America's Affordable, Reliable, and Clean Energy Future .....8**

Sponsor: NARUC President Tricia Pridmore [10/27/2025 10:22 AM VZ from SW]

*Resolution recognizes natural gas [1] is a foundational source of energy that has contributed to a 20-year trend of driving down carbon emissions, [2] can support responsible growth in carbon-free sources like wind, solar and battery technology, working with existing technologies like nuclear and hydroelectric power, without sacrificing reliability and affordability for businesses and residential consumers, particularly marginalized communities, Specifies that NARUC supports continued investment in energy infrastructure including natural gas, that will be necessary to keep energy costs affordable while meeting growing demand; and that Congress and federal regulators must act to streamline permitting reform for wires, natural gas pipelines and other energy infrastructure to speed up construction of energy assets that strengthens America's economy, ensures a more reliable grid, leverages secure American energy, lowers costs for consumers, and creates meaningful American jobs. Passed Gas Committee 11/10.*

**GS-2 Resolution Supporting Permitting Reform for Interstate Natural Gas Pipeline Infrastructure.....10**

Sponsor: Gas Vice Chair Nick Myers [10/27/2025 10:22 AM VZ from SW]

*Resolution reaffirms that expansion of interstate natural gas pipeline infrastructure is a vital national priority and urges Congress to enact reforms to break the permitting logjam for the construction and operation of such infrastructure. Passed Gas Committee 11/10.*

***GS-3 Resolution for Permitted Infrastructure Certainty and Durability.....11***

Sponsor: Commissioner Kim Drexler [10/27/2025 10:22 AM VZ from SW]

*Resolution calls on Congress and state legislatures to create the regulatory certainty needed to promote investment in critical energy infrastructure by enacting meaningful permitting reforms that establish a rational, efficient, consistent permitting process and that produce durable regulatory approvals. Passed Gas Committee 11/10.*

***IV. Telecommunications Committee***

***TC-1 Resolution on Telephone Number Conservation White Paper [TABLED]***

## ***EC-1 Resolution on Gas-Electric Alignment for Reliability (GEAR) Recommendations***

*Whereas* new technologies for renewable electricity generation combined with the significant increase in natural gas production and a corresponding decrease in gas prices have increased dependence on gas for electricity generation;

*Whereas* because natural gas systems were designed primarily to deliver gas for home heating and industrial processes, not to supply fuel for electric generation plants, gas infrastructure and markets are not aligned with emerging demands for electric generation;

*Whereas* the lack of coordination between these systems poses serious reliability concerns in some regions of the United States, especially during winter storms when dependence on gas for both home heating and power electric generation is high;

*Whereas* recognizing this problem, on November 21, 2023, the NARUC Executive Committee approved the creation of the Gas-Electric Alignment for Reliability Task Force to bring together state regulators and industry representatives to develop recommendations to better align the gas and electric industries;

*Whereas* GEAR has completed its work and generated the attached 41-page report, which includes nine recommendations;

*Whereas* some recommendations have already been adopted by the NARUC Board of Directors;

*Whereas*, the final GEAR Report includes the following recommendations that:

- (1) support the creation of a voluntary ongoing Natural Gas Readiness Forum dedicated to the enhancement of U.S. natural gas value chain reliability via the promotion of communication, peer-to-peer connections, situational awareness, and education among its participants and stakeholders to anticipate and respond to calamitous events and other issues;
- (2) with the expertise and influence of its member states, NARUC should support federal permitting reform that would address infrastructure hurdles in a meaningful way such that new infrastructure may be in place in a timely manner to meet growing and changing natural gas and electricity demand;
- (3) states and organized power markets evaluate a wide array of solutions that affect the investment in, development of, and use of storage of all types, including associated infrastructure, to support the electricity grid and end use customer reliability under high energy demand conditions;
- (4) that states should be encouraged to be aware of utilities' load shed practices and should reach out to their ISO/RTO, regulated utilities, and any other relevant electricity consuming groups and review information from NERC to better understand load shed practices, when load shed practices were last updated, and evaluate if changes are needed for the current electricity consumption landscape;
- (5) while historically, natural gas markets have worked well, improvements to ensure greater liquidity and transparency on winter weekends, when there is limited trading, can help to ensure

that reliability is enhanced at a reasonable cost to customers, fully recognizing that these decisions will involve tradeoffs and risk-shifting;

- (6) states, in lieu of direct winterization regulations for natural gas production, provide for consideration of the need and feasibility of a market-driven process that allows cost recovery for utilities and generators that pay a premium for a verified winterized or enhanced performance (e.g., storage and other assets) product for the purpose of increasing reliability through supply loss mitigation;
- (7) GEAR encourages state regulators and policymakers to support stakeholder actions for market-based solutions to incent and advance natural gas fuel procurement and provide economic certainty, consistent with recommendations to improve natural gas unit scheduling and dispatch;
- (8) to ensure system reliability for states with limited and/or no natural gas demand response programs, state regulators in those jurisdictions may want to consider building out robust demand response programs to reduce or shift their energy usage during periods of high demand or system stress, such as severe weather events; and finally,
- (9) that states should consider supporting or adopting measures that facilitate more timely and frequent use of interstate capacity release or asset management arrangements (AMAs) by its utilities so the marketplace may benefit from a more efficient allocation of firm interstate transportation and storage capacity; *now therefore be it*

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners , convened at its 2025 Annual Meeting and Education Conference in Seattle, Washington, congratulates and extends its sincere thanks to all of the GEAR participants for their extensive and collaborative work and adopts the attached GEAR report and its recommendations.

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*Passed by the Executive Committee on November 8, 2025.*

*Adopted by the NARUC Board of Directors on November 11, 2025.*

***EL-1 Resolution Urging the Federal Energy Regulatory Commission to Preserve and Affirm State Retail Regulatory Jurisdiction in its Large Load Interconnection Proceeding***

*Whereas* on October 23, 2025, the Secretary of Energy issued a letter pursuant to section 403 of the Department of Energy Organization Act directing the Federal Energy Regulatory Commission (FERC) to initiate rulemaking procedures and consider the proposed Advanced Notice of Proposed Rulemaking (ANOPR) presenting reforms to ensure the timely and orderly interconnection of large loads to the transmission system;

*Whereas* the states acknowledge the policy priorities expressed by the Secretary, and agree that ensuring efficient, timely, and non-discriminatory interconnection of large loads, including AI data centers, requires prompt and thoughtful consideration by regulators;

*Whereas* to ensure that any Final Rule resulting from the ANOPR process is durable, legal, and does not unintentionally lead to resource adequacy challenges or more delays to the large load interconnection process, it is particularly important that FERC give thoughtful consideration to the concerns of the States and other interested parties;

*Whereas* the ANOPR asserts FERC jurisdiction over the interconnection of large loads to the transmission system;

*Whereas* the ANOPR recognizes that section 201(b) of the Federal Power Act grants the States with exclusive jurisdiction “over facilities used for the generation of electric energy or over facilities used in local distribution or for the transmission of electric energy in intrastate commerce, or over facilities for the transmission of electric energy consumed wholly by the transmitter.” 16 U.S.C. § 824(b);

*Whereas* while the ANOPR disclaims any intention to assert jurisdiction over distribution interconnections, it is imperative that FERC, in any final rulemaking, make clear that it is affirmatively not asserting jurisdiction over end-use sales, which falls squarely within the exclusive jurisdiction of state retail energy regulatory authorities;

*Whereas* state utility commissions are responsible for ensuring resource adequacy and the reliability and affordability of electric service for retail customers;

*Whereas* states’ authority over integrated resource planning, where applicable, derives from their reserved jurisdiction under Federal Power Act section 201(b), enabling states to oversee utilities’ long-term forecasting of electricity demand and evaluation of supply- and demand-side resources to meet that demand in a cost-effective, reliable, and sustainable manner;

*Whereas* the North American Electric Reliability Corporation’s (NERC) 2024 Long-Term Reliability Assessment found that demand growth is now higher than at any point in the past two decades due to demand growth from large loads, with aggregated United States winter peak load forecasted to grow by 21.5 percent to 843 gigawatts by 2034;

*Whereas* in 2023 fifteen states accounted for 80 percent of the national data center load, reflecting the diverse landscape of regional opportunities and challenges presented by large load growth across the United States;

*Whereas* any large load interconnections without sufficient available generation capacity could threaten reliable power service to existing retail customers, as grid operators may lack the resources needed to maintain system stability during peak demand or extreme weather events;

*Whereas* the costs of large load interconnections, including necessary transmission upgrades and other infrastructure investments, may unfairly burden retail ratepayers if not properly allocated;

*Whereas* under the Federal Power Act, the states retain the ability to implement protective measures, such as large load tariffs and flexibility requirements, and the ability to incentivize large loads to invest in local communities, including through programs such as facilitating large loads to interconnect more rapidly while bringing direct economic benefits to the community in the form of funding virtual power plants, non-transmission alternatives or demand-side management programs;

*Whereas* at least 20 states have approved or have pending large load tariffs or similar measures, which may include financial commitments, curtailment protocols, and minimum contract terms to allow for the rapid interconnection of large loads without compromising grid reliability or unduly burdening existing retail customers;

*Whereas* state regulatory authorities have the expertise and authority to balance economic development associated with large loads with the protection of retail customers, and seek to ensure the ANOPR proceeding does not undermine these efforts, disrupt orderly grid planning, and lead to further resource adequacy and affordability challenges;

*Whereas*, for all of the reasons stated above, the states strongly encourage FERC to carefully consider the perspectives of state regulators and other stakeholders to ensure any rulemaking proceeding does not inadvertently create additional challenges to resource adequacy, reliability, and affordability for retail customers;

*Whereas* the states look forward to working with FERC and other interested parties to develop a durable and meaningful resolution to the ANOPR proceeding; now, therefore it be

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners, convened at its 2025 Annual Meeting and Education Conference in Seattle, Washington urges the FERC to preserve and affirm states' retail regulatory authority under the Federal Power Act, ensure that large load interconnections do not compromise grid reliability or impose undue costs on retail customers, and respect state tools for promoting system flexibility and equitable cost allocation.

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*Passed by the Committee on Electricity on November 10, 2025.*

*Adopted by the NARUC Board of Directors on November 11, 2025.*

***GS-1 Natural Gas Plays a Foundational Role in America's Affordable, Reliable, and Clean Energy Future***

*Whereas* United States (U.S.) natural gas is an abundant and secure domestic energy source that supports over 4.1 million jobs and is currently used by 60 percent of American households for home heating, water heating, and/or cooking;

*Whereas* residential and commercial use comprise 24 percent of all natural gas consumed in the U.S.;

*Whereas* in 2024, over 28 percent of the natural gas consumed in the U.S. was used by industry, including as a reliable fuel for manufacturing products like steel, cement, glass, pharmaceuticals, and fertilizers;

*Whereas* in 2023, natural gas powered over 43 percent of America's electricity, followed by nuclear power (18 percent), coal (16 percent), wind (10 percent), hydropower (5 percent), and solar (4 percent);

*Whereas* the U.S. Energy Information Administration found that coal to natural gas switching across the country is directly responsible for more than 61 percent of America's carbon emission reductions since 2005;

*Whereas* the U.S., in less than a decade, has become the world's largest natural gas exporter; these exports have provided security to America's democratic allies by delivering reliable energy and have reduced emissions worldwide by replacing fast-growing coal use in developing countries;

*Whereas* natural gas, as a fuel source used for the generation of electricity, has desirable attributes in that it is dispatchable, making it well-suited as a baseload resource that can support the affordability, reliability, and resource adequacy of the electric system;

*Whereas* power demand across the U.S. is skyrocketing amidst growing energy needs from artificial intelligence, data centers, and electrification policies, even as new power generation has not kept up due in part to state and federal policy and permitting challenges, creating supply and demand pressures that are driving power prices up for all consumers and ratepayers;

*Whereas* natural gas will continue to be needed to meet these growing power needs, yet while natural gas demand has increased over the last 10 years by 43 percent, its associated pipeline infrastructure has only grown 25 percent and its associated storage has only grown 2 percent, suggesting looming supply-and-demand bottlenecks that will impact reliability and could raise costs;

*Whereas* a 2025 Progressive Policy Institute report found that an energy future without natural gas disproportionately harms low-income communities, which are more likely to struggle to pay for food and medicine due to rising energy bills; *and*

*Whereas* public opinion polling shows that 68 percent of Americans agree with using a mix of fossil fuels and renewables to meet our energy needs; *now, therefore be it*

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened at its 2025 Annual Meeting and Education Conference in Seattle, recognizes that natural gas is a foundational source of energy that has contributed to a 20-year trend of driving down carbon emissions, and can support responsible growth in carbon-free sources like wind, solar and battery

technology, working with existing technologies like nuclear and hydroelectric power, without sacrificing reliability and affordability for businesses and residential consumers, particularly marginalized communities; and NARUC supports the continued investment in energy infrastructure including natural gas, that will be necessary to keep energy costs affordable while meeting growing demands in the years ahead; and that Congress and federal regulators must act to streamline permitting reform for wires, natural gas pipelines and other energy infrastructure alike as soon as possible to speed up construction of energy assets that strengthens America's economy, ensures a more reliable grid, leverages secure American energy, lowers costs for consumers, and creates meaningful American jobs.

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*Passed by the Committee on Gas on November 10, 2025.*

*Adopted by the NARUC Board of Directors on November 11, 2025.*

## ***GS-2 Resolution Supporting Permitting Reform for Interstate Natural Gas Pipeline Infrastructure***

*Whereas* analyses cited by energy, labor, manufacturing, and environmental stakeholders demonstrate that electricity demand may grow by as much as 20 percent by 2030 – with natural gas expected to supply roughly 60 percent of that growth and renewables the remaining 40 percent;

*Whereas* supplying natural gas to meet the needs of electricity consumers will not be possible without an expansion of the nation’s interstate pipeline capacity;

*Whereas* the Board of Directors of the National Association of Regulatory Utility Commissioners, convened at its 2025 Summer Policy Summit in Boston, Massachusetts, passed GS-4, a “Resolution Regarding Natural Gas Pipeline Infrastructure and Storage Expansion,” recommending that states and organized power markets evaluate investments in expanding pipeline capacity and all types of gas storage to improve natural gas delivery;

*Whereas* GS-4 recognized that a primary obstacle to expansion of interstate natural gas pipelines is the need to navigate a lengthy and litigious federal permitting process;

*Whereas* GS-4 recognized that legislation aimed at reducing the length, uncertainty, burden, and litigation risk associated with the federal infrastructure permitting process is critical to facilitating the timely completion of infrastructure projects, such as pipeline expansions and new gas storage development;

*Whereas* current implementation of the National Environmental Policy Act, the Clean Water Act Sections 401 and 404, and the Endangered Species Act, and related statutes routinely result in multi-year delays that chill capital formation and impede the delivery of resources to consumers;

*Whereas* regulators, project developers, labor unions, manufacturers, and environmental advocates now share a bipartisan consensus that modernizing federal permitting can and must be achieved;

*Whereas* federal policymakers are currently considering a variety of legislative reforms to the federal permitting process for interstate natural gas pipelines and other major energy infrastructure, including amendments to environmental and natural resources statutes; reforms to judicial review of agency permitting decisions; and expansion of measures for streamlined reviews and authorizations; *now, therefore be it*

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners, convened at its November 2025 Annual Meeting and Education Conference in Seattle, Washington, reaffirms that expansion of interstate natural gas pipeline infrastructure is a vital national priority and urges Congress to enact reforms to break the permitting logjam for the construction and operation of such infrastructure.

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*Passed by the Committee on Gas on November 10, 2025.*

*Adopted by the NARUC Board of Directors on November 11, 2025.*

### ***GS-3 Resolution for Permitted Infrastructure Certainty and Durability***

*Whereas* the demand for energy continues on an unprecedented upward trajectory, estimated to increase 50 percent by 2050 according to the ICF and Grid Strategies LLC;

*Whereas* the only way to meet this demand is to scale up energy infrastructure of all types —such as renewables, natural gas, nuclear — including siting of new power generation assets, as well as the transmission assets like pipelines and wires to move energy where it is needed;

*Whereas* these new power generation assets are needed not only for growing demand, but also to replace aging and retiring power plants;

*Whereas* investments in these interstate and intrastate projects often require years of environmental and engineering reviews, land use and legal planning, and regulatory proceedings across multiple jurisdictions and governing bodies;

*Whereas* energy infrastructure developers require a consistent and efficient regulatory process that produces durable permits and authorizations to secure the capital needed to finance the complex energy systems that serve American families and businesses;

*Whereas* to protect consumers from economic disruptions, cost shifting and reliability risks, the United States (U.S.) must streamline federal and state permitting processes to create additional certainty around energy projects of all types to meet the demand challenges in the near and long term;

*Whereas* the cancellation of fully permitted energy projects could lead investors to decide not to finance critical projects in the future or to require higher returns to account for this risk, either of which would place a larger financial burden on American homes and businesses; *now, therefore be it*

*Resolved* that the Board of Directors of the National Association of Regulatory Utilities Commissioners, convened at its 2025 Annual Meeting and Education Conference in Seattle, Washington, hereby calls on the U.S. Congress and state legislatures to create the regulatory certainty needed to promote investment in critical energy infrastructure by enacting meaningful permitting reforms that establish a rational, efficient, consistent permitting process that produce durable regulatory approvals.

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*Passed by the Committee on Gas on November 10, 2025.*

*Adopted by the NARUC Board of Directors on November 11, 2025.*