

February 5, 1998

To: Rae McQuade, GISB

From: Sylvia Munson, Altra Energy Technologies, Inc.  
Altra Streamline, L.L.C.

Re: Request for comment on proposed standards

Please find below Altra's comments on the proposed standards that are subject to Executive Committee consideration on February 11, 1998.

**C97017**

Altra agrees with the recommended language.

**R97022**

1 The proposed changes to the datasets should be voted on separately, not as a group. There are items in the proposal that are simple and clear and will pass easily.

2 Altra agrees with the change to the conditionality of the Package ID in the Request for Confirmation (1.4.3) and Confirmation Response (1.4.4).

3 Altra does not agree with the addition of Upstream Package ID and Downstream Package ID to Nomination (1.4.1), Request for Confirmation (1.4.3), Confirmation Response (1.4.4), Scheduled Quantity (1.4.5) and Scheduled Quantity for Operator (1.4.6).

Altra has participated in some of the discussions regarding the addition of these elements and we have reviewed the minutes of the meetings that we did not participate in. There are problems that exist today in the confirmation process with the 'matching' of upstream and downstream information. These problems arise from the fact that some data elements used on one side of an interconnect may not be used on the other side of the interconnect. The addition of these two elements will only serve to increase the level of complexity in the confirmation process and increase the risk of a failure to confirm. Altra agrees that the confirmation process needs to be re-evaluated and the elements exchanged in the confirmation process need to be reviewed. Adding more elements into an already problematic area will not solve the problem.

As an alternative, Altra would recommend to the Executive Committee that they request the Business Practices Subcommittee and/or the Information Requirements Subcommittee to review the confirmation process and the associated data elements now that the industry has had more experience in this area under GISB standards.

4 Altra agrees with the change in the conditionality of the Service Requester in the Request for Confirmation (1.4.3) and the Confirmation Response (1.4.4).

5 Altra agrees with the modification to Standard 1.3.24 as proposed.

6 If the proposed data elements are added to the Nomination dataset, then Altra agrees with the proposed modification to Standard 1.3.27.

7 Altra agrees with the proposed addition of language to the Technical guides for the Request for Confirmation and Confirmation Response but we feel that this would be more appropriate to be dealt with in a re-evaluation and review of the confirmation processes as recommended above.

### **R97057(B)**

Note: I know that I participated in the development of the proposed language and at that time, it made sense. Looking at it a second time, I have additional thoughts on the matter - so don't shoot, please.

The proposed language in respect to errors at the line item level is correct and should be approved.

The proposed language for processing of business conditional fields should be reconsidered for the following reasons. First, lets give an example:

Request for Confirmation from PIPELINE A to PIPELINE B

	UsParty	Us K	SvcRqstr	Svc K	Qty
Line 1	X	1	abc	43	100
Line 2	X	2	abc	43	100

Pipeline B doesn't support Upstream Contract. Pipeline B has a single nomination on their system.

Nomination on PIPELINE B

SvcRqstr	Svc K	UsParty	Qty
abc	43	X	188

With the proposed language, Pipeline B would have to make the decision on how Pipeline A's two nominations should receive the distribution of gas. This is not Pipeline B's responsibility and Pipeline A is the one responsible for that task. The result should be that Pipeline B sends back a confirmation to Pipeline A with the information at Pipeline B's level of detail. Then Pipeline A can distribute the resulting quantity appropriately back onto the nominations on Pipeline A's system.

The case could be made that Pipeline A should know the level of detail that Pipeline B expects and, therefore, should submit requests for confirmation appropriately. This argument would mean that Pipeline A would need to maintain information about all of their interconnects and have routines to deal with all of the different scenarios. In the proposed solution above, Pipeline A would receive a positive response and be able to continue with their processing no matter what level of detail Pipeline B supports.

Altra would recommend that this language is strongly needed to be added to the implementation guides, but this request should go with the previous recommendation and be sent back to the appropriate subcommittee for consideration in re-evaluation and review of the confirmation process.

If the Executive Committee chooses to address this issue in this session in lieu of sending it to the subcommittees for further work, Altra will provide proposed alternative language at the Executive Committee session on February 11, 1998.

**R97108A**

no comment

**R97115**

Altra agrees with the recommendation!

Thank you for the opportunity to comment on these proposals.

Sylvia