

July 29, 1999

**ANR Pipeline Company
Comments on Gas Industry Standards Board
Requests R98011 and R98012**

The area of concern for ANR Pipeline Company ("ANR") regarding Gas Industry Standards Board Requests R98011 and R98012 is Principle 2.1.A within Request R98012. This proposed principle is:

The level of detail supported by the Transportation Service Providers (TSPs) in the Service Requester (SR) transaction scheduling process should be supported throughout the process of providing related flowing gas information (i.e. Shipper Imbalance (GISB Standard 2.4.4), Pre-determined Allocation (GISB Standard 2.4.1) from the SR (where supported), and Allocation (GISB Standard 2.4.3) to the Service Requester (where supported)) and would only be to the package ID level where mutually agreed between the TSP and the SR.

Requiring transporters to provide the level of detail described in the principle proposed in R98012 will necessitate system changes for ANR and probably other transporters, and will increase the burden on the pipelines of implementing GISB practices. This is troubling given that the ratepayers who will ultimately carry the costs associated with such changes will not benefit from the above proposed principle. Providing the level of detail described above will not be beneficial because it will not facilitate or enhance the efficiency of transportation business, and, in particular, is not necessary to engage in imbalance trading. Rather than benefit ratepayers, providing the level of detail proposed may be confusing because it will not be consistent with invoicing statements prepared in accordance with GISB standards, and does not match the basis for providing services in ANR's and probably other pipelines' tariffs.

At most, the level of detail of information at issue in R98012 will be used in connection with buy/sell transactions. If that is the case, however, the parties seeking such information should incur the burdens associated with it by deriving that information from data already provided by the pipelines and/or from other sources.

Accordingly, ANR objects to R98012, and urges the GISB to reject it. Strictly as an alternative to rejecting R98012, ANR proposes to alleviate the burden on the pipelines from providing unnecessarily detailed information as follows:

The level of detail supported by the Transportation Service Providers (TSPs) in the Service Requester (SR) transaction scheduling process should be supported on the Pre-determined Allocation (GISB Standard 2.4.1) from the SR (where applicable), and on either the Allocation (GISB Standard 2.4.3) or the Shipper Imbalance (GISB Standard 2.4.4) to the SR (where applicable). The sending of the Allocation or the Shipper Imbalance would be dependent on the TSPs' business practices. In either case, the level of detail would only be to the package ID level where mutually agreed between the TSP and the SR.