TO: GISB Offices

FM: Greg Lander - TransCapacity

RE: Comments on December 27th deadline requests for new standards

DT: Dec. 27th, 1996

Please note that there is a separate page of comment for each proposed request for standard. When a request was multi-part and we were in favor or opposed to the whole proposal, we state so at the top. If the proposed standard is multi-part and we are partially in favor, partially opposed or desire modification of all or a portion of the recommendation, we so state. With respect to the Standards that are New data sets or multiple new Transaction Type or Reduction Reason codes, we have reproduced the Table (or in some cases created a table where it would make sense for consistency sake) and would very much appreceiate if the entire table was placed in the commentary as an alternative to the proposal so that the EC members will be able to see the alternative(s) with the proposals as they vote.

This will be e-mailed to you afternoon of Dec. 28th. Our Administrative portion (including my computer) of the LAN was taken down for enhancement Friday and Saturday. Thus making it impossible to get this printed for faxing or transferred (to Jacki's machine) for E-mailing. If there is any problem with this please let me know. I will be in my office Monday morning.

Thank you
Greg Lander

R96005

In general, TransCapacity favors the new dataset. However, many edits are necessary for the definitions to be clearer, and unambiguous. In addition, we suggest changes to the usage codes for several of the data elements. Finally, as there is no standard in the "Book" referring to this statement, and because this statement was offered in part as the solution to TransCapacity's request for the addition of one data element, "Reporting Pressure Base", to the Measurement Statement (a mandatory dataset), we recommend that standards (proposed below) be adopted that will make the status of this dataset clear to all.

TransCapacity proposes two new companion standards for this dataset.

1. **"All measuring parties should support the sending of the Measured Volume Audit Statement.**

2. **"Consistent with other standards where the obligation to send can be relieved by the receiving party, determination as to whether trading partners will use the Measured Volume Audit Statement dataset should be made by the receiving party."**

The following table is a reproduction of the recommendation. It contains proposed Amendments to the Definitions, Changes in Usage, Added Data Elements, Proposed Data Element Deletions. Amendments, Changes, and Adds are **bolded and underlined** while Deletes are ~~struckthrough~~.

Measured Volume Audit Statement
Data Dictionary

Row	Business Name	Definition	Usage	Condition
1	Statement Type	Specifies the statement as original, ~~change~~ replacement or advance notification.	M	
2	Statement Date/Time	Date and time statement was produced	M	
3	Beginning Flow Date/time	The data and time **at** ~~on~~ which ~~the~~ **this** measurement **was started.** ~~was taken~~	M	
4	Ending Flow Date/Time	Date and time at which ~~the~~ **this** measurement ended	M	
5	Meter Operator*	The party contractually responsible for the measurement of gas at **this** ~~a~~ meter	M	
6	Meter ID	The **meter** Operator's ID ~~number~~ for the measurement device being reported	M	Proprietary meter number
7	Device Station **ID** ~~Number~~	The station ~~number assigned~~ **ID of the station** to **which** this **meter** device **is associated.** ~~by the operator~~	M	

8	Upstream Party*	Identifies the party from whom gas is flowing	~~SO~~ **M**	
9	Downstream Party*	Identifies the party to whom gas is flowing	~~SO~~ **M**	
10	Contact Person	The name ~~and telephone number~~ of the contact for questions regarding the reported measurement information	M	
11	**Contact Phone**	**The telephone number associated with the Contact Person. For questions regarding the reported measurement information.**	**M**	
12	Physical Meter Effective Date	The effective date of physical meter information	M	
13	Measured Quantity	The quantity as measured in ~~MMBTU's~~**Dth's.**	M	
14	Business Period	Current or prior period indicator	M	Default is Current
15	Tube Inside Diameter	The inside diameter measurement of the tube	C	Conditional on meter type
16	Maximum Static Pressure Range	Specifies the maximum value of the static pressure range	M	
17	Minimum Static Pressure Range	Specifies the minimum value of the static pressure range	M	
18	Maximum Differential Pressure	Specifies the maximum value of the differential pressure	C	Used only for orifice meters. Conditional on meter type
19	Orifice Diameter	Measurement of the diameter of the orifice plate.	C	Conditional on meter type
20	Chart Revolution Time	Specifies the chart revolution time for this metering device	C	Conditional on meter type **being equal to "orifice-chart", or, "time-driven positive displacement - chart"**
21	Reporting Pressure Base	Pressure base used in reporting volume in MCF's	M	Default is 14.73
22	Reporting Temperature	Temperature used to report volume if different from actual temperature.	C	Used only if different than actual temperature. Conditional on temperature ~~(31)~~
23	Temperature Range Maximum	The maximum temperature range for the recorder.	~~SO~~ **C**	**Conditional upon the existence of the data pertaining to this meter. If the meter has a maximum temperature, then this information is supplied in this data element.**
24	Temperature Range Minimum	The minimum temperature range for the recorder	~~SO~~ **C**	**Conditional upon the existence of the data pertaining to this meter. If the meter has a minimum temperature, then this information is supplied in this data element.**

25	Atmospheric Pressure	The site atmospheric pressure measurement	~~SO~~ **C**	**Conditional upon the existence of the data pertaining to this meter. If the meter has an atmospheric pressure measuring device, then this information is supplied in this data element.**
~~26~~	~~Flow Period~~	~~The length of time flow~~	~~M~~	
27	Tap Location	The location of the meter tap. Locations are upstream or downstream.	C	Used for orifice meters only. Conditional on meter type **equal to "orifice-chart" or "orifice - EFM".**
28	**Quality Indicator**	**Indicates that gas quality information is provided**	**BC**	**The receiver of the Metered Volume Measurement Statement may require that the measuring party provide gas quality information. This is especially the case where measurement is in Dth. Where so required by the receiver of the Metered Volume Audit Statement, this data element is present and the value is equal to "yes".**
29	Component Percentage	The percentage of a component of gas	~~SO~~ **C**	**Conditional upon Quality Indicator = yes**
30	Heating Factor	Quality information for measurement in **Dth.** ~~MMBTU~~ **The Btu per cubic foot of gas at the specific gravity, temperature and static pressure specified herein.**	~~BC~~ **C**	**Conditional upon Quality Indicator equal to "yes".** Mandatory for measurement in Dekatherms. **As the receiver of this Measured Volume Audit Statement can require that the Measuring Party send to them quantity information in Dth units, the presence of this data element is conditioned on the business practices of the receiver of this statement.**
31	Specific Gravity	The ratio of the weight of a given volume of a substance at **the** ~~a~~ given temperature to the weight of an equal volume of a standard substance at the same temperature.	M	
32	Temperature	The temperature of the gas flow **during the flow period.**	SO	

33	Static Pressure	The static pressure (PSIA) for the meter during the flow period	C	Conditional on meter type **equal to "time-driven positive displacement - chart", "time-driven positive displacement - EFM", or "flow-driven positive displacement"**
34	Differential Pressure	The differential pressure for the meter during the flow period	C	Conditional on meter type **equal to "orifice - chart" or "orifice - EFM"**
35	Tap Type	Identifies the tap as flange or pipe	C	Conditional on meter type **equal to "orifice - chart" or "orifice - EFM"**. Tap types are flange and pipe
36	Meter Status	Identifies the meter as active, removed, or on standby	M	Default is active.
37	Number Dials	Specifies the number of dials for a positive **displacement** meter	C	Used for positive **displacement** meters only. Conditional on meter type.
38	Volume Cycle	Identifies the volume cycle for a positive **displacement** meter	C	Used for positive **displacement** meters only. Conditional on meter type.
39	Chromatograph	Specifies the source of gas quality information. (Sample device is Chromatograph)	C	Used only when quality information is provided. **Quality Indicator equal to = yes.** Conditional on sample device.
40	Volume	The quantity of gas expressed in MCF.	M	
41	Flow Rate	The flow rate **for an** EFM orifice meter.	C	Used only for EFM orifice meters. Conditional on meter type **equal to "orifice-EFM"**.
42	Coefficient	Provides coefficient factor	C	Not used for **orifice -** EFM ~~orifice~~ or positive **displacement - EFM** meters. Conditional on meter type **equal to "orifice -chart", "time-driven positive displacement - chart", or "flow-driven positive displacement"**.
43	Integrated Differential	Provides the integrated differential	C	Not used for **orifice -** EFM ~~orifice~~ or positive **displacement - EFM** meters. Conditional on meter type **equal to "orifice -chart", "time-driven positive displacement - chart", or "flow-driven positive displacement"**.

44	Index Differential	Provides the indexed differential	C	Not used for **orifice -** EFM ~~orifice~~ or positive **displacement - EFM** meters. Conditional on meter type **equal to "orifice -chart", "time-driven positive displacement - chart", or "flow-driven positive displacement"**:
45	Pressure Factor	Specifies the pressure factor for positive **displacement**meter measurement.	~~BC~~ **C**	Used for positive **displacement**meters only.
46	Sample Type	Specifies the sample as spot or accumulated	C	**Conditional based upon Quality Indicator equal to yes.** Used only when quality information is provided. **Further c**~~C~~onditional on sample device **equal to "bottle" or "inline"**:
47	Gas Analysis Effective Date	Specifies the date the gas quality information was determined	~~BC~~ **C**	Mandatory when quality information is **required to be** provided. **Conditional upon Quality Indicator equal to "yes".**
48	Date/Time On	Specifies the date and time for which measurement began	C	Conditional on meter type **equal to "orifice - chart" or "time-driven**- chart**"**
49	Date/Time Off	Specifies the date and time for which measurement ended	C	Conditional on meter type **equal to "orifice - chart" or "time-driven**- chart**"**
50	Component	Identifies the gas component being reported	~~BC~~ **C**	Mandatory when quality information is **required to be** provided. **Conditional upon Quality Indicator equal to "yes".**
51	Meter Type	Identifies the type of meter being used.	M	
52	PI Data Ref Number	Nominatable point as defined in the PI Data Reference Number Database	~~SO~~ **M**	**The PI equivalent of the measuring party's proprietary code for the nominatable point (location) (logical or physical) to which this meter location is associated.**
53	Machine Constant	Conversion factor for scanners or analyzers	C	Conditional on meter type **equal to "orifice - chart" or "time-driven**- chart**"**
54	Sample Device	Type of equipment used for sampling	M	
55	Static Pressure Indicator	Indicates the starting point for measuring Static pressure.	M	Default is PSIA.

		Gauge starts at zero and absolute starts at 14.4 PSI		

Row 1: Removal of the word “change” makes the status consistent with the treatment of nominations which are all originals and must be replaced to be changed.

Row 2: Editorial and clarifying. A beginning time is not a time when something was taken, it is a time when something was started.

Row 5: Editorial and clarifying. Referring to this measurement makes the reference unambiguous.

Row 6: Editorial and clarifying. Specifies which operator (meter operator), and, clarifies that the Operator may have an ID that is other than numeric.

Row 7: Editorial and clarifying. Same as with Row 6, the ID may be alpha or alpha-numeric. In addition makes clear that the station contains the meter.

Row 8: The change in usage status is necessary so that the parties can unambiguously process the incoming information without reference to external data files which would add unnecessary ambiguity. Senders option in this case adds only ambiguity and no “options” are truly created.

Row 9: Same explanation as with Row 8.

Row 10: One data element should not refer to two entirely different things.

Row 11: Added data element supports the removal of “phone” from the contact person data element.

Row 13: Editorial and clarifying. Intended to make this reference consistent with the rest of the standards which are in Dth.

Row 20: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 22: Editorial and clarifying. Removes the “(31)” as this is a number with no meaning in the conditionality portion of the data dictionary.

Row 23: The change in usage status is necessary so that the parties can unambiguously process the incoming information without reference to external data files which would add unnecessary ambiguity. Senders option in this case adds only ambiguity and no “options” are truly created.

Row 24: The change in usage status is necessary so that the parties can unambiguously process the incoming information without reference to external data files which would add unnecessary ambiguity. Senders option in this case adds only ambiguity and no “options” are truly created.

Row 25: The change in usage status is necessary so that the parties can unambiguously process the incoming information without reference to external data files which would add unnecessary ambiguity. Senders option in this case adds only ambiguity and no “options” are truly created.

Row 26: Eliminated because the length of time can be derived from the “Beginning and Ending Date-times”. Definition is ambiguous and conflicts with the two cited data elements.

Row 27: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 28: Added Data element necessary to clarify the conditionality of the various quality and heating factor types of data. Presently there is no data element which makes clear the “BC” nature of Heating Factor, Pressure Factor, Gas Analysis Effective Date, Component, and Component Percentage. This data Element, which is “BC” then makes clear what other data elements are provided.

Row 29: Conforming change to clarify the conditionality of this data element upon the presence of the “Quality Indicator” equal to “yes”.

Row 30: The change to the definition is editorial and clarifying in nature. The change to the usage code is to conform to the addition of the “Quality Indicator” data element and this data element’s dependency upon that data element’s value. The change to the conditionality is explanatory in nature.

Row 31: Editorial and clarifying in nature. Specifies that the “temperature is the temperature not just any unspecified temperature.

Row 32: Editorial and clarifying in nature. Specifies that the temperature was that during the flow period, not just any temperature.

Row 33: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 34: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 35: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 37: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 38: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 39: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 41: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 42: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 43: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 44: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 45: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 46: Editorial and clarifying. Removes ambiguities as to when supplied, (i.e., conditional upon Quality Indicator equal to “yes”) and further conditional upon the existence of a bottle type or inline sample.

Row 47: Conforming change to the addition of the “Quality Indicator” data element

Row 48: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 49: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

Row 50: Conforming change to the addition of the “Quality Indicator” data element

Row 52: Usage status changed to make this dataset consistent with the other standards which are intended to use the PI DRN. If the meter itself does not have a DRN because the meter itself is not nominatable, it is nonetheless recording flow which is part of aggregating a quantity which is associated with quantities which are associated with a nominatable location.

Row 53: Editorial and clarifying. Removes ambiguity as to which type of meter it is conditional upon.

R96010

In general TransCapacity favors the new dataset. However, many edits are necessary for the definitions to be clearer, and unambiguous. In addition, we suggest changes to the usage codes for several of the data elements. Finally, as there is no standard in the "Book" referring to this statement, and because this dataset was offered as one way of resolving the "open-ended" nature of the confirmation process, and replaced other suggestions for "Final Confirmation Document, Confirmation Quick Response, and Request for Final Confirmation, we recommend that standards (proposed below) be adopted that will make the status of this dataset clear to all.

TransCapacity proposes two new companion standards for this dataset.

1. **"All parties initiating the confirmation process with the sending of the Request to Confirm dataset should support the receipt and processing of the Confirmation Response dataset and should support the generation and sending of the Operator Scheduled Quantities dataset.**

2. **"Receiver of nomination (initiator of confirmation process) completes confirmation process with the sending of the Operator Scheduled Quantity document by the scheduling deadline with the caveat that the receiver of the Operator Scheduled Quantity document may relieve the obligation of the sender to send."**

The following table is a reproduction of the recommendation. It contains proposed Amendments to the Definitions, Changes in Usage, Added Data Elements, Proposed Data Element Deletions. Amendments, Changes, and Adds are**bolded and underlined**while Deletes are ~~struckthrough~~.

Row	Business Name	Definition	Usage	Condition
1	Beginning Date	This is the date that a transaction is to be initiated. It includes the century.	M	
2	Beginning Time	This is the time that a transaction is to be initiated. If the Beginning Time is not sent, the time defaults to the beginning of the gas day.	M	

3	Confirmation Requester's Tracking Number	This is created by the originator of the process **(the "Confirmation Service Requester" or "Confirmation Request Originator")** It is line item specific and is used by the **Confirmation Service Requester**~~originator of the process~~ to tie request**(s)** for confirmation to confirmation response**(s)**. It is not validated by the receiver of the~~process~~ **Request to Confirm(the "Confirmation Service Provider")**nor is it a key in the **Confirmation Service Provider's**~~receiver of the process~~' database. The **Confirmation Service Provider's**~~receiver of the process~~ will not track this number but merely echo it back in the **Confirmation R**esponse document. This number is used for EDI only and will not be added to EBBs.	C	Mandatory when present in the **Request to Confirm document**~~confirmation process~~.
4	Confirmation Service Contract **Identifier**	~~Data element used to define a confirming party's right to make the confirmation~~. **The contract identifier used by the contract sponsor/owner for the contractual agreement between the Confirmation Service Requester and the Confirmation Service Provider pertaining to the confirmation process.**	C ~~(BC)~~	Mandatory when present in the **Request to Confirm sent by the Confirmation Service Requester. As Confirmation Service Provider can require Confirmation Service Requester to provide correct value in this field, the conditionality of this data element is dependent upon the business practices of the Confirmation Service Provider.** ~~confirmation process~~.
5	Confirmation Service Identifier Code *	This field identifies the **party (owner/sponsor) whose contract number is used in the Confirmation Service Contract Identifier field**~~owner of the confirmation service contract~~.	C	Required if Confirmation Service Contract field is populated.
6	Contractual Flow Indicator	Indicates the logical direction of flow at a point from the **Confirmation Service Requester's (confirmation request** originator's**)** perspective. May be different than physical flow.	M	

7	Downstream Contract Identifier	**Based upon the value in the Contractual Flow Indicator Field, this is either the contract of the Transportation Service Requester on the Confirmation Service Requester's system, (Contractual Flow Indicator equals "R" for receipt), or, the contract of the Transportation Service Requester on the Confirmation Service Provider's system (Contractual Flow Indicator equals "D" for delivery)**~~This field identifies the contract of the party who is receiving the quantities from the service requester.~~	C ~~(BC)~~	Mandatory when present in the **Request to Confirm sent by the Confirmation Service Requester. As Confirmation Service Provider can require Confirmation Service Requester to provide correct value in this field, the conditionality of this data element is dependent upon the business practices of the Confirmation Service Provider.**~~confirmation process. This element is not needed when the Confirmation Requester's Tracking Number is used~~.
8	Downstream Identifier Code *	**Based upon the value in the Contractual Flow Indicator Field, this is either the common code of the Transportation Service Requester on the Confirmation Service Requester's system, (Contractual Flow Indicator equals "R" for receipt), or, the common code of the Transportation Service Requester on the Confirmation Service Provider's system (Contractual Flow Indicator equals "D" for delivery)**~~This field identifies the party who is receiving the quantities from the service requester~~.	~~C~~ **M**	~~Required if 'Delivery' is specified in Contractual Flow Indicator. This element is not needed when the Confirmation Requester's Tracking Number is used~~.
9	Ending Date	This is the last date that the transaction is to finish. It includes the century.	M	
10	Ending Time	This is the time at which the transaction is to finish. If the Ending Time is not sent, the time defaults to the end of the gas day.	M	

11	Location *	**The location where gas will be scheduled by the transportation service provider; and, where the receiving party is also a transportation service provider, this will be the location code used by the receiving transportation service provider for the activity from the receiving transportation service provider's perspective.**~~The location where the quantity will be scheduled by the transportation service provider.~~	M	**The conventions with respect to populating the "Location" and "Confirmation Requester's Location Code" are as follows: Where a Confirmation Service Provider code exists, it must be provided. Where a Confirmation Service Requester code exists, it must be provided. Transportation Service Provider receiver's (Confirmation Service Providers) who wish to receive their code in an RTC from another Transportation Service Provider (Confirmation Service Requester) must supply their codes and the associated business activity perspective to those Transportation Service Providers sending them RTC's. Failure to do so will result in the receiver of an RTC, receiving the sender's code in the Confirmation Requester's Location Code field and a "DNE" (Does Not Exist) literal character string as the code in the Location Code field. Receivers of requests to confirm (Confirmation Service Providers) returning confirmation responses, must echo back the values contained in the Location Code and Confirmation Requester's Location Code data elements that they have received. Receiver's sending unsolicited confirmation responses must send the values within the Location Code and Confirmation Requester's Location Code which would be returned from an RTC as though an RTC had been sent to them.**

12	Confirmation Requester's Location Code	The location where gas will be scheduled by the sender of the request to confirm document. This is the location code used by the sending transportation service provider for the activity from the sending transportation service provider's perspective.	M	The conventions with respect to populating the "Location" and "Confirmation Requester's Location Code" are as follows: Where a Confirmation Service Provider code exists, it must be provided. Where a Confirmation Service Requester code exists, it must be provided. Transportation Service Provider receiver's (Confirmation Service Providers) who wish to receive their code in an RTC from another Transportation Service Provider (Confirmation Service Requester) must supply their codes and the associated business activity perspective to those Transportation Service Providers sending them RTC's. Failure to do so will result in the receiver of an RTC, receiving the sender's code in the Confirmation Requester's Location Code field and a "DNE" (Does Not Exist) literal character string as the code in the Location Code field. Receivers of requests to confirm (Confirmation Service Providers) returning confirmation responses, must echo back the values contained in the Location Code and Confirmation Requester's Location Code data elements that they have received. Receiver's sending unsolicited confirmation responses must send the values within the Location Code and Confirmation Requester's Location Code which would be returned from an RTC as though an RTC had been sent to them.

13	Package ID	**The identifier assigned by the** Service Requester**on the system of the Confirmation Service Requester**~~assigned identification number used to differentiate between discrete business transactions~~.	C	**If sent to the Confirmation Service Requester by the Service Requester on Confirmation Service Requester's system, will be present in the Request to Confirm and the associated Confirmation Response. Plus, when present in the Request to Confirm, is mandatory in this dataset. If not present in the nomination, will not be present in the Request to Confirm, the Confirmation Response nor the Operator Scheduled Quantity.** ~~Mandatory when present in the confirmation process. This element is not needed when the Confirmation Requester's Tracking Number is used~~.
14	Preparer ID *	The **common code of the** ~~name and address of the~~ business party preparing **this Operator Scheduled Quantity** report.	M	
15	Quantity	The amount expressed is a quantity per gas day in standard units.	M	
16	Reduction Reason	A code identifying the reason that the nominated quantity has been rejected or reduced.	~~SO~~ **C**	**Mandatory when there is a reduction of the Quantity sent from the Confirmation Service Provider in the Confirmation Response document by the Confirmation Service Requester (sender of this Operator Scheduled Quantity)**
17	Service Requester *	Identifies the party **(or their agent)** requesting ~~the~~ service **on the system of the Confirmation Service Requester.** ~~or their agent~~.	~~C~~ **M**	~~Mandatory when present in the confirmation process.~~
18	Service Requester Contract	This is the contract under which **the Service Requester is requesting service from the Confirmation Service Requester.**~~service is being requested~~.	~~C~~ **M**	~~Mandatory when present in the confirmation process.~~
19	Statement Recipient ID *	The **Common Code for the Confirmation Service Provider (the recipient of this Operator Scheduled Quantity from the Confirmation Service Requester)**~~intended user of the statement.~~	M	

20	Upstream Contract Identifier	**Based upon the value in the Contractual Flow Indicator Field, this is either the contract of the Transportation Service Requester on the Confirmation Service Provider's system, (Contractual Flow Indicator equals "R" for receipt), or, the contract of the Transportation Service Requester on the Confirmation Service Requester's system (Contractual Flow Indicator equals "D" for delivery)** ~~This field identifies the contract of the party who is supplying the quantities to the service requester.~~	C ~~(BC)~~	Mandatory when present in the **Request to Confirm sent by the Confirmation Service Requester. As Confirmation Service Provider can require Confirmation Service Requester to provide correct value in this field, the conditionality of this data element is dependent upon the business practices of the Confirmation Service Provider.** ~~confirmation process. This element is not needed when the Confirmation Requester's Tracking Number is used.~~
21	Upstream Identifier Code *	**Based upon the value in the Contractual Flow Indicator Field, this is either the common code of the Transportation Service Requester on the Confirmation Service Provider's system, (Contractual Flow Indicator equals "R" for receipt), or, the common code of the Transportation Service Requester on the Confirmation Service Requester's system (Contractual Flow Indicator equals "D" for delivery)** ~~This field identifies the party who is supplying quantities to the service requester.~~	~~C~~ **M**	~~Required if 'Receipt' is specified in Contractual Flow Indicator. This element is not needed when the Confirmation Requester's Tracking Number is used.~~

Description of changes and reasons for same.

Row 3: Editorial and clarifying in nature, these changes confirm to the clarifications requested by METF in R96040. This also serves to clarify that those who send Requests to Confirm are Confirmation Service Requesters, and those who receive same and return Confirmation Responses are Confirmation Service Providers.

Row 4: Editorial and clarifying in nature. Without the change it is ambiguous and misleading. No data element defines a confirming party's right to make a confirmation. It is the contents of the data element, if anything, which point to a contract which may define the rights of parties. The present wording also implies that it is the confirming party's right to confirm. It may be the

requesting party that has the right to request and the confirming party that has the obligation to respond.

Row 5: Editorial and clarifying in nature. (See above)

Row 6: Editorial and clarifying in nature, these changes confirm to the clarifications requested by METF in R96040.

Row 7: The present wording is ambiguous, which contract (transportation service or confirmation service), which service requester (transportation, confirmation, or title transfer), on whose system (confirmation service requester's or confirmation service provider's)?

The changes are intended to always be unambiguous and allow parties to make use of the values in 1) the Contractual Flow Indicator field, 2) Service Requester field and 3) the Service Requester Contract fields in conjunction with the values in the Downstream and Upstream Identifier Code fields and Upstream and Downstream Contract Identifier fields respectively. These changes if adopted here, would also be proposed for the existing documents. If approved, they should relieve a great deal of the confusion currently existing in the Scheduled Quantities document and the various Request to Confirm and Confirmation Response documents.

Finally, the deletion of the sentence in the Condition portion "that it is not needed if the Confirmation Service Requester Tracking Number is present" is wholly inappropriate and assumes that the receiver of the document can require the Confirmation Service Requester to use the Confirmation Requester's Tracking Number in exactly the same manner as the shipper uses package ID. Furthermore, it is not appropriate for the receiver of the Request for Confirmation to decide that the sender (the Confirmation Requester) "doesn't need something". Just because a value is present in the Confirmation Requester's Tracking Number doesn't mean that the sender is prepared to do without other data that it has sent to the service provider and which it would otherwise have every reason to expect to be present in a return document.

Row 8: Conforms changes to those suggested above. Again, the current wording is extremely ambiguous.

Finally, the deletion of the sentence in the Condition portion "that it is not needed if the Confirmation Service Requester Tracking Number is present" is wholly inappropriate and assumes that the receiver of the document can require the Confirmation Service Requester to use the Confirmation Requester's Tracking Number in exactly the same manner as the shipper uses package ID. Furthermore, it is not appropriate for the receiver of the Request for Confirmation to decide that the sender (the Confirmation Requester) "doesn't need something". Just because a value is present in the Confirmation Requester's Tracking Number doesn't mean that the sender is prepared to do without other data that it has sent to the service provider and

which it would otherwise have every reason to expect to be present in a return document.

Row 11: Current definition is ambiguous. Which Transportation service provider?, which location code? This is the compromise language presently in play from the interpretation subcommittee. It has not been approved but is the current state of the compromise. Works in conjunction with the new data element in Row 12. Self explanatory between the Definition and Condition portions of the Data Dictionary.

Row 12: Eliminates current ambiguity and makes clear what will be sent in the cases where the Confirmation Service Requester and The Confirmation Service Provider are both Transportation Service Providers. See Definition and Condition portions of proposed Data Dictionary.

Row 13: Again, eliminates ambiguity in current definition as to "whose Package ID is in this data element? Is it the sender's or receiver's shipper's Package ID?

Finally, the deletion of the sentence in the Condition portion "that it is not needed if the Confirmation Service Requester Tracking Number is present" is wholly inappropriate and assumes that the receiver of the document can require the Confirmation Service Requester to use the Confirmation Requester's Tracking Number in exactly the same manner as the shipper uses package ID. Furthermore, it is not appropriate for the receiver of the Request for Confirmation to decide that the sender (the Confirmation Requester) "doesn't need something". Just because a value is present in the Confirmation Requester's Tracking Number doesn't mean that the sender is prepared to do without other data that it has sent to the service provider and which it would otherwise have every reason to expect to be present in a return document.

Row 14: Definition: Editorial and clean up. There is not common code for the address, and if there is to be an address for the Preparer, then the address should be its own data element and then the description of what kind of address, electronic, mail, E-Mail, VAN, IP?

With respect to the change in usage code and the change to Condition, the existing usage was incorrect and misconstrued the effect of a BC in the RTC document.

Likewise, the change to the condition description further clears this up.

Row 16: Should not be Sender's Option. The receiver needs to know what the reason for reduction is especially if this is the method they are going to employ to learn of the reduction. The proposed Condition wording makes it clear that the conditionality is only when there has been a reduction since the Confirmation Response was sent by the Confirmation Service Provider. If the "reduction" was done via a "Request to Confirm"; then the Confirmation

Response would have the RTC quantity (or a lesser one) and the Operator Scheduled Quantity (OSQ) quantity would be the same as the Confirmation Response quantity and no “reduction reason” would apply.

Row 17: Eliminates ambiguity as to which “service requester” is being referred to: Is it the service requester on the Confirmation Service Requester’s system, the service requester on the Confirmation Service Provider’s system, or the identity of the Confirmation Service Requester itself? Also changed usage to mandatory. It is too ambiguous to cite “mandatory when present in the confirmation process”. The Request to Confirm document has the identity of the confirmation service requester, the upstream identifier (when contractual flow indicator is receipt); the downstream identifier (when the contractual flow indicator is delivery) and the upstream and downstream contract identifier based upon the business conditional requirements of the receiver of the request to confirm; it does not have the Confirmation Service Requester’s service requester - period. Thus the reference to “mandatory when present in the confirmation process” is unacceptably vague. Does that mean it is “SO” if not present? Or that it is “BC” if not present? Or that maybe it is “MA” if not present? Or do they mean that it is only present in the OSQ if present in the confirmation process. It is not clear and the change makes it clear.

Row 18: Eliminates ambiguity as to which “service requester’s contract” is being referred to. Is it the contract of service requester on the Confirmation Service Requester’s system, the contract of the service requester on the Confirmation Service Provider’s system, or the contract used by the Confirmation Service Requester itself? Also changed usage to mandatory. It is too ambiguous to cite “mandatory when present in the confirmation process”. This is an essential piece of information needed by those who confirm and schedule at the contract level. And, for those who do not need it, it is purely an extraneous field of information. It will not harm those who do not need it to have it and may help receivers of the OSQ, in resolving discrepancies, in data, with parties on their systems, at a later time, were they to know what was scheduled on the up/downstream operator.

Row 19: We do not know who intends to use the statement. But we certainly know who we sent it to. And as per the suggested standard, pertaining to who initiates and completes the confirmation process, the party receiving this document is the Confirmation Service Provider, and the code for them is the common code.

Row 20: Same reasons that applied to Row 7

Row 21: Same reasons that applied to Row 8.

R96029

Follow the recommendation of the Market Committee and Reject

R96031

Follow the recommendation of the Market Committee and Reject

The addition of a “not confirmed” data element and the associated ambiguity is unacceptable. It completely frustrates the purpose of getting closure to the process at the appointed hour.

R96032

Reject in part, accept in part and accept some with the changes reflected below

Although the recommendation appears to be in "favor" (the vote being 20 to 0) what the committee was "in favor" of was rejecting the majority of the requested codes due to the existence of codes which addressed the business reasons underlying the original request.

The following table is a reproduction of the recommendation. It contains proposed Amendments to the Definitions and proposed Changes in Usage. Amendments, Changes, and Adds are **bolded and underlined** while Deletes are ~~struckthrough~~.

Row	Business Name	Nomination Usage	Scheduled Quantity Usage	Code Value	Code Value Description
1	Transaction Type	~~M~~ **SO**	C	Meter Bounce	Describes a "fly-by" or "bounce" situation where gas changes contracts at an interconnect, but does not leave the TSP's system. ~~However, the interconnecting TSP monitors the "bounce".~~
2	Transaction Type	~~M~~ **SO**	C	Storage Inventory Cycling	Applies to storage inventory injection and withdrawal cycling requirements.
3	Reduction Reason	N/A	~~SO~~ **C**	Confirmation Response not received for Delivery Location	For a pathed nomination, the Service Requester needs to know whether the Confirmation Response that was not received is for the receipt location or the delivery location. **Is conditional upon the the presence of information to the TSP regarding the absense of a Confirmation Response at the delivery location.**
4	Reduction Reason	N/A	~~SO~~ **C**	Confirmation Response not received for Receipt Location	For a pathed nomination, the Service Requester needs to know whether the Confirmation Response that was not received is for the receipt location or the delivery location. **Is conditional upon the the presence of information to the TSP regarding the absense of a Confirmation Response at the receipt location.**

5	Reduction Reason	N/A	~~SO~~ **C**	Confirming Party reduction at Delivery Location	For a pathed nomination, the Service Requester needs to know whether the quantity that was reduced is for the receipt location or the delivery location. **Is conditional upon the the presence of information to the TSP regarding the Confirmation Response containing a reduction at the delivery location.**
6	Reduction Reason	N/A	~~SO~~ **C**	Confirming Party reduction at Receipt Location	For a pathed nomination, the Service Requester needs to know whether the quantity that was reduced is for the receipt location or the delivery location. **Is conditional upon the the presence of information to the TSP regarding the Confirmation Response containing a reduction at the receipt location.**
7	Reduction Reason	N/A	~~SO~~ **C**	Storage Ratchet Provision	**For a storage nomination which was reduced due to the imposition of the TSP's provisions regarding ratcheting down of injection or withdrawal nominations in excess of amounts allowed based upon amounts in storage.**

Row 1: Usage Code change is necessary to be consistent with intent of adding the code. It is not mandatory that the code be sent, it is the Sender's Option to send the Code when the sender is intending to achieve the business result of Meter bouncing. Change in the Code Value Description is necessary to ensure that the business activities of a Service Requester on one TSP do not become revealed to another TSP without the knowledge, consent or action of the Service Requester. It is inappropriate for this language to be here.

Row 2: Usage Code change is necessary to be consistent with intent of adding the code. It is not mandatory that the code be sent, it is the Sender's Option to send the Code when the sender is intending to achieve the business result of Storage Inventory Cycling.

Row 3: Usage Code changed to make it clear that this is information that is in fact needed by the Service Requester and should therfore not be at the “option” of the Service Provider to tell the Service Requester or not.

Row 4: Usage Code changed to make it clear that this is information that is in fact needed by the Service Requester and should therfore not be at the “option” of the Service Provider to tell the Service Requester or not.

Row 5: Usage Code changed to make it clear that this is information that is in fact needed by the Service Requester and should therfore not be at the “option” of the Service Provider to tell the Service Requester or not.

Row 6: Usage Code changed to make it clear that this is information that is in fact needed by the Service Requester and should therfore not be at the “option” of the Service Provider to tell the Service Requester or not.

Row 7: Usage Code changed to make it clear that this is information that is in fact needed by the Service Requester and should therfore not be at the “option” of the Service Provider to tell the Service Requester or not. Code Value Description added as it was missing in the METF recommendation.

R96040

We recommend adopting the recommendation of the METF.

R96043

Follow the recommendation of the Market Committee and Reject

Although the recommendation appears to be in “favor” (the vote being 15 to 2) what the committee was “in favor” of was rejecting the majority of the requested codes due to the existence of codes which addressed the business reasons underlying the original request, and modifying the definiton of “Overrun” to be inclusive of the concept of MDTQ (entitlement) overrun and MDQ (point) overrun.

As there is not an offerred definiton to be voted upon, we recommend the following language.

Row	Business Name	Nomination Usage	Scheduled Quantity Usage	Code Value	Code Value Description
1	Transaction Type	SO	C	Authoriized Overrun	**Describes a nomination situation where the Service requester is nominating quantities in excess of either or both of their Maximum Daily Transportation Quantity (MDTQ) (i.e., entitlement) on a segment or path, or, their Maximum Daily Quantity (MDQ) at a point or location.**

R96046

As there is not an offerred definiton to be voted upon, we recommend the following language.

Row	Business Name	Nomination Usage	Scheduled Quantity Usage	Code Value	Code Value Description
1	Transaction Type	SO	C	Linepack	**Describes a nomination situation where the Service requester is nominating quantities of linepack to the Transportatioin Service Provider.**

R96047

Follow the recommendation of the Market Committee and Reject

Although the recommendation appears to be in “favor” (the vote being 14 to 0) what the committee was “in favor” of was rejecting the addition of the new data element called “Transaction Type Indicator” which presumably was to identify every transaction as a forward haul or backhaul. The committee wisely rejected the request and stated that the Transaction Type “Backhaul” was sufficient.

We can recommend that those transaporters who wish to have both a distinction between the other types of transactions (ex. Authorized overrun Current Business Plant Thermal Reduction, etc.) and be able to determine forward versus backhaul, that they build a table which associated points with one another so that the incoming nomination can be processed and the determination of fuel made by the relative geographic locations of the receipt and delivery points.

R96051

We recommend adopting the recommendation of the METF.

The recommendation is consistent with the intent of Business Conditional, MA and Conditional. Once trading partners have agreed that a predecessor document will contain (they have agreed to use and adopt) the MA data element, the succeeding documents should then contain that data element (and the associated value) as Conditional upon the presence of data in the MA data element.

R96052

We recommend adopting the recommendation of the METF.

The recommendation is consistent with the intent of Business Conditional, MA and Conditional. Once a receiving trading partner has determined that a predecessor document will contain (they have communicated to their sending trading partner their intention to adopt) the BC data element, the succeeding documents should then contain that data element (and the associated value) as Conditional upon the presence of data in the BC data element.

R96053

We recommend adopting the recommendation of the METF.

The recommendation is consistent with the intent of Business Conditional, MA and Conditional. Once a receiving trading partner has determined that a predecessor document will contain (they have communicated to their sending trading partner their intention to adopt) the BC data element, the succeeding documents should then contain that data element (and the associated value) as Conditional upon the presence of data in the BC data element.

R96052

We recommend adopting the recommendation of the METF with the following modifications.

The following table is an interpretation of the recommendation. It contains proposed Amendments to the Business Name, Definition and Condition(s) and proposed deletions from the Definition and Condition(s). Amendments are **bolded and underlined** while deletes are ~~struckthrough~~.

Request to Confirm Dataset

Row	Business Name	Definition	Usage	Condition
1	Service Requester **Identifier ***	~~Identifies the party requesting the service, or their agent.~~ **This is the Confirmation Service Requester's (originator of the Request to Confirm) Service Requester (or their agent) which is requesting the service on the facilities of the Confirmaton Service Requester and which party is also requesting to receive or deliver gas form/to the facilities of the Confirmation Service Provider**	~~MA~~ **BC**	**The recipient of the Request to Confirm (Confirmation Service Provider) can require that the Confirmation Service Requester provide to them the identiy (common code) of the service requester on the facilities of the Confirmation Service Requester as a menas of matching nominations to and from the respective systems.**

Row 1: Addition of the word "Identifier" and the asterisk ("*") makes it clear that this is the common code for the entity.

The definition is proposed as there is no definiton offerred by the METF yet it appears that this is the intent of the Request.

The Usage Code is changed to make this data element consistent with the "Service Requester Contract Identifier" data element which is business conditional. It would be unfair in the extreme if a Confirmation Service Provider which matched on its shipper's contracts could require that a Confirmation Service Requester send to the Confirmation Service Provider the Confirmation Service Provider's Service Requesters' (shippers') contracts (i.e., BC), yet, those Confirmation Service Providers who match on Service Requester (Common Code), had to get the agreement of the Confirmation Service Requester in order to receive the common code of their (the Confirmation Service Requester's) Service Requester.

The following table is an interpretation of the recommendation. It contains proposed Amendments to the Business Name, Definition and Condition(s) and proposed deletions from the Definition and Condition(s). Amendments are **bolded and underlined** while deletes are ~~struckthrough~~.

Confirmation Response Dataset

Row	Business Name	Definition	Usage	Condition
1	Service Requester **Identifier ***	~~Identifies the party requesting the service, or their agent.~~ **This is the Confirmation Service Requester's (originator of the Request to Confirm) Service Requester (or their agent) which is requesting the service on the facilities of the Confirmaton Service Requester and which party is also requesting to receive or deliver gas form/to the facilities of the Confirmation Service Provider**	C	**If required by the Confirmation Service Provider in the Request to Confirm, this data element (and the associated value) will be present in the Confirmation Response returned to the Confirmation Service Requester by the Confirmation Service Provider.**

Row 1: Addition of the word "Identifier" and the asterisk ("*") makes it clear that this is the common code for the entity.

The definition is proposed as there is no definiton offerred by the METF yet it appears that this is the intent of the Request.

The Usage Code is changed to make this data element consistent with the "Service Requester Contract Identifier" data element in the Request to Confirm which is business conditional. Once determined by the Confirmation Servie Provider to be required, then the Confirmation Service Provider will echo it back to the Confirmation Servicve Requester.

R96055

We recommend adopting the recommendation of the MSTF

R96057

Reject. The recommendation of the METF is out of line; inconsistent with ANSI; impinges on the valid values in the Sender's Option field, enables receivers to dictate what can appear in the sender's field; is inconsistent with the interpretation adopted by the EC in December with respect to Package ID, is a collateral attack on Package ID, and should be rejected.

The Market Execution Task Force, acting on a request from El Paso, has recommended reducing the size of the "Package ID" from the present "up to 30 characters in length" to a maximum length of 12 characters. It was originally proposed by El Paso as a maximum 3 character limitation. Adopting this limitation will entail shipper's having to process their Package ID's prior to EDI translation. It will also require every Transportation Servive Provider to process the Package ID field post-receipt and EDI translation to first determine its length before accepting the Package ID as valid.

The ANSI EDI field length for the field used to hold the Package ID is stated at 30 characters A/N (alpha-numeric). Reducing the length of the field to 12 characters will impose burdens on companies to preprocess outbound nominations to ensure that they are not in excess of 12 characters, and a burden on TSP's receiving nominations to process inbound post-translation Package ID fields to determine valid lengths. Then, if the field length is greater than the allowed 12, TSP's will have to then send error codes in the pipeline Quick Responses to identify that the ANSI allowed length was exceeded by the service requester. This error code and processing is necessary because it is unacceptably ambiguous to accept either the first 12 or the last 12 characters in the Package ID as this results in an ambiguous result.

There is no good reason to begin imposing artificial limits on field lengths (in particular the Package ID). The EDI lengths are in the ANSI documentation. The ANSI certification would also be jeopardized as GISB has represented to ANSI that it will take the x.12 as it is and not seek to change or otherwise modify the X.12.

In addition, this would be the first time that any non-ANSI limitation was placed on the length of data in a field established for the benefit of a sender of a document. It is important to note that no other limitations (other than ANSI field length limitations) on user-entered lengths are present anywhere else in all of the datasets. It appears that this is a collateral attack on the whole concept of Package ID as a service requester defined value.

One of the benefits of the 30 character field length is that it enables a unique character string or combination of characters and numbers for whatever identification a service requester may desire. We all remember the difficulties associated with DOS filenaming and the difficulties it imposed upon us due to the 8 character plus "dot" plus 3 character extension (total of 12 characters) file name length limitation. Let's not repeat that now with the Package ID before it is even implemented; before we know how useful it may be; and before we have a chance to use the full ANSI EDI allowed length.

Please also note that Request for new Standard 96057 also proposed to limit Contract Identifiers to only 12 characters. While this is mostly an imposition on the TSP's (one that they can deal with on their own by simply not making contracts with identifiers greater than 12, or for that matter 6 characters if they want), the portion of the standard request that we feel is most objectionable is the limitation on the length of the Sender's Option field, Package ID.

R96060

Follow the recommendation of the Market Committee and Reject

While the FERC wrestles with batch versus continuous intra day nominations, those TSP's who adopt either approach can do so without the addition of this data element. There is no need to have the Service Requester tell the Transportation Sevice Provider which "cycle" they wish to be part of. If there is a cycle system, then the Service Requester can time their nomination transmittal to coincide with the one they are in terested in.

R96061

Follow the recommendation of the Market Committee and Reject

Interestingly, this request for two new (MA) data elements (specified to be of 5 characters each) was offerred by the same requester that wanted to eliminate 18 characters from the Package ID (an SO) field. The busniess purpose sought presumably by the customers can be achieved by the Package ID field and if needed the Service Requesters can place all of their required data into this field. They can even use separators (a comma, an underscore, a slash ,etc.) to separate their values within the Package ID field. If the thirty character limit is retained (the 12 character limit rejected) then presumably those customers who wanted only 12 character length Package ID but wanted two additional five character fields could achieve their business result by doing the following.

Package ID Acct 1 Acct 2
12345678910A_12345_12345 for a total of 24 characters

This concatenation achieves the specified business (length is still less than the 30 but greater than the 12) and without the need for two new “MA” fields.

R96063

We recommend adopting the recommendation of the MSTF

R96066

We recommend adopting the recommendation of the MSTF

R96067

Reject in part, accept in part and accept some with the changes reflected below

The following table is a reasonalble reproduction of the recommendation. It contains proposed amendments to the Definitions, proposed changes in Usage, proposed deletions of Transaction Type Code Values, and proposed deletions of words within both Code Values and Code Value Descriptions. Amendments, Changes, and Adds are **bolded and underlined** while deletes are ~~struckthrough~~.

Row	Business Name	Nomination Usage	Scheduled Quantity Usage	Code Value	Code Value Description
~~1~~	~~Transaction Type~~	~~M~~	~~C~~	~~Imbalance Payback from Pipeline - Firm~~	
2	Transaction Type	~~M~~ **SO**	C	Imbalance **Makeup** ~~Payback from Pipeline~~ - Interruptible	**Service Requester (Shipper) is requesting return of gas owed to it by the TSP on an interruptible basis.**
~~3~~	~~Transaction Type~~	~~M~~	~~C~~	~~Imbalance Payback to Pipeline - Firm~~	
4	Transaction Type	~~M~~ **SO**	C	Imbalance Payback ~~to Pipeline~~ - Interruptible	**Service Requester (Shipper) is requesting to return gas owed to TSP by Service Requester on an interruptible basis**

Row 1: Not needed. If a nomination is under a firm contract, and the shipper nominates with a "makeup" transaction type then the TSP knows that it is a Firm makeup request, thus this transaction type is superfluous for firm contract nominations. However, adding this Transaction Type means that TSP's will have to send error codes when the Shipper sends a "firm" transaction type instruction under an interruptible contract nomination.

Row 2: The change to the definiton makes the wording consistent with the conventions adopted with respect to makeup and payback of gas. The language, "payback from pipeline" is non-standard and uses pipeline instead of the common term Transportation Service Provider. There is make-up to shippers and payback to pipelines/TSP, there is no payback from pipeline/TSP.

Usage Code change is necessary to be consistent with intent of adding the code. It is not mandatory that the code be sent, it is the Sender's Option to send the Code when the sender is intending to achieve the business result of

requesting that the pipeline return gas to the shipper on an interruptible basis.

The change to the Code Value Description makes clear that this is a makeup to the shipper on an interruptible basis. If the contract is a firm one then this is clearly an instruction to treat this line item as an interruptible nomination for capacity allocation purposes. Should a shipper send this transaction type on a nomination under an interruptible contract, then it is not ambiguous (although redundant to a simple "make-up" transaction type under the same interruptible contract. Nonetheless, there is no ambiguity and the business results of both the shippers and the TSP's can be achieved with respect to Make-up nominations.

Row 3: Not needed. If a nomination is under a firm contract, and the shipper nominates with a "payback" transaction type then the TSP knows that it is a Firm payback request, thus this transaction type is superfluous for firm contract nominations. However, adding this Transaction Type means that TSP's will have to send error codes when the Shipper sends a "firm" transaction type instruction under an interruptible contract nomination.

Row 4: The change to the definiton makes the wording consistent with the conventions adopted with respect to makeup and payback of gas. The language, "payback to pipeline" is redundant and uses "pipeline" instead of Transportation Servicve Provider. Payback is always to the pipeline/TSP. It is akin to saying "I just bought a car automobile."

Usage Code change is necessary to be consistent with intent of adding the code. It is not mandatory that the code be sent, it is the Sender's Option to send the Code when the sender is intending to achieve the business result of requesting that the pipeline accept gas from the shipper to payback an imbalance on an interruptible basis.

The change to the Code Value Description makes clear that this is a payback to the Transportation Service Provider on an interruptible basis. If the contract is a firm one then this is clearly an instruction to treat this line item as an interruptible nomination for capacity allocation purposes. Should a shipper send this transaction type on a nomination under an interruptible contract, then it is not ambiguous (although redundant to a simple "make-up" transaction type under the same interruptible contract). Nonetheless, there is no ambiguity and the business results desired by both the shippers and the TSP's can be achieved with respect to payback nominations.

R96022

We recommend adopting the Request as filed with one modification to the request with respect to Standard 4.1.8. (see below)

The proposed enhancement to certain existing GISB principles is made in response to the Federal Energy Regulatory Commission's Order No. 587 which stated, "The Commission will incorporate the principles, since they are a part of the GISB documentation and provide guidance as to the intended meaning of the standards. Pipelines, however, will not be expected to comply with the principles unless they are officially adopted as standards." The Commission has made a clear and fair determination in this regard which is intended to assist GISB in determining the appropriate classification for the resolutions it adopts.

Clearly, not every principle should be a standard. This said, there are several GISB principles, adopted in March 1996 which, in keeping with the Commission's guidance, ought to be officially adopted standards. The following GISB resolutions contain, without exception, positive statements of business process which should be recognized and treated as standards.

GISB Principle 1.1.1 - Adopt as is as Standard

The nomination, confirmation and scheduling timeline for gas to flow on the first day of the calendar month is governed by standard 1.3.2.

This standard recommends that the first of the month should be treated similarly to every other day, and that no special circumstances or additional requirements be made in order to move gas on those days. Clearly, GISB intended all pipelines to comply with this standard.

GISB Principle 1.1.4 - Adopt as is as Standard

Pre-nominations are not a required step in the nominations process.

The pre-nomination process was used by very few pipelines and added significantly to the administrative burden shippers using those pipes faced in their attempts to exercise transportation rights and coordinate gas flow across multiple pipes. GISB determined, as part of streamlining and standardizing the nomination process, that pre-nominations are no longer required. This statement is mis-characterized as a principle and should be adopted as a GISB standard.

GISB Principle 1.1.7 - Adopt as is as Standard

Activity codes should be included in the nominations data elements, and usage is at the shipper's option if offered by the transportation service provider.

This resolution was mistakenly presented as a principle as it clearly has implications for several pipelines and the many shippers on those pipelines who currently support the use of activity codes. Absent reclassification and adoption as a standard, it is quite possible that each individual pipeline will continue to set its own requirements concerning the submission and use of this data element, and shippers will have no standard business practice to rely on. Principle 1.1.7 was intended to be a standard.

GISB Principle 3.1.2 - Adopt as is as Standard

Elements should stay consistent from nomination through billing.

This resolution is more than a guiding principle. It should be adopted as a standard which is intended to govern and ensure consistency as the activities of the gas industry progress through various transactions. If this is not adopted as a standard, the efficient flow of data could be seriously impeded due to intracompany and intercompany miscommunication.

GISB Principle 4.1.5 - Adopt as is as Standard

Data should be made available to all requesters in an accepted standard format comparable both in time and delivery mechanism.

The intent of this resolution is to set a business standard which states that standard formats, communication timing and delivery mechanisms should be used. This is a general standard, on which other specific standards depend and should be incorporated by industry participants into their business practices to ensure consistent focus and intent.

GISB Principle 4.1.6 - Adopt as is as Standard

Data providers (transportation service providers) should interface with third party vendors according to GISB standards.

This resolution should be adopted as a GISB standard as it is intended to ensure that all industry participants continue to work together to provide efficient, effective communication interfaces and that GISB, not individual participants, will set industry-wide standards for interaction between market participants.

GISB Principle 4.1.7 - Adopt as is as Standard

Electronic communications between parties to the transaction should be done on a nondiscriminatory basis, whether through an agent or directly with any party to the transaction.

This resolution is intended to set a business practice standard that a company's independent choice of practical and available electronic communication mechanism(s) will not create any bias with respect to how that company's communications are treated by their trading partners. This principle should be adopted as a standard.

GISB Principle 4.1.8 - Adopt with changes as part Principle/part Standard

The same business result should occur regardless of the electronic delivery mechanism.~~This principle should guide the definition of the business process, data content of the transaction, and the timing of~~ the ~~transaction~~.

This resolution contains two different concepts. The first sentence should be adopted as a business practice standard as it sets forth a common and founding premise for electronic communication. The second sentence should be deleted from the standard yet retained in a newly constituted Principle as follows:

"The standard with respect to the ability of service requesters to achieve the same business results regardless of the electronic delivery mechanism employed, should guide the definition of the business process, data content of the transaction, and the timing of the transaction."