



Gas Industry Standards Board

1100 LOUISIANA, SUITE 4925, HOUSTON, TEXAS 77002
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Home Page www.gisb.org

January 14, 1999

TO: Business Practices Subcommittee (BPS) chairs: Greg Lander, Norm Walker, Randy Friedman, Diane McVicker (absent), Terry McRae
Posting on the GISB home page for interested industry participants

FROM: Jo Ann Garcia

RE: **Final Minutes from the Business Practices Subcommittee -- January 14, 1999**

I. Administrative

Mr. Walker opened the meeting, welcomed the participants, the roll was called and antitrust advice was given. The revised agenda was adopted which included "Item 2. Discussion and vote on any proposed recommendations for transferal of requests from BPS to EII." The minutes of the January 7 meeting were adopted with changes.

II. Discussion and vote on any proposed recommendations for transferal of requests from BPS to EBB Internet Implementation (EII) Task Force

Mr. Walker asked if there were any recommendations for transferal of Nomination or Flowing Gas requests to the EII Task Force. It was noted that a review of the log would identify any requests that may be transferred. The submitters should recommend that their requests be transferred to EII Task Force. An inquiry was made as to whether this transferral of requests was limited to Nomination and Flowing Gas requests. Ms. Davis stated there were three Invoicing requests she would like to see transferred as the EII Task Force addresses the Invoicing issues. The discussion is not limited to nominations and flowing gas requests, but after further discussion Ms. Davis noted that she would postpone consideration of these requests until a subsequent meeting. There were no recommendations for transferal of requests to EII.

III. Standards Language for Request Nos. R98011 and R98012

The meeting returned to the outstanding proposed standard 2.3.H, and the revised motion was re-read by Mr. Buccigross:

Motion: Mr. Buccigross made the motion which was seconded to adopt the following standard :

2.3.H In cases where the Swing, Operator Provided Value or Percentage Allocation Methods are employed, if a Service Requester is not present at a location for the full period being allocated, the Transportation Service Provider (TSP) should have prior agreement from such Service Requester before the TSP makes any allocations to such Service Requester for that portion of the period the Service Requester was not present at the location. For the purpose of this standard, a TSP may determine that the smallest such portion could be less than a gas day, but in no event should the portion of the period be greater than a gas day.

Discussion: Concern was voiced regarding the use of the words "less than a gas day." Discussion of the implications of parties being allocated a swing distribution that are not aware of this distribution and the effect on monthly allocation pipelines ensued. Also of concern was the question of when a shipper, who is also the operator of the location, was nominated on gas for only one day of the month but took 30 days of allocations in just that one day and the effect on any other parties in that month. Mr. Buccigross stated that he was aware that there would be an additional calculation the pipeline would have to conduct under this proposal, but was not overly burdensome. He stated that this proposal had the effect of normalizing the month's allocations. Concern was voiced over the effects on



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those parties that wanted to take the swing but under this scenario might not necessarily be able to do so. At this point an amendment was suggested.

First Amendment 2.3.H:

In cases where the Swing, Operator Provided Value or Percentage Allocation Methods are employed, if a Service Requester which is not a confirming party at the location and the Service Requester is not present at the location for the full period being allocated, the Transportation Service Provider (TSP) should have prior agreement from such Service Requester before the TSP makes any allocations to such Service Requester for that portion of the period the Service Requester was not present at the location.

Discussion continued and consideration was given to a pipeline having to make daily checks at points under this scenario. The effects of this proposal on pipelines that do a monthly allocation was discussed at length. The question was raised about the difference between the phrase "present at a location" and the phrase "a confirming party at a location." This discussion resulted in further amending the proposal to:

Second Amendment 2.3.H:

In cases where the Swing, Operator Provided Value or Percentage Allocation Methods are employed, if a Service Requester which is not a confirming party at the location and the Service Requester did not receive scheduled quantities for the location for the full period being allocated, the Transportation Service Provider (TSP) should have prior agreement from such Service Requester before the TSP makes any allocations to such Service Requester for that portion of the period the Service Requester did not receive scheduled quantities for the location.

Mr. Buccigross then suggested this proposal be reworked and a new work paper be posted for further discussion at the next meeting. Because the discussion centered on how parties were to be notified, the discussion turned to 2.3.0.1. This suggestion was accepted and an agreement was reached to proceed with proposed 2.3.0.1, as in the work paper posted by TransCapacity.

Motion: Mr. Buccigross made the motion which was seconded to adopt the following standard :

2.3.0.1 At a location not covered by an OBA, and where a Confirming Party has:

- a) designated a party(ies) other than themselves as the swing party(ies), or,
- b) designated a party(ies) other than themselves as the lowest-ranked (highest numeric rank) party(ies) than
- c) after the timely nominations deadline and prior to initial timely confirmations, such Confirming Party should:
 - (i) provide a PDA to the Allocating Party notifying the Allocating Party as to the existence of such lowest-ranked or swing party,
 - (ii) notify the party(ies) being "swung on" or "lowest-ranked" of such situation, and
 - (iii) include in such notification such party(ies) information as to:
 - 1) whether such party(ies) are the only swing or lowest-ranked party,
 - 2) the extent (quantity in total) of any limits in effect prior to such party(ies) being allocated "swing" or "lowest-ranked" gas,



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- 3) the extent (quantity in total) of any limits on such party(ies) swing,
- 4) the total scheduled quantities which are not subject to swing or which are ranked higher (as applicable); and,
- d) the Confirming Party should obtain from such party(ies) their consent to being so designated as the lowest-ranked or swing party(ies).

Discussion:

Mr. Buccigross read the proposed 2.3.0.1 into the minutes and entertained questions. It was pointed out that the question of timing of the confirmation versus the PDA was in conflict with the proposal. Another issue was raised concerning how this proposed standard would be handled in the intraday process. The maker of the motion stated he would withdraw the motion and rework the proposal to take in to account in its intent the timing issue.

IV. Upcoming Agenda & Adjournment

The meeting adjourned at 4:50 p.m. The next meeting is scheduled for Thursday, January 28, at 3:00 p.m. to 5:00 p.m. central. The agenda for the meeting is:

- 1. Administrative: Welcome, Antitrust Advice, Roll Call, Adoption of Agenda, Adoption of Draft Minutes from January 14, 1999.
- 2. Transfer of BPS items to EII
- 3. Review of the following requests **FOR DISCUSSION AND VOTE** :
 - R98011 Add new standards and definitions to standardize the PDA/Allocation process and standardize the terms parties use when referring to various processes known as allocation
 - R98012 Add a new standard to describe when and under what circumstances Allocation Statements are sent to shippers
[The discussions will start with 2.3.H]
- 4. Next meeting and agenda for telephone conference
- 5. Adjourn

V. Attendees¹

	<u>Name</u>	<u>Company</u>	<u>Member</u>
SERVICES	Greg Lander	TransCapacity	✓
	Jim Buccigross	National Registry of Cap. Rights	✓
	Donna Scott	Enron Administrative Corp.	✓
LDCs	Randy Friedman	Northwest Natural Gas	✓
	Rick Ishikawa	So Cal Gas	✓
PIPELINES	Betty Barnum	Duke -- Panhandle Eastern	✓
	Kim Van Pelt	Duke -- Texas Eastern	✓
	Mary Sue McNeal	El Paso Natural Gas	✓
	Norm Walker	El Paso Natural Gas	✓
	Theresa Hess	Enron -- Transwestern	✓
	Tammy Hopkins	Enron -- Northern Natural	✓
	Julie Unruh	Koch Gateway	✓
	Randy Young	Koch Midstream Services	✓

¹ The attendees' names which appear in **BOLD** are committee chairs. The others are participants.



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	Sandra Barnett	Koch -- Gateway	✓
	Dale Davis	Williams Gas Pipeline	✓
	Kelly Adolf	Williston Basin	✓
PRODUCER:	Terry McRae	PennzEnergy	✓
GISB	Jo Ann Garcia	GISB	✓



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STANDARDS LANGUAGE SUPPORTED FOR REQUEST NOS. R98011 & R98012

as of January 7, 1999

EXISTING STANDARDS:

2.3.24 [DELETE]

DEFINITIONS:

- 2.2.A. Monthly Allocation is the term used to describe the process where the Allocating Party performs the allocation process at the end of the monthly flow period.
- 2.2.C Daily Allocation is the term used to describe the process where the Allocating Party performs the allocation process following each gas day.

STANDARDS:

- 2.3.A At a location, there is at least one Confirming Party on each side of a location.
- 2.3.A.1 Allocations use the total quantity measured, or estimated, during the period to provide allocations to parties' scheduled (or otherwise identified transactions consistent with GISB Standard No. 2.3.F) transactions.
- 2.3.A.3 In the allocation process, estimated quantities should be adjusted to actuals following the time that the actual quantities are known.
- 2.3.B.1.d At a location which is not covered by an OBA, an Allocating Party receives PDAs from others.
- 2.3.B.1.e At a location which is not covered by an OBA, an Allocating Party calculates the allocations for the location and provides these allocations to the appropriate parties for their use.
- 2.3.B.2 At a location which is not covered by an OBA, a party which is not the Allocating Party at the location should receive and process allocations from the Allocating Party and employ these allocations when providing allocation information to its parties (as applicable and appropriate).
- 2.3.C At a location which is covered by an OBA, each Allocating Party can allocate its side of the location.
- 2.3.D.3 At a location which is not covered by an OBA:
- where the Confirming Parties confirm at a level less detailed than the nomination level;
 - where a Service Requester has submitted more than one nomination line item to a Transportation Service Provider (TSP); and,
 - where the TSP allocates to a level lower than the Service Requester contract level;
- the TSP should employ the TSP's tariff allocation methodology (including where applicable employing the other Confirming Party(ies)' Pre-determined Allocation(s) (PDA)) to allocate gas to the confirmation detail level. The TSP should then either: a) accept a PDA from such Service Requesters that provides allocation instructions for the allocation of quantities from the confirmation detail level to the nomination line item detail level, or b) employ the Service Requester's supplied ranks to allocate gas to the nomination line item detail level.

Where a TSP accepts PDAs from a Service Requester and the Service Requester does not provide a PDA, the TSP should employ the tariff allocation methodology for the



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allocation of the gas to the applicable confirmation level of detail and then should perform the default allocating methodology for allocations from the confirmation detail level down to the nomination line item detail level.

TSPs which allocate to Service Requesters at the Service Requesters contract level, or higher, are not required to allocate to a lower level or accept accounting allocation instructions from the Service Requester (i.e. neither PDAs nor Service Requester supplied ranks).

- 2.3.E At a location which is not covered by an OBA, a Confirming Party is permitted to submit a Pre-determined Allocation (PDA) to the Allocating Party which conforms to level of detail as used in the confirmation process between the Allocating Party and that Confirming Party. The Allocating Party should employ such PDA for the purpose of allocating quantities of its party(ies)' gas to the level of detail contained in the confirmation process between the Allocating Party and that Confirming Party.

A Confirming Party should not submit a PDA to an Allocating Party with respect to a location at a lower level of detail (more detailed) than that level of information exchanged between such parties during the confirmation process between them.

A PDA submitted by the Confirming Party to the Allocating Party with respect to a location should conform to the level of detail exchanged between such parties during the confirmation process. Submission by the Confirming Party to the Allocating Party of information at a higher level of detail (less detail) is a mutually agreed process.

- 2.3.F Absent prior mutual agreement among the Confirming Parties and those Service Requester(s) which are not Confirming Parties at the location, a Pre-determined Allocation (PDA) may not be used to allocate gas to a transaction that was not identified in the nomination or confirmation process, as applicable. In the event of a conflict between this standard and the Transportation Service Provider's (TSP's) existing tariff or general terms and conditions, the latter will prevail.

Where there has been such prior mutual agreement, a TSP, upon receipt of a PDA referencing a transaction not otherwise present in a nomination or confirmation may, but is not required to, generate a nomination (or confirmation) transaction (of zero or null quantity) corresponding to the subject transaction.

- 2.3.G Except in cases where the Percentage or Operator Provided Value method of allocation or the operation of GISB Standard No. [2.3.M.1] is being employed, where there is:

- (i) sufficient gas to fulfill all scheduled quantities at a location, a Pre-determined Allocation (PDA) should not result in a quantity being allocated to a party, contract or transaction, as applicable, that is less than the corresponding scheduled quantity(ies) for that party, contract or transaction, as applicable,
- (ii) insufficient gas to fulfill all scheduled quantities at a location, a PDA should not result in a quantity being allocated to a party, contract or transaction, as applicable, that is greater than the corresponding scheduled quantity(ies) for that party, contract or transaction, as applicable.

In the event of conflicts between this standard and the Transportation Service Provider's existing tariff or general terms and conditions, the latter will prevail.

- 2.3.N At a location which is covered by an OBA, the scheduled quantity should be the allocated quantity.

INSTRUCTIONS TO INFORMATION REQUIREMENTS:

- 2.3.B.1.e At a location which is not covered by an OBA, there is at least a Primary Allocating Party which is the Confirming Party which operates on side of the locations and which it has



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been agreed will receive and process PDA(s) from the Confirming Party(ies) on the other side of the location. This Primary Allocating party receives and processes the PDA(s) to the level specified in the PDA(s) and returns appropriate Allocated quantities information to the Confirming Party(ies) on the other side of the location which provided PDA(s). Where the PDA(s) received by the Primary Allocating Party did not specify allocations to the level of transactions present on the Primary Allocating Party's side of the location, other standards apply for the remainder of the allocation process on the Primary Allocating Party's side of the location.

After the Primary Allocating Party has provided Allocated quantities information to the Confirming Party(ies) on the other side of the location, the Confirming Party on the other side of the location which is the operator of the other side of the location (the Secondary Allocating Party) employs the allocated quantities information received by such Secondary Allocating Party from the Primary Allocating Party to provide allocated quantities information to its parties in a manner consistent with the allocated quantities information provided to it by the Primary Allocating Party. To the extent PDA(s) received by the Secondary Allocating Party from party(ies) on its side of the location specify a level of detail more specific than the Allocated quantities information received from the Primary Allocating Party, the Secondary Allocating Party employs these PDA(s) to allocate quantities to its PDA Submitters. Where the Allocated quantities information received by the Secondary Allocating Party were not to the level of transactions on the Secondary Allocating Party's side of the location, and where the PDA(s) received by the Secondary Allocating Party (if any) did not specify allocations to the level of transactions present on the Secondary Allocating Party's side of the location other standards apply for the remainder of the allocation process.

2.3.B.2

Confirming Parties which are not the Primary Allocating Party at a location should receive and process allocations from the Primary Allocating Party and employ these allocations in providing allocation information to their parties and Service Requesters (as applicable and appropriate). Where a Confirming Party is the operator of one side of a location and is not the Primary Allocating Party at the location, then they are the Secondary Allocating Party. The allocations provided by such Secondary Allocating Party to its parties and Service Requesters should reflect the same business results as those communicated to them by the Primary Allocating Party.



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STANDARDS LANGUAGE OUTSTANDING FOR CONSIDERATION

FOR REQUEST NOS. R98011 & R98012

(WORK PAPER PROVIDED FOR 1/7/99 MEETING IS NOT INCLUDED IN THIS DOCUMENT)

as of January 7, 1999

- 2.3.H In cases where the Swing Allocation Method is employed, if a Service Requester is not present at a location for the full period being allocated, the Transportation Service Provider (TSP) should have prior agreement from such Service Requester before the TSP makes any allocations to such Service Requester for that portion of the period the Service Requester was not present at the location. For the purpose of this standard, a TSP may determine that the smallest such portion could be less than a gas day, but in no event should the portion of the period be greater than a gas day.
- 2.3.I Proposed IR implementation Instructions:
- Where the Allocating Party is performing Monthly Allocations at a location, and a) the Swing Methodology is being employed and a particular Service Requester(s) is/are the swing party(ies) under the PDA, or b) the Rank Methodology is being employed and a particular Service Requester(s) is/are ranked lowest (highest numeric rank) and such Service Requester(s) being "swung on" or ranked lowest have not agreed to be allocated gas for those portions of the monthly flow period during which they had no transaction present at the location, such Service Requester(s) should expect the implementation of GISB Standard 2.3.H to be as follows:
- (i) Where the total monthly quantity exceeds the total of monthly scheduled quantities, the total of all scheduled quantities is subtracted from "total monthly allocable quantity", (note: each Service Requester is allocated their total Scheduled Quantity at this step). The result of the subtraction is the "total quantity remaining to be allocated". Then take "total monthly allocable quantity" divided by number of days in month to derive "estimated daily total flow at location". Then take party being "swung on" and assume they are the only party scheduled at the location for the days they are scheduled at the location. Subtract swing party's "daily scheduled quantity" from "estimated daily total flow at location" for each such day, the positive results (if any) from each such subtraction are added together and the total is the "total swing party swing quantity" allocated to the swing party (not to exceed "total quantity remaining to be allocated") . This "total swing party swing quantity" (for this swing party) is then subtracted from the "total quantity remaining to be allocated", the result is then allocated to the next swing party in the same manner, or is allocated according to the rank, or prorata methodology whichever is/are in effect until all of the "total quantity remaining to be allocated" is allocated.
 - (ii) Where the total monthly quantity is less than the total of monthly scheduled quantities, the total of all scheduled quantities is subtracted from "total monthly allocable quantity", (note: each Service Requester is allocated their total Scheduled Quantity at this step). The result of the subtraction is the "negative quantity remaining to be re-allocated". Then take "total monthly allocable quantity" divided by number of days in month to derive "estimated daily total flow at location". Then take party being "swung on" and assume they are the only party scheduled at the location for the days they are scheduled at the location. Subtract swing party's daily scheduled quantity from "estimated daily total flow at location" for each such day, the positive results (if any) from each such subtraction are added together and the total is the "total swing party swing quantity" to be re-allocated away from (subtracted from) the swing party's total



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scheduled quantity (not to exceed negative quantity remaining to be re-allocated). The absolute value of this "total swing party swing quantity" (for this swing party) is then added to the "negative quantity remaining to be re-allocated"; the result is then allocated away from the next swing party in the same manner, or is re-allocated away from the other parties according to the rank, or prorata methodology whichever is/are in effect until all of the "negative quantities remaining to be re-allocated" are re-allocated.

- 2.3.J Where the Allocating Party is performing Monthly Allocations, Running Monthly Allocations, or Cumulative Monthly Allocations at a location and Service Requester supplied rankings are employed for allocations purposes, the individual rankings by day should be summed for each nomination line item and the mathematical sum of these ranks for each line item would be employed to identify the relative rankings of these line items for allocations purposes.
- 2.3.K Where the Allocating Party is performing Monthly Allocations Running Monthly Allocations, or Cumulative Monthly Allocations at a location and Confirming Party supplied rankings are employed for allocations purposes, the individual rankings by day should be summed for each nomination line item and the mathematical sum of these ranks for each line item would be employed to identify the relative rankings of these line items for allocations purposes.
- 2.3.M.1 When an Allocating Party is allocating quantities at a location that is not covered by an OBA (but is covered by another arrangement mutually agreed to between the Confirming Parties with respect to allocating simultaneous receipt and delivery transactions), and where both receipt and delivery transactions are scheduled (or otherwise anticipated) to occur between the Confirming Parties, the Confirming Party may send a PDA to the Allocating Party which PDA should first specify, the portion of any underage or overage which is to be allocated to the receipts and deliveries (respectively and from the perspective of the Allocating Party) and, once so allocated by the Allocating Party, then, second which specifies the allocation of receipt gas to receipt transactions and delivery gas to delivery transactions to the respective level of the receipt and delivery confirmations and consistent with GISB Standards [2.3.D.3, and 2.3.E].
- 2.3.N.1 Where an interconnection between Confirming Parties is covered by an OBA, each Confirming Party should allocate to its respective parties their scheduled quantities.
- 2.3.O.1 At a location not covered by an OBA, and where a Confirming Party has:
- a) designated a party(ies) other than themselves as the swing party(ies), or,
 - b) designated a party(ies) other than themselves as the lowest-ranked (highest numeric rank) party(ies), then
 - c) after the timely nominations deadline and prior to initial timely confirmations, such Confirming Party should:
 - (i) provide a PDA to the Allocating Party notifying the Allocating Party as to the existence of such lowest-ranked or swing party,
 - (ii) notify the party(ies) being "swung on" or "lowest-ranked" of such situation, and
 - (iii) include in such notification to such party(ies) information as to:
 - 1) whether such party(ies) are the only swing or lowest-ranked party,
 - 2) the extent (quantity in total) of any limits in effect prior to such party(ies) being allocated "swing" or "lowest-ranked" gas,



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- 3) the extent (quantity in total) of any limits on such party(ies) swing,
- 4) the total scheduled quantities which are not subject to swing or which are ranked higher (as applicable); and,
- d) the Confirming Party should obtain from such party(ies) their written consent to being so designated as the lowest-ranked or swing party(ies).

When providing the subject PDA to the Allocating Party, a Confirming Party may certify to an Allocating Party that the Confirming Party has obtained the consent of such party(ies) to be so designated.

Absent such certification, such party(ies) should also be provided notification, by the Allocating Party, (within their scheduled quantity line items) that they have been so designated by the Confirming Party; and such party(ies) should provide the Allocating Party an acknowledgment indicating such party(ies)' consent to such situation. Where such consent is not affirmatively acknowledged or otherwise forthcoming, such party(ies) should be afforded the opportunity, during the evening nominations cycle, to eliminate their transaction(s) from such location(s). When such party(ies) do/does not eliminate its transaction(s) from such locations during the evening nominations cycle, the party is deemed to have consented to the allocation methodology during the period of time which they have not eliminated their nominated transaction(s) from such location(s). In the event such party(ies) eliminate their transaction(s) or are otherwise no longer the designated swing or lowest-ranked party(ies), such change would have prospective effect only.

For the purposes of this standard, "notification" by the Allocating Party to those Service Requesters employing GISB EDI/EDM should mean a transmittal to the Service Requester's designated site. For all other Service Requesters, "notification" should mean a posting among the Allocating Party's informational postings. Where an Allocating Party provides a means of affirmatively acknowledging consent, the Allocating Party may determine the means by which Service Requesters convey their acknowledgment of consent to being designated as the lowest-ranked or swing party(ies). Where an Allocating Party relies on the Service Requester either eliminating their transaction or not, there is no requirement on the Allocating Party to establish a means by which a Service Requester would convey its acknowledgment of consent.

2.1.A Service Requesters should have an opportunity to assure that to the maximum extent possible gas is allocated to their scheduled transactions consistent with their nomination instructions (and, where accepted, their allocation) instructions.

2.1.B The allocation process should not be used to accomplish business results after the fact that are simultaneously detrimental to one party and advantageous to another party and that would not have occurred in the scheduling process without the consent of the detrimentally affected party(ies). For these purposes, detrimental means that an allocated quantity for a party becomes greater or lesser than their nominated and scheduled quantity at the same time that another party's allocated quantity becomes or is affected in the opposite manner or not at all. The exception to this would be the business results associated with the use of swing methodology and, even here, detriment should be mitigated through notification to (and acquiring the consent of) such swing party(ies) with respect to a) their being swung on and b) the extent of their potential exposure to such swing allocations.