



Order No. 2004 Standards

Business Practices Subcommittee

The NiSource companies¹ have reviewed the current NAESB standards and the requirements of Order 2004 and believe that the current Informational Posting standards, with slight modification, can accommodate the information that needs to be standardized. In addition, several existing NAESB standards need to be changed. NiSource does not believe that any new business practice standards or definitions need to be created at this time to implement Order 2004.

Existing NAESB Standards Impacted

Standards that need to be changed are 4.3.6, 4.3.18, 4.3.21, 4.3.23

all refer to formatting/listing of the Affiliated Marketer subsection of the “Informational Postings” standards for the Internet Web Site. These standards should simply be changed to reference Energy Affiliate as the subsection.

Potential New Standards Required From Order 2004

FERC Reg. 358 .4 Independent Functioning

(a) (2) must post on website each emergency that resulted in any deviation from the standards of conduct, within 24 hours.

Suggestion – post under “Notices”. No new standard required.

(b) (1) must post names and addresses of Energy Affiliates

¹ The NiSource family includes four interstate pipelines (Columbia Gas Transmission, Columbia Gulf Transmission, Crossroads Pipeline and Granite State Gas Transmission), a combination electric utility and gas distribution company (Northern Indiana Public Service Company) and nine local distribution companies.

Suggestion – already posted under "Affiliated Marketer Information". No new standard required.

(b) (2) must post a complete list of facilities shared with Energy Affiliates, including types of facilities and their addresses

Suggestion – post under "Affiliated Marketer Information". No new standard required.

(b) (3) must post comprehensive organizational charts showing

Suggestion – post under "Organization Charts". No new standard required.

(b) (3) (v) must post information concerning potential merger partners as affiliates.

Suggestion – post under Affiliated Disclosure subsection of "Affiliated Marketer Information". No new standard required.

(c) must post notices of employee transfers.

Suggestion – post under Affiliated Disclosure subsection of "Affiliated Marketer Info". No new standard required.

FERC Reg. 358 .5 Non-Discrimination Requirements

(b) (3) If employee discloses information in a manner contrary to the requirements of 358.5 (b) (1) and (2), must post information.

Suggestion – post under Affiliated Disclosures subsection of "Affiliated Marketer Info". No new standard required.

(c) (4) the information in the "discretion" log must be posted within 24 hours.

Suggestion – post under "Notices". This may require a new subsection heading.

(d) discount offers must be posted when the offer is contractually binding

Suggestion – post under Discount Offer subsection in "Affiliated Marketer Information" heading. No new standard required.