

TO: Business Practices Subcommittee (BPS) chairs: Randy Friedman (absent), Greg Lander, Terry McRae (absent), Diane McVicker (absent), Norm Walker

Posting on the GISB home page for interested industry participants

FROM: Rae McQuade

RE: ~~Final Draft~~ Minutes from the Business Practices Subcommittee -- February 17, 1999

I. Administrative

Mr. Lander opened the meeting at 9:00 a.m., welcomed the participants, and provided antitrust advice. Administrative information was provided by Ms. Julie Unruh, the hostess. The revised agenda was adopted with no objection. The minutes of February 11~~7~~ meeting were adopted with changes.

II. Issues raised by Information Requirements Subcommittee, to be addressed by the BPS

This will be addressed at the first of the next meeting. The agenda was modified accordingly.

III. Transfers from BPS to EII Task Force (Invoicing and Capacity Release Requests)

No requests to transfer requests to EII Task Force were received for consideration by the BPS.

IV. Standards Language for Request Nos. R98011 and R98012

Discussion continued of 2.3.H replacement proposed by Koch and the alternate proposal on how to implement 2.3.H as proposed by El Paso which were presented at the end of the last BPS meeting.

The Koch proposal as adjusted at the 2/11/99 meeting was to replace 2.3.H with the following:
On monthly allocating Transportation Service Providers (TSPs), at locations where the Swing or Rank Allocation Method is employed by a TSP, any Service Requester (SR) that has been designated by a Confirming Party as the Swing party or the lowest ranked SR must be notified by the TSP of its proposed status prior to gas flow. Notification should be via e-mail or other electronic method, fax, or telephone. Absent communication from the SR or Confirming Party to the TSP to the contrary, such designation should be considered effective as of gas flow. If communication to the contrary is received, the allocation method defaults to prorata.

The El Paso proposal was to keep 2.3.H and add new standards as follows:

Existing 2.3.H:

If a Pre-determined Allocation (PDA) for the swing or rank methodology is received without an approval from the swing or lowest ranked party, then it is not considered a valid PDA and allocation defaults to pro-rata

Proposed Standard #1:

On monthly allocating Transportation Service Providers (TSPs) at locations where the Swing or Rank allocation methodology is employed, the Operator should submit a Request to Allocate via Swing or Rank Pre-determined Allocation (PDA)* to the Service Requester that would be designated as the Swing party or the lowest ranked party.

*Indicates new document/dataset

Proposed Standard #2:

On monthly allocating Transportation Service Providers (TSPs) at locations where the Swing or Rank allocation methodology is employed, after receipt of the Request to Allocate via Swing or Rank Pre-determined Allocation (PDA)* from the Operator, Service Requester should approve or deny the request. Such approval or denial by the Service Requester should be via Authorization to Allocate via Swing or Rank Pre-determined Allocation (PDA)*.

*Indicates new document/dataset

Proposed Standard #3:

The Operator should submit the Authorization to Allocate via Swing or Rank Pre-determined Allocation (PDA) received from the Service Requester along with the Pre-determined Allocation (PDA) to the allocating party. The timeframe established in 2.3.5 must be adhered to.

Approved Standard 2.3.5

The upstream or downstream party providing the point confirmation should submit the pre-determined allocation to the allocating party after or during confirmation and before start of gas day.

Discussion:

Mark Scheel indicated that he preferred the simpler approach that after he gets notification that he is the lowest ranked party, it is then up to him to get the Confirming Party to correct the PDA submitted to the Allocating Party. If the PDA it is not changed, then the PDA, as submitted, should stand for allocation purposes, ~~and not revert to a prorata default.~~

There was discussion that the only person who should have the ability to change the PDA is the party submitting it, otherwise GISB is dictating who has the legal right to allocate the gas. There was also discussion on whether the TSP should be required to provide the notification when they are not involved in the business arrangement. Concern was expressed with regard to involving TSPs in communication that should be taking place between operators and their confirmed parties. Mr. Hartmann expressed that the TSP should not be in the middle of the business deal and that they should only provide the notification.

Mr. Scheel stated that they do get notification or find out that they are ranked swing through the Service Requester/Confirming Party business arrangements. The notification by the TSP is only to try to catch those times when that communication does not occur or what is submitted to the TSP is something different from what the Service Requester had been told by their counter party(ies).

Greg Lander said that we could insert the words "which, or whose contract," and that this change would not limit the level of allocation.

Motion: to replace 2.3.H

2.3.H.1 -- On monthly allocating Transportation Service Providers (TSPs), at locations where the Swing or Rank Allocation Method is employed by a TSP, any Service Requester (SR) which, or whose contract, has been identified by a Confirming Party as the Swing party or the lowest ranked SR should be notified by the TSP of its proposed status prior to gas flow. Notification should be via e-mail or other electronic method, fax, or telephone. Absent subsequent communication from the ~~SR or~~ Confirming Party to the TSP to the contrary, such identification should remain unchanged and be considered effective as of gas flow.

Vote:

	In favor	Opposed
LDCs	0	0

End Users	0	0
Pipelines	5/1.11	4/.89
Producers	1/1	0
Service	3/2	0
Total	9/4.11	4/.89

Motion for a Standard:

2.3.H.2 – Parties should communicate to their counter parties that their transaction(s) for allocation purposes are lowest ranked or swing, when such counter parties' transaction(s) are identified by the party as being lowest ranked or swing. This standard does not apply to the relationship between **T**ransportation **S**ervice **P**roviders and their **S**ervice **R**equesters.

Discussion:

Discussion of motion to ensure that communication is taking place between parties involved in natural gas buy/sell transactions.

Mark Gracey asked Greg if the language in 2.3.H.2 included TSPs and other parties. Mark pointed out that the qualification of Monthly allocating TSPs was not a limiting factor in 2.3.H.2. Greg indicated yes.

Mark Gracey does not support this if the TSP is a counter party.

Mark Scheel stated that addressing issues involving the buying and selling of gas is out of scope for GISB.

Tommie Hartman said that this standard is getting into the relationships he has with his customers and he does not believe this is appropriate. Tommie says that his deals with his customers should not be overridden by GISB and he does not know who this helps.

Donna Scott said that considering the way the business works, that the operators of the points connected to points on the pipeline should be responsible for the flow of the gas and that TSPs should be monitoring their gas and working with their operators to ensure the flows meet the scheduled quantities. Donna's concern is that this goes on throughout the month and that not until the end of the month, that the shipper who is impacted **by this lack of communication** will **only then** be notified.

Vote:

	In favor	Opposed
Enduser	0	0
LDC	0	0
Pipeline	8	0
Producer	0	1
Service	1/.666	2/1.333
Total	2.667	2.333

Working from TransCapacity's Draft 11 posted for the February 4, 1999 meeting, TransCapacity indicated they were withdrawing the following proposed language:

(Withdrawn) --Proposed Standard [same as 2.3.J in minutes/workpaper of November 5 &12] 2.3.J

Where the Allocating Party is performing 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.

(Withdrawn) --Proposed Standard [same as 2.3.K in minutes/workpaper of November 5 &12] 2.3.K

Where the Allocating Party is performing 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.

Working through TransCapacity's workpaper, it was decided to defer discussion on 2.3.M.1 and 2.3.N.1 until 2/18/99.

Proposed Standard [same as 2.3.N.1 in minutes/workpaper of November 5 &12] 2.3.N.1

Where an interconnection between Confirming Parties is either covered by an OBA or one of the Confirming Party(ies) is taking all of the quantity variances onto one or more of its contract(s) with the Transportation Service Provider, each Confirming Party should allocate to its respective parties their scheduled quantities.

Motion: Principle: [New]

2.1.A

Gas which is allocated to Service Requesters should be allocated to their scheduled transactions consistent with their allocation instructions, where such allocation instructions are accepted by the Allocating Party.

Discussion of Motion 2.1.A

Randy asked how this moves us down the road.

Greg responded that this ensures that allocations are issued from nominations. The reason why it is a principle, is to get people used to this idea.

Donna asked what specifically are nomination instructions. Greg explained it in terms of ranks. Donna stated that she was not comfortable with using ranks as nominations instructions.

Randy stated that there are intended differences between scheduling priorities and allocation priorities.

Mark Gracey does not support principle this because the level of confirmation has not been established.

Greg stated that the instructions include a PDA. Mark said that instructions may not be accepted because a PDA has already been received. Greg agreed.

Theresa said that you could sum up this principle as "if you accept it, use it." Greg agreed. Tammy Hopkins asked why would someone accept ranks and not use them. Greg stated that the practice existed where PDAs are accepted and not used. Greg further said that this principle ties the process together of receiving PDAs and using them.

Mark said that there is not a standard requiring a TSP to use ranks for allocation. Greg said that would be covered in nominations. Refer to 2.3.D.32. This 2.3.D.32 Standard does not address how the action is accomplished. This principle fills in a gap in 2.3.D.32.

Greg stated that this motion could be considered a modification of 2.3.D.3 if the group would agree.

The motion maker withdrew proposed 2.1.A in favor of the modification of 2.3.D.3 as shown below.

Motion: Proposed 2.3.D.3

Motion to modify 2.3.D.3 to insert the two words “and employ” as shown below.

...The TSP should then either : a) accept **and employ** a PDA ...

Vote:

	In favor	Opposed
Enduser	0	0
LDC	0	0
Pipeline	6	0
Producer	1	0
Service	3	0
Total	5	0

Motion -- Principle: [New] 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 such swing party(ies) with respect to their being swung on.

Discussion of the issue to keep scheduling results consistent, to the maximum extent possible, with allocation results. Dale expressed concern that the same issue related to storage activity that is involved in 2.3.M.1 is involved here as well.

The motion was withdrawn at this time and will be handled with 2.3.M.1.

**Motion - Principle: [New]
2.1.C**

The information detail supported by Transportation Service Providers in the Sservice Rrequester nomination and Confirming Pparty confirmation processes should be supported throughout the process of providing related flowing gas information (i.e. Sservice Rrequester imbalances, Confirming Pparty Pre-determined Allocations(PDAs) and allocations, Sservice Rrequester PDAs (where supported), and Sservice Rrequester allocations (where provided)).

During the discussion of echoing information back to the service requester, Donna explained that when imbalances are calculated they should be consistent model-wise.

Dale stated there are no "models" for allocations. She wanted to find out what information is needed. Allocations are for a point. It was explained that shippers may nominate pathed, and they want their allocation information sent back in the same way.

Donna said that allocations are at the point level. The information should be presented in the same format.

Kim stated that allocations may not be able to be sent back in a nomination model format. Kim stated that the words in the proposal say it covers all flowing gas documents. The PDA, Allocation, Measurement Information and Measured Volume Audit Statement are all at a point. Donna is only including invoices and shipper imbalance statements. It excludes PDAs and allocations.

Randy asked the following series of questions. What is the problem, when does the problem first exist, what are the characteristics of the problem, who can cause the problem (is there is problem with the way processes interact with each other)?

Greg drew a picture on the board to and addressed Randy's questions.

Tammy stated that a conflict exists when storage is involved. Greg said this is not intended to supplant current storage practices, but to merely provide information when those practices are taking place.

Dale expressed concern that this language may result in potentially conveying confidential information.

Greg responded to the confidentiality of information first. Greg said that the diagram below shows that pertinent allocation information is mixed across the nomination line and the confirmation line. Greg grouped all of the Nominations processes including nomination, confirmation through scheduled quantities.

Greg said the two items on the table below illustrate the problem. It is simply inconsistent information. You cannot tie party information at the inception to party-party information on the result.

With respect to the "when does it first occur: Greg said it happens in the allocation process. In the bottom (of the table below), it can occur with the PDA and in the allocation process. He also stated that the characteristics of the problem are that the originating transaction cannot be tied by an automated process to the resulting transaction. The problem is that you have to infer relationships without rules. In addressing the "who" that can cause the problem, Greg explained that it ranges from the TSP (top of the matrix) to the PDA submitter and the allocating party.

Randy said this is a big issue. Donna Scot agreed and supported the principle. Randy stated this is out of scope only because it exceeds the scope of the request currently being processed.

Kim agreed that this is out of scope because it is outside the scope of the request. Kim said there is no model in the nomination. Confirmations are not model specific. Imbalances are outside the scope of this request. Problems with nominations are bigger than BPS and should not be addressed here. It is not clear how the "model" however contemplated by this principle, would be pushed all the way through.

Mike S. said the more he looks at this language the more he is uncomfortable. It encompasses unrelated information. Mike agrees that a service requester should be able to receive an imbalance statement that is consistent with the nomination. Mike further said that standardizing the confirmation process should not be a part of this process for this one request.

	Originating transaction	Something in the middle	Resulting document
Good	Non path nomination	====>	Non path imbalance
Good	Path non threaded nomination	====>	Path non threaded imbalance
Good	Path nomination	====>	Path imbalance
Bad	Non path nom	====>	Path imbalance
Bad	Pathed nomination	====>	Non pathed imbalance
Good	Confirming party – point confirmation	Point PDA ====>	Point Allocation
Not	SR	Point PDA ====>	Point Allocation

happening yet			
---------------	--	--	--

Mike Schisler pointed out that he has a request R96124, which relates to this issue and it is on the agenda for Information Requirements for its next meeting.

The discussion went to the scope of the Principle 2.1.C with regard to the requests that are being addressed.

The motion was withdrawn.

Begin Thursday, February 18, 1999

Greg called the meeting to order.

**Motion - Principle: [New]
2.1.D**

When scheduled quantities have been synched up between Confirming Parties, the allocation process should not cause divergences. The intent here is not to cause one Confirming Party to take responsibility for another Confirming Party's business practices nor to have them take responsibility for enforcing another party's following of the GISB standards, but rather to serve as a guideline that the allocation process should not cause divergent business results from those obtained in the nominations, confirmations and scheduling process.

Discussion of the issue to "keep one's tariff or general terms and conditions on their side of the flange instead of letting it bleed over to the other."

Betty Barnum expressed concern that the party to party-party and party-party to party allocations on opposite sides of the flange could result in differences. Greg stated this principle was not intended to address the case Betty stated.

Donna Scott stated that the process of comparing scheduled quantities to actuals and using the PDA to allocate should be a lot simpler to figure out.

Nomination ==> Confirmation ==> Scheduled Quantity ==> Allocated Quantities (1)

Measured Quantity ==>PDA ==> Allocated Quantity (2)

Greg drew the above diagram on the board and stated that, in some cases, there is no association between Allocated quantity (1) and Allocated quantity (2).

Dale provided the example where the nominations and confirmations for four deals equates to 25% for each. Then the ranked PDA submitted reflects a 40%-40%-10%-10% allocation for the same four deals. She asked if what is being proposed is for the nominated and confirmed quantities to override the PDA? The answer was yes.

Tommie said that operators practice the "we believe what we are seeing" philosophy as far as confirmations, but measured quantities part way through the month do not necessarily reflect those confirmations and subsequent scheduled quantities. Operators want to confirm what was sold and what was flowed. Tommie said that people behind plants may not have the most timely and accurate measured quantity information. Tommie said that the plant operators depend upon the owners of the gas to accurately determine what they have flowed throughout the month.

Greg stated that we could add the following language:

At locations which are not covered by an OBA and where the percentage allocation methodology is being employed, there should be a process where once the PDA is received, the scheduled quantities are adjusted on a prospective basis (i.e. for future gas days and in the end of gas day scheduled quantity), to more closely reflect the allocation methodology.

After discussion, Greg stated that this is an “information deficit” problem. He suggested that we move to R98012 and then come back to this later.

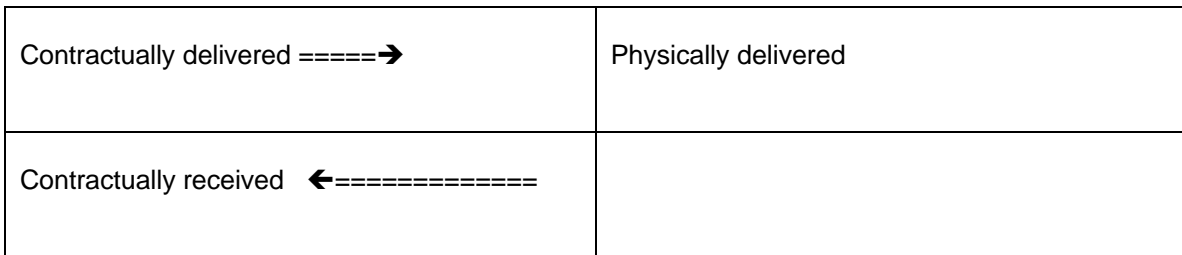
Donna suggested we move off this and then on [to 2.3.M.1](#) and [2.3.N.1](#).

The motion was withdrawn.

Motion 2.3.M.1 [modified language - same intent]

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 in total to the receipt transactions and in total to the delivery transactions (respectively and from the perspective of the Allocating Party). Such PDA should also specify within the category of receipt transactions the allocation of receipt gas as well as within delivery transactions the allocation of delivery gas which allocations are to the respective level of the receipt and delivery confirmations and consistent with GISB Standards [2.3.D.3, and 2.3.E].

Discussion involved the allocation of simultaneous receipts and deliveries at a point where there is no OBA. Greg provided a diagram where there are nominations to deliver and to receive gas which result in a net delivery.



Hypothetically, this could be a storage field. This proposed language states where the overage or underage should be allocated.

The table below shows some of the cases between the delivery and receipt sides of the flange.

	Case 1	Case 2	Case 3	Case 4	Case 5
Delivery	+ (over)	+ (over)	- (under)	+/- (over/under)	+/- (over/under)
Receipt	+ (over)	- (under)	+ (over)	+/- (over/under)	+ (over)

Randy stated that he did not know what problem we are trying to solve. Randy said that it appeared as though we were only addressing storage points. Dale explained that one example would be when the operator of a city gate is also the holder of a bundled storage service that is nominated and allocated at the city gate. The customer wants to use their storage service to swing on in addition to swinging on transport activities.

Greg said storage is an example, but there can also be points that are not storage.

Randy asked if there are already agreements between parties, why do we need a standard. Greg responded that there may not be a reason to do this, but that people had conveyed to him that people did not always get allocated their scheduled quantities.

Mike Schizler has problems with how this affects the confirmation process. Mike expressed concern that this standard required the allocating party to allocate at the same level as the confirmation.

Greg said that there is an agreement between the parties on how they will allocate the flange sides.

Due to the lack of a second for this motion, the discussion moved on.

Motion: Proposed Standard

2.3.N.1

At a location where one of the Confirming Parties has agreed to be allocated all of the quantity variances (positive and negative) between total scheduled quantities and measured quantities at that location onto one or more of its contract(s) with the Transportation Service Provider, each Confirming Party should allocate to its respective parties their scheduled quantities.

Discussion:

There was discussion if we need to have a separate motion or if we can accomplish the same thing by modifying 2.3.N. Mary Sue wanted to keep 2.3.N and change these words to address only non OBA points. Mark Gracey stated that some points are balanced at the producer or operator level.

Randy asked if the standard is needed. Greg responded yes, because 2.3.N.1 doesn't cover the situation where the Confirming Party is taking all the quantity variance. Randy stated that long is allocated differently than when it is short.

Tammy asked for clarification if you have swing at a point and the operator takes so much that takes it to zero and they have an arrangement that the remainder of the swing goes to another party, doesn't this prohibit the other party from taking the swing and they will have to take their scheduled quantities. Greg responded that this standard would not apply if all the swing is not taken by the party.

Vote:

	In favor	Opposed
Enduser	0	0
LDC	0	0
Pipeline	1	4
Producer	1	0
Service	3	0
Total	3.4	1.6

R98012

Discussion:

Greg wrote the following two statements on the board in response to questions received over lunch.

- A TSP can agree to send the allocated quantities on a daily basis to a service requester rather than accept uploads of requests for allocated quantity(ies).
- Support by a TSP of requests for allocated quantities other than all locations for a service request is a mutually agreed process.

Donna Scott and Mark Scheel stated that the issue only relates to out-of-balance transactions, not a difference between scheduled quantities and actuals.

Motion: Proposed Standard No. 2.3.A

Upon request to its Transportation Service Provider, a Service Requester should be provided allocated quantities pursuant to Standard 2.4.3 or 2.4.4 for the transaction(s) which have been scheduled by such Transportation Service Provider for the Service Requester. A Transportation Service Provider can agree to send the allocated quantities on a daily basis to a service requester rather than accept uploads of requests for allocated quantities. GISB Standard 2.3.21 applies to the daily provision of allocated quantities here under. Support by a Transportation Service Provider of requests for allocated quantities other than all locations for a service requester is a mutually agreed process; provided however, that in order to support GISB standard 2.3.21 and where a Transportation Service Provider has without mutual agreement determined not to send allocated quantities here under, the Service Requester can rely on the absence of a transaction as indicative that the scheduled quantities are the allocated quantities.

Vote:

	In favor	Opposed
Enduser	0	0
LDC	0	0
Pipeline	0	7
Producer	1	0
Service	3	0
Total	3	2

Motion Principle: [New]

2.1.A

The information detail supported by Transportation Service Providers in their scheduling process should be supported throughout the process of providing related flowing gas information (i.e. Shipper Imbalance (GISB Standard 2.4.4), PDAs (GISB Standard 2.4.1) from the Service Requester (where supported), and Allocation (GISB Standard 2.4.3) to the Service Requester (where supported)).

Discussion

Laura Mosley questioned “What is the imbalance statement supposed to look like when a TSP allows both pathed and non pathed nominations for the same contract?”

Greg answered that the imbalance nominations could be presented in the same way as the TSP schedules its pipe. ~~run-up-on-a-monthly-basis.~~

Laura said a shipper could send in pathed and non pathed transactions on alternate days for the same contract.

Greg stated that pooling is taking place on the same contract as transportation.

Laura said the two models could be in the same market area.

Donna Scott stated that the transactions can be broken into two transactions. Laura stated her processes are pathed.

No vote was taken as a motion to adjourn was made and passed.

Motion to adjourn passed balanced vote.

Vote:

	In favor	Opposed
Enduser	0	0
LDC	0	0
Pipeline	7	0
Producer	0	1
Service	1	1
Total	3	2

Meeting was adjourned at 3:10 p.m.

Attendees, Wednesday, February 17, 1999

Row	Name	Company	Segment	Member	Voting
1	Mark Scheel	Dynegy	Services	Yes	Yes
2	Greg Lander	TransCapacity	Services	Yes	Yes
3	Tommie Hartman	Exxon	Producers	Yes	Yes
4	Kelly Adolf	Willison Basin	Pipelines	Yes	Yes
5	Kurt Link	Williston Basin	Pipelines	Yes	No
6	Dale Davis	Williams Gas Pipelines	Pipelines	Yes	Yes
7	Mary Sue McNeal	El Paso Natural Gas	Pipelines	Yes	Yes
8	Norm Walker	El Paso Natural Gas	Pipelines	Yes	No
9	Randy Young	Koch Midstream	Pipelines	Yes	Yes
10	Julie Unruh	Koch Gateway	Pipelines	Yes	Yes

11	Sandra Barnett	Koch Gateway	Pipelines	yes	No
12	Mark Gracey	Tennessee Gas Pipeline	Pipelines	Yes	Yes
13	Laura Moseley	Florida Gas Transmission	Pipelines	Yes	Yes
14	Theresa Hess	Transwestern Pipeline	Pipelines	Yes	Yes
15	Ki-m Van Pelt	TrunklineGas Company	Pipelines	Yes	Yes
16	Mike Schisler	Natural Gas Pipeline	Pipelines	Yes	Yes
17	Donna Scott	Enron Administrative Services	Services	Yes	Yes
18	Tammy Hopkins	Northern Natural	Pipelines	Yes	Yes

Attendees Thursday, February 18, 1999

Row	Name	Company	Segment	Member	Voting
1	Mark Scheel	Dynegy	Services	Yes	Yes
2	Greg Lander	TransCapacity	Services	Yes	Yes
3	Tommie Hartman	Exxon	Producers	Yes	Yes
4	Dale Davis	Williams Gas Pipelines	Pipelines	Yes	Yes
5	Mary Sue McNeal	El Paso Natural Gas	Pipelines	Yes	Yes
6	Norm Walker	El Paso Natural Gas	Pipelines	Yes	No
7	Randy Young	Koch Midstream	Pipelines	Yes	Yes
8	Sandra Barnett	Koch Gateway	Pipelines	yes	No
9	Mark Gracey	Tennessee Gas Pipeline	Pipelines	Yes	Yes
10	Laura Moseley	Florida Gas Transmission	Pipelines	Yes	Yes
11	Theresa Hess	Transwestern Pipeline	Pipelines	Yes	Yes
12	Ki-m Van Pelt	TrunklineGas Company	Pipelines	Yes	Yes
13	Mike Schisler	Natural Gas Pipeline	Pipelines	Yes	Yes
14	Donna Scott	Enron Administrative Services	Services	Yes	Yes
15	Betty Barnum	Panhandle Eastern	Pipelines	Yes	Yes
16	Tammy Hopkins	Northern Natural	Pipelines	Yes	Yes