

COLUMBIA GAS
Transmission**Commercial Services**

December 4, 1997

Ms. Rae McQuade
Gas Industry Standards Board Executive Director

Re: Comments Related to Standards R97031A, R97031B and R97031C

Columbia Gas Transmission has reviewed the set of three recommended interpretations (C97016, C96030, C96032) and eleven recommended standards (R96059, R96121A1, R96121A2, R96121A3, R96121A4, R97008A, R97067, R97084, R97031A, R97031B and R97031C). Columbia Gas is in agreement with the majority of these interpretations and standards recommended in the above requests.

However, Columbia Gas does not agree with some of the language or intent in the "Technical Implementation of Business Process" found in both R97031A and R97031B requests. One section of language specifically states:

"When these types of charges and/or allowances are invoiced together with contract level amounts, the Transportation/Sales Invoice document is used. If service requester level charges and/or allowances are the *only* amounts invoiced, this Service Requester Level Charge/Allowance Invoice document should be used instead."

which implies that two (2) types of invoice formats or processes exist, one for contract level with transactional activities and one for only service requester level with no transactional activities other than charge/allowance items only.

Columbia Gas's position is that there should be only one invoice format or process that will process and produce invoices at the Service Requester/Contract Level with transaction activities as well as Service Requester Level without any transactional activity.

This approach will minimize additional information system required to process and produce a separate invoice just because no contract or transaction had occurred for a certain Service Requester. It will also minimize any confusion on the Service Requester by not having to receive two different invoice formats as the situation occurs. This in turn will also minimize cost for all involved parties.

Columbia Gas requests that GISB clarify the intent of the statement,

".....If Service Requester Level Charges and/or Allowances are the only amounts invoiced, this Service Requester Level Charge/Allowance Invoice document should be used instead."

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meaning there are two invoice systems. If that is not the intent and it is left to each Transportation Service Provider to implement this standard, then the above two statements should be modified or deleted.

Michael Ng
Commercial Services Representative

Attachment

REQUEST No: R97031(A)

GISB Transportation/Sales Invoice

TECHNICAL IMPLEMENTATION OF BUSINESS PROCESS

An Transportation/Sales Invoice is the communication between companies that itemizes goods shipped or services rendered and specifies the price and term of the transaction. It also serves as a request for payment and documents that goods have been provided or services have been performed. The types of transactions invoiced in the natural gas industry include gas sales, and gas transportation, and related charges and/or allowances.

The Transportation/Sales Invoice is identified by the **invoice identifier**. This is an identifier a code assigned by the originator of the invoice and is a point of reference for communications regarding the invoice. When an invoice supercedes a previously issued invoice, the **previous invoice identifier code**, if utilized, will reflect the invoice being replaced. An invoice uniquely identifies a single **invoice date, currency, exchange rate, effective exchange date, account number, tax ID identification code number, contact person, service requester, payee, billable party (payer), remittance address and net due date.**

The **currency, exchange rate and effective exchange date** are used traditionally where gas crosses borders and the billable party is in a different country than the payee.

The **tax identification code ID number** is the payee's tax id number to be used for government reporting.

There may be multiple **service requester contract numbers** and effective dates (**beginning transaction date/beginning transaction time, ending transaction date/ending transaction time**) on a single Transportation/Sales Invoice.

For each unique combination of service requester contract number and effective date, there may be one or more lines of detail. Each detail is identified by a **line number**. For a line number, there may be a single **package ID, quantity, unit price, price tier number, delivery location, and delivery zone, amount due, adjustment type, service code, charge indicator, location indicator, replacement release code, charge type, receipt location, and receipt zone, and replacement party identifier ID.**

[paragraph inserted as a result of R97026]

A charge type may describe one or more rates applied to the same transaction or billable unit of service such as maximum daily quantity, receipt quantity, delivery quantity, or pipeline interconnection facilities. One charge type may be applicable to several different types of services. Different rates may be associated with the same charge type depending upon service, contract, path, month, rate tier, or other factors.

Request No: R97031(A)

GISB Transportation/Sales Invoice

[new paragraph as a result of R97031A]

In some cases, no specific contract or transaction applies to an invoiced amount; such an amount is referred to as a "service requester level charge or allowance." Examples of service requester level charges or allowances include interest on past due invoices, imbalance charges and GRI refunds. These charges are described by the service requester level charge/allowance amount descriptor while the relevant amount for each descriptor is found in the service requester level charge/allowance amount. When these types of charges and/or allowances are invoiced together with contract level amounts, the Transportation/Sales Invoice document is used. If service requester level charges and/or allowances are the only amounts invoiced, the Service Requester Level Charge/Allowance Invoice document should be used instead.))

All of the contract level details amounts and service requester level amounts (if applicable) for each invoice are summarized into ~~a total invoice amount~~ the invoice total amount.

Propose to BG ~~8/6/98~~

REQUEST NO: R97031(B)

GISB Service Requester Level Charge/Allowance Invoice

TECHNICAL IMPLEMENTATION OF BUSINESS PROCESS

The Service Requester Level Charge/Allowance Invoice is the communication between companies which is utilized where charges and/or allowances which apply only at the service requester level are invoiced. When no specific contract or transaction applies to an invoiced amount, the amount is referred to as a "service requester level charge or allowance." Examples of service requester level charges or allowances include interest on past due invoices, imbalance charges and GRI refunds. These charges are described by the **service requester level charge/allowance amount descriptor** while the relevant amount for each descriptor is found in the **service requester level charge/allowance amount**.

PROPOSE
TO BE
DELETED

~~When these types of charges and/or allowances are invoiced together with contract level amounts, the Transportation/Sales Invoice document is used. If service requester level charges and/or allowances are the *only* amounts invoiced, this Service Requester Level Charge/Allowance Invoice document should be used instead.~~

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The Service Requester Level Charge/Allowance Invoice is identified by the **invoice identifier**. This is an identifier assigned by the originator of the invoice and is a point of reference for communications regarding the invoice. When an invoice supercedes a previously issued invoice, the **previous invoice identifier**, if utilized, will reflect the invoice being replaced. An invoice uniquely identifies a single **invoice date, currency, exchange rate, effective exchange date, account number, tax identification code, contact person, service requester, payee, billable party (payer), remittance address and net due date**.

The **currency, exchange rate and effective exchange date** are used traditionally where gas crosses borders and the billable party is in a different country than the payee.

The **tax identification code** is the payee's tax id number to be used for government reporting.

Each combination of service requester level charge/allowance amount descriptor and service requester level charge/allowance amount is identified by a **line number**. Additional information at this level may include the **service requester level adjustment type**, and/or the **charge/allowance period**.

All of the invoiced amounts for each Service Requester Level Charge/Allowance Invoice are summarized into the **invoice total amount**.