

TO: GISB Executive Committee Members

From: Colorado Interstate Gas Company

RE: Response to Request for Comments on Proposed Standards

Date: July 2, 1999

In general, GIG is in support of the standards to be considered by the Executive Committee (EC) at its scheduled meeting on July 15 and 16, 1999. However, CIG offers the following comments on the proposed standards indicated:

1. **R98053/R98054** – The changes proposed by these requests add two new mutually agreeable data elements to the Nomination Data Set which may be used by Service Requesters to carry any type of desired information they may wish to provide. These data elements are not to be a part of the Nomination key but are to be carried through to at least Scheduled Quantities (including Operators). Given the proposed allocation rules discussed below, it is not clear that these data elements will not also affect allocations. These new data elements appear to duplicate and expand the function already supported by the Package ID. Further, CIG has experienced somewhat frequent problems with shipper expectations when they change non-key data, especially between intra-day nomination cycles.

CIG does not specifically object to the new data elements proposed by these requests, however, we believe GISB should be looking for opportunities to reduce the number of data elements in all transaction sets rather than continually adding new optional elements.

2. **R98011/R98012** – While some of the instructions provided in the standards proposed by these Requests may be appropriate, in general, they appear to be an effort to define allocation processes down to the most minute detail. Many of the standards merely state the obvious, i.e. 2.3.A.3 “In the allocation process, estimated quantities should be adjusted to actuals following the time that the actual quantities are known.” Or 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.” Other standards (2.3.F) offer a TSP the right to enter a null nomination transaction into its own system. Given the fact that these standards are primarily aimed at interstate pipelines who will be required by the FERC to incorporate these standards, often verbatim, into their tariffs, less is definitely better than more.

Specifically, CIG believes that R98011 Standards 2.3.A.3, 2.3.B.1.d, 2.3.B.1.e, and 2.3.B.2 are unnecessary. Further, Standard 2.3.N.1 is unclear. Additionally, in R98012, the third paragraph of Standard 2.3.A is unclear and confusing. It does not appear to have a clear history during the Task Force deliberations. CIG recommends that this paragraph be dropped from the proposed standard.

Finally, the Instructions to Information Requirements for these requests are overly complicated and are essentially written as additional standards. Rather than being instructions, they are in fact prescriptions for IR to follow. If these additional “standards” are required, they should be sent forward as standards. If they are redundant or only serve to restrict IR from doing its job, they should be dropped from the proposal.

Thank you for your consideration of these comments.