

NGPL Position and Task List for XKR

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It is NGPL's position that current business practices on NGPL operated TSPs fully comply with the requirements of FERC Order 587-G as pertaining to Cross Contract Ranking (XKR). NGPL also believes that these practices fully support the ideas contemplated in the "DYNEGY PERSPECTIVE ON XKR" workpaper submitted to GISB. Additionally, based on the "Cross Contract Ranking Discussion Paper" submitted by Koch to GISB, it appears that NGPL and Koch, both being Pathed Non-Threaded TSPs, have a similar approach to, and implementation of, XKR. Finally, all versions of the GISB nomination data sets, including the current v1.3, fully support XKR practices within the GISB Pathed Non-Threaded model. It is therefore recommended that the task list for the XKR Task Force (as it pertains to Pathed Non-Threaded) need only include the crafting of business standards that reflect current Pathed Non-Threaded XKR practices.