

November 22, 1996

To: Rae McQuade, GISB Executive Director

From: Donald Richardson, Market Initiation Task Force - Capacity Release Team Chair

Rae,

Please accept the following comments as part of the Industry Comment Requested on Changes to Capacity Release Standards. The Capacity Release Team is submitting these comments based on discussions at the November 11, 1996 meeting and opportunity for additional discussion at a scheduled November 22, 1996 conference call. Perhaps it is unusual for us to comment on our own Comments, but we noticed some minor items that need attention.

Many of these improvements come from a new member to the Team with good eyes. He is a very welcome addition.

Changes to the "Capacity Release Team Comments on Standards" are in bold.

Please call me if I can answer any questions.

Very sincerely,

Donald W. Richardson, Chair

Market Initiation Task Force Capacity Release Team

TAB 3 - EXECUTIVE SUMMARY

Page 3 -- Change the presentation of the datasets as follows:

Mandatory Download Datasets

1. Firm Transportation and Storage - Offer
2. Firm Transportation and Storage - Bid Review
3. Firm Transportation and Storage - Award Notice
4. Firm Transportation and Storage - Withdrawal, which is subdivided:
 - A. Offer Withdrawal
 - B. Bid Review Withdrawal
 - C. Award Notice Withdrawal
5. Operationally Available and Unsubscribed Capacity
6. System-Wide Notices
7. Response to Upload of Request for Download of Posted Data Sets
8. Replacement Capacity

Mandatory Additional Datasets

9. Upload of Request for Download of Posted Datasets
10. Electronic Withdrawal Upload, which is subdivided:
 - A. Offer Withdrawal
 - B. Bid Review Withdrawal
11. Upload to Pipeline of Prearranged Deals (UPPD)
12. UPPD - Validation
13. UPPD - Final Disposition
14. Note/Special Instruction

Not Mandatory Additional Datasets

15. UPPD - Notification

Business Conditional Additional Datasets

16. UPPD - Bidder Confirmation
17. UPPD - Bidder Confirmation Validation

Page 6 -- Change the sixth sentence of the second UPPD paragraph to begin "If **confirmation is required by the Transportation Service provider**, the UPPD-Bidder Confirmation transaction".

TAB 6 - FIRM TRANSPORTATION AND STORAGE - OFFER

Page 5 -- Data Dictionary -- the following field should be added:

Business Name: Bidder Company Code

Definition: The unique company code number for the legal entity which is the bidder.

Usage: SO

Condition:

This data element has existed since June, 1994. The tariffs for some Transportation Service Providers require them to provide this information for prearranged deals.

Page 10 -- Data Dictionary -- Special Terms and Miscellaneous Notes -- Condition -- Change to "Mandatory when **the offer is not a stand-alone offer**".

EDI - FIRM TRANSPORTATION AND STORAGE - OFFER

Page 32 -- Table E -- Stand-Alone Offer Indicator -- PID08 = "N" -- Change the Description to read "Not a stand-alone offer; parties should read the offeror's terms and conditions in the **Special Terms and Miscellaneous Notes field**".

TAB 7 - FIRM TRANSPORTATION AND STORAGE - BID REVIEW

Page 6 -- Data Dictionary -- Special Terms & Miscellaneous Notes -- Change Condition to "Mandatory when **bid is not a stand-alone bid**."

EDI - FIRM TRANSPORTATION AND STORAGE - AWARD NOTICE

Page 24 -- Table B -- Special Terms and Misc. Notes -- Usage -- Change "C1" to "SO".

TAB 12 - UPLOAD TO PIPELINE OF PREARRANGED DEAL (UPPD)

Page 7 -- Data Dictionary -- Minimum Volumetric Commitment Percentage -- Condition -- Change to "Where supported by the Transportation Service Provider this field indicates the Bidder's minimum volumetric commitment percentage".

Page 7 -- Data Dictionary -- Minimum Volumetric Commitment Quantity -- Condition -- Change to "Where supported by the Transportation Service Provider this field indicates the Bidder's minimum volumetric commitment quantity".

Page 9 -- Data Dictionary -- the following field should be added:

Business Name: Releaser Requested Posting Time

Definition: The future time at which the releaser requests posting of this deal.

Usage: SO

Condition:

Standard 5.3.24 specifically references the posting time, and it needs to be in the data set.

EDI - SYSTEM-WIDE NOTICES

Page 9 -- EDISIM -- MIT01 -- Notice **Type** -- Add the following values:

7	=	Press release/company news/phone list, etc.
8	=	Gas scheduling

Subj: Koch's comments on proposals posted 11/21 and 11/22
Date: 96-12-04 14:31:56 EST
From: ArthurL@kochind.com (Arthur, Lisa)
To: gisb@aol.com (GISB Office)

12/4
Ran

Koch Gateway submits the following comments on the requests for modification to existing standards posted on the GISB home page on November 21 and 22, 1996.

Koch either supports or does not oppose the recommendations to the Executive Committee for all of the proposed modifications with the following exceptions:

R96014 - Deal Type → TO VOTE ON

It appears that the recommendation to the GISB Executive Committee that was prepared for this proposal was extracted directly from the Market Execution meeting minutes, thus it contains no mention of any impacts to the transactions that fall within the Market Settlement area.

In our original proposal, we recommended adding the deal type data element to the following transactions:

- Pre-Determined Allocation (shipper level)
- Allocation Statement (shipper level)
- Transportation/Sales Invoice
- Payment Remittance

We feel that support of the deal type data element on these additional transactions is necessary to support standards 2.3.24 "Delivery point allocations should be performed at the lowest level of detail provided by nominations" and principle 3.1.2 "Elements should stay consistent from nominations through billing".

In addition, there were several warning messages in our original proposal that did not make it into the recommendation that was prepared for the EC. The significance of the requested warning/error messages is that for situations when the effective period of the nomination may extend beyond the term of the deal, the pipeline needs to have the ability to warn the shipper that a deal has expired and that the nomination will still flow if not replaced, but not under the terms of the deal originally specified.

Since there was no reason stated why the requested error messages were denied or how we should notify our customers of the following situations, we ask that you reconsider our proposal and incorporate the error and warning messages as originally recommended.

R96015 - Fuel Indicator

It appears that the recommendation to the GISB proposal was extracted directly from the September Market Execution meeting minutes. Following the September meeting, our proposal was significantly revised and resubmitted to the GISB EC. Thus, the recommendations are out of synch

with our revised proposal.

In our revised proposal, we identified three feasible alternatives, one of which was recommended by the METF, and asked that the GISB EC determine which alternative is best for the industry.

- * Alternative 1 was our original proposal for the addition of a new data element, fuel indicator
- * Alternative 2 was the proposal the addition of a new value for the Quantity Type Indicator Field
- * Alternative 3 was the recommendation of the METF, a request for several new Transaction Types.

In declining our request, the preparer of the document recommends that KGPC submit a request for new Transaction Type Codes, rather than requesting a new data element. Since these new codes were requested under Alternative 3 of our revised proposal, does this recommendation imply that the requested transaction types requested in our revised proposal are approved? If so, then the following need to be added to the list of approved transaction types:

- * Current Business - Fuel Charged
- * Imbalance Payback from Pipeline - Fuel Charged
- * Imbalance Payback to Pipeline - Fuel Charged
- * Injection - Fuel Charged
- * Withdrawal - Fuel Charged
- * Overrun - Fuel Charged1 (for point MDQ overruns) (1)

(1) Identified since preparing the revised proposal

In lieu of adding the above transaction type codes, we still feel that Alternative 2, providing a third value for Quantity Type indicator (B - Both), is a better solution. As such, we encourage you to closely review our revised proposal, which it appears may have been overlooked, and to provide us with some explanation as to why you feel the new transaction types are a better choice than the additional value for capacity type indicator.

R96024 - Second Quantity Field

Koch supports a receipt quantity, a delivery quantity and a fuel quantity in the nomination data set to facilitate the nominations process and therefore supports Columbia Gas' request for an additional quantity field. We encourage the committee to reconsider the merit of this proposal.

----- Headers -----

From ArthurL@kochind.com Wed Dec 4 14:23:55 1996

Return-Path: ArthurL@kochind.com

Received: from kii.kochind.com ([206.97.246.2]) by emin42.mail.aol.com (8.6.12/8.6.12) with SMTP id OAA17429 for

<gisb@aol.com>; Wed, 4 Dec 1996 14:23:53 -0500

Received: from imail.kochind.com ([146.209.16.81]) by kii.kochind.com

via smtpd (for emin42.mx.aol.com [198.81.11.78]) with SMTP; 4 Dec 1996 19:24:34 UT

Received: by ictmail01.kochind.com with SMTP (Microsoft Exchange Server Internet Mail Connector Version 4.0.994.63)

id <01BBE1E6.35BDA7D0@ictmail01.kochind.com>; Wed, 4 Dec 1996 13:22:34 -0600

Message-ID: <c=US%a=_%p=kochind%I=KOCHIND/ROUTING/00065FA2@ictmail01.kochind.com>

From: "Arthur, Lisa" <ArthurL@kochind.com>

To: GISB Office <gisb@aol.com>

Subject: Koch's comments on proposals posted 11/21 and 11/22

Date: Wed, 4 Dec 1996 13:19:00 -0600

X-Mailer: Microsoft Exchange Server Internet Mail Connector Version 4.0.994.63

MIME-Version: 1.0

Content-Type: text/plain; charset="us-ascii"

Content-Transfer-Encoding: 7bit

Date: December 3, 1996

To: Rae McQuade

From: Paul Love
GISB Representative for
Natural Gas Pipeline Co. of America

Re: **Comments on Proposed Standards Changes**

Natural Gas Pipeline Company of America (NGPL) is either indifferent or can support most of the proposed standards changes and submits the following comments only on those proposals that we strongly support or oppose.

<u>REQUEST NO.</u>	<u>REQUEST DESCRIPTION/COMMENTS</u>
R96052	<p>Change to Request for Confirmation/Confirmation Response - Upstream Contract Identifier</p> <p><u>Comment:</u> NGPL can support this request only if the following addition is made to the request: Abstract/Discussion, second paragraph, second sentence, - "In other words, if the Upstream Contract Identifier information is provided in the confirmation request (added words) <u>and it is accepted and processed by the document receiver</u>, it should be echoed back in the confirmation response." This is consistent with the use of Business Conditional data elements on other documents.</p>

<u>REQUEST NO.</u>	<u>REQUEST DESCRIPTION/COMMENTS</u>
R96053	<p>Change to Request for Confirmation/Confirmation Response - Downstream Contract Identifier.</p> <p><u>Comment:</u> The same comment made on R96052 applies to this request.</p>
R96058	<p>Change to documentation on Pathed non-threaded nomination model</p> <p><u>Comment:</u> These changes are textual in natural only and are needed to clarify the model and its proper use.</p>
R96059	<p>Add Comments data element to the Nomination and Scheduled Quantity documents.</p> <p><u>Comments:</u> Although this data element is mutually agreeable, it can cause confusion when it is used. Processing instructions can be included in it, and when not acted on by the service provider disputes can arise. If service requesters want this data element, it should be defined such that comments only have meaning to the requestor and the service provider does not process it in any way other than echo it back to the requestor.</p>
R96006	<p>Add alternate receipt/delivery point data element to nomination transaction.</p> <p><u>Comment:</u> This seems to be unnecessary information when the receiver should be able to determine if the points chosen are valid alternate points for the primary points. Additionally, since this data element has been defined as "Business Conditional", all service requestors not needing this information will be required to send warning messages everytime a service requestor sends this data.</p>
R96020	<p>Validation Code value (Request Selected Has Been Rejected)</p> <p><u>Comment:</u> NGPL concurs with the sense of the room in the METF. If all nominations are originals and the</p>

previous nomination has been rejected, then the message associated with the initial rejection should be used again.