



September 22, 2000

To: The Gas Industry Standards Board

Re: Business Practices Subcommittee proposed standards regarding items assigned from FERC's Order No. 637 work plan.

On September 5, 2000, the Gas Industry Standards Board posted for comments the work of its Business Practice Subcommittee related to Order No. 637. On September 20, 2000 a group of distributors, "the Commenting GISB LDCs" filed responsive comments on the BPS resolution and proposed standards regarding items assigned to them from the Order 637 work plan as a part of the 2000 annual plan (corresponding to request no. 2000ap9). The comments highlighted concerns with standards, or the lack thereof, for enabling standard posting of index of customer information, partial day biddable capacity releases and partial day recalls.

The American Gas Association (AGA) shares the concerns enunciated by the "Commenting GISB LDCs" in their comments. One of the primary goals of the Federal Energy Regulatory Commission in issuing its Order No. 637 was to achieve comparability between released capacity and pipeline service offerings. AGA is concerned that achieving this important goal will be frustrated by GISB's actions. Therefore, AGA encourages GISB's Executive Committee to implement the standards proposed by the Concerned GISB LDCs. These standards are necessary so that, for example, Index of Customer data is filed in a standard format that can be imported into analysts computer modeling. Additionally, the ability to post partial day capacity releases for bid and to recall mid-day in accordance with the intraday nomination opportunities is to critical to ensuring that the comparability principles of Order No. 637 are met.

AGA will continue to pursue comparability objectives before GISB and FERC. We hope that the GISB process, which has been so successful to date, continues to allow for solid consensus building across industry segments.

Sincerely,

*Jane Lewis*

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