

August 17, 2001

Rae McQuade
Gas Industry Standards Board
1100 Louisiana
Houston, TX 77002

Re: Comments for August 23
GISB Executive Committee Meeting

Rae,

Enron Transportation Services (ETS) submits the following comments regarding GISB's response to the report prepared by Sandia National Laboratories, which has been posted for industry comment. We appreciate the effort put into the drafting of this document. ETS agrees with the majority of the 'GISB Responses' as drafted. We offer the following suggestions.

7.2.2 → This item proposes the deletion of GISB Standard No. 4.1.1. ETS agrees with this proposal because the four diagrams that have been added to the EDM book clearly depict the EDM technology. The model is referenced in other areas of the EDM book; we suggest corresponding revisions be made.

- We suggest that GISB Standard No. 4.1.11 also be deleted; it refers to the Future Technology Model.
- Tab 4, Business Process and Practices, p. 6, Major functions of the Internet EDM Model covered by the Standards → The title of this section includes the term 'Internet EDM Model' (note the initial caps). For clarity and to alleviate any future confusion or reference to the outdated Future Technology Model, we suggest the term 'Internet EDM' be used. This suggested term is currently used elsewhere in the EDM book, such as the first sentence in the Business Process and Practices section. It is also used several times in the previous section - Executive Summary. Based on these examples, the title can be revised to 'Major functions of Internet EDM covered by the Standards'.
- Tab 3, Executive Summary, p. 1, Open Standards → The model is referred to in the paragraph directly beneath the list of components. We suggest the following revision. This deletes the reference to the model and also corrects what we believe to be a reference to an outdated section of the Business Process and Practices tab.

From:

“A brief delineation of these components and their relationship to the model are covered at a high level in the Business Process and Practices (Business Process Description) section and in more detail in later sections of this manual.”

To:

“A brief delineation of these components is covered at a high level in the Business Process and Practices (Major functions of Internet EDM covered by the Standards) section and in more detail in later sections.”

7.2.3, 7.2.4 and 7.2.7 → The proposed GISB Response to each of these items states that GISB does not plan to take any action at this time. We agree with this conclusion. However, ETS would like to suggest that the rationale for this conclusion be revised. We don't feel that the three Principles are unclear, but we are okay with the statement that GISB concurs with Sandia's finding and analysis. Since implementing Sandia's recommendation would only entail re-wording of the Principles, we don't feel that the resources required to implement this would be significant. Most importantly, the replacement language recommended by Sandia changes the original intent of the Principles. It may also be helpful to note that Principles are different from Standards; they are used for guidance in implementations. Below is suggested language for the GISB Response:

“We concur with the finding and the analysis. GISB appreciates Sandia's recommendation, but does not at this time plan to take any action. The language of a Principle may not be as precise as that of a Standard because it is intended for use as guidance in implementation. Moreover, the language recommended by Sandia changes the original intent.”

7.3.8 → ETS agrees with Sandia's finding and analysis and offers the following revisions to GISB's implementation. This item 7.3.8 covers several revisions. Our suggestions noted below use the same PDF page numbers as used in the GISB Response.

- The first revision is to move language from the Business Process and Practices section (PDF page 20) to Appendix A. We feel it would be more appropriate to create a new appendix for this information titled:
“Appendix XXXX – Minimum (MM/DD/YYYY) Technical Characteristics for an EDM Server”
In addition to moving the language noted in the GISB Response, we suggest the paragraph immediately following the list of ports also be moved to the new appendix.
- PDF page 20 → The first bullet gives instructions on deleting the language noted above from the Business Process and Practices section. In order to give clear instructions to the parties that will assemble the EDM book for publication, we suggest the bullet be re-worded to the following:
“Remove the text starting with “Allowable TCP Ports” and ending with “1604”
Also, revise the second bullet to reference the new Appendix XXX instead of Appendix A.
- PDF page 37 → Revise the first bullet to reference the new Appendix XXX instead of Appendix A.
- PDF page 63 → Revise the new language to reference the new Appendix XXX instead of Appendix A.
- PDF page 89 → Revise the new language to reference the new Appendix XXX instead of Appendix A.

7.4.1 → The Sandia Recommendation addresses two separate issues. The GISB Response appears to deal with only one of them. ETS has comments on both issues.

- Sandia recommends re-numbering the pages in the EDM book. ETS likes this idea and suggests that GISB incorporate this change into all of its standards books. At one time, the pages of the EDM book were numbered in this fashion. It was easier to locate information when the tab number was included as part of the page number. This can be handled during the next publication of the GISB standards.
- Sandia noted that there appears to be a section that does not have a tab number. It is located between Tab 6 and Tab 7. ETS believes that this 28-page section is actually part of Tab 6. Therefore, the only revision needed is the re-numbering of the pages so that the entire 31-page section is sequentially numbered (i.e., the numbering does not start over again at p. 1 on the Batch Flow Diagram). This can also be handled during the next publication.

7.4.4 → ETS agrees with the GISB Response. It would be helpful to note the location of the ‘Frequently Asked Questions’ in the EDM book. They are located on PDF page 74. It’s preferable to use the PDF page numbers as opposed to the page number within the specific tab because this is the same type of page reference that is used elsewhere in this document (see 7.3.8). The last sentence of the GISB Response could read: “The Frequently Asked Questions (see PDF page 74 of the EDM document) will be modified as follows: ...”.

7.4.7 → It would be helpful if the proposed revisions noted in the GISB Response were in the ‘from’ and ‘to’ format used in other items in this document. This would allow the reader to see the revisions without the need to refer back to the EDM book.

Thank you,

Theresa L. Hess
Manager, GISB Business Standards
and Development