

"Jim Buccigross" Model Description

Regarding the requirement that pipelines provide all electronic information and conduct all electronic transactions with their customers over the public Internet using only internet protocols and procedures:

Conceptual Outline:

Transactional *functions* of the EBB's would be transitioned to the Internet and such information would be exchanged via ANSI X12 Documents utilizing the existing GISB Electronic Delivery Mechanism (EDM) standards for these transactions.

Non-transactional data (Informational Postings) under Standard No. 4.3.6 would be communicated over the Internet via a "common look and feel" standardized web page.

GISB makes no requirements as to TSPs establishing transactional web pages, nor is there any prohibition. If a TSP chooses to establish such a web page, it should be treated as a competitive offering and, consistent with GISB Standard 1.1.11, users of such services should bear the cost.

Finally, any transactional web page established by (or for) a TSP should communicate with the TSP's "back-end" systems in the same fashion as standardized EDI data is communicated.

Specific proposed standards, principles and definitions to implement the "Jim Buccigross" Conceptual Outline (Model 1):

4.1.A: GISB EDI/EDM is defined as ANSI X12 Documents (EDI) exchanged via Internet designated site(s) utilizing Electronic Delivery Mechanism (EDM) standards.

Defines GISB EDI/EDM requirements applicable to transactional functions. Used in proposed standards below as appropriate.

4.2.A; Users of EBB services for required transactional functions should bear the cost of that service.

See GISB Standard No. 1.1.11 as regards title transfer tracking. This standard mimics the language for transactional EBBs once the GISB EDI/EDM model is functional for required transactional functions.

4.3.A: Transactional functions required to be provided by TSPs via EBBs (i.e., information required to initiate, execute and settle required transactions) should be transitioned to GISB EDI/EDM.

Lays out the transition of EBB functions to the GISB EDI/EDM model as per the NOPR and makes it clear that any "required" transactional functions are transitioned.

4.3.B: The non-transactional data (Information Postings) listed as items 1 and 3 under Standard No. 4.3.6 should be made available via the existing GISB EDI/EDM standards.

Clarifies that System-wide notices and Operationally available and unsubscribed capacity are also available via EDI - to permit their use by parties as a transactional function - as per current standards. This does not constitute a change to current practice, only a clarification.

4.3.C: The non-transactional data (Informational Postings) listed as items 1 through 5 under Standard No. 4.3.6 should be communicated over the Internet via a "common look and feel" (i.e., information required to be available would be accessible via Internet web page(s) using common navigation and common naming conventions).

Clarifies that the non-transactional data under Standard No. 4.3.6, continues to be available from TSP's web pages per current standards and proposed common look and feel standards. Also clarifies that "look and feel" means common navigation and naming conventions.

4.3.D: Required transactional functions which should be provided by TSPs via GISB EDI/EDM standards are those transactions identified within the following sections of GISB's standards.

- a) 1.4.X,
- b) 2.4.X (excludes 2.4.6 which is used only where parties have mutually agreed to do so),
- c) 3.4.X; and,
- d) 5.4.X (excluding 5.4.4, 5.4.10, and 5.4.11, which are used only where applicable to TSP business practices),

Clarifies that while there may be other transactions and functions on TSP EBBs, they are not among the "required" transactional functions, which are the only ones that need to be migrated to the Internet.

4.3.E: By June 1, 1999, GISB business practice and GISB EDI/EDM standards with respect to: 1) the ability to upload an offer, have it considered valid, and have it processed by the TSP; as well as, 2) the ability to upload a bid, have it considered valid, and be processed for bid evaluation and awarding purposes will be available and will be added to the list of required transactional functions under Standard 4.3.D.

Clarifies that the only new transactional datasets which need to be added are the Upload of Offer and Uploads of Bid. Once these transactions are standardized, they will become part of the list in proposed Standard No. 4.3.D above.

4.3.F: No TSP should be compelled to provide required transactional functions via an EBB (without regard to mode of communications with that EBB, including Internet EBB, web page EBB, dial-up EBB etc.) following a reasonable period of time after which the required transactional functions have become available via GISB EDI/EDM.

This proposed standard gets to the heart of maintaining dual systems. No one should be compelled to maintain dual systems for required transactional functions after the availability of GISB EDI/EDM for such functions.

4.3.G: Following a reasonable period of time after which all required transactional functions have become available via GISB EDI/EDM, a TSP which determines to provide transactional functions via an EBB (without regard to mode of communications with that EBB, including Internet EBB, Web-page EBB, dial-up EBB etc.), may do so provided the mode of communications between the EBB and the TSP's business system are conducted via GISB EDI/EDM.

Further clarifies the EDM model diagrammed in Standard 4.1.1 as applicable when GISB EDI/EDM transactional functions are standardized and functional.

4.3.H: A TSP which determines to provide transactional functions via an Internet EBB, Web-page EBB, or Internet accessible EBB and which requires its trading partners to employ such EBB to achieve an intended transaction result or acquire transaction information, should request GISB EDI/EDM standards for such transactional functions; and, within a reasonable amount of time after such standards are approved and ratified, should support the conduct of such transactions using such standards with those trading partner(s) wishing to employ same.

Further clarifies the intent of the last paragraph at the end of the current GISB Standard No. 4.3.6. (See general explanatory discussion below.)

8.1.A [8 denotes a new “general” section]

GISB makes no finding as to the specific timing of implementation of any Standard(s) that it establishes.

GISB standards are voluntary. This clarifies that where appropriate, when GISB publishes standards it makes no finding as to the timing of implementation of that standard.

General Explanatory Discussion:

4.3.A-C and 4.3.H clarify, and are within the meaning and intent of, Standard 4.3.6 which states in part:

“Transportation Service Providers should make all pertinent EBB functions and information available via the Internet or via technology recommended by GISB within a reasonable amount of time after each function or information has become standardized as appropriate by GISB.

Here the accent is on “*pertinent*”. The *pertinent* functions and information are 1) the required *information* (the list of 1 through 5 in standard 4.3.6); and, 2) the required transactional *functions* which are clearly the already standardized 10 HPDR’s, plus the remaining required, but yet to be standardized, uploads of Offers and uploads of Bids. As uploads of Offers and uploads of Bids have yet to be standardized, they are not yet in the GISB EDI/EDM group of standards. Once these were to be standardized, the “*pertinent*” functions and information referred to in the first paragraph after the listing of the five non-transactional items would have been so standardized.

The other portion of 4.3.6 states:

“Within a reasonable amount of time, all EBB information, functions and transactions should be achieved via one mode of communications. Information and functions should remain available through existing systems until one mode of communication is available”.

As to “all EBB *information*”; this term refers to the present list of required 4.3.6 non-transactional data. This data is now available on web pages. There exists no unmet requirement for additional information to be “available”. Therefore, there is no additional “non-transactional information” to be made available via web pages and no new non-transactional standards need be formulated.

As to “all. . . functions and transactions [being] achieved via one mode of communications,” the one mode of communications is clearly via the Internet. And, in this context, “one mode of communications” refers to the GISB EDI/EDM standards to achieve the functions and transactions listed in the X.4.X standards. With respect to the “all” portion of the sentence, if we interpret this to mean all *required* transactional functions, then, the only *requirements* (as set by GISB or FERC) that are not yet met for transactions and functions (i.e., those which are not yet achievable via the X.4.X standards) are: 1) the ability to upload an offer, have it processed by the TSP; as well as, 2) the ability to upload a bid, have it considered valid, and be processed for bid evaluation and awarding purposes.

(As used in this table, "required" means required by FERC or other generally applicable government regulations, does not include requirements in specific tariffs which requirements are not generally applicable regulations)

| Issue | Proposal 1 | Proposal 2 | Proposal 3 |
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| 1 Should non-transactional information which is required to be present on an EBB be transitioned to Internet Web page(s)? | | | |
| 2 Should non-transactional information which is not required to be present but currently <i>only</i> available via an EBB be transitioned to Internet Web page(s)? | | | |
| 3 Should non-transactional information which is <i>not required</i> to be available via an EBB, yet is available via an EBB, and is also available on a comparable basis via other methods (fax, EDI, diskette, flat-file download, E-Mail) be transitioned to Internet Web page(s)? | | | |
| 4 Should transactional functions required to be present on an EBB today (i.e., capacity release) be transitioned to Internet Web Page(s)? | | | |
| 5 Should additional transactional functions which are required to be supported in GISB EDI/EDM but not required to be supported on EBBs, be required to be present on Internet Web EBBs? | | | |

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| 6 | Should transactional functions present on any EBB be transitioned to Internet Web EBBs and in the process should GISB standardize the look and feel of all transactional functions present on any EBB and apply these standards to every EBB? | | | |
| 7 | What about transactional functions which <i>become required</i> to be available electronically in the future? | | | |
| 8 | What about transactional functions which are <i>not required</i> to be present on EBB <i>but are currently available only</i> on EBB? | | | |
| 9 | What about transactional functions which are <i>not required</i> to be present on EBB, are currently (or in the future) present on EBB, and available on a comparable basis via other methods (E-Mail, fax, diskette, flat-file download, EDI, etc.)? | | | |
| 10 | Should TSPs be compelled to transition functions not covered by the 10 HPDR's, the five 4.3.6 items, and the upload of Offers and Bids to Web EBBs? | | | |

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| 11 | Should TSPs be compelled to standardize content, presentation, navigation, and naming conventions for any activity presently conducted on their EBB and transition these activities to Web EBBs? | | | |
| 12 | Should we define "Look and Feel" to include content and appearance (presentation)? | | | |
| 13 | Should we define "Look and Feel" to be only navigation and naming conventions? | | | |
| 14 | Should we apply "Look and Feel" (however defined) to only the five 4.3.6 items? | | | |
| 15 | Should Web EBBs (if implemented for transactional functions) communicate with the TSP's business systems using GISB EDI/EDM? | | | |
| 16 | Should GISB find that Web EBBs are competitive services and that users of them should bear the cost of their being provided to them? | | | |

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| 17 | Should GISB re-examine the issue of requiring Web EBBs for transactional functions in 2001 to determine whether the market has responded by providing common "Look and Feel" solutions for transactional functions? | | | |
| 18 | Should GISB adopt a general principle that it makes no finding with respect to the timing of implementation of the standards it establishes? | | | |

As used in this table, “required” means required by FERC or other generally applicable government regulations, does not include requirements in specific tariffs which requirements are not generally applicable regulations)

Questions listed below are applicable to all proposals.

| | Issue | Model 1 - Jim Buccigross | Model No. |
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| | Overview Question: | | |
| 1 | What has FERC required be done on EBBs that GISB has yet to standardize via either Internet EDI or Internet web page? | Upload of Capacity Release Offers and Bids via EDI as proposed in Order No. 587-F NOPR. | |
| | Example: what in addition to the present GISB X.4.X and five Informational Postings has FERC required be done electronically? | | |
| | Issue Area: Non-Transactional | | |
| 2 | Should non-transactional information which is not required to be present but currently <i>only</i> available via an EBB be transitioned to Internet Web page(s)? | Either transition to Web page over 18 months beginning June 1999, or, make such information available via other means such as fax, E-Mail, diskette etc. If transitioned to Internet Web page(s), then no need for standardization of content or presentation and no need for common navigation or naming conventions. | |
| | Examples of this type of information would be: system expansion open seasons, notices of pending rate, service or fuel changes. | | |

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| 3 | Should non-transactional information which is <i>not required</i> by tariff to be available via an EBB, yet is available on an EBB, but at the same time is also available on a comparable basis via other methods (fax, EDI, diskette, flat-file download, E-Mail, letter, etc.) be transitioned to Internet Web page(s)? | No need to transition to Internet Web page(s) provided such non-transactional information continues to be available to people through other means. | |
| | Example: Maps, phone lists, general information, promotional items, advertising, etc. | | |
| | Issue Area: Transactional | | |
| 4 | Should transactional functions required to be present on an EBB today (i.e., capacity release) be transitioned to Internet Web Page(s)? | No. No transition of current HPDR's because they are already available in GISB EDI/EDM. Add ability to upload Offers and upload Bids via EDI. | |
| | Examples: Offers, Awards, Bidding, withdrawals etc. | | |
| 5 | Should transactional functions which are required in EDI/EDM yet not required to be supported on EBBs , be required to be present on Internet Web EBBs? | No. No transition of current HPDR's because they are already available in GISB EDI/EDM. Add ability to upload Offers and upload Bids via EDI. | |
| | Examples: nominations, quick responses, requests for confirmations, confirmations, scheduled quantities, operator scheduled quantities, PDAs, PDA quick responses, measurement information statements, allocation statements, imbalance statements, invoices, payment remittances, and statements of account. | | |
| 6 | Should transactional functions present on any EBB be standardized, transitioned to the web, and apply to every EBB? | No. | |

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| | <p>Example: Some EBBs provide functionality to request contracts, discounts, amend contracts, previous day's scheduled quantities, customer account balance, imbalance figures, etc. while others do not.</p> | | |
| 7 | <p>Should each EBB's transactional functions (other than the GISB standardized functions) be transitioned to the web? If so, should these be standardized?</p> | No. | |
| | <p>Example: TSP 1 does contract requests on the EBB, TSP 2 does not. Should TSP 1 be required to transition contract requests to the web, and if so, should this be standardized?</p> | | |
| 8 | <p>What about transactional functions which <i>become required</i> to be available electronically in the future?</p> | <p>No change recommended. If FERC or GISB standardizes and requires additional transactional functions, then these future transactional functions would be at least supported via GISB EDI/EDM.</p> | |
| | <p>Example: Suppose Title Transfer Tracking is required to be supported (but not provided) by TSPs, does this transactional, support, function then have to transitioned to Web pages?</p> | | |

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| 9 | <p>What about transactional functions which, while <i>not required</i> to be present on EBBs, <i>are (or become)</i> available <i>only</i> on an EBB? Should these be transitioned to GISB EDI/EDM and web pages because they are only available on an EBB?</p> | <p>Either transition the function to GISB EDI/EDM or provide other comparable means to conduct the transaction and achieve intended business results. Transaction available via GISB EDI/EDM a reasonable amount of time following the adoption and ratification of a request.</p> | |
| | <p>Example: Imbalance trading or netting is supported by a TSP, is not required by FERC to be done on an EBB, but for that TSP is only available if the shipper uses the EBB?</p> | | |
| 10 | <p>What about transactional functions which are <i>not required by FERC</i> to be present on EBB, <i>are (or become)</i> available on EBB, <i>and yet are also</i> available on a comparable basis <i>via other</i> methods (E-Mail, fax, diskette, flat-file download, EDI, etc.)? Should these also be transitioned even though there are other comparable means to achieve the same business result?</p> | <p>No. No requirement for GISB EDI/EDM. No requirement for standardization of EBB presentation, content, navigation, or naming conventions. (There is no need for dual systems, as is made clear in the 587-F NOPR.)</p> | |
| | <p>Example: contract requests can be done on-line or via fax with no substantial difference in business result to service requester.</p> | | |
| 11 | <p>Should TSPs be compelled to transition functions not covered by GISB (i.e., the 10 HPDR's, the five 4.3.6 items, and the upload of Offers and Bids to Web EBBs)? If so, what functions?</p> | <p>No.</p> | |
| | <p>Example: Should TSP's do more than what GISB has standardized in X.4.X datasets (plus uploads of offers and bids) and the Informational Postings?</p> | | |

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| 12 | Should we define “Look and Feel” to include content and appearance (presentation)? | No. | |
| | Should GISB standardize what is inside of a page? | | |
| 13 | Should we define “Look and Feel” to be only navigation (getting to the page), naming conventions (naming the subject matter within a page), and downloads formats (RTF, tab delimited, text etc.)? | Yes. | |
| | Should GISB stop at the means of finding and getting to pages and electronic format of the downloads? | | |
| 14 | Should we apply “Look and Feel” (however defined) to only the five 4.3.6 items? | Yes. If FERC or GISB adds standardized informational posting requirements to the 4.3.6 items, these would be added at that time. | |
| | Should we stop at the Informational Postings or get into requiring that transactions be on the Web in a common look and feel? | | |
| 15 | Should Web EBBs (if implemented for transactional functions) communicate with the TSP’s business systems using GISB EDI/EDM? | Yes. | |
| | Example: Every user, whether they use the EBB, their own EDI, or a third-party would get the same level of functionality regardless of method because all forms would use GISB EDI/EDM to get to the business system. | | |
| 16 | Should GISB re-examine the issue of requiring Web EBBs for transactional functions in 2001 to determine whether the market has responded by providing common “Look and Feel” solutions for transactional functions? | Yes. | |

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| | Example: standardize the Uploads of bids and offers, stop there (with respect to new, required functions) and then see if in a couple of years the market has responded with “one interface solutions”. | | |
| 17 | Should GISB make a finding that the question of transitioning EBB transactional functions to web EBBs is best left to individual TSPs and their service requesters? | Yes. | |
| | GISB would be able to create standards but the choice as to whether to transition any EBBs functions to web EBBs would be left to individual companies. | | |
| 18 | Should GISB adopt a general principle that it makes no finding with respect to the timing of implementation of the standards it establishes? | Yes. GISB standards are voluntary. When and if the FERC adopts them, then they set implementation deadlines, not GISB. | |
| | Example: GISB would pass a standard that says that we make no finding as to the implementation timing of our standards. | | |
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