RESPONSES FROM CARL CALDWELL

Questions From Tom Ehinger
Subj: Questions for Internet Models
Date: 98-03-26 10:01:33 EST

Carl Caldwell Model

1) By including "no standards for screen layouts" in your description, how do you address common look & feel when you essentially promote chaos at a party where no dress code applies but costumes are optional?

    a) To use your "costume" analogy, I am saying that GISB issues a standard costume (read standard data elements/names) for all GISB members. GISB members are free to wear or color the costume however they like. One would expect members to wear a "mask" on their face but if they strap it to their knee GISB members would have no problems with that because they could easily recognize the "it" as a the standard "mask" and would not mistake it for a "knee pad". The idea is to have standard data elements and not have to agree on the exact placement of the data elements on the screen.

2) If every TSP has leverage to define a flat file layout then the user is back where he started with proprietary EBBs. Isn't a flat file just an abbreviated EDI data set?

    a) My model stated that TSPs and their customers might mutually agree to support flat files. GISB members can mutally agree to any processes so long as they do not impact standard processes. Yes, a flat file is generally an EDI transaction that is formatted and transmitted as a single line.

Questions From Bob Wallenhorst
Subj: Internet Transition Meeting - Followup Questions
Date: 98-03-24 12:07:41 EST

Caldwell Model

1) Does this model presume that standardizing only the data requirements for transactional web pages sufficiently addresses the Commission's concerns regarding customer training costs and delays?

    a) Using standard data elements along with standard field descriptors will give TPS the flexibility to accommodate all the BC and MA data elements as well as the three nomination models and multi-tiered PDAs. Seeing the same data elements, names and code values should dramatically

reduce the learning curve of each site. The concept also dramatically reduces the number of hour of GISB committee time. If a additional principle needs to be passed that individual screens need to be user friendly, intuitive, and not a candidate for a new Rorschach test ; I would concur.

2) Does this model suggest that all jurisdictional pipelines would provide a transactional web page? Would the provision of such be jurisdictional?

   a) My model does not address jurisdictional vs. non-jurisdictional TSPs (LDCs, intra-states, gathering systems, or production facilities) but suggests that the GISB standards should apply to both EBBs/Web Sites and EDI.

3) Does this model envision that certain "standard" transactions (e.g., 1.4.1 - 1.4.6) could be conducted via all transactional web pages, and that all transactions would have standard data sets, and that transactions beyond those specified as "required" would be provided on a mutually agreeable basis?

   a) GISB sets voluntary standards for the natural gas industry. The model sets a voluntary minimum basic set of transactions as the existing GISB standards less Measurement Audit statement. To be GISB compliant, any new electronic transactions, such as gas sales contracting, would go through GISB process before being utilized on a web transactional page,

4) What would be included in "all gas industry transactions"?

   a) "EDI transactions for all gas industry transactions should be defined by trading partners and GISB according to the GISB process. Service providers may mutually agree to support these transactions on their transactional web pages according to the web page transactional technology model."

      Al gas industry transactions includes whatever information/transactions that parties mutually agree to support. (would not include Oil, beanie babies, or widgets unless GISB's scope is changed)

Questions From Jim Buccigross

Specific questions for Carl Caldwell:

1) In your point 6, you state that “TSP and Service Requester may mutually agree to support additional data elements”. Does this mean that TSPs would, on a by-Service-Requester-basis, have different browser web pages depending on what they mutually agreed to with each Service Requester? If not, then how would you propose this be implemented?

a) As envisioned each TSP would include the BC and MA data elements it would support on the transactional web screens. A service requestor by service requestor customized approach is not envisioned but not prohibited.

2) In your point 9, you state “Valid codes available for data validation or selection should be available in downloadable format for use by customer and third-party service providers.” Does this mean that DUNS Numbers would be provided by TSPs?

   a) The model suggests that in order to ensure basic comparability between the transactional web pages and EDI; that valid codes should be available for download. The alternative of not allowing drop down list boxes of valid code on web pages and requiring each code to be typed in is laughable. Yes, valid DUNs numbers should be exchanged between trading partners in order to ensure proper communication.

3) Does this mean that if the Web page provides contract MDQ level validation that this information would be available for download?

   a) The model does not envision contract specific validation data in downloads. But the model does not prohibit such downloads.

4) Does this mean that if the Web-page provides point MDQ level validation that this information would be available for download?

   a) The model does not envision contract specific validation data in downloads. But the model does not prohibit such downloads.

5) Does this mean that if the Web-page provides data validation for different transaction types this information would be available for download?

   a) Ditto answer 2a, 3a, 4a.

6) Does this mean that the format for the downloads would be standardized? If so, by GISB?

   a) Yes and Yes

7) In your point 10 you state “EDI transactions for all gas industry transactions should be defined by trading partners and GISB according to the GISB process. Service providers may mutually agree to support these transactions on their transactional web pages according to the web page transactional technology model.” What is the timing. Does this mean that we do the EDI first, for all these transactions so that the business rules, data dictionaries and implementation guides are done, and then TSPs would provide these defined transactions on a mutually agreed basis?

    a) Yes, EDI first. Trading partners with similar electronic business transaction to be standardized would define standard EDI transactions inside or outside the GISB subcommittees (e.g. similar to the work that Enron and Texaco did on the Measured Volume Audit statement.) The work product would then be submitted to GISB for review and approval as a mutually agreeable transaction.

8) Does this mean that TSPs would not deploy any of the yet to be standardized transactions on the web until the EDI needed to communicate them to the TSP’s business system is ready?

    a) This model does not envision any limits on transactional web sites but restates the voluntary GISB standardization process.

9) You indicate that “Data elements and codes used to communicate transactions from the TSP web site to the TSP backroom system should use GISB standard data elements and codes. (EDI)” Is the parenthetical EDI to be construed as a requirement that this communication be via EDI? If no, doesn’t this raise a comparability issue as between customers using EDI and those who may use the proposed web site?

    a) The parenthetical EDI is intended to mean that the data elements and codes used in EDI and the transactional web pages should be the same. It was also intended to indicate that the data did not need to be processed through a EDI translator and could enter the system at the point where the EDI transaction exit the translation software. At that point, transactions would use the exact same data elements and codes and the EDM source would be undeterminable, thus comparable.

Questions From Mike Bray

CALDWELL MODEL

1) How long does the TSP hold the outbound response for the requestor to retrieve?

    a) The model does not address that detailed an issue.

2) Is any data validation required beyond datatype validations and the common codes defined by GISB?

    a) No.

3) Item 9 states that all gas industry transactions should be defined via GISB. Is that all transactions available on any TSPs EBB or a subset? Please clarify.

    a) Trading partners with similar electronic business transaction to be standardized would define standard EDI transactions inside or outside the GISB subcommittees (e.g. similar to the work that Enron and Texaco did on the Measured Volume Audit statement.) The work product would then be submitted to GISB for review and approval as a mutually agreeable transaction.

4) Would the expected transaction response time required for this model be the same as the GISB EDI/EDM standards in 4.3.2 and 4.3.3?

    a) The time delay in those standards is for transmission, translation, and data validation to the extent that transactional web page do not provide real time response that may be necessary but more definition may be necessary to determine the timing.

5) Given that it has taken 8 months to prepare the proposal to the GISB EC for common look and feel standards for the 9 documents for non-transactional postings, what schedule is being proposed for GISB to define common look and feel standards for transactional functions? When would TSPs be expected to implement these standards? What are the TSPs expected to implement for 6/1/1999?

    a) The model attempts to reduce the time necessary for GISB committees to define the look and feel for the industry by giving parties the flexible to arrange screens however they see fit. GISB need to define abbreviations for the data element names and determine what EDI elements may be

managed behind the screens (e.g. sequence numbers, transaction tracking numbers etc.) Your previous question also brings the timing issue for transactional web sites and that needs to be resolved. The timing of implementation is not relevant for voluntary standards.

Questions From Norm Walker
Norm Walker
Member of the Sponsors of Model #3
Questions for the Models

Model # 2 - Carl

1) Does this model expressly preclude transportation service providers from offering an EBB for their customers that is covered by cost of service?

    a) GISB Standard 1.1.16 "Compensability of particular products or services should be determined by trading partners and/or regulatory agencies as applicable, but not by GISB. "

2) Does this model expressly preclude a transportation service provider, who is responsible for the safe and efficient operation of the pipeline system, from exceeding what ever standards are established to improve the response time in collecting and processing information to better serve their customers and manage the physical facilities?

    a) TSPs are always free to exceed GISB voluntary standards.

3) Does this model require that parties who are not responsible for the safe and efficient operation of the pipeline system be given exactly the same access to the computer systems used to manage the pipeline as are transportation service providers who bear that responsibility?

    a) This model describes comparable access for service requestors to a TSPs backroom systems and does set standards for TSP access to those transactions.

4) Does your model require that all services provided by transportation service providers be standardized? And, if so, is this a requirement for all segments in the natural gas industry, such as marketers' buy/sell, wellhead operators' Joint Operating Agreements, etc?

    a) No.

5) What are the time frames associated with your model?

   a) The model attempts to reduce the time necessary for GISB committees to define the look and feel for the industry by giving parties the flexible to arrange screens however they see fit. GISB need to define abbreviations for the data element names and determine what EDI elements may be managed behind the screens (e.g. sequence numbers, transaction tracking numbers etc.) After the GISB process is completed; industry participants are free to implement GISB's voluntary standards.

Questions From Shelley Corman
Transition to the Internet Task Force
Follow-Up Questions

Questions for Carl Caldwell Model

1) Your model contemplates that all website input screens would convert to EDI/X-12 prior to entering the TSP's internal system. Is that correct?

   a) No, The parenthetical EDI is intended to mean that the data elements and codes used in EDI and the transactional web pages should be the same. It was also intended to indicate that the data did not need to be processed through a EDI translator and could enter the system at the point where the EDI transaction exit the translation software. At that point, transactions would use the exact same data elements and codes and the EDM source would be undeterminable, thus comparable

2) You said that the TSP can still provide "interactive" validation tools if the TSP agrees to download the data necessary for third-parties to provide the same validations. At what interval would the TSP have to provide updated data?

   a) Valid codes for download would be available at the same time they are available for use on the transactional web page. Interval would be on demand of third party from the transactional web site.

3) Do you believe that a TSP will be able to provide "interactive" contract level (as compared with point level) validations under your model? Does the answer to this question change if the EDI transmissions are sent at a line-item level?

   a) The model does not envision contract specific validation data in downloads. But the model does not prohibit such downloads.

Jim's Table

The required aspect to these questions is not necessary for the GISB process. The answer to these questions are individual company positions before the FERC not GISB.

1) Model presents proposed GISB standard model not requiring anyone to do anything. All GISB standards are voluntary.
2) Ditto answer to #1
3) Ditto answer to #1
4) Ditto answer to #1. Model presents proposed GISB standards for web transactional sites.
5) Ditto answer to #1
6) No, proposes that web transactions be standardized on a voluntary mutually agreeable basis.
7) Ditto answer to #6
8) Trading partners with similar electronic business transaction to be standardized would define standard EDI transactions inside or outside the GISB subcommittees (e.g. similar to the work that Enron and Texaco did on the Measured Volume Audit statement.) The work product would then be submitted to GISB for review and approval as a mutually agreeable transaction.
9) Ditto answer to #1
10) Ditto answer to #1
11) Ditto answer to #1. Trading partners with similar electronic business transaction to be standardized would define standard EDI transactions inside or outside the GISB subcommittees (e.g. similar to the work that Enron and Texaco did on the Measured Volume Audit statement.) The work product would then be submitted to GISB for review and approval as a mutually agreeable
12) Yes, Look and feel to the data element, name and code level. The model proposes GISB to define standard data elements and names for transactional web pages.
13) No, navigation. Yes, namimg. Yes Download format.
14) No.
15) No. Proposed model uses industry standard web browser software.
16) No, isn't 2001 the name of a book or something. GISB should address setting voluntary transactional web pages today.
17) No, that is merely a restatement of the voluntary nature of GISB standards.
18) No, the basis question before GISB is whether or GISB should create web transaction based standards?

Answers to Questions on the Hahn Model

Per S. Corman –

1. This Model does not demand nor was it the intent to take a position on companies continuing the use of Ebbs. This model intends to make Web sites more similar than dissimilar, thereby creating the simpler, user-friendly mechanism that will promote the increased use of natural gas. The statements in this model about "moving the Ebbs to the Internet" is based on statements in the NOPR that the FERC intends to eliminate "the need for different log-on and access procedures and different software for each pipeline". GISB shouldn't take a position on companies offering additional services such as nonstandardized transactional services. GISB should develop standards that represent minimum services that all companies can expect.

2. This model takes no position on specific implementation dates or on "interim steps to standardization"! Although GISB has generally not taken positions on these 2 issues, such concerns should be discussed at the EC to determine if GISB should do so in this instance.

3. GISB's charter includes the definition of electronic standards which natural gas industry participants should use in order to promote a more efficient, competitive and seamless natural gas grid. GISB standards are voluntary. It is anticipated that companies not compelled by jurisdictional authorities to use GISB standards would implement them in order to support the growth for gas demand and to drive down overall costs and reduce inefficiencies.

Per M. Bray

1. Although some participants at the 9-95 FERC Technology Conference proposed a national standard EBB for all pipelines, this model represents only functionally similar Web sites/Ebbs so that shippers on multiple systems see more similarity than dissimilarity.

2. I believe the producer community just wants a commitment to discussing the level of standardization, which will achieve the concept of user-friendly. This model doesn't intend to standardize the content areas where adequate value to users isn't evident. This model nevertheless supports standard nomenclature, navigation and functional screen layouts.

3. Please refer to S. Corman #2. Response

Per N. Walker

1. The short answer for companies participating in these GISB activities is yes! Although we believe that more commonality is necessary with interstate sites to make our industry user-friendlier, a major concern is in the area of state unbundling. As stated in the first paragraph of the model, the industry should not let non-jurisdictional companies go about the development of their EBBs without commonality. Otherwise they may be so different and fragmented that the Shippers have to have different hardware/software requirements and special training on each. Shipper's on multiple companies would incur unnecessary complications and overhead trying to perform basic business transactions which will only hinder the growth in natural gas usage we all desire.

2. The sponsors do not have such a "working" example. We believe it is the purpose of subcommittees and task forces such as the Common Look and Feel T. F. to develop an industry solution that properly balances the concerns of the industry. However, the sponsors will participate in developing an example for standards consideration.

3. No, this model is not intending to minimize the contribution of third party service providers. This model is responding to the need for standards for Shippers continuing to communicate directly with TSPs. This model does not limit value-added products that use the TSP's standardized data (such as for analysis, charting and the general management of the data.)

4. With this model, third party service providers will be able to more easily acquire data so value-added products can be developed.

5. Although this model does not suggest "absolute commonality" it does champion greater similarity rather than less. The issue of "funding" as you use it seems to have a definition different than normal participation in GISB. Every company that sends representation is funding changes where consensus can be achieved. It is our hope that GISB remains the best vehicle to achieve our common goal of a growing natural gas industry.

6. Some in the producer segment have been in implementation for months now but obviously not every company. I can testify that Texaco Natural Gas has been implementing scheduling, meter-volume and audit statements and allocations. We are disappointed, however. We have had no success thus far in going into production with EDI nominations. We have one successful allocation and a few successes in the measurement area. TPAs are difficult because not one company in the pipeline segment that we've approached will use the GISB model. We are executing them as they are successfully negotiated and many pipes won't even do measurement statements without one. I've heard that some producers are waiting or are perhaps just way behind but Texaco is looking for trading partners on the transactions mentioned and we are using the GISB implementation guides.

Per J Buccigross (In discussions with Mr. Buccigross, he agreed to a conceptual answer rather than question by question)

As a backdrop and in answer to some of your points, an EBB is a “human to computer” and a “ computer to human” form of communication. EBBs in the gas industry are generally thought of as proprietary, dial-up systems designed without regard to compatibility with other company systems.

The producer segment continues to support “ EDI over the Internet” standards, but recognizes two major issues:

1) Implementing GISB’s electronic standards isn’t going well and
2) EBB functionality in some form should not be eliminated because of 1) above and because we do not envision EDI being the sole mechanism for electronic communications for some time.

Small companies as well as large companies with relatively little activity will not be able to justify the support necessary to map data use differences between TSPs. In short, some transactions are incomplete such as in allocations and others such as nominations seem to have too many interpretation differences within the nomination models. Such variations impede the rapid implementation of EDI and drive up the costs of doing so.
Texaco has been trying to implement in the nomination, allocations and measurement data areas. You may recall a statement that I made at the GISB annual meeting in which 10 TSPs were targeted for implementation of nominations. Here it is 4/98 and we don’t have one in production mode for the above reasons. As such, the shorter- term solution is greater standardization of the emerging Web sites. Clearly this isn’t the most efficient approach for large companies, but is the only approach we’ve identified pending effective implementation of EDI.

This model doesn’t intend to direct the elimination of Ebbs as they exist. The market will ultimately determine that (or the FERC). However, we strongly support operational simplification pending EDI implementation. Again, we continue to support EDI implementation in order to gain the advantage of “one-write”!

We see incremental benefits as follows: 1) elimination of special hardware/software by moving to Web sites (but not dictating the death of EBBs), 2) Web site construction with “common look and feel”, 3) Use of EDI to gain “one-write” and 4) standardized business practices underlying GISB transaction sets to minimize customized data mapping and quicker implementation.

Midway in your 2nd page, you suggest “Since these capabilities exist today in the third-party market, because of GISB standards, hasn’t this goal of “greater value”

already been achieved?" Some Shippers are using third-party service providers and still don't have their 1st success in implementing computer-to-computer scheduling of gas. Therefore the answer is "no "!

This model does not take any position on compensability and is in accordance with GISB policy (Standard 1.1.16). Therefore, I am not addressing those questions dealing with such.

Responses of TransCapacity to Questions posed

Tom Ehinger's Questions

1. Does "using only Internet protocols and procedures" mean that TSPs will not design web pages for their current EBB screens at this time?

Response:

It means that TSPs will not be required to spend millions of dollars on transitioning non-internet EBBs to Internet EBBs (whether on web pages or other Internet based systems). This is because once TSPs support the upload of Offers and upload of Bids via GISB EDI/EDM, all of the functions which the FERC has ever required be placed on a TSP's EBB will have been transitioned to Internet protocols and procedures. The only requirements the FERC has ever issued with respect to EBBs are the:

a) Order 497 items:
    1) Affiliate notices, and
    2) capacity allocation logs,
b) Order 636 items:
    1) Available Capacity (IT and unsubscribed FT),
    2) Notices of conditions affecting available capacity (System-wide notices)
    3) the ability to view Offers and Bids,
    4) the ability to post offers, and,
    5) the ability to bid upon same; and,.
c) the Order 581 item:
    1) the index of customers

Via the GISB process, the industry agreed to add to that list tariffs (via the 4.3.6 standards). Tariffs had never before been a requirement and the industry determined to add tariffs to the list of electronically available items by mutual agreement. In the foregoing list, the only remaining non-Internet transitioned items are the ability to post an offer of release and the ability to bid upon an Offer via "Internet protocols and procedures". Internet "protocols" refers to TCP/IP which is the Internet communications protocol. Internet procedures refers to HTTP "Get" and HTTP "Post".

In the non-transactional area, the Internet protocol is TCP/IP and the Internet procedure is HTTP "Get" which is employed to retrieve the informational postings.

In the transactional area, the only FERC required transactions that have ever been required to be placed on a TSP's EBB are Capacity Release transactions. Currently, all of the transaction disclosure requirements are met by the ability to request and receive downloads of Offers, Bids, Awards, Withdrawals, System-Wide Notices, Operationally Available Capacity, and Unsubscribed FT Capacity via GISB EDI/EDM. Some of the required upload transactions have been standardized; namely Uploads of pre-arranged deals. Soon, Uploads of Offers and Bids via a business practice which provides comparability to the Uploading Offerrors and Uploading Bidders will be in place. Once these are in place via GISB EDI/EDM, all of the FERC required transactions will be available via "Internet protocols and procedures".

In the case of GISB EDI/EDM, the Internet protocols are TCP/IP, and the Internet procedures are HTTP "Post".

Thus, soon, all requirements for FERC required EBB activity will have been transitioned to "Internet protocols and procedures", and those wishing to accomplish their business activities "using only Internet protocols and procedures" will finally be able to do so.

2. What purpose is served if manyTSPs develop their own web pages but they have not followed a common look& feel(including content area) and users are nowoblidged [sic] to pay separately for this and a vendor product?

Response:

We see this question as being in three parts. As to the first part, "what purpose is served if many TSPs develop their own web pages"; we interpret this to refer to developing web pages for transactional activities, as TSPs already have transitioned non-transactional information to Internet web pages. If this reference is correct, we do not know what motivations TSPs may or may not have, or what purposes they may be serving or not serving by developing their own web pages for transactional activities. We certainly know it will keep a lot of programmers, IT staff in general, and business people busy spending millions of dollars to accomplish this requirement. Likewise, we do not know what benefit they may receive for doing so.

As to the second part, "but they have not followed a common look and feel (including content area)". As Mike Novak observed, shippers who use a single (or very few) EBB(s) already have standardization. As you have observed, users of many pipeline EBBs have the GISB EDI/EDM to achieve their one look and feel, if they so value such a thing. Given this scenario, one is prompted to ask, what is the purpose served by compelling the users of single EBBs to change to a new system, on the Internet, to meet the needs of users who use many EBBs, but which users already have a methodology (GISB EDI/EDM) for meeting their needs, efficiently and inexpensively?

As to the third part we do not see why anyone would pay for both an EBB and the GISB EDI/EDM. Nor, under TransCapacity's formulation would they have to. They would have a choice. If a common look and feel was the highest valued good that a party sought, then they have the ability to achieve that value, through either construction of their own, customized look and feel, or through the purchase of a third-party's services which best met their desires for a common look and feel. Those that did not value a common look and feel sufficiently to follow either of the two foregoing paths to such common look and feel interface, could instead, opt for the continuation of the status quo. We do not see the equity of compelling TSP's to meet the needs, of the few requiring many EBBs to manage their businesses, over the desires of the many who do not need such standardization. It comes down to money. Should TSPs pay for the creation and maintenance of systems tailored to the needs of those who do not pay them for services (Confirming Operators and poolers); or, should they meet such needs with the GISB EDI/EDM minimum standards and focus their attention on what they do best, moving gas for a fee.

Finally, where is it written that a TSP must provide business management and coordination services to its trading partners for free? It has been written that the minimum transaction services can be accomplished via GISB EDI/EDM. When you purchase phone service from the phone company they are not compelled to give you a handset with caller ID, a clock, conference calling, call forwarding, hold, and digital display of the number dialed, nor are they compelled to provide you with an internal switchboard, voice mail nor an electronic version of your bill. These are value-added "presentation" and business management services. They are compelled to provide you with an RJ45 compatible jack (if they wire your building and you request same), a 9 volt carrier, a dial tone, an analog signal, and network switching. What you choose to purchase in addition to that for display, presentation and business management services, or, what you seek to use that carrier and network switching for, are all up to you. The analogy to the gas transportation business' unbundling is very similar. EBBs are the handsets of old. GISB EDI/EDM is the RJ45 jack and dial tone enablers of service unbundling and they comprise the foundation blocks for mass-customization of users' telecom applications and business management tools.

If, in 1983, at the dawn of the PC age, a group had sat down to define what word processor that came with every PC should look like and how the information would be presented, they would have looked at what was available at the time and picked "the best for their needs at the time". It would have been the character-based, black background, yellow letters, function key activated menus and functions, and 80 character wide, forty line tall screens pioneered by WANG. We would have been hamstrung and word processor innovation would have stalled or stopped altogether. Instead, just such a group did sit down and standardized ASCII text as the minimum for storing and communicating text. Then as technology advanced what followed was RTF, which is now the standard format exchangeable among graphically-based word processors. Those companies which require multiple word processor interfaces, i.e., AMI Pro, Word, and Word Perfect have this RTF format to work with to exchange among differing applications, or, they can choose the one (from among the many) that best fits their needs internally and use RTF to exchange with parties outside of their organization which do not use their chosen format. This is the path that TransCapacity is recommending. RTF equals GISB EDI plus TCP/IP with HTTP "Get" and HTTP "Post" which equals EDM. Put them together and you get GISB EDI/EDM.

Bob Wallenhorst's Questions

(1) Does this model suggest that the only means of communication common to all TSPs is EDI via the public Internet using X12 documents?

Response:

TransCapacity's model suggests, that for transactional information, the common, minimum standard for communications which can be relied upon by all parties seeking to deliver to and receive from (communicate with) TSPs, their transactional information is the GISB EDI via EDM (X12 EDI via the public Internet using Internet protocols and procedures). With respect to non-transactional information we propose no changes to the informational postings. In this area, two of the five types of informational postings are also transactional in nature (or cross-over between purely informational and purely transactional). These are the System-Wide Notices and

Available Capacity. Under TransCapacity's proposal, these two types would continue to be available via both the TCP/IP protocol with the HTTP "Get" procedure (the process of "getting" information via the web pages); and, via the TCP/IP protocol with the HTTP "Post" procedure (the process of posting a request and receiving back (a post) the response(s) via the GISB EDI).

We do not propose any change to the three TCP/IP with HTTP "Get" only types of information. Thus, we see a mixture of EDI and pure text being communicated via the public Internet.

(2) Would it be possible under this model for entities, either affiliates of a jurisdictional pipeline or otherwise, to be the sole provider of "EBB" services (aside from EDI) for a jurisdictional pipeline?

Response:

We do not see the evolution of "sole providers" as likely. The benefit of the GISB EDI/EDM model as proposed by TransCapacity, is that multiple parties can offer comparable services to anyone in the gas industry needing to communicate with (deliver information to or receive information from) the TSP. Under our model, the ability of the TSP, its affiliate, or anyone else for that matter, to charge for EBB services means that the competitive market will draw in other providers anytime margins appear. If only one provider did emerge for a given pipeline, then it would be because all the shippers on that pipeline chose to use that provider. This occurrence would then have the users using many different systems for the different pipelines, as in your question you presume a "by-pipeline" sole-provider. A "by-pipeline" sole provider envisions a multiple provider environment across the industry. Our model has multiple providers across the industry, but any given user could choose one to do all of their communications with all their TSPs. Thus, from our multiple provider model, a common interface is possible for the user.

Back to your example. Assume that all shippers had chosen one provider for a particular pipeline. This choice however, does not preclude the ability of another provider to employ the GISB EDI/EDM to get information to and from that pipeline. Thus, should another shipper come along which does not want to use the services of the incumbent, that shipper (or their third-party provider) can employ the GISB EDI/EDM on the same basis as the incumbent, to communicate transactions to the TSP's back-office business system. The ability of the GISB EDI/EDM, as an enabling set of technology and business practice standards, means that it is unlikely that "sole providers" of EBB, or EBB-like services will evolve. The ability to employ the GISB EDI/EDM modality now, and into the future, means that entry and exit of providers will be determined by the ability to generate profits earned from providing services that parties desire.

An EBB is a computer to person interface. If a provider chooses to implement such an interface for its customers, there is nothing in TransCapacity's proposed model that stops them. Thus, even third parties can develop (as some already have) EBB-like interfaces which rely on the GISB EDI/EDM to communicate the results of data entry to the TSP's back-office business systems. In this way, the one-to-one linkage of a single EBB to a single Pipeline is broken. This having been accomplished, there is no

limit on the range of choice that a particular user may have at their disposal. Likewise, most third parties, TransCapacity included, know that to have a viable services they have to support all TSPs. For our part we are now at 20 and climbing. Without the GISB EDI/EDM formulation that we have proposed, there is no good way for a common look and feel to be provided to anyone via a single interface. Even a common look and feel, mandatory, Internet-EBB as proposed by Tom Ehinger of Amoco still means that users will have to log on to multiple EBBs, navigate to their screens and input data into the TSP's EBB, as data entry clerks, and then turn around and key in the same data again into their own back-office system(s). Under Tom's formulation, this is repeated for each TSP upon which a nomination is made. It is repeated again, to retrieve the scheduled quantities information, the allocation information and the imbalance information. With the GISB EDI/EDM, the ability to achieve a one write, or less than one-write system, is enabled, and done so in a competition and innovation enhancing manner.

(3) Who does this model envision as being "users" in the reference to Standard 1.1.11? Shippers? Pipelines? Marketers? Confirming Operators? Regulatory agencies?

Response:

In a change from TransCapacity's previous position, we propose an amendment to our initially proposed 4.1.A principle. In its re-formulated state, it makes clear that users who pay TSP's for service, may receive Internet-EBB services from the TSP, should the TSP: 1) seek to build (or buy) such services, and, 2) seek such determination in a regulatory proceeding. Under the TransCapacity model, with respect to other users' transactional activities only, (note non-transactional information via TCP/IP and HTTP "Get" would continue to be part of the minimum) the following would reasonably apply under TransCapacity's model:

1) As pipelines do not pay for confirmation, allocation and measuring services received from interconnected pipelines, they could be charged for use of the other's EBB or they could use the GISB EDI/EDM without charge.

2) Marketers, to the extent they are Transportation Service Agreement shippers paying for transportation services would be in the "shipper" category, and depending on a TSP's choice, they may or may not pay directly for EBB services.

3) Marketers, to the extent they receive pooling or other services (i.e., title transfer tracking, acceptance and processing of PDAs etc.) for which there are no TSA charges, could be charged for use of the EBB or they could use the GISB EDI/EDM without charge.

4) Confirming Operators could be charged for use of the EBB or they could use the GISB EDI/EDM without charge.

5) As Regulatory Agencies are seldom, if ever, conducting transactions via EBBs, the TransCapacity proposal would not affect them. As a further note with regard to Regulatory Agencies, where they are interested in transactional

activity, it is typically in a monitoring role (ex. Capacity Release). To date, they have opted for the GISB EDI/EDM. As this is not likely to change there would be no financial implications for Regulatory Agencies.

(4) On page 30 of the 11/12/97 NOPR, the Commission states "Regardless of whether standards are developed, however, pipelines should begin preparing to make the transition to the public Internet". Since pipelines are already required to support EDI via the public Internet using X12 documents, what is it that this model envisions the pipelines "should begin preparing" to do?

Response:

Pipelines should begin preparing to accept Uploads of Offers and Uploads of Bids via GISB EDI/EDM. This is one reason why the enabling business practices need to be put in place soon, so that the GISB Information Requirements and Technical Subcommittees can implement the datasets in time for the June 1999, FERC date. We believe it was anticipated by the FERC that the datasets might not be available by this June, so that the Commission's instruction would pertain to the use of GISB's "Final Actions" awaiting FERC adoption of the datasets. Of course, there may be some that may choose to await filing of the GISB datasets and acceptance from the FERC, but that is between them and the FERC, in light of the language you cited.

(1) Does this model presume that standardizing only the data requirements for transactional web pages sufficiently addresses the Commission's concerns regarding customer training costs and delays?

Response:

Although this question was posed to Mr. Caldwell, we felt that the reader may be interested in the answer to this question as it applied to the TransCapacity Model.

Under TransCapacity's model, the only parties that need to change are those that want a common look and feel, and then they have a choice of: 1) their in-house developed system, or, 2) that of the third-party which most closely meets their suite of needs (presentation, reliability, features, cost, training, integration with internal application, etc.) The numerous shippers that are happy with the dial-up system can stay with the dial-up system. TransCapacity's model is the only one that puts the burden of training (to adapt to change), where it belongs, on the party seeking the change. Why should every user of every EBB change to satisfy the demands for one common look and feel of the "few large" users who do not wish to expend resources to accomplish the single system for themselves? Where is the equity in that? As to TransCapacity's proposal, even if a TSP does transition their EBB to an Internet-EBB, the provision of required transaction services would be done in a manner identical to that provided by third parties. The underlying communications between the interface and the back-office business system would be via GISB EDI/EDM. Thus, in the future, (1999 under Tom's proposal), when the change is about to occur, if there were significant differences (in cost, convenience etc.) between the new TSP Internet-EBB and those systems of third-parties, the user would have, at that time, the choice of making the change to the TSP's Internet-EBB (with or without charges as explained above) or to that of a competing third-party system.

Gerry Hahn's Question:

Responses of TransCapacity to Questions posed

Could you please explain your logic or philosophy behind your support for CL&F for informational postings but not CL&F for transactional. It appears inconsistent to do so and also seems to disregard the messages clearly communicated in 9-95 FERC Hearing. I recall the IPAA in particular going so far as to advocate the concept of a national EBB approach!

Response:

TransCapacity opposed the resolution as it was first drafted at the GISB Board of Directors. Only after the language "the GISB Board of Directors requests the GISB Executive Committee to further evaluate..." was added that TransCapacity voted in favor of the resolution. That evaluation is done and we are now largely unhappy with the results. We feel that the ILTF has gone beyond evaluation and helpful suggestions into mandating design and dictating presentation. We are opposed to any standardization which goes to any level lower than navigation to a page and common naming of pages. We wish to correct the impression that our attendance at meetings or assistance in the process via chairing same, is misconstrued as support for the work. It should not be. As we are opposed to standardization below the navigational (to the page) and naming conventions (for the matters to be contained on a page) level, it is consistent with an opposition to 1) requiring TSP's to spend millions to transition, and 2) even if the "requirement" aspect of Tom's proposal is dropped, to spending countless hours of time and effort on the standardization of screen content.

We believe that (within the non-transactional information for instance) those who want standardization of screen content can get the raw material for their customized reports in EDI (see GISB standard 4.1.13) using GISB standard 5.4.13 for operationally available and unsubscribed FT and then make whatever reports they want from the raw material . This is what TransCapacity does today. This is in the non-transactional area. Where there is no EDI standard (i.e., Affiliate Notices, and Tariffs, we have agreed to some convenience standards (ex. the ten items within a tariff (also contained in Federal Regulation as required to be in every tariff)). On the other hand, should anyone request that there be an EDI dataset developed for even these items, we would then move elimination of the CL&F standards as superfluous because the necessary common look and feel can be achieved from the raw material. In essence, the EDI provides the ability to give each user its own common look and feel. We feel this is far superior to the least-common-denominator-common-look-and-feel that would result from a central planning committee's command and control approach to standardizing presentation. EDI enables mass-customization for each customer seeking communication without requiring any trade-offs between customers.

As to your reference to some message communicated in September 1995, that TransCapacity is disregarding. We were at the same conference. The "standardize EBBs" message was enunciated by both IPAA and NGC. TransCapacity measures the effectiveness of communication by the results of that communication. Using this measure, the results of the messages communicated at that conference were: from the Commission, an order to the industry to standardize business practices and to focus on the 10 HPDR datasets which were developed by Gas*Flow but not voluntarily implemented (as they were supposed to have been) by the industry. They declined then to go the route of requiring EBBs be standardized. They had that choice then, they rejected it. The Commission disregarded the message. The Commission also

disregarded the pipelines' message that nothing was needed, that the market could achieve the Commission's standardization results. They did hear TransCapacity's message of two parts which was 1) give the industry a deadline and they will meet it; and 2) make implementation of the datasets mandatory.

Finally, TransCapacity has not disregarded the fundamental message that all shippers communicated: "we want one interface for all pipelines". TransCapacity has focused its entire corporate mission on just such a functionality. The only problem it seems, is that we wish to be paid for our services.

Mr. Bray's Questions:

1. Please confirm that this model is proposing: (1) Upload of Offer and Uploads of Bid be standardized through GISB for EDI processing and implemented by the TSPs according to these standards by 6/1/1999. (2) No changes are required to the TSP's EBB for 6/1/1999.

Response:

In answer to part 1, with respect to additional transactions, business practices and datasets, **yes, we propose only that TSP's process uploads of Offers and uploads of Bids in GISB EDI/EDM by June 1, 1999**. (see enabling business practices proposed as work papers to R97111 in BPS.

With respect to part 2, we propose no changes to TSP EBB's for 6/1/11999. Further, TransCapacity proposes no changes to TSP EBB's ever, period.

2. Clarify how a transactional function, transaction result and/or transaction information would be identified as required. (4.3.A, 4.3.H)

Response:

To further clarify our intentions with respect to Standards 4.3.A and 4.3.H, we have re-drafted standard 4.3.H and proposed a new standard 4.3.I. Please see same. The rest of this answer presumes the reader has read the re-drafted 4.3.H and the new 4.3.I.

4.3.A is intended to provide an ongoing framework for deciding which future datasets are "required" as opposed to available for use on a mutually agreed basis. 4.3.D itemizes the required datasets. 4.3.E recognizes that uploads of offers and bids will be added to 4.3.D. 4.3.H and 4.3.I make clear that as long as there is some other comparable means of accomplishing a business result, aside from a TSP's EBB (of whatever kind), that a TSP need not implement other datasets. If there is no other means than via the EBB, then the TSP would apply for a GISB EDI/EDM standard and use it once the standard is available. Of note, we do not prevent the business practice from occurring during the pendency of the standard (GISB EDI/EDM) only that another means must be available while the process is underway. This is patterned after the Duke filings to continue to provide services via its EBB while GISB worked on providing GISB EDI/EDM methodologies. It is not our goal that every TSP do everything only in EDI. It is our goal that if a business result can only be obtained via an EBB, that a comparable GISB EDI/EDM methodology be available, or, that a comparable (i.e., fax etc.) means to accomplish the same business result be available.

3. Does 4.3.G preclude a TSP from having an EBB that may provide a faster response to the customer than the EDI/EDM server implementation?

Response:
No. If a TSP provides a faster response because of technology, processing or ease of interface, than a third-party, so be it. What we are concerned with is that there not be a built-in disadvantage to third-parties. If the TSP chooses to put in a faster link (at the EBB's expense) to the back-office business system (for example, via a fiber-optic, private, intranet connection to the router where the url is located) that is acceptable. As long as both the TSP's EBB and the third-parties use EDI via EDM to get there and back, use the same url, and the back-office processing is the same, then no problem.

5. Given that it has taken 8 months to prepare the proposal to the GISB EC for common look and feel standards for the 9 documents for non-transactional postings, what schedule is being proposed for GISB to define common look and feel standards for transactional functions? When would TSPs be expected to implement these standards? What are the TSPs expected to implement for 6/1/1999?

Response:
Although this question was posed to Messrs. Hahn, Walker, and Caldwell, plus Ms. Munson, we felt that the reader may be interested in the answer to this question as it applied to the TransCapacity Model.

Actually, it will have taken a year. The GISB Board first considered this matter in May of 1997. As to the 9 we believe that it is really only five. There already existed standards for Operationally Available, Unsubscribed FT, System-wide notices and Index of Customers. The ILTF took a year and even then half of the items had workable presentation standards to begin with. Even tariffs are standardized already by the FERC, but the movement of the data to standard web page presentation was exhaustive. We cannot imagine the length of time it will take the "central planning committee" to agree on how to present nominations using the three models. Beyond that, the variations in need for up and downstream contracts, will become a target. The differences in making pooling, storage, make-up, payback, and PTR nominations will come into focus and be a target of the central planning committee. So too, will be the differences in presenting pool balances, point balances, contract and shipper balances, the variation in need for capacity type, and ranking. The need for "role" information, "source location", "associated contract", "first supplier" and "last supplier" will all come into question. Then, the desire to do pooling the same way on every system will be addressed. Copying old noms to new days and different contracts will be at issue. Next, inevitable demands to "calculate fuel on the fly", determine remaining contract MDQ, warn of over-use of point MDQ or path MDTQ on the fly will be voiced. And, don't forget calculating authorized overrun quantities while we are at it. The demand for interactive switching to view imbalance reports, so that shippers can see what they have to nominate to get into balance will creep in next. The desire to see discount rates while making nominations to get the best rate is sure to follow. The demand for on-line verification of up and downstream matching between nominations and

confirmations is not far behind. How about on-line contract amendment, or contract requesting, discount requesting, title transfer tracking, imbalance netting, cash-out calculation? Believe us when we say, this effort will be regretted by all who provide service, should we go down this slippery road to managing shippers' businesses, for free, at the service provider's expense. And, keep in mind, each of these demands for verification and business management assistance, will engender a need to provide the same data to third parties so that they can provide the same services as the "TSP's EBB" via their competing EBB. Going down that road is not just about "Look and Feel", it is about providing standardized, value-added business management tools, for free.

Norm Walker's Questions:

1. Does this model expressly preclude transportation service providers from offering an EBB for their customers that is covered by cost of service?

Response:

As initially proposed, yes. However, we have reconsidered that position and have re-drafted 4.1.A to reflect our change in position. It should be a matter between a TSP and its paying customers to determine, in a regulatory proceeding, the ground rules for compensation and mutual consideration. It is our view however, that no one should receive "free service". Given the existence and recognition of third-party providers and their roles, this is patently anti-competitive and predatory. If someone is paying a TSP for service and what they are paying for includes provision of an EBB interface, then so be it. On the other hand, TransCapacity will oppose cross-subsidization to the extent we perceive that it causes us a competitive harm. In the past, we have supported a flat-rate charge to everyone who wants electronic services. We have proposed a level charge on all users and proposed that this charge could entitle them to either or both of EDI and EBB services. The nature of the costs is fixed (especially with the GISB EDI/EDM methodology) and thus a flat-rate fixed charge might be appropriate. Third-parties too would pay such charge, and to the extent they used this service for multiple customers they could spread their costs accordingly. However, we would oppose as strenuously as we know how, any attempt to charge just EDI users, or to provide free service to non-paying parties.

2. Does this model expressly preclude a transportation service provider, who is responsible for the safe and efficient operation of the pipeline system, from exceeding what ever standards are established to improve the response time in collecting and processing information to better serve their customers and manage the physical facilities?

Response:

Anything anyone wants to do to improve the reliability of the grid, enhance predictability of business results, and improve responsiveness of systems is fine with us, provided, that in so doing we do not create a second-class status for those who sought a common look and feel via GISB EDI/EDM. TransCapacity has always promoted the ability of parties to exceed the standards, provided all may avail themselves of the ability to exceed. We are leaders in working with companies to accommodate their individual needs. Our record on package ID, associated contract, capacity type indicator, capacity release surcharges, role, service code, transaction types, replacement

capacity, withdrawal uploads, deal type, measurement volume audit statement, and many more "exceeds issues" speaks for itself. We want to be partners in the search for solutions. This industry can count on TransCapacity to assist all segments to better serve our common customers and trading partners to better mange the physical facilities. That after all, is why the company was formed.

3. Does this model require that parties who are not responsible for the safe and efficient operation of the pipeline system be given exactly the same access to the computer systems used to manage the pipeline as are transportation service providers who bear that responsibility?

Response:

Someone once said: "you are either part of the solution or part of the problem". Providing equal access to the solution sets the standard for being part of the solution. You once said "With one trifling exception, the world is entirely composed of others". In the gas business it is "others" with which we must communicate and coordinate. Neither a TSP nor its trading partners can manage this situation alone. Responsibility is a burden that all who have an ability to respond must bear. Providing equal access (the ability to respond) as a right and in return expecting responsibility as an obligation, is a founding principle of civil life. We see providing equal access as the glass being all full with the expectation that civil behavior will ensue among equals charged with coordination of their individual business intentions.

4. Does your model require that all services provided by transportation service providers be standardized? And, if so, is this a requirement for all segments in the natural gas industry, such as marketers' buy/sell, wellhead operators' Joint Operating Agreements, etc.?

Response:

If the question is, should all services be the same, then a unequivocal, no. There were and continue to be good reasons for variations in services. We ask only that the manner of providing the same service be sufficiently defined that a party employing GISB EDI/EDM, to accomplish their business result, be able to do so. Please see our revised proposed standard 4.3.H and newly proposed standard 4.3.I. While it may be nice for some in the industry to have one means of conducting title transfer, we are not among them. As to the coordination with TSPs of this activity we believe there is a finite set of long-run, competitively neutral, best practices available to the industry; and, we are working towards establishing these.

While there may be some who want one form of JOA, we believe that there are good reasons for there to be many distinct forms. Should someone someday wish to provide/propose standards for these various distinct forms, we will participate so as to encourage predictability and certainty of business result.

If, in these or other areas, there are new ways to "skin the cat", then proponents of these will find us willing to participate in making these distinct practices able to be accomplished in an unambiguous and predictable manner.

5. What are the time frames associated with your model?

Response:

Please see proposed principle 8.1.A. With respect to uploads of capacity release offers and bids, we believe the Commission has spoken and June 1, 1999 is the date. We do not oppose that date. With respect to any TSP-initiated transition to an Internet-EBB, we propose only that, should that occur, then, simultaneous with that occurrence, provision be made for comparable non-EBB methods. In the event a TSP desires to support only electronic formatted communication of a TSP-sponsored business activity, then, we request that they submit a request for standard to accomplish the same business result via GISB EDI/EDM. If on the other hand, other means (i.e., fax, e-mail, letter, etc.) exist to comparably achieve the same business result, then there would be no requirement that a TSP submit such practice for GISB EDI/EDM standardization. In short, the TSP is in full control of the timing of any voluntary TSP-initiated transition. And, finally, central to our proposal, should a TSP determine that they do not wish to provide an EBB (and many today do not provide any EBB) or do not wish to transition an existing EBB to the Internet, then under our proposal they are not required to do so.

Shelley Corman's Questions:

1. Does your statement that "if a TSP chooses to offer an EBB it must do so as a competitive offering" mean that all EBB costs (past and present) must be removed from TSP rates? How does this statement comport with GISB's standard about not taking a position on comparability? Are you also proposing that TSP EDI development and support costs will be separately collected?

Response:

Please see our re-drafted proposed standard 4.1.A. We have reconsidered our position partially as a result of your question. We do not feel that past EBB costs should be separated out. The past is the past. The reasons that TSP's built EBBs, in the past, are varied and their reliance on the regulatory framework, at the time, should not, today, be over-turned. On the other hand, going forward, we do believe that, should a TSP's EBB be transitioned, to the Internet, that it communicate with the back-office business system via GISB EDI/EDM. We further believe that should a TSP determine with its ratepaying customers to provide them EBB services as part and parcel of the transportation service, they may do so and be in conformance with GISB standards. As to your question with respect to comparability, we believe you mean compensability. GISB is very clear on comparability of electronic delivery methods. GISB Standards 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8, set forth the comparability theme. As for compensability, GISB Standard 1.1.16, although within the nominations, confirmations, and scheduling of services section of GISB Standards, may be interpreted more broadly to apply to any service or product. Even if that interpretation were made, or a similar standard added to the new proposed Section 8 "General Standards" section of the GISB Standards book, we believe our formulation in 4.1.A is consistent with this formulation as it sets forth which of these matters are appropriate for "between trading partners determination" and which are appropriate for "regulatory resolution". In our view, the fact that anyone is suggesting requiring TSPs to transition EBBs to the Internet at all begs the compensability issue because it strikes at the heart of our company's economic viability. Those who seek to require TSP's to transition and provide this service for free are saying to third-party service providers that they can propose our economic extinction via the introduction of GISB Standards. This

situation is simply unacceptable to us. If GISB can contemplate requiring the introduction by TSPs of a free service for the proposing parties, in competition with existing fee-for-service providers, then it is GISB not TransCapacity which is pre-determining whether a service is compensable or not. Once that line is crossed, it is fundamental to our economic survival that we prevent this back-door determination of compensability from putting us out of business. Absent a clearly articulated FERC policy that EBBs must be transitioned to the Internet, and provided for free or for a fee, we must seek to mitigate our damages from such proposals here at GISB. We apologize that TSPs are caught in the middle. That is not of our doing. Eliminating any requirement for transitioning goes part of the way to alleviating our concerns. Finally, to be certain that the process of developing standards, even voluntary ones, does not "pick winners" (see GISB Standard 4.1.2) we believe that the essential competitive structures must be established up front. This makes clear that the proponents of forced transition can not achieve by silence (concerning competitive structures which choose winners) what could not be achieved by direct action (active pressure to establish mandatory transitions to competitively injurious standards).

2. Under your proposal, what should a TSP do with a shipper that refuses to use EDI? Could the TSP reject nominations without liability?

Response:

Yes. Should a TSP determine that GISB EDI/EDM was the means that parties had to use to communicate, the TSP could refuse to provide service. This was accomplished earlier this year in Noram (ending of fax transmittals in favor of EBB data-entry) and last year in Florida Gas when FGT required shippers to nominate via either flat file or GISB EDI/EDM. In the case of FGT, the TSP ended the ability to nominate via fax (except in emergency) and FGT never had an EBB and the FERC never required them to build one. Presumably, the way to reduce or eliminate liability is to file a tariff change which makes clear that as of a date certain, only specified methods (including GISB EDI/EDM) would be acceptable means of communicating transactions. It is not our proposal to handle liability, should TSP's wish GISB to consider such a matter they are free to propose a standard or principle that allocates liability or which points to the TPA, or other document as the place where such matters are handled/negotiated.

3. You say that no TSP should be compelled to provide an EBB, what about the FERC regulations which require EBBs? Are you suggested that GISB will petition the FERC to remove these requirements?

Response:

FERC has said over and over again that the requirement for EBBs will go away, as a matter of regulation, once the GISB standards concerning minimum "Internet protocols and procedures" are in place. As we stated in answers above to Tom Ehinger and Bob Wallenhorst, the only remaining FERC requirements for EBBs, which have not been met, are the upload of capacity release offers and bids. Should an individual TSP feel that it has some other, additional requirements that are as yet unmet by GISB EDI/EDM, TransCapacity's standards 4.3.A, 4.3.G, 4.3.H, and 4.3.I provide the road map for resolution of this situation. Should any TSP you are familiar with have such a situation, TransCapacity pledges its good offices to expedite the establishment of such standards, including the testing and, if desired, prototyping of the business activity so

that a fully fleshed-out proposal can be submitted in the initial request (a time and resource saving gesture) so that scarce industry resources need not be focused on peripheral yet nonetheless important transition matters.

In the event a TSP does petition to eliminate liability for non-GISB EDI/EDM (excluding emergency situations) then TransCapacity would support such filings. GISB, as it is precluded from advocating individual standards before regulatory bodies, had best decline to participate in such a petition.

4. Under your proposal, must there be an EDI format for every document or transaction included on an EBB/website? Is this a precondition to putting a new function on an EBB? Can you envision any type or posting or transaction which does not lend itself to EDI?

Response:

Part 1, No. In response to this question and one posed by Mr. Bray, we have redrafted proposed standard 4.3.H and proposed a new standard 4.3.I to better clarify our intentions.

Part 2, No. In our answer to Mr. Bray we also make clear that our proposed standards create no pre-conditions to TSPs offering services. There is a requirement that some interim, alternate, comparable means of accomplishing the same business result be in place. But this is transitory and would evaporate once the GISB EDI/EDM were available and supported (where the interim comparable method were to be eliminated). More importantly, in the event that the effort to create and support the GISB EDI/EDM for a given EBB transaction was not seen to outweigh the cost of supporting fax for the users of GISB EDI/EDM for the remainder of their transactions with that TSP, then there need never be a requirement that the TSP support GISB EDI/EDM for that particular practice (assuming of course this was not one of the 4.3.D required practices), again provided the alternate method continued to be available for users of GISB EDI/EDM.

Part 3, Yes and No. We can envision that a pipeline map does not lend itself to EDI communication. We can also envision that should the industry so desire, that any textual material could be standardized in EDI. The question of course would be, is it necessarily worth the effort, if other means already exist and are standardized? We would answer not likely. We did not oppose the standardization of Available Capacity (Operationally Available and Unsubscribed FT) in both EDI and web pages because these matters are a mixture of both non-transactional, information only, and transactional (i.e., relating directly to the ability to employ capacity for a particular use via a nomination or confirmation). Nor did we oppose the addition of text messages (System-wide notices) to standard 4.3.6, again because while some of these messages affect the ability to achieve transaction results, (Critical Notices and certain of the non-critical notices) others were truly, purely advertising and informational in nature. Had we known then what we know now; -- that agreeing to any sort of duplication, no matter how minor, would have lead to the assertion that this was the intent of 4.3.6's last paragraph, we would certainly have aggressively opposed any duplication, period. We know better now, and perceive even "well-meaning" attempts to standardize content in the non-transactional as leading, perforce, to a precedent setting

determination to transition all EBBs to Internet-EBBs and to standardize all transactional screens to a common look and feel. If we had it to do over again, we would have opposed standardization on web pages of Available Capacity, and System-wide notices. They already existed in GISB EDI/EDM. We would probably also have opposed a standardized requirement that tariffs be available; due to the fact that tariffs are already on-line via FERC's new windows FASTR database. This said, the line should now be clearly drawn lest even passive ascent to "well-meaning" presentation standardization is perceived as TransCapacity is being "inconsistent"... to "support [for] CL&F for informational postings but not CL&F for transactional" (See G. Hahn's question). We are now on the record, and will be casting our vote in opposition to the ILFT effort if all lower than page level standards are not eliminated. GISB has few enough resources and should no longer squander them on duplication of effort. This is one of the reasons we oppose the dual system aspect of requiring transitioning of transactional activities to Internet-EBBs.

Responses to Questions for Model #3.

RESPONSES FROM NORM WALKER

1. Bob Wallenhorst (Exxon)

(1) Would the common look and feel web site for Informational Postings provided by 6/1/99 comply with the proposal on page 33 of the 11/12/97 NOPR that the content of information provided be the same regardless of format (EBBs, web sites, or EDI)?

Response (1): The information will be the same.

(2) During the phased transition to the internet, will customers be required to maintain both dial-up EBB access and internet access, or will all functionality remain on the dial-up EBB until all transactions have been transferred to the internet web site?

Response (2): No, the initial access will be through the Internet.

2. Jerry Hahn (Texaco)

In your model you advocate beginning the process of creating standards for transactional Web sites by 6-98! Does your model support creating more similarity than dissimilarity between TSP Web sites for transactional functions in that effort or does it merely call for discussions to begin as to the need for such similarity? In other words, does your model suggest that the effort would have a real commitment to creating CL&F for transactional?

Response (a): Considering the fact that Producers, end users, LDCs, service companies that provide gathering and/or processing services and pipelines have the necessity to make their web sites similar, the model anticipates that all the above mentioned parties would join in a "mutually agreed to everyone-implements-or-no-one-implements" strategy. And, since GISB standards are voluntary and the constituents passing them intend them to apply to all segments of the industry, a condition that could be forwarded is that unless and until a critical mass of all segments implement the standards involving the public Internet, no segment would be "required" to implement them. Another provision could be that standards would be offered on a voluntary basis for a period of 36 months. If the standards passed by the Executive Committee and ratified by GISB membership are for the industry in general and they serve a need then a critical mass from all segments should have implemented them after 36 months. If the standards do not reach a "critical mass" of use, then they would be eliminated.

Response(b): Yes.

Responses to Questions for Model #3.

3. Jim Buccigross (TransCapacity)

General Questions for all models

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 No. 1 - Jim Buccigross	Model No. 3
	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 ***only*** available via an EBB be transition 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.	Not necessarily.
	Examples of this type of information would be: system expansion open seasons, notices of pending rate, service or fuel changes.		
3	Should **non-transactional** information which is ***not required*** 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.	Not necessarily.
	Example: Maps, phone lists, general information, promotional items, advertising, etc.		
	Issue Area: Transactional		

Responses to Questions for Model #3.

	Issue	Model No. 1 - Jim Buccigross	Model No. 3
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.	If they are, they should be phased in.
	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.	Not necessarily.
	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.	No.
	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.		
7	Should **each EBB's transactional** functions (other than the GISB standardized functions) be **transitioned** to the web? If so, should these be standardized?	No.	These may be moved to the Internet resulting in only one application.
	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?		
8	What about **transactional** functions which ***become required*** to be available electronically in the future?	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.	

Responses to Questions for Model #3.

	Issue	Model No. 1 - Jim Buccigross	Model No. 3
	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?		
9	What about **transactional** functions which, while ***not required*** to be present on EBBs, ***are (or become)*** available ***only*** on an EBB? Should these be transitioned to GISB EDI/EDM and web pages because they are only available on an EBB?	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.	See answer to #7.
	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?		
10	What about **transactional** functions which are ***not required by FERC*** to be present on EBB, **are (or become)** available on EBB, **and yet are also** available on a comparable basis **via other** 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?	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.)	No requirement for standardization of EBB presentation, content, navigation, or naming conventions.
	Example: contract requests can be done on-line or via fax with no substantial difference in business result to service requester.		
11	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?	No.	Market forces will indicate which functions not covered by GISB would be desirable to be transitioned..
	Example: Should TSPs do more than what GISB has standardized in X.4.X datasets (plus uploads of offers and bids) and the Informational Postings?		
12	Should we define "Look and Feel" to include content and appearance (presentation)?	No.	No. See answer to 13.
	Should GISB standardize what is inside of a page?		

Responses to Questions for Model #3.

	Issue	Model No. 1 - Jim Buccigross	Model No. 3
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.	Yes to navigation. Yes to nomenclature in navigation. Yes to downloads of non transactional data in HTML and RTF.
	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.	Yes
	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.	No
	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.	The market and technology will determine the order and timing of the phased implementation.
	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.	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.		

Responses to Questions for Model #3.

	Issue	Model No. 1 - Jim Buccigross	Model No. 3
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.	Yes.
	Example: GISB would pass a standard that says that we make no finding as to the implementation timing of our standards.		

4. Jim Buccigross (TransCapacity)

No questions

5. Jim Buccigross (TransCapacity)

Please provide specifics for what you mean by "provide access to all current EBB transactional functions over the public Internet using Internet protocols and procedures."

> **Response:** This means that a party (Producer, Enduser, LDC, Service Company and/or Pipeline – all of which may be TSPs) could place their proprietary EBB behind a "browser plug-in" that would bridge between Internet Protocols and the back end data base and allow customers to use the proprietary EBB.

Does this mean that the existence of what anyone's EBB provides will be provided by every EBB?

> **Response:** No.

If not, how do we determine whether any given EBB has in fact transitioned functionality?

> **Response:** Why does this need to be determined if customers are using the public Internet to conduct business with Producers, End Users, LDCs, service companies and pipelines?

What is your technology model for doing this?
Is it browser?
Is it Remote Access Server?
Is it Network Dial-up?
Are the connections between parties via permanent IP addresses?, or dynamic IP addresses?
Does the TSP have a permanent IP address and the shipper able to have either?

> **Response:** The "technology" model includes, but is not limited to "browser plug-in" software. This model does not rule out the possibility that the existing EDI/EDM standards are sufficient to meet all future business needs, nor does it rule out the possibility that existing EDI/EDM standards will be determined by the market place to be less than adequate when compared to currently-emerging alternatives.

Please define what you mean by "Internet protocols and procedures?"

> **Response:** TCP/IP.

Does this mean EDI/EDM?

> **Response:** No, this is not what is meant, nor what is excluded.

If so, for everything, or only some things?

> **Response:** See answer above.

Does it mean EDI/EDM **plus** browser?

Response: As stated above, this is not meant, nor is it precluded in the definition of "Internet protocols and procedures?"

Again, for everything or only for some things?

Response: See answer above.

Does it mean either EDI/EDM **or** browser?

Response: See above answers.

If so, who chooses? the TSP, the Service requester, GISB?

Response: The choice is determined by the needs of the market and the capabilities of the service provider (producer, end user, LDC, service company or pipeline) to provide.

Does it mean EDI/EDM where GISB has made EDI/EDM standards?

Response: This model does not rule out the possibility that the existing EDI/EDM standards are sufficient to meet all future business needs, nor does it rule out the possibility that existing EDI/EDM standards will be determined by the market place to be less than adequate when compared to currently-emerging alternatives.

Does it mean EDI/EDM (where GISB has made EDI/EDM standards) and browser or some other means where GISB has not done EDI/EDM standards?

Response: See answer immediately preceding.

If yes to "some other means", what is this "other means"?

Response: The market place will determine the other means. Standards should not prohibit more cost and time efficient modes of communication to be used as they emerge and can be used to differentiate service, decrease expenditures or increase revenues.

Does it mean EDI/EDM (where GISB has made EDI/EDM standards) and browser (or some other means for these same transactions) and browser only or some other means only in cases where GISB has not done EDI/EDM standards?

Response: See answer above.

If yes to "some other means", what is this "other means"?

Response: See answer above.

You propose to "begin the process of creating standards for transactional web sites. Of the existing 32 standard X12 datasets, determine the necessity, order and time frame for implementation."

Do you include the Uploads of Offers and Uploads of Bids as these are remaining to be done in X12?

Response: The number is the generally referred to quantity of data sets in the "little book." If the uploads of Offers and Bids are in there, then they were included. If they were not, then they are not. However, if they were not, they are not expressly excluded from the activity.

If those are done in X12 would those be added to your 32?

Response: See answer above.

When you say "begin" please define "begin".

Response: This is generally the initiation of a process.

When you say "determine" what do you mean?
By what process would we "determine the necessity"?

Response: Determine the necessity means the GISB consensus building process, which is based on need and subsequent use as the process proceeds. If standards, inclusive of data sets, are only used by the parties that are mandated to implement them, then the phased implementation would be evaluated to determine whether additional work needed to be performed or the effort abandoned.

Would it be 17-2? ratified by members and sent to the FERC?

*** Response:** Yes to 17-2. Yes to ratified by members. Since GISB standards are voluntary and the constituents passing them intend them to apply to all segments of the industry, a condition that could be forwarded is that unless and until a critical mass of all segments implement the standards involving the public Internet, no segment would be "required" to implement them. Another provision could be that standards would be offered on a voluntary basis for a period of 36 months. If the standards passed by the Executive Committee and ratified by GISB membership are for the industry in general and they serve a need, and if the proposed standards are endorsed and implemented by a critical mass from all segments then they would be sent to the FERC. If the standards do not reach a "critical mass" of use, then they would be eliminated.

Would this "determination" be a package? or subject to individual voting?

Response: With the last condition, it would necessarily be a package with a sunset.

Would this "determination of necessity" be a BPS one vote one company vote or a segment-balanced at the EC vote?

Response: See the asterisked response above. (The one related to the 17-2 vote question.)

What are the benefits of delaying the determination to a later date?

Response: As stated in the model, Y2K. As stated in the general meeting, spending O&M and capital dollars over a span of several budget cycles is less of a financial and business impact than requiring an unbudgeted and unsized project preemptive status over cost/benefited projects.

What is the benefit to TSP's of doing any of this?

Response: This model allows the TSPs (Producers, End Users, LDCs, service provider who operate gathering systems or processing plants and pipelines) to respond to the business needs of the customers.

Do you intend to recommend a **requirement** that TSPs transition their transactions to Web pages?

Response: See the asterisked response above. (The one related to the 17-2 vote question.)

Why would a TSP want to be **required** to transition EBBs to web pages?

> **Response:** Since these are voluntary standards passed by constituents who ALL intend to use them, the question is why would Producers, End users, LDCs, service companies and pipelines want to be required?

Do you intend to have GISB do standardized look and feel for transactional web pages?

> **Response:** Yes to navigation and nomenclature in navigation. Any additional standardization will be based on market forces.

6. Jim Buccigross (TransCapacity)

No Questions

7. Questions From Mike Bray (Duke Energy)

No questions.

8. Questions From Norm Walker (El Paso Energy)

No questions.

9. Questions From Shelley Corman (Enron)

No questions.

10. Questions From Tom Ehinger (Amoco)

1. According to what technology and mandate will dial-up EBBs transfer to the internet while prohibiting extensive replacement web pages from being developed? A double cost is possible if standards then follow six months later.

> **Response 1:** The statement that standards could be developed "later" comes from the NOPR page 35, it does not come from this model. It is in no one's interest to double spend scarce capital resources.

2. (a) Does the process of creating standards for transactional websites" include access to the content area of the screen? (b) What limits does this portend?

> **Response (a):** This is not a condition nor a preclusion of this model.

> **Response (b):** This model does not address this issue.

Responses to Questions for Model #3.

3. How do you stop TSPs from an evolution of current EBBs to a web page design on their own by June 1999 without approved standards?

Response: If all TSPs (producers, end users, LDCs, service companies that provide gathering services, and pipelines) were "mandated" in some fashion to implement Internet standards on a non discriminatory basis, the process would proceed at the pace of legitimate business, as the market place demands.

RESPONSES FROM MIKE NOVAK

Questions from T. Ehinger:

1. Explain the technology and rules that would transfer current dial-up EBBs to the internet while precluding a wholesale change and extra costs being attributed to a web page design before standardization has occurred?

The WINFrame technology suggested by N. walker sounds promising but I'm not positive it would work in every case. Because I'm suggesting a phase in, there shouldn't be a wholesale change unless a TSP makes the business decision to make that change. Web page design costs, particularly if they are to a standard, should be trivial. If a TSP can drop toll-free dial-in as a result of moving to the web, there should be significant savings.

2. When you speak of standard screens "as being templates" and then you allow proprietary means for submission of nominations, you turn good words back into status quo. Where is industry progress on common business transaction communication?

We have made no realistic progress towards standardizing communications (except for the very few parties that use EDI) as an Industry. I suggesting a standard the people can design to and move to over time. The current EBBs are not going to remain static anyway; most pipelines will make changes as their business need require. I would like to funnel dollars towards a new standard without causing a major financial impact. Without standards, TSPs must make choices and spend money. No one likes to re-invent the wheel. It may take longer to get to a standard but we are not going to get there by picking a date that everything must be done by (it won't be done this century). On the other hand, if TSPs move in stages, we as an industry get much closer to standardization.

3. You have expressed (rightfully so) that single TSP shippers are already standardized, but the premise is that multi-pipe shippers (likely larger entities that compose the bulk of nominations) want a change to a "single" standard. Will you support that "drill down"?

When my proposal is fully implemented, shippers will have the choice of conducting business through the standard format or through the TSP's proprietary format, if the TSP still wishes to provide that format.

4. If LDCs do not want or accept industry standard screens being developed, then the multi-TSP/LDC users can expect a non-FERC regulated environment to produce a plethora of screens albeit on the internet. Right?

If we don't set up a standard design specification now, you can virtually count on an even wider variety of proprietary formats in the LDC and intrastate world. LDC EBBs are starting to pop up now and much like their Pipeline predecessors, that have little in common with each other.

Questions from R. Wallenhorst:

(1) What is the proposed timing for transitioning to the CIF?

We need to research the problem more but I would like to see basic access to the existing EBB via the internet, common navigation and provision of nomination functionality (that is, web support of nomination related datasets) by June 1999. I would require additional functionality to be added at six month intervals so that the entire standard would be met by June 2001. I would support having a waiver for TSPs that needed deadlines extended but the waiver requirements would be fairly stringent.

(2) Does standardizing only navigation sufficiently address the Commission's concerns regarding customer training costs and delays?

In the short term, yes but in the long term, no. I think that a detailed specification (that is a Mutually Agreeable extension of the standard) that TSPs can design to is the best means to get the industry to a standard. If there is a big market for this design, there will be many developers. The LDCs and intrastates as well as gatherers and many of the medium to mid-sized pipelines are or will be the market. Overtime, it makes less sense to be different. In the short term, being different is fine if a TSP has a means of providing that functionality.

Questions from M. Bray:

1. Clarify what standards should be developed for the standard screens (4d).

A standard nomination screen might have static information related to the shipper, service and contract at the top of the screen. The bottom of the screen might involve action selections that submit or validate on the bottom of the screen. Navigation buttons (which would be hyper links to other key functions/pages) might be at the side. The main body of the page would be for the nomination data and I would like to see the data oriented top/down and left/right. For example, the upstream data elements would be on the left and the downstream on the right. Which data elements, beyond those which are mandatory or business conditional would be at TSP discretion.

2. Is the TSP required to offer the standard screens?

Yes, but phased in over time. Initially, navigation to an existing screen (or a clone of a proprietary EBB screen) would be sufficient.

3. What are the TSPs expected to implement for 6/1/1999?

At a minimum, web internet access to the existing proprietary EBB. I also am very inclined to require the navigation and most likely, nomination functionality.

4. Given that it has taken 8 months to prepare the proposal to the GISB EC for common look and feel standards for the 9 documents for non-transactional postings, what schedule is being proposed for GISB to define common look and feel standards for transactional expected to implement these standards?

From my experience as intraday co-chair and as someone who followed the non-transactional process, clearly I would not follow the process used in either of those work efforts. I have a plan which I would rather not divulge right now. I think GISB, as a whole, needs a more expeditious process that keeps development of standards focused.

Questions from N. Walker:

1. Does your model preclude pipelines from offering EBB functions as part of their cost of service?

No.

2. Does this model expressly preclude a transportation service provider, who is responsible for the safe and efficient operation of the pipeline system, from exceeding what ever standards are established to improve the response time in collecting and processing information to better serve their customers and manage the physical facilities?

No. These standards are minimum, however, a TSP could not deliberately starve the industry standard approach. For what was within the TSP's control and within the standard, functionality should be comparable. Anything over and above the standard would be provided in a TSP specified manner.

3. What are the time frames associated with your model?

At a minimum, web internet access to the existing proprietary EBB by June 1999. I also am very inclined to require the navigation and most likely, nomination functionality and the same time but that could slide to November 1999. Based upon the current EDI datasets, I would prioritize functionality and require additional functionality to be added at six month intervals so that the entire standard would be met by June 2001. I would support having a waiver for TSPs that needed deadlines extended but the waiver requirements would be fairly stringent. I would like to complete the standard design by December 1998 so that TSPs could comply with the entire standard by June 1999 if they had the resources.

RESPONSES FROM SYLVIA MUNSON

Questions From Jim Buccigross

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. 6 - Sylvia Munson
	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.	Nothing - though Upload of Offers and Bids was suggested
	Example: what in addition to the present GISB X.4.X and five Informational Postings has FERC required be done electronically?		However - there are implied steps that must be taken to accomplish some of our standardized txns and those steps have not been, but must be, standardized, too. For example: some pipes require that any new upstream or downstream party is added to the contract via the proprietary EBB before the nom is submitted that references that party. The ability to perform this update must be standardized into EDI before noms can be performed in a comparable manner on those pipes (or the business practices must change).
	Issue Area: Non-Transactional		

2	Should **non-transactional** information which is **not required** to be present **but** currently ***only*** 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.	Yes, transition to Web page over 18 months beginning June 1999. There is no need for standardization of content or presentation and no need for common navigation or naming conventions of non-mandatory informational postings.
	Examples of this type of information would be: system expansion open seasons, notices of pending rate, service or fuel changes.		But aren't some of these things covered in system wide notices, which is already standardized into EDI?
3	Should **non-transactional** information which is ***not required*** 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.	No need to transition to Internet Web page(s) provided such non-transactional information continues to be available to people through other means and those other means are available to all interested parties.
	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.	No. No transition of current HPDR's because they are already available in GISB EDI/EDM. All outstanding non-standard transactions must be made available via EDI.
	Examples: Offers, Awards, Bidding, withdrawals etc.		Example: Update of upstream party on a contract, 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.	No. No transition of current HPDR's because they are already available in GISB EDI/EDM. All outstanding non-standard transactions must be made available 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.	No. But if it's available on EBB-A, then EBB-A should make it available via EDI.
	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.		
7	Should **each EBB's transactional** functions (other than the GISB standardized functions) be **transitioned** to the web? If so, should these be standardized?	No.	The only requirement that those functions should have moved to the web is the requirement to provide them via standardized EDI. Not via web pages.

	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?		
8	What about **transactional** functions which ***become required*** to be available electronically in the future?	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.	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.
	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?		
9	What about **transactional** functions which, while ***not required*** to be present on EBBs, ***are (or become)*** available ***only*** on an EBB? Should these be transitioned to GISB EDI/EDM and web pages because they are only available on an EBB?	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.	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.
	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?		

10	What about **transactional** functions which are ***not required by FERC*** to be present on EBB, **are (or become)** available on EBB, **and yet are also** available on a comparable basis **via other** 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?	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.)	If the other 'comparable means' is a GISB standard means, then the answer is No, but non-standard means should not be deemed as comparable.
	Example: contract requests can be done on-line or via fax with no substantial difference in business result to service requester.		
11	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?	No.	Yes, the upload of Offers and Bids is not covered by GISB today and these items are the items mentioned by one service area in the industry. There are other items that cause the same problems and they need to be identified and addressed starting with the most common functions and working our way through, not in a reactive manner.
	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?		
12	Should we define "Look and Feel" to include content and appearance (presentation)?	No.	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.	YES
	Should GISB stop at the means of finding and getting to pages and electronic format of the downloads?		Yes
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.	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?		Stop
15	Should Web EBBs (if implemented for transactional functions) communicate with the TSP's business systems using GISB EDI/EDM?	Yes.	Yes, as a minimum they should afford all mechanisms of communication equal functionality to that provide using GISB EDI/EDM.
	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.	Yes.

	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".		I don't agree with the example, though. My example would be that there could be other issues or solutions that need to be reviewed by 2001. What we have today is a starting place.
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.	No, we should make a finding that the transition is accomplished via standardization of transaction functions into EDI and making them available via EDI/EDM.
	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.	Yes.
	Example: GISB would pass a standard that says that we make no finding as to the implementation timing of our standards.		

QUESTIONS ON THE PROPOSED INTERNET TRANSITION MODELS

RESPONSES FROM SYLVIA MUNSON

Questions from Mike Bray

1. Item 3 seems to state that a subset of EBB transactions should be identified for standardization yet Item 4 seems to state that all EBB transactional functions should be standardized. Please clarify.

Answer - Item 3 states that there is a group that remains to be standardized - we've already standardized 32 transaction sets in GISB, but we haven't standardized all transactions that are conducted via EBBs. Item 4 says that all of the transactions, whatever they are once they are documented via Item 3, should be included in standardization. There are reports and views that TSPs offer on their proprietary EBBs today. If those reports and views are derivable from information that is readily available in EDI transaction sets (either from the service requestor or the TSP), then there is no need to standardize that report or view into a common format because that information should be considered a feature of the proprietary EBB. If the report or view contains information that is not readily available in EDI transaction sets and therefore could not be provided in a comparable manner by a software vendor, then the information does need to be standardized in an EDI transaction set and made available or provide to the software vendor who elects to support those same functions.

2. Does Item 9 apply to only transactions that are standardized per Items 3 and 4? Does Item 9 mean the transactional web page should perform the same business functions as the standard EDI data sets with the TSP choosing how to communicate to the backend?

Answer - Since Items 3 and 4, as explained in question 1, includes all transactions that are conducted electronically, then, yes, Item 9 applies to those same transactions. Item 9 means that the functions that can be accomplished via 'any' transactional web page, whether that web page is required or optional, should accomplish a business transaction in the same manner as it has the opportunity to be accomplished via standardized EDI. This leads to the premise that the opportunity to perform business in a manner comparable to the proprietary offerings must exist for software service providers to be able to compete in the marketplace.

3. Is Item 12 proposing the non-core data sets would be used on a mutually agreeable basis?

Answer - yes. The core data sets would be those that are necessary to conduct business and the core may need to include some business conditional data sets to accommodate disparate practices. The non-core data sets would be mutually agreeable - such as value added features that a TSP would choose to provide.

4. Given that it has taken 8 months to prepare the proposal to the GISB EC for common look and feel standards for the 9 documents for non-transactional postings, what schedule is being proposed for GISB to define common look and feel standards for transactional functions? When would TSPs be expected to implement these standards? What are the TSPs expected to implement for 6/1/1999?

Answer - (Note - this is the exact same answer as I gave for Norm Walker's Question #3) Well . . . I didn't really associate time frames with my model. It was one of those 'this page intentionally left blank' scenarios. I strongly feel that transactions should not be moved to the Internet until they are standardized into GISB standard data sets. But this position leaves room for parties to impede the process of standardization of those transactions in order to slow down the transition. I definitely don't want that to happen, but I don't want to break open the chick's shell until the chick is ready to breathe on it's own. My bullet # 3 stated that we should begin the approach with an industry survey to determine the

range of transactions that remain to be standardized. This survey should determine our timeline. The existing standardized data sets are already available via the Internet and it would be silly for us to say that they have to be done by June '99 because they've already been done. The problem with these datasets, as we stated in our filing on March 31, is that they do not include all of the transactions and information that is required by pipelines so that a service provider can offer a comparable level of service. We need to take the steps by June '99 to ensure that the 'whole picture' for transacting business on the existing transaction sets in GISB is in place via X12 on the Internet by June '99. Additional transactions and should be addressed on an aggressive timeline that may include implementation by June '99. The problem right now is that we don't know how much work we've got to do to accomplish this, so it is premature to decide whether we can deliver on the projected date.

Questions from Norm Walker

1. Does your model preclude pipelines from offering EBB functions as part of their cost of service?

Answer - yes, per GISB Standard 1.1.11 - users of such services should bear the cost. It is appropriate for pipelines to include mandatory EBB services in their cost of service. As Altra stated in its filings to the FERC on December 18, 1997 and on March 31, 1998, proprietary (non-standard and/or non-mandatory) services that a pipeline elects to offer via their EBB should not be included in their cost of service. This practice gives a competitive advantage and built in funding mechanisms for a pipeline's proprietary solutions that are not afforded to a software vendor.

2. Does this model expressly preclude a transportation service provider, who is responsible for the safe and efficient operation of the pipeline system, from exceeding what ever standards are established to improve the response time in collecting and processing information to better serve their customers and manage the physical facilities?

*Answer - no, as long as the means that they offer to exceed the standard is available in a comparable manner across all media by which that transaction **can** be conducted. By this I mean that a TSP can give their proprietary solution a 15 second response time if they can also give their EDI solution a 15 second response time. If a software vendor is not able to compete with a pipeline's front end software to utilize the pipeline's excellent response time, then that is a limitation that the software vendor must deal with. Of course, this comparability should only apply to transactions where the source of the information is outside of the TSP's office. This has no impact on transactions that are conducted internally between the departments of a TSP and that have no required electronic input from outside sources.*

3. What are the time frames associated with your model?

Answer - Well . . . I didn't really associate time frames with my model. It was one of those 'this page intentionally left blank' scenarios. I strongly feel that transactions should not be moved to the Internet until they are standardized into GISB standard data sets. But this position leaves room for parties to impede the process of standardization of those transactions in order to slow down the transition. I definitely don't want that to happen, but I don't want to break open the chick's shell until the chick is ready to breathe on it's own. My bullet # 3 stated that we should begin the approach with an industry survey to determine the range of transactions that remain to be standardized. This survey should determine our timeline. The existing standardized data sets are already available via the Internet and it would be silly for us to say that they have to be done by June '99 because they've already been done. The problem with these datasets, as we stated in our filing on March 31, is that they do not include all of the transactions and information that is required by pipelines so that a service provider can offer a comparable level of service. We need to take the steps by June '99 to ensure that the 'whole picture' for

transacting business on the existing transaction sets in GISB is in place via X12 on the Internet by June '99. Additional transactions and should be addressed on an aggressive timeline that may include implementation by June '99. The problem right now is that we don't know how much work we've got to do to accomplish this, so it is premature to decide whether we can deliver on the projected date.