



To: GISB

From: Donna Greif, Enron North America

Subject: Comments on Requests R97064E, R97064F, and R97064G

Date: February 20, 2001

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R97064E, R97064F, and R97064G request the creation of ANSI Compliant documents to support Transportation/Sales Invoice, Service Requester Level Charge/Allowance Invoice, Shipper Imbalance, Nomination Quick Response and Confirmation Quick Response EDI Transaction Sets. Enron North America (ENA) respectfully asks the Executive Committee to deny these requests.

ENA has successfully implemented GISB's current ANSI documents with several dozen pipelines throughout the industry. The ANSI documents GISB has in place today work, raising the question, why fix what's not broken?

The re-writing of these documents will result in an exorbitant amount of time and costs associated with hiring IT personnel to re-write the code, training IT staff on GISB rules, and extensive efforts to coordinate/re-implement changes across the national pipeline grid. Costs would impact all segments of the industry. Those trading partners who use EDI with more than one pipeline will be required to maintain two sets of code, as new ANSI compliance implementation will be staggered due to pipeline waivers. In addition, many pipelines do not support a test environment, making it impossible to run in a "parallel" mode. Testing of new code is critical especially for time sensitive data.

GISB is currently in the process of exploring the possibilities of incorporating XML into the EDM standards. GISB's limited time and resources would be better served by focusing on new technology rather than on changing existing code when no compelling reason exists for that change. ENA would rather wait until GISB completed its development of XML standards rather than rebuilding X12 already successfully in place today. (Note: ENA does understand that there have been no finalized decisions regarding development of standards for XML; but have heard statements that GISB will wait to re-develop ANSI standards for Capacity Release until XML decisions have been made. If that is the case, why can't we wait on all the other datasets too?)

The industry used ANSI documents from another industry and incorporated them into successful datasets that are used in production today. In fact, ENA has implemented a substantial array of those datasets with over 30 pipelines. The above referenced requests ask the industry to recreate what has already proven to work quite well in its current form. ENA's EDI team would like to continue to move forward on EDI implementation with all of the GISB datasets with all the FERC regulated pipelines. This request will freeze all progress to move forward, as we will be required to re-implement with those pipelines already in successful production today.

ENA realizes that these requests date back to 1997 and that GISB has done a considerable amount of work to create ANSI approved documents for the Gas Industry. ENA understands that we are submitting comments at the tail end of development and GISB is done and ready to approve. At the same time, since the request in 1997, much development with the current ANSI documents has been completed by many companies within each industry segment. In a way, time may have proven that the need for change is not as critical as once thought. **The documents used today work.** It is our understanding that GISB's reasoning for creating new documents is to ensure ANSI documents have the ability to manage future/current requests. But no specific requests have been made to suggest future/current requests can not be incorporated into the documents in place today. In addition, ENA also recognizes that GISB has a concern that they are maintaining code lists, not ANSI.