

## **Comments of Enron Interstate Pipelines Regarding Proposed GISB Intraday Model & Standards**

As noted in previous comments, the Enron Interstate Pipelines strongly support the intraday compromise model, and look forward to acting on the proposal as a comprehensive package of standards and principles at the upcoming EC meeting.

The Enron Interstate Pipelines have only a few comments and concerns, as set forth below:

- We agree with recent comments in the FERC NOPR in Docket No. RM96-1-007 that an explicit confirmation standard is appropriate for confirming intraday nominations at interconnect points. Existing standard 1.3.22 (the so-called “lesser of rule”) simply does not fit with the new intraday framework in which parties expect to coordinate grid-wide activity at the GISB synchronization times. We believe that the proposed standards generally reflect this change to encourage explicit confirmations with one notable exception. The current language regarding intraday decreases continues to employ a “lesser of “ convention, instead of an explicit confirmation rule. We hope that this is an oversight, and will be prepared to offer suggested language at the EC meeting.
- Recent additions to the proposed standards which would exempt bumped interruptible shippers from all penalties have serious implications for pipeline integrity. We do not expect that we will be able to support an intraday model which gives certain shippers carte blanche to engage in non-performance. A more detailed description of our concern is set forth in our written comments to the FERC NOPR.

Again, the Enron Interstate Pipelines are encouraged by the progress of the intraday task force. We commend the Chairs of the task force for their hard work and perseverance, and look forward to adopting a comprehensive set of intraday standards at the January 8-9 EC meeting.