

August 9, 2000

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

Rae,

The Enron Gas Pipeline Group (GPG) submits the following comments on the recommendation that is posted for request R97011.

As noted on page 3 of the recommendation, the Business Practices Subcommittee (BPS) sent an instruction to the Information Requirements Subcommittee. Below is an excerpt from that instruction:

“... Modify the condition of the Replacement Shipper Contract Number in the Offer Upload Final Disposition such that the winning bidder’s contract number be communicated to *that* winning bidder. ...” (emphasis added)

Currently, the Condition of the Replacement Shipper Contract Number data element is as follows:

“Mandatory when this document is sent to the *prearranged* replacement shipper that was awarded the offer.” (emphasis added)

This current Condition requires that a contract number be sent to the ‘prearranged’ replacement shipper, but it does not address sending the replacement contract number to the other winning bidders. Although the data set *allows* for the contract number to be sent to the other winning bidders, we believe that the intent of the instruction from BPS was to *require* that each winning bidder receive its own contract number. If the identities of multiple winning bidders are included in the same data set, only the contract number of the winning bidder that is receiving the data set would be required to be included.

We believe that this was the intent of the BPS instructions and that these instructions have not been incorporated into the recommendation. The current Condition only requires the contract to be sent to a ‘prearranged’ replacement shipper, and not to any other replacement shippers. We believe this is a hold-over from the previous use of the data set when it was used only for prearranged deals. Some of the hold-over language also still appears in the Technical Implementation of Business Process.

Thank you,

Theresa L. Hess