

December 8, 2000

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

Re: Comments for December 14, 2000
GISB Executive Committee Meeting

Rae,

Enron Transportation Services (ETS) submits the following comments regarding the GISB recommendations that have been posted for industry comment. Comments are due by December 8, 2000 and will be addressed at the December 14, 2000 meeting of the GISB Executive Committee.

- **R96124, et al (Shipper Imbalance)** → Per the recommendation, two data elements – ‘Adjustment Quantity’ and ‘Adjustment Type’ – are proposed to be moved to a higher level in the Shipper Imbalance data set. This was brought up during BPS’ resolution of other issues sent to it from IR regarding the Shipper Imbalance. BPS did not move the data elements from their current level. The following excerpts from BPS subcommittee meetings verify that this change has not been made.
- **BPS 1/13/00, p. 3** → Excerpt: “There was an additional brief discussion as to whether imbalances could and would exist at the point level as opposed to the contract level. Participants did not choose to pursue this avenue of discussion.”

A motion was passed at this meeting stating that the Adjustment Quantity data element is not needed at the line item level. The data element was not moved to a different level in the data set.

- **BPS 2/3/00, p. 6** → Excerpt: “Ms. Hess asked if it had been determined how to reflect adjustments on the Shipper Imbalance. Mr. Keisler said that during the January 13, 2000 BPS call, the Adjustment Quantity and Adjustment Type were moved to the same level as the contract. Ms. Hess stated that they were not moved, but she reiterated the agreement that they did not belong at the level they currently exist.”

During this meeting, it was clarified that the data elements were not being moved to a different level in the data set.

A revision such as moving a data element to a different level in a data set is within the purview of the BPS subcommittee. This type of revision may have business practice implications for both the sender and receiver of the data set, which should be thoroughly reviewed. BPS has not approved such a revision for these two data elements in the Shipper Imbalance. And, a request to do so has not been submitted to GISB.

- **R96124, et al (Shipper Imbalance)** → Per the recommendation, the data element 'Imbalance Value' is proposed to be deleted. I've researched the minutes of the BPS and IR meetings, and do not find a reference to the deletion of this data element. Is this possibly a typo in the recommendation?

Thank you,

Theresa L. Hess
Manager, GISB Business Standards
and Development