

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 1

Jerry Hahn: Opened the meeting at 9:05 AM

Mike Novak explained the logistics for the two day period.

Hahn read the antitrust statement.

Novak: Explained that each "Issue to be resolved" would have a one hour discussion limit. Because of the shortened period, an attempt to get at least one comment from each segment would be made before we revert to normal queue operation. The items on the "Issue to be Resolved" section of the agenda were reordered to handle the 'easier' issues first.

Greg Lander made a motion to adopt the agenda which was seconded and passed unanimously.

Hahn asked everyone to take 5 minutes to review the minutes from the 9/11 meeting.

Novak reviewed the minutes.

Paul Love made a motion to adopt the minutes as amended. It was seconded and passed.

Lander picked up the confirmation discussion that Donna Scott lead during the 9/11 meeting. A revised handout with a Case 6 was distributed.

Lander: A key for Case 4 - Intraday Type II - Explicit issue is "Should the non-communicating party be able to receive a different result by not communicating than it would have if it had communicated"

Case 5 is Intraday Type I (10 AM nomination for 5PM flow) and Case 6 is Intraday Type I (5PM nomination for 9PM flow). The cases have notes added which reflect that once the day has started, you can't unflow gas.

Joyce Phillips: Are these results illustrative? Are they allocations?

Lander: Yes (they are illustrative) but they are not allocations or related necessarily to physical flow.

Norm Walker: But these are the scheduling results for all flanged parties.

Lander: Yes.

Joe Bianchi. Physical flow or flowrate should not be part of the standards.

Lander: Yes.

Phillips: This is not an instruction for Gas Dispatchers?

Lander: That is correct. The gas in question has already flowed.

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 2

Hahn: We covered this in prior meetings when we said the "gas could not be unflowed".

Bob Wallenehorst: If the welded parties have agreed to a non-prorated flow, how do we handle that condition? Those operators would have to realize that non prorata flow might lead to penalties for someone.

Phillips: That would be an allocation issue. Perhaps we should drop the footnotes and leave the intraday notes as a 24 hour number.

Novak: In Wallenhorst's situation, the two parties doing the confirmation can agree to a different result, from a scheduling perspective.

Terry Fitch: I think we should keep the footnotes there. We need to explain how the numeric results flow.

Joe Kardas: This is just an illustration. It doesn't cover every case.

Hahn: I think this is adequately addressed in Standard 1.3.9

Walker: This is an ideal model assuming our expected flow rates are an even flow but so far as being a prescription for results, I'm not sure I can do this. It is a goal, however.

Lander: This is a scheduling result.

Walker: Well, can a footnote be added to spell that out in a footnote? The term "flow" means different things to different people.

Diane McVicker: But a well could have flowed a different quantity than the scheduled result.

Lander: Keep focused on that this is a scheduling result.

Walker: A factory that uses gas before 5PM (it shuts down then) can't unflow either if it loses it's supply. I can accept the results in an ideal world, but I can't live with that business result necessarily.

Lander: People may end up with imbalances. We can change things but adding asterisks to cover these situations but we need to have predictable business results.

Wallenhorst: I think producers might be forced into offering a balancing service.

Lander: That's a contracting issue. Your contract could say, buyer take at an even flowrate. When that doesn't occur, you can possibly penalize.

Fitch: I can't tell which contract is going down because an end user doesn't take gas. There may be 40 contracts at a point. There is no way to identify who is responsible. We have schedules and physical flow will differ. That's why we have PDAs.

Novak: (To Walker) The factory situation you've described is very typical for an LDC. The "deal" for the factory from a service perspective is take the gas when you need it but give it to me at an even flowrate (from a scheduling perspective) during the day. If that flow stops, you are correct in saying that I can't unflow the gas the factory has consumed. On the other hand, I design my services to penalize, outside a tolerance range, the factory for not living up to its end of the deal, i.e. delivering the gas it consumed to my citygate.

Chuck Beaver: Scheduling is about the theoretical rate of flow. The primary goal should be to get predictable business results that don't necessarily harm people. Should our results, from a standards writing perspective, be benchmarks?

Paul Keeler: In looking through a series of people transacting gas at a point, its best for the pipeline to sort out the flow. There are contracting issues between the 5 people, but that can be worked out.

John Coppens: What was the purpose of the confirmation matrix?

Lander: To get people to understand what the results of application of the "lesser of" rule to the intraday process. The discussion seems to indicate that not everyone is happy with the results.

Walker: We try to flow scheduled quantities. This has an impact on horsepower, changing plates and ultimately costs.

Lander: We are talking about scheduled quantities not flow.

Walker: But when you talk about already flowed...

Lander: I'm talking about already scheduled.

Walker: When we get to what exceeds the standards, do I help one party and hurt another?

Lander: That doesn't pass our test concerning about when standards can be exceeded.

Love: If we try to say every thing will be "win-win" we'll never get done. We've got to establish some rules and everyone in the industry has to follow the rules.

Wallenhorst: We need to consider that PDAs have to be submitted at every cycle.

Beaver: When we return from break lets take a sense of the room on where we should head with representing the "already flowed" concept in the Confirmation model: either a theoretical prorata scheduled number, or a more vague to-be-determined-by-pipeline.

Break...

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 4

Lander: With respect to the intraday nominations, confirmations and scheduling process and the processing of requests for increases, the lesser of nominated or confirmed quantity should be the new scheduled quantity;

and where there is no response or communication between the confirming parties there should be no change to the previously scheduled quantity;

...for decreases, [the Service Requesters should agree as to the quantities however absent such agreement], the lesser of nominated, confirmed or elapsed prorated scheduled quantity should be the new scheduled quantity;

and where there is no response or communication between the confirming parties, the greater of the nominated or elapsed prorated scheduled quantity should be the new scheduled quantity.

The scheduled result from the intraday nominations, confirmations and scheduling process should be the benchmark used for the allocations, imbalance and subsequent processes.

Case 4 Line items 5,6 & 7:

Line 7 was a result of line 5. 6 can stand alone. So its 5&7 vs. 6

Beaver: Line 7 & line 12 are trying to capture force majeure events.

Novak: I think its more often than force majeure. No TSP should be forced to keep someone whole (presuming it lost a supply) even though it doesn't have a request for a Service Requester.

Lander: That is the result of Line 6.

Hahn: We need to look at the matrix as a business process matrix and then come back and see if it meshes with the physical world. Markets lose their ability to take gas and platforms go down.

Lunch...

Bianchi: It's important that the pipelines have the ability to balance transactions.

Dale Davis: I agree with Bianchi, but if I have other options or services, I don't want to be precluded from offering them.

Lander: Line by Line review of Case 4:

Line 5 - Does anyone advocate this? If not, 5 & 7 collapse into 6.

Wallenhorst: Even though 5 can be gamed, from an operational perspective it's not proper to assume a change without communication. We shouldn't always assume dark motives.

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 5

Fitch: Communications are going to have to be quick. Because of this, it becomes more likely that we will miss a few people in the process. We therefore need to handle the cases where people don't communicate. There's not an intent not to communicate.

Joe Kardas: People need to communicate to make the 7/24 system work. There should be penalties for those who do not communicate.

Hahn: As a producer, I'm concerned about the laminar (steady-state) production profile. We have to recognize the difference between the production profile and the marketplace. It seems as if the burden of making the change falls on the producer. The "lesser of" rule causes a bias towards reductions.

Lander: Is there a distinction between "we tried to communicate but failed" and "there was not attempt to communicate"?

Hahn: Let's hold the vote of lines 5&7 vs. line 6 Result 1 - 31 - 1 (line 6 prevails)

Lander: 10&12 vs. 11 is the same issue.

Hahn: Let's hold the vote of lines 10&12 vs. line 11 Result 1 - 31 - 1 (line 11 prevails)

A line 25 showing an increase on upstream with a decrease on the downstream is added to the Case with the "lesser of" rule prevails (the downstream controls)

A line 26 showing an decrease on upstream with an increase on the downstream is added to the Case with the "lesser of" rule prevails (the upstream controls)

Review of Case 4 complete (no one contested the results of any of the lines other than those voted on).

Lander: We will now review Case 5 - Intraday Type I (10 AM nomination for 5PM flow)

Again we have 5&7 vs. 6 but this is for Type I instead of Type II, does that change anyone's vote?

Result 2 - 29 (line 6 prevails)

Lander: 10&12 vs. 11 is the same issue. Again, lines 10&12 vs. line 11 as similar 5&7 vs. 6.

Result 2 - 29 (line 11 prevails)

Derryl Morgan: We have power plants on our system that may take gas between 3PM and 5PM. The pipeline is hung out to dry if the gas has been delivered to the plant but the supply reduction is prorated.

Julie Dennis: Mobile Bay agrees with Morgan.

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 6

A line 25 showing an increase on upstream with a decrease on the downstream is added to the Case with the "lesser of " rule prevails (the downstream controls)

A line 26 showing an decrease on upstream with an increase on the downstream is added to the Case with the "lesser of " rule prevails (the upstream controls)

Review of Case 5 complete (no one contested the results, except as noted, of any of the lines other than those voted on).

Lander: We will now review Case 6 - Intraday Type I (5PM nomination for 9PM flow)

Again we have 5&7 vs. 6 but this is for Type I instead of Type II, does that change anyone's vote?

Result 2 - 29 (line 6 prevails)

Lander: 10&12 vs. 11 is the same issue. Again, lines 10&12 vs. line 11 as similar 5&7 vs. 6.

Result 2 - 29 (line 11 prevails)

Hahn: We need to consider a case where someone starts to flow at 5PM (via an untimely, for example) and uses a Type I to cease flow at 9PM. The least amount of flow is 1/6 or 4/24 of the daily scheduled rate. This is in addition to the case where someone is on at 9AM and goes off at 9PM; they get 1/2 or 12/24 of the scheduled daily flow.

Lander: Yes

Hahn: What about someone who was on at 9AM, got bumped at 5PM (partially), and initiates another cut for 9PM?

Bianchi: You have to consider cumulative scheduled flow for the day.

Donna Scott: If you look at this from a 1/24 of scheduled flow basis (as scheduled flow changes during the day), it works out.

Break...

A line 25 showing an increase on upstream with a decrease on the downstream is added to the Case with the "lesser of " rule prevails (the downstream controls)

A line 26 showing an decrease on upstream with an increase on the downstream is added to the Case with the "lesser of " rule prevails (the upstream controls)

Review of Case 6 complete (no one contested the results, except as noted, of any of the lines other than those voted on).

Hahn: Lander will conduct a teleconference to discuss the physical side of the matrix.

Lander: Now, does the language I previously offered still make sense?

Love: Would 'Prorated Previously Scheduled' might be a better word than 'Elapsed Prorated Scheduled'.

Davis: I think the 'benchmark' language is not necessary. It's a restatement of the obvious.

Lander: But it was an issue in this meeting today.

Fitch: I move that we take a sense of the room that we accept Lander's Language as footnotes for the confirmation matrix.

Lander: I'll re-read the language:

*With respect to the intraday, nominations, confirmations and scheduling process and the processing of requests for increases, the lesser of the nominated or confirmation quantities should be the new scheduled quantity. Where there is no response communication between Confirming Parties there should be no change to the previously scheduled quantity.*

*With respect to the intraday, nominations, confirmations and scheduling process and the processing of requests for decreases, the service requesters should agree to the quantity. However, absent such agreement, the lesser of the confirmation quantities but in any event no less than the elapsed prorated scheduled quantity should be the new scheduled quantity. Where there is no response communication between the Confirming Parties, the greater of the unresponded to confirmation quantity or the elapsed prorated scheduled quantity should be the new scheduled quantity.*

*The new scheduled quantity resulting from the intraday nominations, confirmations and scheduling process should be the benchmark used for the allocations, imbalance and subsequent processes.*

Hahn: Terry, let's keep the vote on this until tomorrow.

Fitch: OK

Hahn: Let's move on to agenda item 1) New Name for cycles. Take the ballot home and mark your choice.

*Timely Nomination - Late Nomination - Intraday Nomination I - Intraday Nomination II*

*or*

*Timely Nomination - Cycle 2 Nomination - Intraday Nomination I - Intraday Nomination II*

We'll tally the vote tomorrow.

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 8

Beaver: Reviewed the minutes from a conference call which boiled the choices down to two. These are labels, they do not impact any standards. We can change standards to conform to the new labels.

Lander: I don't think the names have been thought through. They seem to limit the number of cycles we have. If we want to add cycles, we may need to change names.

Ishikawa: I'd like to hear more of the merits of some of the options.

Hahn: Lander naming proposal added to ballot:

*Timely - 6PM - Intraday 10AM - Intraday 5PM*

Walker naming proposal added:

*Cycle 1 - Cycle 2 - Cycle 3 - Cycle 4*

Hahn: The chairs have a proposal for the capacity release item on the agenda. Please review it before tomorrow morning.

This is an excerpt from the draft letter:

*...the Intraday Nominations Task Force requests that existing Capacity release standard 5.3.2 be reviewed to determine the feasibility of same day flow and, if workable, modify existing GISB Standards accordingly.*

Meeting Adjourned for 9/17

Meeting Restarts on 9/18 at 9:20AM

Hahn read the Antitrust statement.

Hahn: The discussion on naming of cycles will be limited to 30 minutes.

Lander: '*Timely - 6PM - Intraday 10AM - Intraday 5PM*' works best because its clear what time the nomination is due. New cycles can easily be inserted

Walker: Cycle 1-2-3-4 is simple. If we add cycles we can re-number. Military time might be an option for the future.

Cynthia Corcoran: I think it is important to distinguish between nominations for the next day from those that for the current day.

Lander: I'll modify mine to '*Timely Next Day - 6PM Next Day - Intraday 10AM - Intraday 5PM*'

Corcoran: Are our times cast in stone yet?

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 9

Novak: No but the 'labels' could change if a time changes.

Hahn: Picking a convention that doesn't tie into times gets around that problem. While the ballots are being collected, let's begin the discussion on the Capacity Release issue. Basically, we think the timeline could accommodate some form of same-day capacity release. The question is whether this task force should handle that issue.

Lander: I move that we develop a formal request for a standard on this subject and then move it through normal procedures. (Triage, EC, etc...)

McVicker: Second

Donna Scott: Could that request be handled before we are done? I'm not sure that makes sense.

Hahn: It would have to be handled after the Intraday Task has finished.

Walker: I'd like to amend the motion to make Lander the spokesperson for the Task Force on this issue alone.

McVicker: Second

Corcoran: I don't support this because it changes underlying service concerns.

Davis: We shouldn't take an advocacy position on this issue.

Hahn: I agree but we have to handle this issue somehow. It has been in our minutes.

Lander: I'll change my motion to say that the Task Force doesn't have to handle the issue. I'll set up a separate request on my own.

McVicker: Second

Lander: The motion says: *THE INTRADAY TASK FORCE WILL NOT BE DEALING WITH THE ISSUE OF SAMEDAY NOMINATIONS FOR CAPACITY RELEASE AWARDS AS A REQUEST FOR STANDARD TO MODIFY THE 5.3.2 TIMELINE WILL BE MADE AND PROCESSED ACCORDING TO GISB PROCEDURES.*

Novak: This motion presupposes that "day of" capacity release exists. I don't think that's proper.

Walker: Let's recast it as "*The intraday task force has considered "day of" capacity release and has determined that this is not within their scope.*"

Lander: I now withdraw my motion.

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 10

Hahn: Is there any opposition?

Lander: I believe it is in scope but it will be handled elsewhere.

Hahn: Other than this comment, I'll record there is no opposition.

Hahn: Let's move on to the rollover issue.

Bianchi: I don't want to degrade the timely nomination by allowing the untimely to rollover. The untimely nomination shouldn't be just as good as a timely nomination.

Phillips: In the development of the datasets, we determined that each day within a date range was a new nomination. Until we made this distinction, no rollover made sense. This being clear, I think the issue goes away and it doesn't present a problem to have a rollover. The reason the standard was crafted was different than this issue (it was a technical issue).

Lander: The issue is "What is the balance between the incentive system and customer ease."

Jay Story: Our customers have told us they want rollover.

Walker: I'd like to hear from shippers.

McVicker: I'd like it to rollover.

Ishikawa: I'd like a rollover. It's a matter of convenience for shippers. Let's not call it a rollover but instead a "Date Range".

Novak: As a shipper I think convenience should prevail but as an LDC that is becoming more of a TSP, I think integrity of the 11:30 AM deadline is important. The tendency will be for people to wait for the Late Nomination.

Gary Payne: I'd like to see the Date Range processed.

Wallenhorst: Are we creating an aftermarket? I don't support giving people an incentive to wait until 6PM.

Love: Our customers voted against a Date Range. We have a priority of service concept in our tariff that makes it best that intradays don't rollover. They shouldn't have priority over a timely nomination for the next day.

Hahn: I think to reverse a prior decision (no rollover) doesn't make sense. Decisions have been made based on the prior decision to favor "no rollover".

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 11

Davis: I agree with Love. For those that don't have flowing gas priority, I can see how this isn't a big deal but for those of us who do it is a big deal. An untimely nomination could undo the schedule for the next day.

Walker: If we were starting with a clean slate, I'd opt for date range. But we made a call and spent resources on putting that standard in place. Keep it the way it is.

Beaver: There is a technical solution to Davis and Love's problem. Gas that started to flow off an intraday could be distinguished from other gas that was already flowing. There is a date range.

Ishikawa: I'm somewhat sympathetic to money concerns but there will be several system changes. I'm not sure how much the incremental cost really is. The shipper could submit nominations at the same time to defeat the incentive that people are trying to retain.

Story: I'd like to make a motion that "*The intraday task force will not address the date range issue*". Let's rely upon our existing standard.

Kardas: Second

Novak: Doesn't that give the effect of saying no Date Range will be processed.

Hahn: Yes

Lander: We are being silent on the issue.

Beaver: Aren't we saying the date range for the untimely has a date range of one day.

Hahn: Some pipelines do allow a rollover though.

Phillips: We are processing our shippers requests. If they request a date range, then we can process it.

Novak: I see an inconsistency. A late nomination submitted to interconnecting pipelines with a date range. One processes that date range and the other only processes one day. This is inconsistent. We should have a consistent system, either way, across the grid.

Corcoran: These are voluntary standards.

Love: You can achieve consistency by submitting a one day nomination (late) to both pipelines followed by a subsequent date range nomination (timely). Both will process these nominations, but in their own way.

Novak: I see what you mean.

Hahn: The vote on the motion: PASSES 31 - 2

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 12

Hahn: Agenda item 4) [old 2] Can an Untimely Nomination bump gas scheduled under a lower priority service that was nominated under a Timely Nomination? Does any one disagree that the 8/25 model addresses this?

Editor's Note: There was no opposition.

Hahn: 3) [old 5] Can a continuous scheduling pipeline interface with a batch pipeline? My question is it even possible for a continuous pipeline to bump?

Keeler: By FERC order, with 4 hours notice, yes.

Hahn: By agreeing to the confirmation matrix yesterday, isn't the framework for the grid wide sync up in place. A continuous pipeline would be available at a sync up time just as a batch pipeline would be.

Lander: But won't a continuous pipeline between two batches try to process and confirm out of sequence and thereby the nomination won't be scheduled? I think we need a standard to ensure that the continuous pipeline hold on to the nomination until the batch is ready.

Walker: Why wouldn't things work properly now?

Love: As a continuous pipeline, we would try to confirm it that way now but if we couldn't we would look at the source and if it was batch, we would confirm batch.

Lander: I'm concerned that we would fall into a "No response" if the batch didn't respond.

Phillips: As a continuous pipeline, it sits in my system until the batch is ready to confirm.

Lander: The standard would be:

*A TSP receiving an intraday nomination for a flow period prior to the applicable Grid-wide confirmation coordination process deadline applicable to such flow period should hold such nomination for processing (leave it standing) until the nomination receipt deadline applicable to such flow period has passed.*

Coppens: But what about the 4 hour standard?

Lander: We'll ultimately drop it.

Lunch...

Lander: Introduced a couple of standards concerning interface between continuous and batch TSPs with respect to holding intraday nominations

Walker: Isn't this language already in the 8/25 model?

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 13

Fitch: I'm concerned that I might have to hold a nomination, i.e. not process it at my next cycle. Aren't we being forced to label what cycles a nomination should apply to?

Lander: People shouldn't send in nominations too far in advance, e.g. Sunday for Thursday but any time after Wednesday 11:30 AM seems reasonable.

Kardas: People shouldn't be forced to resubmit nominations if they miss a deadline for a cycle.

Walker: (To Fitch) Would you try to confirm confirmation of an intraday well in advance of the day it applies to?

Fitch: I'd give the quick response back, for example, right away but I'd process (confirm and schedule) at the appropriate time.

Walker: The distinction between the different phases of processing is important.

Lander: Words can be added to the standard to make that distinction.

Beaver: (To Fitch) Could you hold grid nominations but process continuous right away?

Fitch: I'm not continuous but I'd use the effective start date and time of the nomination to determine what cycle it applies to and base the confirmation time off that.

Beaver: Can't we just say "Continuous pipelines should hold the nominations until the grid-wide confirmation time"?

Lander: Grid-wide confirmation time isn't defined yet but if it was, yes.

Davis: Isn't the logical extension of this that we would require a cycle identifier on the nomination? I don't want to go that way. Isn't the effective date-time an indicator as to when flow might start? I'm not sure what the quantity implications are.

Lander: If we've said you can't go off the time the nomination was received or what the effective date-time, what do you do? We have to pick some way to identify the time?

Davis: I want to discuss the business need from a processing point of view.

Story: We were told in our FERC Order that we couldn't demand that our shippers provide us with an effective time. We are a batch pipeline. We've told our shippers not to send something in between batches that might disadvantage them at batch time. The onus is on the shipper to nominate properly.

Love: I agree somewhat with Transco. We should process the nominations at the next batch time. Standard 1.3.9 makes the hours not important.

Tammy Lee Jaquett: If I receive a nomination for 10AM at 10:05AM do I reject it or do I hold it to 5PM?

Hahn: You could always waive the deadline.

Lander: You could do either of your options. It's your call. You can process it when you want but you don't process it **for** a time other than what the shipper wants.

Beaver: Should we address whether we should have a label on the nomination as a part of the standards development time? Can we look again at date any time? Receipt time stamp?

Hahn: The label has been rejected before.

Lander: Yes, perhaps we've learned more since then.

Teresa Hess: I think we really need some way to distinguish what we are processing. The effective time is what I think would work best.

Bianchi: I don't want to store future nominations but if we have to on an intraday basis, I think Hess has the best approach.

Fitch: Let's focus on the original two standards. If I'm continuous and my welded party is batch, I should hold the nomination until they are ready. We want to make sure that a continuous pipeline doesn't throw sometime out because the batch isn't ready.

Walker: (To Beaver) When you write standards, for time considerations, don't worry about flowtime. Confirmation time (i.e. when the shipper wants us to confirm) is what matters.

Hahn: The chairs want to hand the nomination cycle to which the request will apply, if it should apply, to the Standards group. Lander's proposals along with Beaver's will also be handled.

Editor's Note: The Lander proposals are:

*A TSP performing continuous processing (confirming and scheduling) of nomination, which TSP receives an intraday nomination for a flow period which nomination, to be confirmed and scheduled, involves coordination between the TSP and one or more up or downstream Confirming parties which are not performing continuous processing, should hold such nomination for processing (leave it standing) until the confirmation and scheduling process associated with the nomination receipt deadline applicable to such flow period has passed,*

*A TSP which performs batch processing (confirming and scheduling at least associated with the Grid-wide confirmation coordination process deadlines) of nominations, which TSP receives an intraday nomination for a flow period prior to the applicable Grid-wide confirmation coordination process deadline applicable to such flow period should hold such nomination for processing (leave it standing) until the confirmation and scheduling process associated with the nomination receipt deadline applicable to such flow period has passed,*

Lander: Do we need a definition for Continuous? Without one, I think many interpretations could evolve. What about first come capacity issues?

Chair's note: This closes the discussion on "Can a continuous scheduling pipeline interface with a batch pipeline?"

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
FINAL MINUTES  
PAGE 15

Hahn: The results of the cycle naming ballot show that by 15-14

*'Timely - 6PM - Intraday 10AM - Intraday 5PM'*

*is preferred over*

*Timely Nomination - Late Nomination - Intraday Nomination I - Intraday Nomination II*

Hahn: The next Intraday Task Force meeting will be November 11 or 12 depending upon the date of the EC meeting in Washington.

The standards group will have teleconferences and we'll try to have a face to face meeting for October 17. If the standards group is done early, we could have a full Task Force meeting.

Break...

Beaver: The first standards call is tentatively 9/26 at 10AM. The second call will be October 3, time uncertain. The third call would be October 8 or October 10.

Hahn: Now issue 6) [Old 4)] What does "exceeding the standard" mean in the intraday world? Is it possible to exceed the standard? A short answer is Yes, if confirmations can be made.

Novak: You have to consider the GISB definition of when and under what circumstances someone may "exceed the standards". It won't be often but it is possible.

Hahn: For example, a continuous pipeline that does not have grid interconnects can do what it wants in this matter.

Wallenhorst: I'm concerned that a transaction being bumped on an upstream pipeline (a continuous pipeline that is exceeding standards) could result in a decrease on a downstream pipeline.

Novak: It's a supply disruption. That happens now.

Love: But shouldn't the bump only occur at grid sync up times?

Novak: Yes

Story: I think we have the rules to cover every situation. All people have to do is a little math to come up with the right quantity for confirmation purposes. The flow may occur differently but that's OK.

Hahn: Does the lesser of rule only apply at sync up times?

Love: That may be too far.

Hahn: But if there's agreement at a non-sync up time via the confirmation process, that's fine.

Bianchi: Anything outside the sync up times should be by mutual agreement.

Hahn: As a hand-off to the Standards, could we say the following:

- 1) Bumping that requires synchronization across the grid occurs at grid wide sync up times*
- 2) Confirming parties are not required to support confirmations at other than sync up times.*
- 3) The "lesser of" rule is a default mechanism that applies at grid wide sync up times only.*

Gracey: I'm concerned that I don't have a good definition for grid. Perhaps if we said interstate grid.

Fitch: If you are working with your customers and want to do whatever at any time, fine. But if you are talking about the interstate grid, then there are specific times.

Daly: Bumping outside sync up times requires explicit confirmation.

Novak: I think Story was on the right track about doing the math and converting the quantities to sync up time quantities.

Hahn: I think we don't need to address item 6) any further.

Corcoran: Second

Hahn: Now consider 7) Should there be any limitations placed on the number of intraday nominations placed during a day? A nomination cycle? Are limitations inherently inconsistent with the goal of continuous and contiguous scheduling?

Bianchi: I'm not in favor of limits but there are time constraints. We need to revisit the processing time.

Fitch: I agree. I don't want to count either.

Hahn: We'll need to revisit this at some point. Item 7) will be continued at the next meeting.

Meeting Adjourned.

INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
 FINAL MINUTES  
 PAGE 17

INTRADAY TASK FORCE

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9/17/97

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INTRADAY TASK FORCE MEETING - SEPTEMBER 17-18, 1997 - NIAGARA FALLS, NY  
 FINAL MINUTES  
 PAGE 18

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