

First Draft response to Request for Interpretation C03005

Text of Request:

Standard 3.3.14 states that “the transportation invoice should be prepared on or before the 9th business day”. What is the definition of “prepared”? Is the intent of this standard that the transportation invoice should be mailed on or before the 9th business day or that it should be “rendered” on or before the 9th business day?

Text of WGQ Standard 3.3.14:

The imbalance statement should be rendered prior to or with the invoice, and the transportation invoice should be prepared on or before the 9th business day after the end of the production month. Rendered is defined as postmarked, time-stamped, and delivered to the designated site.

Text of Interpretation:

Prepared means “made ready”. The intent of the standard is that the invoice be rendered or “made available” to the Service Requester (“SR”) on or before the 9th business day of the month. Mailing the invoice is one form of rendering the invoice to the SR. It is implied that the invoice be prepared prior to it being rendered. The invoice could be prepared the same day it is rendered but preparation must take place prior to it being rendered.

The date the invoice is rendered is more significant than the date it is prepared. For example, an invoice prepared on the 8th business day but not rendered until after the 9th business day is late with respect to WGQ Standard 3.3.14. That the invoice was prepared in advance of the 9th would be of no consequence to the SR.