

Outline of Intraday process with an industry-wide standard Bump process:

- 1) The standard synch up times are 9 AM, 3 PM, and 9 PM.
- 2) The standard nomination deadlines are 11:30 for regular nominations, 6 PM calendar day prior to gas day for Type II, 10 AM of gas day for first Type I, and 5 PM of gas day for the second Type I.
- 3) Type II noms may bump scheduled gas with notice to affected shippers and confirming parties by 8 AM (via a scheduled quantity document) and effective flow at the 3 PM synch-up time of gas day.
- 4) Type II noms which do not bump may be scheduled with notice to affected shippers and confirming parties by 8 AM (via a scheduled quantity document) and effective flow at 9 AM start of gas day synch-up time and if not scheduled to be effective with the 9 AM start of gas day synch-up time, should be scheduled with notice to affected shippers and confirming parties by 8 AM (via a scheduled quantity document) to be effective with the 3 PM synch-up time.
- 5) The first of the Type I nominations may bump scheduled gas with notice to affected shippers at 2 PM (via a scheduled quantity document) with effective flow at the 9 PM synch-up time of gas day.
- 6) The first of the Type I noms which do not bump are scheduled with notice to affected shippers at 2 PM (via a scheduled quantity document) to be effective with the 3 PM synch-up time of gas day.
- 7) The second of the Type I nominations do not bump scheduled quantities and are scheduled with notice to affected shippers at 9 PM (via a scheduled quantity document) to be effective with the 9 PM synch-up time of gas day.
- 8) Bumped service requester(s) and confirming parties always have at least two hours and in one case up-to thirteen hours notice (via a scheduled quantity document) prior to the next intraday nomination deadline; and these parties have the opportunity to attempt to schedule gas so as to avoid "shutting in or shutting off" gas.

Issue Num	Issue Description	Concept	Explanation	Standard
1	Confirmation rule for no/incomplete confirmation.	No communication with respect to the subject transaction(s), no change.	Lack of communication with respect to the subject transaction(s) equals no change up or down in quantities.	1.3.A With respect to the intraday confirmation process, the lesser of rule applies when there is communication between confirming parties with respect to the subject transaction(s). Absent an alternatively agreed upon convention such as confirmation by exception, if no response communication is received with respect to the subject transaction(s) no change is made.
1	Confirmation rule for numbers that don't match.	Where communication with respect to the subject transaction(s) occurs, the lesser of rule applies.	This allows for consistent programming of confirming parties' scheduling applications as between regular and intraday nominations	same as above
1	Confirmation rule for no nomination on one side.	Where communication with respect to the subject transaction(s) occurs, the lesser of rule applies.	Lack of communication with respect to the subject transaction(s) equals no change up or down in quantities.	same as above
1	Consider application/changes to "Lesser of rule".	See proposed standards 1.3.A and 1.3.B	This allows for consistent programming of confirming parties' scheduling applications as between regular and intraday nominations	same as above
1	Consider explicit confirmation rules.	The default convention for confirmation between confirming parties is the explicit confirmation process.	Provides a known and predictable default which governs in the absence of agreement between the parties to any other convention including confirmation by exception.	1.3.B With respect to the nomination, confirmation and scheduling process, (including intraday nominations and changes), parties may agree to an explicit confirmation process or to a confirmation by exception process. In the absence of agreement to the contrary, the parties are expected to support the explicit confirmation process. The "explicit confirmation process" is so named because it requires that the confirming parties respond to requests to confirm and that the resulting quantity so confirmed (according to the lesser of rule) is unambiguously the entire quantity for that particular level of confirmation for the subject scheduling interval as agreed upon between the confirming parties.

1	Consider confirmation by exception rules.	The confirmation by exception process should be defined and standardized. This should include default time intervals which (absent mutual agreement to the contrary) upon expiration where no exception was taken, the transaction(s) is/are considered confirmed and can be so scheduled.	Provides a known and predictable process for confirming parties wishing to rely upon the party requesting the confirmation to schedule the subject location(s) according to the requested transactions unless exception is taken by the confirming party.	1.3.C Interconnected parties may agree on a confirmation by exception process. Confirmation by exception means that that the interconnected parties may agree that one party may deem that all requests for change at a location are confirmed by the other party; unless the party confirming by exception takes exception, by informing the party seeking to effect the change, of their exception to the change(s), within one hour from receipt of the applicable document. One hour is the default exception time period, absent mutual agreement to the contrary. Mutually agreed upon exception time period(s) may be any interval; provided, the expiration of such time period is a time sufficiently prior to the time for receipt of scheduled quantities to allow processing and sending of same.
2	Effect of 9 AM eff. TM from Type II noms on supply demand balance in gas market.	Bump on Type II noms not effective until 3 PM synch-up time. Type II Noms on a no bump basis would start no later than the 3 PM synch-up time but could with agreement of services requester and confirming parties be scheduled at 9 AM start of gas day.	If FT shippers are assured of 9 AM start time for nominations not made until 6 PM prior to gas day, it is likely that a bifurcated gas market will evolve, one for firm late in the day transactions and one for timely yet in certain cases uncertain to flow noms (i.e., IT and other interruptible services such as overrun). This would not seem in the interest of all participants in a seamless reliable and stable gas market.	1.3.D Where a Type II nomination is made which would require a previously scheduled quantity for the applicable gas day to be bumped; notice (via a scheduled quantity document) would be provided to the all affected service requesters and applicable confirming parties (including bumped service requester(s) and applicable confirming party(ies)) by 8:00 AM; and, unless otherwise agreed to by the affected service requester(s) and confirming party(ies), the scheduled quantities would not be effective until the 3 PM synch-up time.  1.3.E Where a Type II nomination is made which would not require a previously scheduled quantity for the applicable gas day to be bumped, notice (via a scheduled quantity document) would be provided to the service requester(s) and applicable confirming party(ies) by 8:00 AM; would be scheduled to be effective no later than the 3 PM synch-up time; and with mutual agreement of the affected service requester(s) and confirming party(ies) such scheduled

2 cont				<p>quantity(ies) could be made effective with the 9 AM synch-up time.</p> <p>1.3.F For nomination, confirmation and scheduling of Type ii nominations:</p> <ul style="list-style-type: none"> <li>a) nominations leave control of the service requester by 6:00 PM and are received by the Transportation Service Provider by 6:15 PM the calendar day prior to gas day;</li> <li>b) the Quick Response is received by 6:30 PM</li> <li>c) the confirmation process begins subsequent to the receipt of the Quick Response;</li> <li>d) the confirmation process including receipt of the scheduled quantity document is completed by 8 AM; and, (1) where the nomination at 6 PM did not cause a “bump”, the scheduled quantity document relates to quantities for the service requester which would be scheduled to be effective no later than the 3 PM synch-up time; and, with mutual agreement of the affected service requester(s) and confirming party(ies), such scheduled quantity(ies) could be made effective for flow with the 9 AM synch-up time; and, (2) where the nomination at 6 PM did cause a bump, the TSP will notify confirming parties and adversely affected service requester(s) by 8 AM; and the bump would not be effective until the 3 PM synch-up time. Service requesters and confirming parties that have been notified of a bump (via the 8 AM scheduled quantity document) have until the 10 AM Type I deadline to request other arrangements.</li> </ul>
2	Effect of 9 AM eff. TM from Type II noms on rights under	In most, if not all cases what is proposed here would be	Does not adversely effect existing rights as grid-wide coordination does	See above

	existing firm agreements.	considered an enhancement to firm shippers' rights	not now exist.	
2	Effect of 9 AM eff. TM from Type II noms on No-notice service.	There is no existing or proposed standard with respect to No-notice service(s).	As No-notice service is just that, it would not be directly affected. However, more reliance on a truly workable grid-wide intraday process may reduce the utility of No-notice service.	No proposed standard.
2	Effect of 9 AM eff. TM from Type II noms on Storage service.	There is no existing or proposed standard with respect to Storage service(s).	As most storage services are nominated services the nomination rules would apply to them as well. However, more reliance on a truly workable grid-wide intraday process may reduce the utility of certain un-nominated "swing-on-storage" services.	See above
2	Effect of 9 AM eff. TM from Type II noms on IT market.	See above	If FT shippers are assured of 9 AM start time for nominations not made until 6 PM prior to gas day, it is likely that a bifurcated gas market will evolve, one for firm late in the day transactions and one for timely yet in certain cases uncertain to flow noms (i.e., IT and other interruptible services such as overrun). This would not seem in the interest of all participants in a seamless reliable and stable gas market.	See above

3	<p>What is rationale for first intraday Type I at 10:00 AM of gas day for same gas day.</p>	<p>The first Type I nomination deadline is 10 AM with the same communications time frames and confirmation and scheduling process as regular nominations. Scheduled Quantity document by 2 PM with flow synch-up at 3 PM. where the nomination at 10 AM did not cause a “bump”. Where it does cause a bump, the bump would not be effective until the 9 PM synch-up time. Thereby giving service requesters and confirming parties until the 5 PM Type I deadline to make other arrangements.</p>	<p>This gives all parties (east coast to west coast) time in the morning to address their situations and make appropriate arrangements and communicate nominations to their trading partners and TSPs. Gives adversely affected parties three hours from receipt of the scheduled quantity document notifying them of a bump to take action and make arrangements and nominations by the 5 PM deadline.</p>	<p>1.3.G For nomination, confirmation and scheduling of Type I nominations, the first Type I nomination deadline associated with the minimum Grid-wide confirmation coordination process is as follows:</p> <ul style="list-style-type: none"> <li>a) nominations leave control of service requester by 10:00 AM and are received by the Transportation Service Provider by 10:15 AM after the start of the gas day;</li> <li>b) the Quick Response is received by 10:30 AM;</li> <li>c) the confirmation process begins subsequent to the receipt of the Quick Response;</li> <li>d) the confirmation process including receipt of the scheduled quantity document is completed by 2 PM; and, (1) where the nomination at 10 AM did not cause a “bump”, the scheduled quantity document relates to quantities for the service requester which would be scheduled to be effective with the 3 PM synch-up time; and, (2) where the nomination at 10 AM did cause a bump, the TSP will notify confirming parties and adversely affected service requester(s) by 2 PM; and the bump would not be effective until the 9 PM synch-up time. Service requesters and confirming parties that have been notified of a bump (via the 2 PM scheduled quantity document) have until the 5 PM Type I deadline to request other arrangements.</li> </ul> <p>1.3.H For nomination, confirmation and scheduling of Type I nominations, the second Type I nomination deadline associated with the minimum Grid-wide confirmation coordination process is as follows:</p> <ul style="list-style-type: none"> <li>a) nominations leave control of service requester by 5 PM and are received by the Transportation</li> </ul>

				<p>Service Provider by 5:15 PM after the start of the gas day;</p> <p>b) the Quick Response is received by 5:30 PM;</p> <p>c) the confirmation process begins subsequent to the receipt of the Quick Response;</p> <p>d) the confirmation process including receipt of the scheduled quantity document is completed by 9 PM with flow to be effective with the 9 PM synch-up time. There is no bumping of scheduled quantities as a result of nominations submitted with the 5 PM Type I intraday nomination.</p>
4	With two intraday nominations (i.e., not including untimely,) industry appears to be in constant confirmations mode.	The process of nominating, confirming and scheduling transactions is the central service that TSP's and confirming parties provide to service requesters and as such it is appropriate that a customer friendly, grid-wide synchronized process be in place to take account of varying intraday market, operational, and weather conditions.	It is Impossible to predict accurately when changes occurring due to weather, market or operational conditions will occur and the proposed standards provide a periodic opportunity to respond to them.	see above
5	Should an intraday process include a process for notification to parties of changed volumes?	Yes	A gas market that takes account of both the rights of firm shippers and reasonable expectations of scheduled IT shippers provides predictability to both and will lead to a more prosperous industry for all.	See above
6	We need name for Gas nom'd and scheduled on Day 1 that does not get scheduled on Day 2 (but was nom'd for day 2).	This should be called an "unscheduled nomination".	Even where the subject transaction(s) were confirmed, the fact is the gas was not scheduled for the subsequent gas day and this is not a bump, but rather an unscheduled nomination.	1.2.A A transaction nominated and scheduled for a gas day which is also nominated and confirmed (or confirmable) for the subsequent gas day which nevertheless does not get scheduled due to a pipeline constraint is called an unscheduled nomination.

6	We need name for Gas that was turned off as a result of the confirming TSP.	This would be called a “scheduled cut”.	The gas was flowing (or scheduled to flow) on the other TSP and was cut for whatever reason by that TSP. The effect on the service requester and confirming parties on the affected TSP is that their scheduled gas was cut.	1.2.B A transaction nominated, confirmed and scheduled for a gas day which nevertheless gets cut by the confirming TSP subsequent to its having been scheduled is called a scheduled cut on the system of the TSP not initiating the cut.
6	We need name for Scheduled gas that is unscheduled by the Service Requester’s TSP as a result of other nominations to the same TSP.	This would be called a “bump”.	The gas was flowing (or scheduled to flow) on the subject TSP and was cut due to the nomination of another of that TSP’s service requesters. The effect on the affected service requester(s) and confirming parties on the subject TSP is that their scheduled gas was bumped.	1.2.C A transaction nominated, confirmed and scheduled for a gas day which nevertheless gets cut by the subject TSP subsequent to its having been scheduled due to the nomination of another service requester on the subject TSP is called a bump on the system of the subject TSP initiating the cut.
7	Is an intraday nomination for one or multiple days?	One day	It’s simpler to administer. This is because of the complications associated with the scheduling of intradays on the day they are received (which should be scheduled after other timely nominations - i.e., a lower priority except for bump) would be different than it would be when scheduled on a subsequent day ( along with other nominations from a priority point of view).	No change to existing standard.
8	How are Batch processes handled?	All nominations received after the last deadline are processed with those received prior to the next deadline as though they were all received at the same time. Their relative scheduling priority as between one another is determined by	This is the most common meaning of batch.	1.2.D Batch processing means that all transactions (nominations, confirmations and scheduled quantities) which are received after the last submission deadline are processed along with those received prior to the next deadline (or processing interval) as though they were all received at the same time.

		the tariff (i.e., FT, secondary, IT etc.)		
8	Are nominations received for processing by a Batch process pipeline considered to be all equal come if received prior to the running of the Batch process or is the time-stamp important for allocating capacity?	Yes. The time stamp is not important in Batch processing other than to determine which Batch process they are processed in.	This is the most common meaning of batch.	See above
8a	Is continuous scheduling based upon the time-stamp of when the nomination was received or the effective time of requested flow?	Daily quantities, once scheduled in a continuous mode, utilize capacity which is then unavailable for nominations with later effective times of flow.	The reliance upon time-stamp of receipt is not the determining factor as it would require “holding” capacity open for a later period, based upon when the nomination was received instead of looking at the next group of effective times, scheduling that capacity and continuing from there.	Definition for continuous and contiguous scheduling 1.2.E With respect to intraday processes, continuous and contiguous scheduling means that those nominations received prior to the initiation of a confirmation and scheduling process and which nominations relate to (request) the next effective flow time are processed and scheduled contiguously with then current scheduled transactions. Nominations with later effective times, regardless of when they were received by the TSP, may be processed together or as they are received, but in either case, will be processed subsequent to nominations requesting earlier effective times.
8b	What does first-come-first served mean in the context of continuous scheduling?	It means that the earliest requested effective time will be scheduled prior to (served first or before) a later requested effective time. This capacity is “first come”, in the day, and, given that all quantities are daily quantities, if the capacity is requested and utilized it is not available to “serve” later coming effective times.	Any other interpretation will result in gaming of the time-stamps to the point that service requesters will put in “first-come-first-served” intraday nominations well in advance of the processing time associated with their desired effective time.	see above

8c	Can we separate the concept of the grouping of transactions being processed in one computer scheduling session from the concept of batch processing?	Yes. The fact that a computer may not run continuously is distinct from the batch mode of processing.	Batch means all nominations are deemed “equal come” if received prior to the applicable nomination deadline. Continuous and contiguous scheduling and first-come-first-served scheduling are synonymous and mean what the applicable definition says they mean.	
8d	What does first come first-served mean in the context of group processing?	It means that nominations being processed at the same time are nonetheless accorded scheduling priorities based upon a combination of the tariff rules and the requested effective times, with requested effective times taking precedence as between two equal tariff priority requests.	see above discussions	
9	Address Bumping.	Bumping can occur with nominations submitted under the Type II timeline with effective flow at 3 PM. Bumping can occur with nominations submitted under the first of the Type I timelines with effective flow at 9 PM. No bumping can occur on the second of the Type I nominations.	A service requester which gets bumped, has an opportunity to request other arrangements for the same gas day. No bumping occurs with nominations submitted at the 5 PM deadline. This means that if a service requester does not get notice (via a scheduled quantity document) by 2 PM of a gas day, they know that the quantities that were scheduled as of that time will continue through the remainder of the gas day. In addition, giving FT shippers two (bumpable) nomination chances with flow to begin at 3 PM or 9 PM; plus the chance for all shippers to make	see above

			non-bumping nominations which may begin at 9 AM, and should begin by 3 PM and/or 9 PM is a sufficient addressing of the bumping issue.	
10	Avoidance of FT Shipper degradation of service with respect to the number of intraday nominations.	This has been done. And, if a bumping nomination does not impact grid-wide confirmation, then the rules of the TSP's tariff apply. Rather than degrading FT shippers' capabilities and rights, the added feature of grid-wide coordination is likely to enhance it.	This allows for grid-wide transaction coordination to be predictable; accommodate bumping -- a benefit for firm shippers, while still recognizing the reasonable expectation by scheduled shippers that they would receive notice of bumping and/or cutting in time to make other arrangements for the remainder of the gas day. Where a TSP provides more frequent intraday nominations, today -- they do so without the ability to rely on a standardized grid-wide coordination process. TSP's which provide more frequent intraday nominations can still do so and with the agreement of confirming parties can coordinate more frequently than the grid-wide minimum synch-up times.	1.3.I Continuous and contiguous intraday scheduling is on a mutually agreed basis as between confirming parties. Those Transportation Service Providers offering continuous and contiguous scheduling should, when interacting with the Grid-wide confirmation coordination timelines, schedule at least according to the minimum grid-wide coordination timelines for effective flows at the grid-wide minimum synch up times.
10	Avoidance of FT Shipper degradation of service with respect to existing bumping rights.	Having two opportunities to submit bumping nominations which at the same time provides for both grid-wide coordination and the ability of impacted service requesters and confirming parties to make other arrangements; is a fair balance between these two poles. On-system intraday bumping nominations could still occur if no impact on grid-wide coordination or with		see above

		the mutual agreement of impacted parties		
10	Avoidance of FT Shipper degradation of service with respect to unilateral pipeline decisions (relates to Note 1 on original "Chairman's Summary Alternative 2).	This proposal addresses this issue.		
11	Can effective standards for intraday nominations be developed in the absence of standards for contractual scheduling priorities?	Yes, but at the same time a process needs to be agreed to and what occurs in the cases of no match need to be addressed (i.e., the lesser of rule, etc.) .		
12	Modifications to the times in the current timeline.	There is no need to modify the current timelines in the present regular intraday process.	The proposed times for nominations and the coordination process use times in and around the regular nomination timeline.	<p>1.3.J A Grid-wide synchronization time is that time at which, at a minimum, scheduled quantity activity is synchronized as between interconnected Transportation Service Providers. This means that, as between interconnected Transportation Service Providers, their scheduled daily quantities will be synchronized at each Grid-wide synchronization time. The Grid-wide synchronization times are 9:00 AM, 3:00 PM and 9:00 PM.</p> <p>1.3.K The Grid-wide minimum confirmation coordination process(es) are those process(es) which support the ability of Transportation Service Providers to coordinate their scheduling activities in conjunction with the Grid-wide synchronization times.</p> <p>1.3.L All Transportation Service Providers should support the Grid-wide minimum nomination timeline and the Grid-wide minimum confirmation coordination process.</p>

13	Desire to prevent complete re-opening of the pipeline once the gas day starts.	A complete elimination of bumping (the only way to eliminate “re-opening of the pipeline once the gas day starts) would de-value FT.	Devaluing FT is not in the long term interest of the gas industry.	
14	Should we avoid a one size fits all solution?	We should avoid a solution which prevents innovation or prevents service variation and enhancement. But we should at least provide the benefits of at least one set of predictable options for all. This “set of sizes” available in all cases would be the minimum, not the only. This is a minimum set of conditions needed to create a seamless natural gas market and achieve the benefits such a market will bring to all its participants.		
15	Should all intradays that are processed outside the standard timeline be done on a no-bump basis?	Yes, with respect to the grid-wide coordination process. As for on-system bumping outside the grid-wide timeline, we leave it to the tariffs of the individual TSPs to rule.		
16	Number of intraday nominations to be processed per day (per contract, per shipper, per service, per transaction)	No limitation.	Limits become arbitrary, and if service requesters see them as unworkable, they will simply create other entities, contracts, or transactions as necessary to	Eliminate Standards 1.3.10 and 1.3.32; and, add a new standard 1.3.M There is no limitation as to the number of intraday nominations (line items as per GISB Standard 1.2.1) which a service requester may submit

			overcome such rule based limitations.	at any one deadline or in total across all deadlines..
17	Should a continuous pipeline be allowed to switch to batch?	Yes.	The rigors of the old “continuous” did not have the same grid-wide coordination aspects which assure greater likelihood of successful intraday activity. So the ability to move to batch, at the minimum timeline should be allowed in this case.	
18	Define Batch.	see above		
19	Define Confirming Parties	The parties communicating with respect to the physical or contractual flows (or both) within their operational and/or contractual control vis a vis a TSP.	Need to distinguish between service requesters (or their role with respect to a transaction) and confirming parties and their role in coordinating and confirming transactions at their locations.	<p>Definition of Confirmation 1.2.D The process in which a service provider compares nominations received for service at a location with the nominations received by the interconnecting operator at that same location.</p> <p>Definition of Confirmation Requester 1.2.E A Service Provider (including a Point Operator) which is seeking to confirm with another Service Provider the transfer of quantities of gas at a location from a service requester (or the contract of same) with which it has a relationship to a service requester (or the contract of same) with which the other Service Provider has a relationship. The location at which the transfer is occurring is the interconnection between the facilities of (or a location associated with) the Confirmation Requester and the facilities of (or a location associated with) the Service Provider.</p> <p>Definition of Confirmation Provider 1.2.F A Service Provider (including a Point Operator) which provides a confirmation to a Confirmation Requester (either in response to a Request to Confirm or as an unsolicited response) or to another Service Provider</p>

				<p>with respect to the transfer of quantities of gas at a location from a service requester (or the contract of same) with which it has a relationship to a service requester (or the contract of same) with which the Confirmation Requester (other Service Provider) has a relationship. The location at which the transfer is occurring is the interconnection between the facilities of (or a location associated with) the Confirmation Requester (or other Service Provider) and the facilities of (or a location associated with) the Confirmation Provider.</p> <p>Definition of Confirming Party 1.2.G One or the other of either the Confirmation Requester or the Confirmation Provider.</p> <p>Definition of Confirming Parties 1.2.H The Confirmation Requester and the Confirmation Provider.</p>
20	Processing/Scheduling time.	After each deadline there is a processing interval during which coordination occurs, followed by a scheduling event which is in advance of the flow synch-up time.	Just specifying a nomination deadline and a flow synch-up time does not coordination make.	See coordination timelines above
21	What is the impact of the capacity release timeline.	Parties acquiring capacity via a pre-arranged deal at the 9 AM upload, 10 AM contract timeline, should be able to nominate by at least the 5 PM deadline for 9 PM flow on a no-bump basis. This capacity should be un-nominated for the subject gas day at the time of the pre-arranged release (9 AM)	This increases the utility of released capacity to acquiring parties, and the value of releasable FT capacity for releasing parties.	Change Standard 5.3.2 shorter term releases, last line to read: “ -- contract tendered with contract # by 10:00 AM; contract executed; nomination possible for same gas day (if applicable capacity acquired) by deadline for second intraday Type I nomination timeline (i.e., by 5:00 PM) provided capacity not nominated by releasing party for subject gas day, and nomination possible for next gas day by 11:30 AM (Central Clock Time). [and make no change to Longer term releases]

Related Necessary changes:

1.2.X

The element of “time” in a nomination is for informational purposes and serves to communicate the service requester’s intentions to the applicable Transportation Service Provider(s); does not determine the patterns of flow as between interconnected parties. The requested beginning or ending “time” portion(s) of an intraday nomination can be for any time(s) within the subject gas day; such time(s) shall be for informational purposes only; such time(s) may assist the applicable Transportation Service Provider(s) and other Interconnected Party(ies) as to the intentions of the nominating service requester(s) but the ability to flow the daily quantities at the necessary flow rates are determined between the interconnected parties.

1.3.X

Only interruptible services can be bumped and only by primary FT. There is no bumping of interruptible services by secondary (or lower priority) FT. There is no bumping of secondary (or lower priority) FT by primary FT.

1.3.X

Intraday nominations have prospective effect, can not un-flow gas without the concurrence of all affected parties, and are for full gas day quantities.

1.3.X

Type (i) intraday nominations are defined as nominations received after the start and before the end of a gas day which pertain to that gas day. Type (ii) intraday nominations are nominations which pertain to the subsequent gas day; are received after the daily grid-wide nominations deadline and before 6 PM the calendar day before the start of the subsequent gas day.

1.3.X

For confirmation and scheduling of regular timely nominations (in conjunction with standard 1.3.2 GISB version 1.0):

- a) the confirmation process begins subsequent to the Quick Response;
- b) the confirmation process is completed by 3:30 PM unless a later time (prior to the 4:30 scheduled quantity document deadline) is mutually agreed to by the applicable confirming parties;
- c) the scheduled quantity document is received by 4:30 PM and relates to quantities for the service requester to be effective with the 9:00 AM start of the subject gas day synch-up time.

1.3.X

Each nomination should indicate whether it is intended to be processed as a standard nomination (i.e., the 11:30 leave control of service requester deadline); a Type II nomination, or the first or second of the Type I nominations. Intraday nominations Type I and Type II for a gas day should also be received by the subject Transportation Service Provider after the 11:30 AM “leave control of the sender time” associated with the regular nominations deadline for a subsequent gas day (the same gas day to which the intraday nomination relates).

### 1.3.X

Each service requester should receive a scheduled quantity (including unsolicited scheduled quantities) which should indicate what type of scheduled quantity it is. The following are the different types of scheduled quantities documents:

- 1) There is a prior to gas day scheduled quantity document (i.e., the 4:30 received by service requester scheduled quantity document);
- 2) There is a scheduled quantity document that is the result of the Type II grid-wide confirmation coordination process;
- 3) There is a scheduled quantity document that is the result of the first Type I grid-wide confirmation coordination process;
- 4) There is a scheduled quantity document that is the result of the second Type I grid-wide confirmation coordination process; and,
- 5) There is a scheduled quantity document that contains the end of gas-day scheduled quantities and this document is a recapitulation of all scheduling activity during the just completed gas day.

Scheduled quantities documents type 2, 3, and 4, above are “changes only” scheduled quantities documents and are intended to reflect only: a) the new scheduled quantities (daily quantities) scheduled by the Transportation Service Provider in response to the service requester’s nomination(s) activities (i.e., nominations by the service requester receiving the scheduled quantities document); or, b) the changes (i.e., alterations to the service requester’s previously scheduled quantities) as a result of scheduling activities by the Transportation Service Provider for other service requesters.

### 1.3.X

Receivers of scheduled quantities documents may waive the obligation of the sender to send.

### 1.2.X

The definition of Partial Confirmation Process

The Partial Confirmation process is defined as the sending by a Confirming Party to another Confirming party of a Request to Confirm or Confirmation Response document (including unsolicited Confirmation Response document(s)) which document contain only a portion of the transactions nominated to be effective for the subject scheduling process interval at a location where the Confirming Parties confirm transactions.

### 1.3.X

Confirming Parties receiving a partial Request to Confirm should process such partial request to confirm and should respond to same with a Confirmation Response with respect to the transactions provided in the Request to Confirm. Such Confirmation Response may also contain unsolicited Confirmation Responses with respect to transactions other than those contained in the partial Request to Confirm. As soon as practicable subsequent to receipt and processing of the Confirmation Response, the Confirming party should send another partial Request to Confirm containing other transactions (including transactions contained in an unsolicited Confirmation Response, if any). The party receiving such partial Request to Confirm should process such partial request to confirm and should respond to same with a Confirmation Response with respect to the transactions provided in the Request to Confirm. Such Confirmation Response may also contain unsolicited Confirmation Responses with respect to transactions other than those contained in the partial Request to Confirm. If any partial Request to Confirm contains the balance of the transactions nominated to be effective for the subject scheduling process interval at the subject location, the partial Request to Confirm should so indicate. Parties responding to such final partial Request to Confirm should so indicate as well.

Commentary with respect to the immediate purpose of the partial Confirmation Response:

If a solution to the “Southwest Dilemma” (other than an exemption from the no bump at 9 AM from 6 PM nominations rule for that one pipeline) is to be developed, it will require this process at the interconnects and other transaction locations on that Southwest Pipeline. With this process, the “Small Southwest Pipeline” (SSP) can have a two step (like the old day one day two) process all in the same time frame as their interconnected TSP’s have their one scheduling process (albeit a two wrap partial confirmation based process).

- 1) On the first SSP-only nomination deadline, 10 AM CCT (10:15 for EDM) nominations are submitted to the SSP for FT and IT should the shippers so choose to submit them.
- 2) By 12 noon the SSP initiates partial Requests to Confirm to the Confirming Parties,
- 3) By 1:00 PM Confirming Parties’ Confirmation Responses are returned in response to the SSP’s partial Request(s) to Confirm
- 4) By 1:30 PM Partial Scheduled Quantities are delivered to SSP’s Service Requesters and Confirming Parties (other than interconnected TSPs which have only received “partial Requests to Confirm and are awaiting the “balance” of the Requests to Confirm from SSP)
- 5) By 2:30 (2:45 for EDM) the second SSP-only nomination deadline nominations are submitted to the SSP for FT and IT should the shippers so choose to submit them.
- 6) By 3:00 PM Quick Responses and the balance of the Partial Requests to Confirm are sent out to SSP’s Confirming Parties
- 7) By 4:00 PM Confirming Parties’ Confirmation Responses are returned in response to the SSP
- 8) By 4:30 PM TSP’s interconnected to SSP can still make their deadline for getting Scheduled Quantities to their Service Requesters and Confirming Parties.
- 9) By 5:00 PM the SSP-only Scheduled Quantity deadline arrives and the SSP delivers Scheduled Quantities to its Service Requesters and non-TSP Confirming Parties (“non-TSP” because the SSP is likely to have received the Operator Scheduled Quantity already from the interconnected TSP’s under step 8 above).

In this way, a minimally disruptive solution can be arrived at for the SSP without having to mess up the entire rest of the country with a “6 PM bump at 9 AM” rule. In the event the SSP cannot meet this timeline immediately, then a six month window should be provided by means of a six month exemption *for the SSP only* from the “no 9 AM bump from 6 PM noms rule”. This exemption could be allowed while they work on their systems and business processes to meet the above timeline.