

TO: GISB Executive Committee ("EC") Members

FROM: Koch Gateway Pipeline Company  
Koch Midstream Pipeline Company

RE: Request for Industry Comment on Proposed Standards

DATE: May 6, 1999

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As participants in numerous GISB task forces and subcommittees, Koch Gateway and Koch Midstream (hereinafter "Koch") appreciate the amount of time, effort, and negotiation that have gone into the proposed standards that are currently out for comment. Koch supports the majority of the proposed standards, but would also like to offer comments regarding the following items.

## **Notices**

### Background

Section 284.10(c)(3)(vi) of the Code of Federal Regulations states:

"A pipeline must post notices of operational flow orders, critical periods, and other critical notices on its Internet web site and must notify affected parties of such notices in either of the following ways to be chosen by the affected party: Internet E-Mail or direct notification to the party's Internet URL address."

In Order No. 587-H, the Commission commented: "[I]n addition to notification through the scheduled quantities statement, pipelines should provide direct notice of bumping using Internet E-mail or direct notification to a shipper's Internet URL address...."

The Commission stated in Order No. 587-G that:

"Even for after hours notice, Internet postings provide shippers with a significant amount of flexibility. Employees can check for critical notices on the Internet at home. In addition, the requirement for direct notice to E-mail and Internet addresses will enable those shippers who want telephonic or pager notification to receive such notice by purchasing software that automatically triggers telephones or pagers when an Internet message is received."

There are nine new standards being proposed by the Notices Task Force. S9 of the recommendation states:

"Intraday bump notices should contain at least the affected Service Requester Contract, Receipt and/or Delivery Location, and Receipt and/or Delivery Point Quantity from the Scheduled Quantity (GISB standard 1.4.5)."

### Comments

S9 goes beyond the minimum requirements set forth in Order Nos. 587-G, H, and the Commission's regulations. In neither the regulations nor the Orders does the Commission state that it is necessary for pipelines to provide to shippers the level of detail specified in S9. The Commission makes it clear that it intends that pipelines give Service Requesters notice, essentially a tap on the shoulder, to let these parties know that they need to check the TSP Web site for more information. In fact, in Order No. 587-G, the Commission stated that parties can *check the Internet at home*. If the Commission had intended that Service Requesters be provided extensive information regarding a bump or critical notice, certainly it

would have included such requirements in its regulations or would have otherwise mentioned such requirements in the Orders themselves. Further, requiring TSPs to generate this level of detail in e-mails or other Internet communications will waste valuable time that could instead be used by Service Requesters to work with the TSP to address these important incidents. For these reasons, Koch opposes S9 and urges the Executive Committee to strike S9 from the Notices Task Force recommendation.

### **Common Codes**

The Common Codes Subcommittee has recommended three standards and one principle to the Executive Committee for this meeting. S3 states:

“For GISB purposes, there should be a unique entity common code for each entity name and there should be a unique entity name for each entity common code.”

While Koch does not disagree with the proposed standard in theory and believes there may ultimately be value in such a standard, Koch does not believe the time is ripe for creating such a standard.

Standard GISB entity common codes are currently issued by Dun & Bradstreet (“D&B”). D&B representatives have told various GISB participants and GISB staff that it will not implement a requirement like the one proposed in S3 upon the natural gas industry. Even assuming for argument’s sake that D&B would voluntarily agree to conform with S3, the standard would require D&B to completely change its numbering system for the natural gas industry (a very small portion of its total business).

If D&B refuses to conform with the standard and the industry insists upon compliance with the standard, GISB would have to choose another common code provider that will voluntarily conform to this standard. Either option will likely disrupt the industry for a considerable period of time, and for those that have D-U-N-S® Numbers embedded in their computer systems, such a change will be at considerable expense. Further, for either option to be chosen during the time TSPs are implementing Internet Web sites would be particularly burdensome.

Finally, passing this standard will only serve to confuse those not familiar with the issues related to this proposed standard. For instance, TSPs have been working for several months to generate data to populate D&B’s cross reference file on the GISB Home Page. How are parties unfamiliar with GISB supposed to understand how this proposed standard can be reconciled with the cross-reference file, which will no doubt contain numerous line items that have a unique entity name but a number of different entity common codes? For these reasons, Koch encourages the Executive Committee to remove this standard from the Common Codes Principle and Standards Recommendation.

Thank you in advance for your consideration of these comments.