

TO: GISB Executive Committee
FROM: Koch Gateway Pipeline
DATE: October 3, 1997
RE: Proposed Standards and Intepretations

Koch expects to be able to either implement or make minor changes to implement the majority of the proposed standards and interpretations that are currently out for industry comment, with the exception of the following items.

R97109

Koch strongly objects to the proposed standard related to R97109. We anticipate a huge number of changes will be required to readjust our system to conform with a 12 character limit on the fields associated with Standards 1.4.x, 2.4.x, 3.4.x, 3.4.2, and 5.4.x (and their associated implementation guides).

Not only will this new standard require a massive undertaking (potentially tens of thousands of dollars) by Koch to change its existing practices, but it is also objectionable because it is another example of changes being made retroactively once thousands of dollars have already been spent in the implementation of the initial standards. We, as an industry, are now three months into the implementation of GISB Standards and now we are beginning to “back pedal” to undo what has already been done. Koch relied on the initial field length being a set number of thirty characters and we and our customers made implementation changes accordingly. This proposed standard will adversely affect both Koch and our customers. For these reasons, we ask that the Executive Committee vote to not accept the proposed standard.

R97058A

Although Koch supported the compromise that was necessary to produce this proposed standard, we would like to make it clear we do not support promulgating similar “sunset provision” language regarding D-U-N-S Numbers in any other GISB proceedings. Koch feels there is a fundamental problem related to this request that has not been addressed by the proposal, and in fact, probably has been clouded by the proposed standard itself. Koch firmly believes that all parties transacting business in the natural gas industry should have by now a D-U-N-S Number to be used in doing business with TSPs. The Numbers are quickly and easily obtained, and Koch fears that by allowing parties to delay obtaining such Numbers, the problem of not having all parties using D-U-N-S Numbers is being compounded. While we sympathize with the requester’s dilemma that produced the request, Koch feels the Executive Committee should eliminate altogether or sharply limit future exceptions of the kind set forth in this proposed standard.