

KGPC Comments on R96068  
1/31/97

With respect to the Park, Ride, & Loan Transaction Type code values El Paso requested, KGPC supported the original recommendation of the METF back in October, which was for El Paso to use the following code values that were requested by TransCanada:

26 Park  
27 Park Withdrawal  
28 Loan  
29 Loan Payback

These values were approved unanimously by the METF in October prior to El Paso presenting their request at a later point in the same meeting. At the time, El Paso agreed with this recommendation and withdrew this portion of their request.

However, because (1) TransCanada's code values never were submitted on the official paperwork, and thus never approved by the GISB EC and (2) El Paso's request was rejected by the task force, KGPC determined it was necessary to develop an alternative solution that would work within the framework of code values already approved by GISB.

The workaround we devised is to use existing transaction type code values of 06 Injection and 07 Withdrawal along with two logical points, one for parking and another for lending, to accomplish the same thing, as follows:

<u>Point Nominated</u>	<u>Transaction Type</u>	<u>Meaning</u>
Parking Point	06 Injection	Park
Parking Point	07 Withdrawal	Park Withdrawal
Loan Point	06 Injection	Loan Payback
Loan Point	07 Withdrawal	Loan

KGPC believes that this problem should be resolved in a consistent way across the industry in order to minimize confusion to the shippers who must nominate on numerous pipes. Rather than implementing the above workaround, we are willing to change our implementation plans and support the set of transaction types originally recommended by the METF:

26 Park  
27 Park Withdrawal  
28 Loan  
29 Loan Withdrawal

We cannot, however, change our plans and support Park, Ride, and Loan codes as requested by El Paso, without the Park Withdrawal and Loan Withdrawal codes.

Additionally, we should note that KGPC has requested in R96088 a new service code, PK, for Parking and Lending Service. Since Transaction Type is not currently an invoice data element, regardless of whether or not the new transaction type code values proposed by El Paso are adopted, we still need the new Service Code proposed. Service Code is a Mandatory invoice data element. In order to accurately describe the charges for this parking and lending activity on our invoice as approved by FERC, the Park and Lend service code is needed.