

NGPL Comments on R99033

It is NGPL's position that R99033 should be carefully considered by the EC to ensure that any benefits derived from implementing this request justify the implementation costs. We believe that the industry wide cost for adding the data elements "Operating Capacity" and "Total Scheduled Quantity" to the existing data set 5.4.13 "Operationally Available and Unsubscribed Capacity" is in not justified by the anticipated benefits cited in Dynegy's request.

Dynegy cites "...competitive and monitoring purposes" as the tangible benefits in section 5 of their request R99033. These additional data items cannot possibly provide any type of "...competitive ... purpose" since the data would be freely available to all players in the marketplace. Likewise, these additional data elements also cannot possibly provide for any meaningful "...monitoring purpose" since they are simply the components used to calculate the value of the existing element "Quantity Available [code value 1: operationally available]". Knowledge of the (proposed) "Operating Capacity" would not help a Service Requester to make a determination to transport gas at a location. This is a transient number based on a multitude of conditions existing on an entire pipeline (and even interconnecting pipelines) and it has absolutely no commercial value to Service Requesters. Nor would knowledge of the (proposed) "Total Scheduled Quantity" at a location help a Service Requester to make a determination to transport gas at a location. This number provides no information whatsoever as to the existence of capacity. However, knowledge of the existing data element "Quantity Available [code value 1: operationally available]" does help a Service Requester to make a determination to transport gas at a location. This is true because this number is inclusive of the best available information needed to make such a determination.

Dynegy cites in section 6 of their request R99033 that there is no incremental cost associated with implementing this request, should it pass the GISB process and be adopted by the FERC. At a minimum, web pages displaying this proposed information would need to be created or modified, EDI layouts would need to be modified, and the data extract programs that populate both the web pages and the EDI would need to be modified. This effort would be required for every interstate pipeline entity under FERC jurisdiction. Additionally, these new data items would be required to be provided during a very "congested" portion of the daily timeline as defined by GISB, further straining existing computing power at individual TSPs.

In summary, we believe that Dynegy has not provided adequate evidence of "Tangible Benefits" that can justify the "Costs to Implement". Thus, it is our position that the EC should require further explanation of possible "Tangible Benefits" associated with implementation of R99033, as well as determine a realistic estimate of the "Costs to Implement" R99033, before acting to endorse it.