

TO: Rae McQuade

FROM: Paul D. Love

SUBJECT: NGPL and KN Energy Comments on Proposed Standards

The following comments reflect our concerns with certain standards proposed in R97102. Overall we support the principles, definitions and standards proposed. However, we do not support any of the standards proposed in the minority report.

Proposed Standard 8:

Proposed standard 8 when combined with proposed standard 12 for tariff information could duplicate the table of contents information required in proposed standard 19. This will result in duplication of effort by requiring two cross references to the same information be maintained. To avoid this duplication, we recommend that the subcategories in proposed standard 8 for tariff information be modified as follows:

<u>CATEGORY</u>	<u>SUBCATEGORY</u>
Tariff	Title Page
	Table of Contents
	Entire Tariff
	*Sheet Index (when applicable)

*This subcategory would apply only in situations where a sheet index is included in tariff filings. Otherwise, this subcategory would not be listed.

Proposed Standard 19:

Proposed standard 19 is unclear and could require service providers to create new tariff sheets to satisfy the subcategory breakdowns identified. We suggest that proposed standard 19 be modified to read as follows:

“Each line of the Table of Contents of the Tariff should provide a link to a corresponding tariff sheet by clicking on the sheet numbers shown.”

This change to the standard makes it very clear that no new tariff sheets are required in order to be compliant with the standard.

Proposed Standard 14D:

NGPL and KN do not support proposed standard 14D because it is limited in scope to the extent that the notice types listed may not provide the best description for all situations. This list of notice types places limitations on notice classifications. Situations could arise where a different notice type could be more meaningful than the types listed in this standard.

Proposed Standard 24:

NGPL and KN do not support this standard because proposed standard 24 is changing the already adopted format for downloads set out by GISB in section 4.3.5 and 4.3.16 of the Implementation Guide. Additionally, the Commission in order 587-G adopted these standards for downloading of information. In reference to the Index of Customers, the FERC has already prescribed the tab-delimited /ASCII format.