

Comments on Interpretation C97002

Natural Gas Pipeline does not agree with this interpretation for the following reasons:

1. EDI is a transactional process and when the results of the event giving rise to a transaction are unambiguously communicated once, no additional communication should be required. Nominations, containing a "Beginning" and "Ending" Date and Time, scheduling cuts and non-confirmation of nominated volumes are all transactions/events giving rise to scheduled quantity transactions. Scheduled quantity documents containing "Beginning" and "Ending" Date and Times, are generated in response to these events. Thus, Natural contends that once the results of a "scheduling" process have been communicated, no additional communications are needed until circumstances or events occur necessitating further communications. This is exactly the same concept employed with the nomination transaction/document which in fact, drives the scheduling process.
2. This interpretation creates inefficiency, redundancy, and increases the costs for all parties in the industry. For example: Shipper A submits a nomination containing three nomination transactions with a "Beginning Date" of 9/1/97 and an "Ending Date" of 9/30/97. No other nominations are submitted by Shipper A and no scheduling cuts of Shipper A's volumes are made by the transportation service provider for the entire month of September. These transactions are confirmed, scheduled to flow and at 4:30 p.m. on 8/31/97 scheduled quantity documents are sent to Shipper A containing a "Beginning Date" of 9/1/97 and an Ending Date of 9/30/97. Given this interpretation, 30 additional scheduled quantity documents would need to be prepared/transmitted by the transportation service provider and received and processed by Shipper A. This clearly is unnecessary and costly when the 8/31/97 scheduled quantity document accurately, unambiguously reflected the same result. Additionally, this same information, scheduled quantities, is provided twenty-four (24) hours later when Shipper A receives daily operational allocation information (See Standards 2.3.21 and 2.4.3)

Given these considerations, Natural Gas Pipeline recommends the following change to the second paragraph of C97002A:

"This means a new scheduled quantity document transmittal would occur by or at the end of each gas day, which scheduled quantity document would contain all transactions resulting in scheduled volume changes which have not been previously reported for the just-completed gas day."