

October 3, 1997

Ms. Rae McQuade  
Executive Director  
Gas Industry Standards Board  
1100 Louisiana, Suite 4925  
Houston, Texas 77002  
email: gisb@aol.com

Dear Ms. McQuade:

NrG Information Services Inc. (NrG) would like to extend its thanks to all the Task Forces and Committees for the effort put forth to clarify and identify the requests for changes.

It is our hope that our experience in developing a multi-pipeline solution provides us with the ability to objectively view the proposed standards. The attached document contains NrG's comments, which we respectfully submit for the purpose of providing clarification to those proposed changes which may affect successful implementation.

If you have any questions, please contact me at (403) 974-2605.

Sincerely,

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**Gas Industry Standards Board**  
**Proposed Standards Changes**  
**For Consideration by the Executive Committee on**  
**October 16, 1997**

**Comments of**  
**NrG Information Services Inc.**

## **Introduction**

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NrG Information Services Inc. (NrG), as a member of the Services Segment of the Gas Industry Standards Board (GISB) and a service provider, is pleased to offer the following comments on those proposals that affect successful implementation of the GISB Standards.

As a participant in GISB's standards development, NrG is very sensitive to the significance of the business issues which will be addressed at the Executive Committee meeting on October 16. Enclosed are specific comments pertaining to Request R97109.

## Request R97109

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Change the field length of contract numbers associated with Standards No.1.4.x, 2.4.x, 3.4.x and 5.4.x and their related implementation guides and change the remittance numbers associated with Standard No. 3.4.2 and related implementation guide items to utilize a field length of 12 characters instead of the current 30-character field length.

NrG opposes the request for two reasons: First, NrG does not understand that there is an obligation for Transportation Service Providers (TSPs) to move to a 30 character field length if their business processes and applications do not require it. Second, though submissions to GISB would indicate that there are no TSPs using systems that require such a long field<sup>1</sup>, NrG in fact provides services to a pipeline that requires the 30 character length.

NrG feels that a contract identifier may have any length between 1 and 30 characters and that TSPs may assign any length within those boundaries. There seems to be a lack of documentation supporting a need for an industry standard field length. NrG feels that contract numbers, or identifiers, are established at the sole discretion of the TSP.

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<sup>1</sup> From, GISB's Triage Conference call notes of August 6, 1997:

*TSP's existing systems typically have designated contract number field length of various sizes from 3 to 12. These are contract numbers currently in use in the industry and none of these numbers require a 30-character field length.*

The on-line screen or storage system need only support the field size designated by that TSP. Any attempt to use a longer field would be correctly prohibited by the on-line screen and thus never need to be passed through to other TSP systems.

NrG provides service to several North American pipeline companies. One of those is Westcoast Energy Inc. (WEI). Their systems extensively utilize contract identifiers longer than the suggested 12 character limit and less than the current 30 character limit. To decrease the field length at this time, after the current standards have been in effect for some time, would cause them to consider severe changes in their method of assigning those identifiers. The current standards indicate 30 characters and they made use of that capability to serve their customers. WEI complied with the existing standard. To impose a new standard on them now would cause them significant expense.