

Dynegy cannot agree with the "General Concept" contained in the workpaper posted for February 11, 1999 meeting. It should be neither a working principle nor a GISB principle because it is not was intended by FERC in Order 587-g.

In FERC Order 587-g, FERC requires pipelines to :

"Notify shippers of critical events affecting the system, such as operational flow orders, by posting the information on pipeline web sites and by direct notice either through Internet E-Mail or notification to the shipper's Internet address."

This does not mean post the notice on your web site and E-mail the shipper to check the web site. The term "direct notice" is purposefully used to mean that the notice be posted on the web site **and** sent via E-mail or notification to the shipper's Internet address. The whole notice. The notice content, not just that there was a notice; go look for it.

The intent is that the shipper handle the routing and distribution of the notice after receipt whether the receipt is by E-mail or by EDI. An EDI document to inform a shipper to look at a web site is laughable. EDI is supposed to contain machine processable data. If the notice is included, a machine could include it in E-mails or pages it generates.

I suggest we rethink this "General Concept" . . .