

Notices Task Force Work Paper for the February 24 Meeting

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Intraday Bumps:

- Facts:
 - There is a general principle that there should be comparability between EBBs and EDI. The same business result should be available to SRs regardless of whether they elect to use the TSP's EBB or EDI.
 - SRs have requested notification of intraday bumps by means other than the Scheduled Quantities so the SR would not have an obligation to constantly monitor TSP web sites. Internet E-mail and/or EDI notification (at the SR's option) of intraday bumps is the notification methods required by the FERC.
 - SRs desire the ability to control internal distribution of notifications based on the sender of the notice and the type of notice.
 - Notification itself cannot remedy a bump. Taking action to remedy a bump requires the SR to access a system capable of submitting nominations. The system used could either be the TSP's web site or an EDI-based solution used by the SR. Either the TSP's web site or an EDI-based system should have the ability to process and display Scheduled Quantities information. If the SR intends to take action to remedy a bump using either type of nomination system, then the SR also would have access to the detail information provided with the Scheduled Quantities.
 - Scheduled quantities whether received via EDI or viewed on the web page contain the detail information of the bumped transactions. There is comparability between EDI and the web site. The TSP's web site for Scheduled Quantities has a requirement that a mechanism be in place that either allows reduced transactions to be displayed at the top or that allows the SR to select only those transactions that have been reduced.
 - Reduction Reason codes are mandatory in the Scheduled Quantities document.
 - The Scheduled Quantities page on the TSP's web site will be in the password protected region of the web site. This prevents parties other than the SR or its designated agents from viewing sensitive information.
 - Informational postings such as OFOs and other critical notices are in a region of the web site that is not password protected. If intraday bump notifications are posted in the informational posting section of the web site, there would be no way to prevent any party from viewing the information. If intraday bump notifications are to be posted in the informational posting section of the web site and if detailed information concerning the bump were included in the notification, sensitive information would be publicly available. If the intraday bump notification was posted in the informational posting section and did not include detailed information concerning the bump, the SR would be required to access the Scheduled Quantities web page for the details of the bump.

- If SRs want to monitor TSP web sites for intraday bumps, the Scheduled Quantities display is available for such purposes.
- Data set 5.4.16 (System-Wide Notices) has data elements for Notice Effective Date and Notice Effective time and these data elements are mandatory. The data set also has a data element for Notice Text that is also mandatory. This data set does not have data elements for contracts or for the party intended to receive the notice.
- Conclusions:
 - Since notification itself cannot remedy an intraday bump and since SRs would need to access either the TSP's web site or their own EDI-based nomination system to attempt to remedy an intraday bump and since either type of nomination system should have the ability to process and display Scheduled Quantities information, the intraday bump notification can simply alert the SR that an intraday bump has occurred and contain the information necessary for the SR to control internal distribution based on the notice type and sending TSP. This meets the need to notify the SR independently of the Scheduled Quantities and control internal distribution based on the type of notice and sending TSP.
 - Since informational postings are not password protected and since SRs do not want sensitive information concerning their transactions to be publicly available, any posting of an intraday bump notification in the informational posting section of the TSP's web site should not contain detail information concerning the transactions that have been bumped. This meets the need to protecting sensitive information.
 - Since the posting of an intraday bump notification should not contain detail information concerning the bumped transaction and since the SR would need to access the Scheduled Quantities web page for such details, it would be more efficient for both SRs and TSPs if intraday bump notifications were not posted in the informational posting section of the TSP's web site and SRs simply view the Scheduled Quantities web page. Further, if SRs intend on monitoring TSP web sites for intraday bump notification, it would be at least as easy to check the Scheduled Quantities web page as it would be to check the informational posting web page and then access the Scheduled Quantities to see details concerning the bump. This meets the need of balancing the SR's need for information and the TSP's need to efficiently provide such information.
 - To provide comparability between notification mediums (EDI, Internet E-mail and EBB), the same level of information should be made available in all mediums. If standards require intraday bump notifications to be posted in the informational postings section of the TSP's web site, then there should not be detail information concerning the bumped transaction in any notification medium.
 - The data elements Notice Effective Date and Notice Effective Time in data set 5.4.16 (System-Wide Notices) can be used to indicate the gas day and time the bump is effective based on the nomination effective times stated in standard 1.3.2.
 - To provide comparability between EDI and Internet E-mail notification, the Internet E-mail should include Notice Type and TSP for internal distribution

purposes and Notice Effective Date and Time and Notice Text consistent with information provided via EDI. Although the EDI data set has additional mandatory data elements, these data elements are not considered critical to maintain comparability between EDI and Internet E-mail concerning intraday bumps.

- Proposed Solution:

- At the SR's option, notification of intraday bumps will be performed via EDI and/or Internet E-mail. Notification of intraday bumps will not be posted in the informational posting section of the TSP's web site.
- To facilitate internal distribution, the subject line of an Internet E-mail notification should include "Intraday Bump" (not case sensitive) followed by the DUNS # of the sending TSP followed by the TSP's name or acronym. The DUNS # is needed for reliable identification of the TSP and the name or acronym is useful to include in text pager messages.
- The body of the Internet E-mail notification should include the effective date/time of the intraday bump consistent with the nomination effective date/times stated in standard 1.3.2.
- The body of the Internet E-mail notification may also include additional information concerning the specific transaction(s) bumped as long as the additional information provided in the E-mail is consistent with the information that would be provided in the Notice Text of the EDI notification. Conversely, if additional information is provided in the Notice Text of the EDI notification, the same information should be provided in the body of the E-mail.
- The EDI data set 5.4.16 (System-Wide Notices) should be expanded to include a Sender's Option data element for Notice Recipient that identifies the business party to whom the notice is directed. For intraday bump notices, this data element would be mandatory and populated with the Service Requester that is being bumped. The Sender's Option usage is needed since the data element may or may not be applicable depending on the type of notice and the intended audience.
- The EDI data set 5.4.16 (System-Wide Notices) should have a code value for the Notice Type data element to identify an intraday bump notification. (Instruction to IR approved in the February 11 meeting.)

OFOs and Other Critical Notices:

- **Facts:**
 - As a general principle, there should be comparability between EBBs and EDI. The same business result should be available to SRs regardless of whether they elect to use the TSP's EBB or EDI.
 - SRs have requested notification of OFOs and other critical notices by means other than just posting on the TSP's EBB so the SR would not have an obligation to constantly monitor TSP web sites. Internet E-mail and/or EDI notification (at the SR's option) is the notification methods required by the FERC.
 - SRs desire the ability to control internal distribution of notifications based on the sender of the notice and the type of notice.
 - OFOs and other critical notices contain a significant amount of text. Information that must be contained in an OFO or other critical notice can vary from TSP to TSP.
 - OFOs and other critical notices can have a general (not directed to specific parties) or specific (directed to specific business parties) target audience.
 - Question: Are all OFO and other critical notices required to be posted on the TSP's EBB including notices directed to specific business parties? The answer to this question may or may not have a direct impact on the conclusions or proposed solution.
 - Informational postings such as OFOs and other critical notices are in a region of the web site that is not password protected.
 - Data set 5.4.16 (System-Wide Notices) has data elements for Notice Effective Date and Notice Effective time and these data elements are mandatory. The data set also has data elements for Notice Text and Critical Notice Indicator that are also mandatory. This data set does not have data elements for contracts or for the party intended to receive the notice.
- **Conclusions:**
 - There should be no problems in providing identical information between the EBB, Internet E-mail and EDI although the format may be different depending on the media used.
- **Proposed Solution:**
 - At the SR's option, notification for OFO or other critical notices will be performed via EDI and/or Internet E-mail. Notification of OFOs and other critical notices will be posted in the informational posting section of the TSP's web site.
 - To facilitate internal distribution, the subject line of an Internet E-mail notification should include "OFO" (not case sensitive) or "Other Critical Notice" (not case sensitive) followed by the DUNS # of the sending TSP followed by the TSP's name or acronym. The DUNS # is needed for reliable identification of the TSP and the name or acronym is useful to include in text pager messages.
 - The body of the Internet E-mail notification should include the effective date/time of the OFO or other critical notice.

- The body of the Internet E-mail does not need to include whether the notice is a critical notice since it can be assumed by the very nature of OFOs and other critical notices that the notice is critical. In effect, the notice is critical by default.
- The body of the Internet E-mail notification may also include additional information concerning the specific notice as long as the additional information provided in the E-mail is consistent with the information that would be provided in the Notice Text of the EDI notification. Conversely, if additional information is provided in the Notice Text of the EDI notification, the same information should be provided in the body of the E-mail.
- The EDI data set 5.4.16 (System-Wide Notices) should be expanded to include a Sender's Option data element for Notice Recipient that identifies the business party to whom the notice is directed. For OFOs and other critical notices, this data element would be Sender's Option and populated with the business party that the notice is being directed to. The Sender's Option usage is needed since the data element may or may not be applicable depending on the type of notice and the intended audience.
- The EDI data set 5.4.16 (System-Wide Notices) should have a code value for the Notice Type data element to identify operational flow orders and other critical notice notification. (Instruction to IR approved in the February 11 meeting.)