

Notices Task Force Work Paper for March 22, 1999 Meeting

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Dated: March 16, 1999

Item 1: Format of E-mail

- Proposed Alternative to Koch Proposed #6: (proposed changes are underlined or marked through)
 - When sending Internet E-mail notifications for intraday bumps, operational flow orders and other critical notices, the subject line of the E-mail should include the following information separated by commas in the following order: (1) “Critical” or “Non Critical”, (2) Notice Type description (~~“Bump”, “OFO”, “Critical”~~), (3) the Notice Effective Date in YYYYMMDD format, (4) the name or abbreviation of the Transportation Service Provider (excluding commas), and (5) the Transportation Service Provider’s DUNS number.
 - Instruction to IR: Modify the TIBP to clearly state that the Notice Type description should be the complete text description that corresponds to the Notice Type codes. Concerning Notice Type code 7, the sending party will have three options when selecting a Notice Type description; (a) “Press Release,” (b) “Company News,” or (c) “Phone List.” If additional codes are added that have more than one purpose similar to code 7, the sending party will have options similar to those described for code 7.
 - Supporting Arguments:
 - The proposed alternative is not intended to retrade previously agreed upon language but simply to seek comparability between the e-mail notice and the EDI data set 5.4.16 (System-Wide Notices). Since all existing Notice Types can be flagged as critical notices in data set 5.4.16, using the Notice Type description as further clarified in the instructions to IR will assure that there is comparability.
 - The proposed standard in no way requires that all Notice Types must be sent via e-mail. It is the intent of this task force to simply standardize how the e-mails should be formatted whenever notices are sent via e-mail.
 - Since we are trying to standardize the format of the subject line, we need to allow for the first item to indicate non-critical notices as well as critical notices.
 - This covers the issue raised in NrG’s work paper for the February 24 meeting concerning the ability to send all critical system-wide notices as defined in data set 5.4.16.

Item 2: Penalties Applicable Flag (this issue was raised in Dynegy’s work paper for the February 24 meeting)

- Proposed Standard: Concerning intraday bump notices, the notice should indicate whether penalties will apply on the day volumes are reduced. This standard does not supercede tariff penalty provisions.

- Supporting Arguments:
 - Order 587-I on page 8 states: “The regulations further provide that pipelines must give an interruptible shipper advance notice of its reduction in scheduled volumes and inform the shipper whether penalties will apply on the day its volumes are reduced.”
 - There are several arguments in the FERC filings concerning when it is appropriate to waive or enforce penalties concerning intraday bumps. FERC has set its policy and the regulatory arena is a more appropriate forum to specify when penalties will be waived and to the extent they are waived. GISB should not attempt to set policy on this issue. The sentence “This standard does not supercede tariff penalty provisions” attempts to capture the concept that the receiving party will need to be aware of a pipeline’s specific penalty provisions. However, the receiving party should have a certain level of comfort that scheduling penalties for that day will not be invoked consistent with FERC policy outlined in Orders 587-G, 587-H and 587-I when an intraday bump notice is flagged indicating that penalties will not apply on the day the volumes are reduced.
 - This standard should not attempt to apply beyond intraday bump notices. The task force should focus on the notification protocols where there is clear FERC policy. To expand the topic to all types of notices would be time consuming and it is very questionable whether or not consensus could be reached.
- Implementation Alternatives: a data element will need to be added to the EDI data set 5.4.16 and a method to indicate within an e-mail whether or not penalties will apply for the day of the reduction.
 - EDI: Instruction to IR to modify 5.4.16 to include a new Penalty Indicator data element to indicate whether or not penalties apply for the effective date of the notice. The usage should be conditional upon a Notice Type being Intraday Bump. The data element values should clearly indicate whether penalties apply or penalties are waived for the day of the bump.
 - By naming the data element Penalty Indicator, the data element description and usage could be modified in the future through the usual GISB process for use with other types of notices.
- Internet E-mail:
 - (a) The body of the e-mail should indicate whether or not penalties apply for the day of the bump.
 - (b) The subject line should include as the last item “Penalties Apply” or “Penalties Waived” to indicate whether or not penalties apply for the day of the bump.
 - If (b) is selected, the TIBP will need to state that this last item may not appear on Notice Types other than Intraday Bumps. This would be consistent with the conditional usage for the Penalty Indicator data element.