

*Cynthia A. Corcoran*  
*Managing Counsel*

January 31, 1997

Rae McQuade, Executive Director  
Gas Industry Standards Board  
1100 Louisiana  
Suite 4925  
Houston, Texas 77002

**Re: PanEnergy Corp Comments on Requests for Modifications to  
Existing Standards or Creation of New Standards**

Dear Rae:

Attached please find PanEnergy's comments regarding the requests for Modifications to Existing Standards or Creation of New Standards due by January 31, 1997.

For your convenience, these are being provided by e-mail and will be followed by a hard copy through the U.S. Mail.

Sincerely,

Cynthia A. Corcoran

Attachment

**PanEnergy Corp Comments on Requests for Modification to  
Existing Standards or Creation of New Standards  
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Request Number: R96069  
Requestor: EPNG  
Description: Modify the nomination quick response transaction to add a warning message.

Task Force

Recommendation: Change as requested.  
PEC Position: Support the recommendation.

PEC Comments: This is a request to add a warning message (to mirror the existing error message) to the Nomination Quick Response which will be used to communicate warnings not covered by existing codes. This is needed to cover situations where codes have been requested but not yet assigned. The potential for abuse exists, but the trading partners could keep everyone honest by questioning the continued use of this code.

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Request Number: R96080  
Requestor: NGPL  
Description: Modify the measurement information and allocation statement transactions to add contact information at the detail level.

Task Force  
Recommendation: Declined.  
PEC Position: Support the request.  
PEC Comments: The request is to put contact information at the detail level on the Measurement and Allocation statements. Current implementation guide puts this information at the header (or company) level. TETCO assigns analyst responsibilities at a point level, not a company level. If we are required to put the contact information in the header, this could result in the submission of multiple files to a single trading partner because of the breaks which will occur in the data when multiple analysts are assigned to a company's points. Including the contact information in the detail level of these statements will ensure that the trading partner receives only one file for each of these documents.

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Request Number: R96092  
Requester: PanEnergy  
Description: Modify the allocation statement data dictionary so that Beginning Flow Date/Time and Ending Flow Date/Time are split into four elements.

Task Force

Recommendation: Change as requested.  
PEC Position: Support Task Force Recommendation  
PEC Comments: The Recommendation to GISB Executive Committee states that the associated revisions needed are "updates needed to the above stated implementation guides/standards. Technical Task Force", referring to the Flowing Gas and Invoicing data sets, and the page attached to the Task Force Recommendation reflects no revisions needed to the data dictionary.

In fact, the December 19, 1996 meeting minutes of the Market Settlement Task Force states the following:

Recommendation was made to make a default of the beginning and end of the gas day for the time element in the flowing gas and invoicing transaction sets. This would require a change to the data dictionary to reflect the default. The data elements would be left as is in the data sets.

The Market Settlement Task Force Recommendation should reflect the following changes to the data dictionaries of the Pre-determined Allocation (2.4.1), the Allocation Statement (2.4.3), the Shipper Imbalance (2.4.4), and the Measurement Information Statement (2.4.5), and the Invoice (3.4.1):

Previous Implementation:

Beginning Flow Date/Time - The date and time on which the transportation/transaction first started.

Ending Flow Date/Time - The date and time on which the transportation/transaction ended.

Proposed Implementation:

Beginning Flow Date - The date on which the transportation/transaction first started.

Beginning Flow Time - The time in which the transportation/

transaction first started. If the Beginning Flow Time is not sent, the time defaults to the beginning of the gas day.

Ending Flow Date - The date on which the transportation/transaction ended.

Ending Flow Time - The time in which the transportation/transaction ended. If the Ending Flow Time is not sent, the time defaults to the end of the gas day.

The usages and conditions, if applicable, are not affected by the splitting of the data elements and adding the defaulting time language. This change is consistent with the Beginning and Ending Dates and Times utilized in the Nomination (1.4.1), the Nomination Quick Response (1.4.2), the Request for Confirmation (1.4.3), the Confirmation Response (1.4.4), and the Scheduled Quantity (1.4.5).

The Technical Subcommittee should make the corresponding Data Element Cross Reference and X12 Data Set revisions.

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Request Number: R96101  
Requestor: PEC  
Description: Modify usage requirement of "Service Requester" and "Account Number" in Payment Remittance and Invoice Datasets.

Task Force

Recommendation: Split decision at Market Settlement (9 support, 9 opposed)  
PEC Position: Support original request.  
PEC Comments: PanEnergy Corp pipelines request that the usage of the Service Requester and Account Number data elements in the Invoice data dictionary be modified to "SO" (sender's option) and in the Payment Remittance data dictionary from "MA" (mutually agreed to) to "C" (conditional). The condition would be defined as "Required if sent in the invoice."

When the remitting party sends a payment remittance for multiple service requesters, the remitting party will be able to relay which service requester he is remitting for. If these data elements are mutually agreed to in the invoice, there would be no obligation for the remitter to send the information back on the payment remittance, thereby making it impossible for the transportation service provider to correctly apply the payment. Making the data elements sender's option on the invoice and conditional on the payment remittance ensures that the remitting party includes all valuable information on the remittance and that the transportation service provider applies the payment correctly.

PanEnergy disagrees with the task forces' comment contained in the recommendation to the GISB Executive Committee that tracking accounts receivable at an invoice level is a standard practice. Most invoices being billed by utilities, gas companies, or other sources require the payee to report their "Account Number" on the payment and not the invoice numbers being paid. By changing the "Service Requester" and "Account Number" to Sender's Option on the invoice, we are guaranteed that the customer will give us this information when submitting the Payment Remittance Statement. This information is very valuable in ensuring that cash is applied to the appropriate party in a timely manner as to avoid any interest charges.

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Request Number: R96107  
Requestor: PEC  
Description: Add data element "Previous Balance Forward" to Invoice data dictionary.

Task Force

Recommendation: Declined  
PEC Position: Support original request.  
PEC Comments: PanEnergy Corp pipelines request that a new data element be added to the invoice data dictionary. This new data elements is "Previous Balance Forward" and is defined as "the remaining balance due for each service requester/billable party at a summary level." This data element would have the usage of "SO" (sender's option).

It is usually the business practice of any company to pay for services from an actual invoice as opposed to a Statement of Account. By adding the unpaid balance to the invoice, the entire amount due is represented in one document, thereby, ensuring that the service requester/billable party is aware of the total amount due for a given month. Offering this information on the invoice allows PanEnergy's pipelines to maintain a level of service that is currently being offered to their customers.

By adding the Previous Balance Forward amount to the Invoice, it now correlates to the information being provided on the Statement of Account.

PanEnergy believes that the comments about the Statement of Account in the Discussion section of the recommendation to the GISB Executive Committee are not valid. The Statement of Account provides only outstanding balances by invoice which does not include the CURRENT amount due. Therefore, by adding this new data element to the Invoice data set, the customer will be able to determine the TOTAL amount due (current and past due) in one document.

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Request Number: R96108  
Requestor: PEC  
Description: Add error codes and warning codes to Nomination Quick Response.

Task Force

Recommendation: Change as modified  
PEC Position: Support original request.  
PEC Comment: PEC request to add 3 error messages and 14 warning messages to the Nomination Quick Response. One of the error messages was withdrawn at the 12/18 METF meeting because it only applies to EBB transactions. METF supported the remaining 2 error messages and all 14 of the warning messages, with minor modifications to the wording. The ME Task Force recommendation to the Executive Committee form reflects the two errors, but only 13 of the 14 warnings. The missing warning is "Node Quantity Exceeded", which needs to be included on the recommendation form to accurately reflect the results of the 12/18 METF meeting. The Technical Task Force has assigned a technical implementation value for this warning. Attached hereto are the relevant minutes that were distributed at the 1/22/97 METF meeting.

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Request Number: R96110  
Requestor: PEC  
Description: Add two business conditional data elements, Aggregator's Supply Point and Aggregator's Supplier to Confirmation, Confirmation Response and Allocation data sets.

Task Force

Recommendation: Declined  
PEC Position: Support original request.  
PEC Comment: PEC request for two additional business conditional data elements in the Request for Confirmation, Confirmation Response and Allocation data sets. These two data elements were requested so that TETCO could provide the same information to existing tariff approved "Transportation Aggregation Balancing Service" TABS parties via EDI as is currently available via the EBB. This information identifies the supplier and supply point of the gas which is being put into a TABS pool; it has been provided to the TABS parties since TETCO implemented its TABS service as part of its Order No. 636 restructuring in June 1993 and was deemed to be information needed by the TABS party to confirm the activity at his TABS point since other parties place nominations to move gas into and out of his pool. During the discussion at the 12/18 METF Meeting, the proposed usage of these data elements was changed from business conditional to mutually agreeable; however, the task force members voted to oppose the request to add these elements to the Request for Confirmation and Confirmation Response data sets. They felt that providing the supply information to the TABS party was providing him with confidential information to which he should not be entitled. The fact that we have been providing this information pursuant to Commission order for 3-1/2 years without adverse effects did not convince them to support the request. The request to add these elements to the Allocation data set was not addressed at the 12/19 MSTF meeting because PanEnergy did not have anyone in attendance to present our position and explain the need for the additional elements.

We have identified a way to use the existing data sets to provide the information which we are currently providing via the EBB, but it will result in some data elements being used for something other than their intended purpose. This is not an acceptable solution. This solution results in presenting virtually meaningless information to the TABS parties, and result in a degradation of existing services which is contrary to the express service of Order No. 587 and GISB's own principles.