

December 8, 2000

**To: Gas Industry Standards Board**  
**From: Pipeline Segment**

**Re: Business Practices Subcommittee Priority Action Items 1 and 2 and R00026**

At the scheduled December 14, 2000 GISB Executive Committee meeting, the agenda includes a discussion and vote on Recommendations and Proposed Standards. This agenda item contains certain BPS proposals related to implementation of Order No. 637 requirements and related standards such as R00026. Among the proposals are new or revised standards for capacity releases and recalls which include support for intraday capacity releases and would remove current GISB restrictions against partial-day recalls.

Our fundamental concern with the proposed standards is that they do not fully address the far-reaching impact of flowing day recalls. There are significant operational concerns with these standards. We are concerned about whether the operational provisions are in place to ensure that the recalled party does not continue to flow, particularly during critical periods. We are concerned about whether current GISB communication time frames are adequate for handling the ripple effect of flowing day recalls across the grid. The proposed standards address only one narrow operational concern – whether gas has been scheduled on the particular contract to be recalled. This does not begin to address the operational challenges of the recall or the potential impact to other transactions across the grid.

Given these operational concerns, we do not understand the rush to adopt flowing day recall standards. While we understand that this work is in response to R00026, we do not believe that flowing day recalls are necessary to fulfill the scheduling equality requirements of Order No. 637. Order No. 637 requires that replacement shippers have the same nomination opportunities as shippers acquiring original capacity. There are no existing pipeline contracting or scheduling functions that are the equivalent of the recall of capacity by a releasing shipper. Very few pipelines have received authorization to sell hourly services and most pipeline tariffs prescribe a uniform hourly flow rate throughout the day. Further, most pipelines have not yet received approval to implement balancing provisions to address daily price fluctuations or intraday variability.

In the spirit of compromise, we have worked on and concurred with revised standards that permit intraday releases. However, under these revised standards, all capacity release options continue to be available only on Business Days to insure that the proper contractual relationships and notice provisions are supported. Nonetheless, throughout the negotiations on this compromise approach, the pipelines have made it clear we cannot support the proposed flowing day recall standards.

Aside from our opposition to the flowing day recall standards, the pipelines have agreed to other recall standards that are more liberal than are supported by the existing standards. In this area, we have agreed to support a revised standard which will permit capacity to be recalled for transactions in the Evening Nomination Cycle. This allows a releasing shipper to recall capacity until the afternoon of the day prior to gas flow. While this timeline supports a shorter notice for recalls, it still preserves the application of the full-day contract entitlement and gas flow rights for both the releasing and the replacement shippers. Flowing day recalls, though, are a separate issue. Flowing day recalls could significantly increase the incidence of scheduling problems, overruns, imbalances and increased occurrences of Operational Flow Orders. Because of the potentially disruptive nature of flowing day recalls, pipelines cannot support the proposed flowing day recall standards.

Any move from daily increments of service to partial-day increments of service must be undertaken in the context of all services offered on each pipeline system, including firm services, interruptible services, and balancing and operational provisions. Because these developments involve changes to tariffs and customers service offerings, this is not an area that is currently ripe for GISB development.

The attached Pipeline Segment position paper incorporates the concepts identified above into the BPS recommendation and is offered as an alternative to the BPS recommendation.

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

**NOTE: Wherever two versions are shown below, Version 1 is per the recommendation as of the E.C. meeting of November 16, 2000. Version 2 incorporates the revisions from the 11/16/00 recommendation and then reflects the pipeline segment's proposed modifications thereto.**

**Proposed revision to GISB Standard No. 5.3.2:**

**Version 1**

- 5.3.2** For short-term *biddable* releases (less than ~~5 months~~ 1 year):
- ~~Offers~~ should be tendered by ~~4:00~~ 12:00 P.M. on ~~the a~~ a *Business dDay* before
  - ~~nominations for short-term releases (less than 5 months);~~
  - open season ends no later than ~~2:00~~ 2:00 P.M. on ~~the a~~ a *Business dDay* before ~~nominations are due~~ (evaluation period begins at ~~2:00~~ 2:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken);
  - evaluation period ends at ~~3:15~~ 2:00 P.M.;
  - match or award is communicated by ~~3:15~~ 2:00 P.M.;
  - match response by ~~4:30~~ 4:30 P.M.;
  - award posting by ~~5:30~~ 5:00 P.M.;
  - ~~posting of pre-arranged deals not subject to bid by 9 A.M. the day of nominations;~~
  - contract tendered with contract # by ~~10 A.M.~~ 4:00 P.M.; contract executed; nomination possible for next day gas flow beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)

- For longer term *biddable* releases (~~five months~~ 1 year or more):
- offers should be tendered by ~~4:00~~ 12:00 P.M. ~~four b~~ b *Business dDays* before award for long-term releases;
  - open season ends no later than ~~2:00~~ 2:00 P.M. on the *Business dDay* before timely nominations are due (open season is three ~~b~~ b *Business dDays*);
  - evaluation period begins at ~~2:00~~ 2:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken;
  - evaluation period ends at ~~3:15~~ 2:00 P.M.;
  - match or award is communicated by ~~3:15~~ 2:00 P.M.;
  - match response by ~~4:30~~ 4:30 P.M.;
  - award posting by ~~5:30~~ 5:00 P.M.;
  - ~~posting of pre-arranged deals not subject to bid by 9 A.M. the day of nominations;~~
  - contract tendered with contract # by ~~10 A.M.~~ 4:00 P.M.; contract executed; nomination possible for next day gas flow beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)

For non-biddable releases:

Timely Cycle

- posting of prearranged deals not subject to bid are due by 9:30 A.M. on a Business Day;
- contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for Timely Cycle.

Evening Cycle

- posting of prearranged deals not subject to bid are due by 4:00 P.M. on a Business Day;
- contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for Evening Cycle.

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

Intraday 1 Cycle

- posting of prearranged deals not subject to bid are due by 8:00 A.M. on a Business Day;
- contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for Intraday 1 Cycle.

Intraday 2 Cycle

- posting of prearranged deals not subject to bid are due by 3:00 P.M. on a Business Day;
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for Intraday 2 Cycle. (Central Clock Time)

**Version 2**

**5.3.2** For biddable releases (less than 1 year):

- offers should be tendered by 12:00 P.M. on a Business Day;
- open season ends no later than 1:00 P.M. on a Business Day (evaluation period begins at 1:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken);
- evaluation period ends at 2:00 P.M.;
- match or award is communicated by 2:00 P.M.;
- match response by 2:30 P.M.;
- award posting by 3:00 P.M.;
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)

For biddable releases (1 year or more):

- offers should be tendered by 12:00 P.M. four Business Days before award;
- open season ends no later than 1:00 P.M. on the Business Day before timely nominations are due (open season is three Business Days);
- evaluation period begins at 1:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken;
- evaluation period ends at 2:00 P.M.;
- match or award is communicated by 2:00 P.M.;
- match response by 2:30 P.M.;
- award posting by 3:00 P.M.;
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)

For non-biddable releases:

Timely Cycle

- posting of prearranged deals not subject to bid are due by 9:30 A.M. on a Business Day;
- contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for Timely Cycle beginning at the next available nomination cycle for the effective date of the contract.

Evening Cycle

- posting of prearranged deals not subject to bid are due by 4:00 P.M. on a Business Day;

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

- contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for ~~Evening Cycle~~ beginning at the next available nomination cycle for the effective date of the contract.

Intraday 1 Cycle

- posting of prearranged deals not subject to bid are due by 8:00 A.M. on a Business Day;
- contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for ~~Intraday 1 Cycle~~ beginning at the next available nomination cycle for the effective date of the contract.

Intraday 2 Cycle

- posting of prearranged deals not subject to bid are due by 3:00 P.M. on a Business Day;
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for ~~Intraday 2 Cycle~~ beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)

**Pipeline Position: Modify proposed revisions to Standard 5.3.2 per Version 2.**

**Rationale**

- Consistency of language with the biddable release process.

**Proposed revision to GISB Standard No. 5.3.6:**

**Version 1.**

**5.3.6** Recall terms should be agreed to in advance between the releasing and acquiring shippers.

- ~~If~~ Where the releasing shipper wishes to recall capacity to be effective for a gas day, releases with an award posting date prior to [month day, year] are grand-fathered and the recall notice should be provided to the transportation service provider (TSP) and the acquiring shipper no later than 8:00 A.M. Central Clock Time on the nomination day.

For releases with an award posting date on or after [month day, year]:

- Timely recall notice should be provided to the ~~transportation service provider TSP~~ and the acquiring shipper no later than 9:30 A.M. and 9:45 A.M., respectively, Central Clock Time on the nomination day such that the releasing shipper may place a timely nomination for the next day's gas flow.
- Evening recall notice should be provided to ~~transportation service provider TSP~~ and the acquiring shipper no later than 1:00 P.M. and 1:15 P.M., respectively, Central Clock Time on the nomination day such that the releasing shipper may place an evening nomination for the next day's gas flow.
- Flowing Day Recall notice effective for the Intraday 2 nomination cycle should be provided to the ~~transportation service provider TSP~~ and the acquiring shipper no later than 2:45 P.M. and 3:00 P.M., respectively, Central Clock Time on nomination day such that the releasing shipper may place an Intraday 2 nomination for the current day's gas flow. Such recalls should be limited to situations where the

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

acquiring shipper has not scheduled the capacity. Further, the nomination by the releasing shipper should be scheduled on a basis that does not bump any flowing gas.

For recallable releases, the recallable shipper should provide a recall contact to the TSP.

**Version 2:**

- 5.3.6** Recall terms should be agreed to in advance between the releasing and acquiring shippers.

Where the releasing shipper wishes to recall capacity to be effective for a gas day, releases with an award posting date prior to ~~[month-day-year]~~ the date this standard is incorporated into the Federal Energy Regulatory Commission regulations are grand-fathered, and it is the obligation of the releasing shipper to provide the recall notice ~~should be provided~~ to the transportation service provider (TSP) and the acquiring shipper(s) no later than 8:00 A.M. Central Clock Time on ~~the nomination day~~ a Business Day which is prior to the effective date of the recall such that the releasing shipper may place a nomination for the recalled capacity for the effective date of the recall. Further, the affected shipper(s) should adjust their transportation activity to be consistent with the parameters of the recall notice.

For releases with an award posting date on or after ~~[month-day-year]~~ the date this standard is incorporated into the Federal Energy Regulatory Commission regulations:

Timely recall notice is the obligation of the releasing shipper and should be provided to the TSP and the acquiring shipper (s) no later than 9:30 A.M. and 9:45 A.M., respectively, Central Clock Time on ~~the nomination day~~ a Business Day which is prior to the effective date of the recall such that the releasing shipper may place a timely nomination for the ~~next day's gas flow~~ effective date of the recall. Further, the affected shipper(s) should adjust their transportation activity to be consistent with the parameters of the recall notice.

Evening recall notice is the obligation of the releasing shipper and should be provided to TSP and the acquiring shipper(s) no later than 1:00 P.M. and 1:15 P.M., respectively, Central Clock Time on ~~the nomination day~~ a Business Day which is prior to the effective date of the recall such that the releasing shipper may place an evening nomination for the ~~next day's gas flow~~ effective date of the recall. Further, the affected shipper(s) should adjust their transportation activity to be consistent with the parameters of the recall notice.

~~Flowing Day Recall notice effective for the Intraday 2 nomination cycle should be provided to the, Central Clock Time on nomination day such that the releasing shipper may place an Intraday 2 nomination for the current day's gas flow. Such recalls should be limited to situations where the acquiring shipper has not scheduled the capacity. Further, the nomination by the releasing shipper should be scheduled on a basis that does not bump any flowing gas.~~

~~For recallable releases, the recallable shipper should provide a recall contact to the TSP.~~

**Pipeline Position: Modify proposed revisions to Standard 5.3.6 per Version 2 above.**

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

**Rationale:**

- I. Rationale For Not Supporting Flowing Day Recalls:
  - A. As currently proposed, the likelihood that Flowing Day capacity potentially available for recall will actually be available is very remote. Capacity is purchased in the secondary market because someone needs the capacity, and in most cases, the capacity will be utilized by the replacement shipper at all times. Thus, given the qualification in the second part of the fourth bullet in Standard 5.3.6 (last two sentences), it is unlikely that the recall can be effectuated.
  - B. If the last two sentences of this proposed Standard 5.3.6 are deleted, too much instability and bumping is introduced into the marketplace in a time period/nomination cycle which currently precludes bumping. Flowing Day recalls can and, since they will be most likely used during critical operating time periods, will bump flowing gas resulting in curtailment of markets and supplies. If such cuts are not communicated accurately and timely, the parties involved could incur penalties. Further, if the affected supplies and/or markets are not reduced appropriately, the requirements for OFOs will increase significantly
- II. Rationale For Recalls To Be Done On A Business Day:
  - A. Recalls require communication, not only between the releasing and replacement shipper, but at a minimum between the replacement shipper and his suppliers and markets. If the replacement shipper has released this capacity, communications with the sub-replacement shipper and his suppliers and markets also are required. In order for the communications to be timely, and for each party to take the appropriate action, recalls need to be initiated on a "Business Day" when contacts are more readily available and the probability of a coordinated response is more probable. Recalls on non-business days will increase the probability of the problem noted in I., B. above.
  - B. To provide the replacement shipper whose capacity is being recalled with the greatest opportunity to find alternative means to move his gas, recalls need to occur on a Business Day when knowledgeable contacts are more readily available and new capacity release transactions can be effectuated or the use of alternate fuels can be more effectively initiated.
- III. Rationale For Communication Changes
  - A. TSPs may not be aware of the specifics of recall provisions and thus, it is necessary for the releasing shipper to contact the replacement shipper(s).
  - B. TSPs should always rely on the instructions of the releasing shipper since the releasing shipper determines the nature and extent of the recall. Therefore, the TSP should effect a valid recall as requested by the releasing shipper. Any dispute about the nature or extent of a recall should be resolved between the releasing and replacement shippers.

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

**Proposed revision to GISB Standard No. 5.3.7:**

**Version 1.**

**5.3.7** ~~There should be no partial day recalls of capacity.~~ Transportation service providers should support *Flowing Day Recall* and the function of reputting by releasing shippers. *Reput rights, if any, should take effect at the beginning of a gas day, but no sooner than the gas day following the day of the recall.*

**Version 2**

**5.3.7** Transportation service providers should support ~~Flowing Day~~ *Timely and Evening* Recalls and the function of reputting by releasing shippers. Reput rights, if any, should take effect at the beginning of a gas day, but no sooner than the gas day following the *effective* day of the recall.

**Pipeline Position: Modify proposed revisions to Standard 5.3.7 per Version 2 above.**

**Rationale:**

- Consistency with proposed revisions to Standard 5.3.6.

**Proposed revision to GISB Standard No. 5.3.31:**

**Version 1**

**5.3.31** Transportation Service Providers which support capacity release should accept and process uploads of capacity release offers from releasing shipper(s) (or its authorized third party service provider), provided the offer is received by the Transportation Service Provider at their designated site by ~~12:45 P.M.~~ *11:45 A.M.* CCT on a Business Day. Such received offer, if determined to be valid, should be posted as an Offer and should be available for bidding by ~~4:00~~ *12:00* PM CCT (the normal posted-by deadline and start of bidding time) on that Business Day or the Releasing Shipper's specified Business Day (if later than the received Business Day).

**Version 2**

**5.3.31** Transportation Service Providers which support capacity release should accept and process uploads of *biddable* capacity release offers from releasing shipper(s) (or its authorized third party service provider), provided the offer is received by the Transportation Service Provider at their designated site by 11:45 A.M. CCT on a Business Day. Such received offer, if determined to be valid, should be posted as an Offer and should be available for bidding by 12:00 PM CCT (the normal posted-by deadline and start of bidding time) on that Business Day or the Releasing Shipper's specified Business Day (if later than the received Business Day).

**Pipeline Position: Modify proposed revisions to Standard 5.3.31 per Version 2 above.**

**Rationale:**

- Clarity

**Pipeline Segment Position  
BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026  
RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

**Proposed revision to GISB Standard No. 5.3.32:**

**Version 1**

**5.3.32** Transportation Service Providers which support capacity release should accept and process uploads of capacity release bids from potential acquiring shipper(s) (or its authorized third party service provider), provided the bid is time-stamped as leaving control of the bidder no later than ~~2:00~~ 1:00 P.M. of the applicable deadline day and is received by the Transportation Service Provider at their designated site by ~~2:15~~ 1:15 P.M. Such timely bid, if determined to be valid, should be evaluated by the Transportation Service Provider for the purpose of identifying the winning bidder associated with the Offer upon which the bid was made.

**Version 2**

**5.3.32** Transportation Service Providers which support capacity release should accept and process uploads of *biddable* capacity release bids from potential acquiring shipper(s) (or its authorized third party service provider), provided the bid is time-stamped as leaving control of the bidder no later than 1:00 P.M. of the applicable deadline day and is received by the Transportation Service Provider at their designated site by 1:15 P.M. Such timely bid, if determined to be valid, should be evaluated by the Transportation Service Provider for the purpose of identifying the winning bidder associated with the Offer upon which the bid was made.

**Pipeline Position: Modify proposed revisions to Standard 5.3.32 per Version 2 above.**

**Rationale:**

- Clarity

**Proposed revision to GISB Standard No. 5.3.35:**

**Version 1**

**5.3.35** Unless the affected party and the Transportation Service Provider (TSP) have agreed to exclusive notification via EDI/EDM, the affected party should provide the TSP with at least one Internet E-mail address to be used for Electronic Notice Delivery of intraday bumps, operational flow orders, *recall notices* and other critical notices. The obligation of the TSP to provide notification is waived until the above requirement has been met.

**Version 2**

**5.3.35** Unless the affected party and the Transportation Service Provider (TSP) have agreed to exclusive notification via EDI/EDM, the affected party should provide the TSP with at least one Internet E-mail address to be used for Electronic Notice Delivery of intraday bumps, operational flow orders, ~~recall notices~~ and other critical notices. The obligation of the TSP to provide notification is waived until the above requirement has been met.

**Pipeline Position: do not modify existing Standard 5.3.35**

**Rationale:**

- Revisions to existing standard are no longer necessary based on proposed revisions to Standard 5.3.6.

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

**Proposed revision to GISB Standard No. 5.3.36:**

**Version 1**

**5.3.36** Transportation Service Providers (*TSP*) should support the concurrent sending of electronic notification of intraday bumps, operational flow orders, *recall notices* and other critical notices to two Internet E-mail addresses for each affected party. *If the TSP elects to delegate the notice requirement to the original recalling shipper, that shipper, upon provision of applicable contact information, if available, from the TSP, should issue the recall notice to all affected contracting parties in the release chain.*

**Version 2**

**5.3.36** Transportation Service Providers (*TSP*) should support the concurrent sending of electronic notification of intraday bumps, operational flow orders, ~~recall notices~~ and other critical notices to two Internet E-mail addresses for each affected party. ~~If the TSP elects to delegate the notice requirement to the original recalling shipper, that shipper, upon provision of applicable contact information, if available, from the TSP, should issue the recall notice to all affected contracting parties in the release chain.~~

**Pipeline Position: do not modify existing Standard 5.3.36**

**Rationale:**

- Revisions to existing standard are no longer necessary based on proposed revisions to Standard 5.3.6.

**Proposed New Standard**

**5.3.XX** *To effect the provision of a notice of recall (and subsequent reput) of released capacity, releasing shippers and acquiring shippers should provide each other with the email address(es) of their respective representatives responsible for sending and receiving Recall and Reput notices. Acquiring shippers who re-release capacity should also provide the respective email addresses of their acquiring shippers to their original releasing shipper.*

**Pipeline Position: add new Standard 5.3.XX**

**Rationale:**

- The new standard regarding contact information is necessary to insure that a releasing shipper will have all the notification information necessary to effect a recall / reput.

**Proposed revision to GISB Standard No. 5.3.41:**

**5.3.41** The display of capacity release data for an Offer should be selected from a summary list of Offers. The summary list should be comprised of the following:

Offer Number  
 Release Term Start Date  
 Release Term End Date  
Recall Cycle Indicator  
 Location Information as applicable, and/or navigation to detail

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

Maximum Offer Quantity – Contract  
Biddable Deal Indicator  
other data elements, if applicable

**Pipeline Position: no change to proposed revised Standard 5.3.41**

**Proposed new GISB Standard No. 5.2.z1:**

**5.2.z1** ~~A Flowing Day Recall is a recall of capacity that becomes effective during the same gas day.~~

**Pipeline Position: delete proposed Standard 5.2.z1**

**Rationale:**

- No longer necessary based on proposed revisions to Standard 5.3.6.

**Proposed new GISB Standard No. 5.3.z1:**

**5.3.z1** *A release which takes effect during a gas day shall not be available for recall until the day following the effective date of the release.*

**Pipeline Position: no change to proposed Standard 5.3.z1**

**Proposed new GISB Standard No. 5.3.z2:**

**5.3.z2** *Recall notices should contain at least the affected Service Requester Contract(s) and the effective date/cycle.*

**Pipeline Position: no change to proposed revised Standard 5.3.z2**

**Proposed new GISB Standard No. 5.3.z3:**

**5.3.z3** ~~Where a Flowing Day Recall has been issued and made effective, volumetric charges, including commodity charges, should be billed to the parties that utilize the capacity.~~

**Pipeline Position: delete proposed Standard 5.3.z3**

**Rationale:**

- No longer necessary based on proposed revisions to Standard 5.3.6.

**Proposed Review of Existing Interpretations and Standards**

**Pipeline Position: Transfer package of approved standards to Interpretations Subcommittee and Business Practices Subcommittee for review**

**Pipeline Segment Position**  
**BPS Order 637 Priority Action Items 1 and 2 (Priority 6) and R00026**  
**RECOMMENDATION – as modified @ E.C. Conference Call Mtg. 11/16/00**

and updating. Any additional modifications should be brought back to the E.C. and approved prior to the above package being fully staffed and / or member ratified.

**Rationale:**

- **Consistency**

At the BPS meeting of June 30, the following interpretations were identified as needing to be reviewed for consistency with any proposed modifications adopted to address BPS Order 637 Action Items 1 & 2. Such review was conducted at the August 8-9, 2000 BPS meeting. Subsequent to that meeting, additional modifications to standards have been proposed. The criteria for a review are now different. Examples: The above proposed package of standards deletes references to capacity release transactions that are “short term” or “five-months”. The package also modifies the timetable for capacity release transactions. It is therefore necessary to do a comprehensive review of all the standards and interpretations, including but not limited to the list below, to ensure consistency.

Interpretations

Interpretation 7.3.2

Interpretation 7.3.3

Interpretation 7.3.15

Interpretation 7.3.44

Interpretation 7.3.45

C99003 - New Interpretation Adopted by the E.C. August 24, 2000

Standards:

To be determined by the Business Practices Subcommittee