

BOILED VERSION

I have boiled this document down to it's barest essentials for our use in the Standards Group sessions - Chuck

The following are proposed standards and standard definitions related to the confirmations and scheduling process, the grid-wide confirmation coordination process, the grid-wide coordination times, bumping (not whether but what), Batch, Continuous, Rollover, and Unused Capacity. It is believed that all of these would apply regardless of any particular Intraday timeline or bump/no bump policy call.

Proposed Standard 1.2.T1

"The confirmation process is the process in which the Confirming Parties (the Confirmation Requester and the Confirming Party) compare, respectively, certain information pertaining to (a) nomination(s) they received for service at a location with certain information sent to them by the other of the Confirming Parties; which such sent information pertains to (a) nomination(s) received by such other of the Confirming Parties at that same location."

TERM - "Confirmation Process"

Proposed Standard 1.2.T2

"A Confirmation Requester is a Service Provider (including a Point Operator) which is seeking to confirm with another Service Provider (the Confirming Party) the transfer of quantities of gas at a location from a Service Requester (or the contract of same) with which Service Requester the Confirmation Requester has a relationship, to a Service Requester (or the contract of same) with which the Confirming Party has a relationship. The location at which the transfer is occurring is the interconnection between the facilities of (or a location associated with) the Confirmation Requester and the facilities of (or a location associated with) the Confirming Party."

TERM - "Confirmation Requester"

Proposed Standard 1.2.T3

"A Confirming Party is a Service Provider (including a Point Operator) which provides a confirmation to a Confirmation Requester (either in response to a Request to Confirm or by sending an Unsolicited Confirmation Response) with respect to the transfer of quantities of gas at a location from a Service Requester (or the contract of same), and with which Service Requester the Confirming Party has a relationship, to a Service Requester (or the contract of same) with which the Confirmation Requester has a relationship. The location at which the transfer is occurring is the interconnection between the facilities of (or a location associated with) the Confirmation Requester and the facilities of (or a location associated with) the Confirming Party."

TERM - "Confirming Party"

Proposed Standard 1.2.T4

"The term Confirming Parties refers to the Confirmation Requester and the Confirming Party."

TERM - "Confirming Parties"

Proposed Standard 1.3.C1

"With respect to the nomination, confirmation and scheduling process, (including intraday nominations and changes), Confirming Parties may agree to an Explicit Confirmation process or to a Confirmation by Exception process. In the absence of agreement to the contrary, Confirming Parties are expected to support the Explicit Confirmation process. The 'Explicit Confirmation process' is so named because it requires that the Confirming Parties respond to Requests to Confirm (or initiate Unsolicited Confirmation Responses) and that the resulting quantity so confirmed (according to the lesser of rule as applicable) is unambiguously the entire quantity for that particular level of confirmation for the subject scheduling interval as agreed upon between the Confirming Parties."

CONCEPT - Default method for Confirmations is Explicit

Proposed Standard 1.3.C2

"With respect to the nomination, confirmation and scheduling process, (including intraday nominations and changes), Confirming Parties may agree on a Confirmation by Exception process. Confirmation by Exception means that the Confirming Parties may agree that one party may deem that all requests for change at a location are confirmed by the other party (the Confirmation by Exception Party); unless the Confirmation by Exception Party takes exception, by informing the party seeking to effect the change, of their exception to the change(s), within one hour from receipt of the applicable document. One hour is the default exception time period, absent mutual agreement to the contrary. Mutually agreed upon exception time period(s) may be any interval; provided, the expiration of such time period is a time sufficiently prior to a time for receipt (by Operators and Service Requesters) of scheduled quantities to allow processing of the exception (via a Confirmation Response document) by the Confirming Party receiving such Confirmation Response document and sending of the applicable Scheduled Quantities document(s)."

CONCEPT - outline of Confirmation by Exception process

Proposed Standard 1.3.C3 [under consideration in BPS as resolution to C97028 provided for informational purposes]

"As between Confirming Parties (the Confirmation Requester and the Confirming Party) and with respect to the confirmations and scheduling process, the following is the Day-at-a-Time Confirmation process:

"At least during each Business day, Confirming Parties' (the Confirmation Requester and the Confirming Party) should attempt to confirm and schedule transaction(s) nominated by their respective Service Requesters; which nominations are: 1) to be effective for the same gas day (a Type I intraday nomination), or, 2) to be effective for the following gas day (a regular nomination or a Type II intraday nomination). To accomplish this, a Request to Confirm or Unsolicited Confirmation Response (as applicable) corresponding to the applicable nomination(s) will be submitted to the respective Confirming Party or Confirmation Requester for their review and processing (i.e., the return of a Confirmation Response or Operator Scheduled Quantity document as appropriate). In addition and by mutual agreement of the Confirming Parties, the Day-at-a-Time Confirmation process may be used for conducting the confirmation and scheduling process during non-Business day(s) (i.e., weekend day(s) and/or federal holiday(s))."

CONCEPT - ? general Confirmation process outline

Proposed Standard 1.3.C4 [under consideration in BPS as resolution to C97028 provided for informational purposes]

"As between Confirming Parties (the Confirmation Requester and the Confirming Party) and with respect to the confirmations and scheduling process, the following is the Auto-Confirmation process:

"Where, of the two Confirming Parties at a location, one of them and in this case, the Confirmation Requester, does not perform confirmations as set forth in Standard during non-Business days [1.3.X above standard number to be inserted when assigned] (as determined from time-to-time in a dated, written notice from the Confirmation Requester to the Confirming Party upon the latest date of which the Confirming Party may rely), the Confirming Party may consider that the submitted Unsolicited Confirmation Response has been auto-confirmed by the Confirmation Requester, as submitted; and, the Confirming Party may schedule the subject auto-confirmed nomination(s) through the earlier of: a) the Ending Date/Time in the Service Requester's nomination, or, b) the end of the gas day occurring during the calendar day of the second subsequent Business day.

"Likewise, where, of the two Confirming Parties at a location, one of them and in this case, the Confirming Party does not perform confirmations as set forth in Standard during non-Business days [1.3.X above standard number to be inserted when assigned] (as determined from time-to-time in a dated, written notice from the Confirming Party to the Confirmation Requester upon the latest date of which Confirmation Requester may rely), the Confirmation Requester may consider that the submitted Request to Confirm has been auto-confirmed by the Confirming Party, as submitted; and, the Confirmation Requester may schedule the subject auto-confirmed nomination(s) through the earlier of: a) the Ending Date/Time in the Service Requester's nomination, or, b) the end of the gas day occurring during the calendar day of the second subsequent Business day."

CONCEPT - outline of Auto-Confirmation process

Proposed Standard 1.3.C5

"With respect to the regular confirmation process (and not the intraday confirmation process), the lesser of rule applies with respect to (a) location(s) where the Confirming Parties, conducting the confirmation process, have chosen the Explicit Confirmation process."

CONCEPT - Explicit Confirmation method uses Lesser of Rule during REGULAR confirmations.

Proposed Standard 1.3.C6

"With respect to the intraday confirmation process, the lesser of rule applies with respect to (a) location(s), where the Confirming Parties, conducting the confirmation process, have chosen the Explicit Confirmation process; and, where a response communication (i.e., a Confirmation Response having been sent in response to a Request to Confirm, or, within the intraday confirmation process only, a Request to Confirm having been sent as a response to an Unsolicited Confirmation Response) is received with respect to the subject transaction(s). Likewise, the lesser of rule would not apply in cases where no response communication (i.e., no Confirmation Response is sent in response to a Request to Confirm, or, within the intraday confirmation process only, no Request to Confirm is sent as a

response to an Unsolicited Confirmation Response) has been received with respect to the subject transaction(s), in which case, no change is made."

CONCEPT - Explicit Confirmation method uses Lesser of Rule during INTRADAY confirmations, except where no communication.

Proposed Standard 1.3.C7

"With respect to the Confirmation by Exception process, all requested quantities (increases, decreases, and other changes whether related to the regular or the intraday confirmation processes) are deemed confirmed, without regard to the lesser of rule, between the Confirming Parties with respect to the location(s) where they conduct the Confirmation by Exception process, unless the Confirmation by Exception Party takes exception to the change prior to the expiration of the exception time period, in which case the lesser of rule is applied."

CONCEPT - Confirmation by Exception uses confirmed qty, not lesser of rule (unless exception is taken, then lesser of).

Proposed Standard 1.3.C8

"With respect to the Auto-Confirmation process, all transaction(s) (increases, decreases, and other changes whether related to the regular or the intraday confirmation processes) with respect to the location(s) where the Confirming Parties conduct the Auto-Confirmation process which transaction(s) are communicated to the Auto-Confirmation Party by the other of the Confirming Parties are deemed confirmed between the Confirming Parties without regard to the lesser of rule."

CONCEPT - Auto-Confirmation uses confirmed qty, never lesser of rule.

Proposed Standard 1.3.C9 [under consideration in BPS as resolution to C97028 provided for informational purposes]

"The Nomination, Request to Confirm, Confirmation Response, Unsolicited Confirmation Response, Scheduled Quantity and Operator Scheduled Quantity Documents all contain a Beginning Date/Time and an Ending Date/Time.

"As between the Confirming Parties (the Confirmation Requester and the Confirming Party); and, absent mutual agreement to the contrary, with respect to the Beginning Date/Time in the confirmations and scheduling process, when transaction(s) nominated by their respective Service Requesters are attempted to be confirmed and scheduled, the Beginning Date/Time in the Request to Confirm or Unsolicited Confirmation Response (as applicable) should be no earlier than the later of; 1) the beginning of the current gas day (for Type I intraday nominations), or, 2) the beginning of the next gas day (for regular and Type II intraday nominations). Case 2 above is for use in situations where there is a multi-day nomination submitted to the party generating the Request to Confirm or Unsolicited Confirmation Response document (as applicable) and the gas day for which confirmation is sought is subsequent to the first gas day (the gas day pertaining to the original Beginning Date/Time) within the corresponding nomination.

"As between the Confirming Parties (the Confirmation Requester and the Confirming Party); and, absent mutual agreement to the contrary, with respect to the Ending Date/Time in the confirmations and scheduling process, when transaction(s) nominated by their respective Service Requesters are attempted to be confirmed and scheduled, the Ending Date/Time in the Request to Confirm or Unsolicited Confirmation Response (as applicable) should be no later than the earlier of 1) the end of the current gas day (for Type I intraday nominations), or 2) the end of the next gas day (for regular and Type II intraday nominations)."

CONCEPT - Date Range handling instructions for confirmation process

Proposed Standard 1.3.C10 [under consideration in BPS as resolution to C97028 provided for informational purposes]

"With respect to the confirmations and scheduling process: 1) the Beginning Date/Time in any of the Request to Confirm, Unsolicited Confirmation Response, Confirmation Response, Scheduled Quantity, and Operator Scheduled Quantity documents should not be earlier than the Beginning Date/Time in the corresponding nomination(s) document(s); and 2) the Ending Date/Time in any of the Request to Confirm, Unsolicited Confirmation Response, Confirmation Response, Scheduled Quantity, and Operator Scheduled Quantity documents should not extend beyond the equivalent Ending Date/Time in a corresponding Nomination document."

CONCEPT - Conf. dates should not precede originating nom dates. Scheduled Quantities docs should not extend beyond same.

Proposed Standard 1.3.C11 [under consideration in BPS as resolution to C97027 provided for informational purposes]

"Affected parties (Confirming Parties (i.e., the Confirmation Requester and Confirming Party) and Service Requesters) should recognize that even though Confirming Parties may have confirmed and scheduled their respective nominations for a period of time, a subsequent event (including by way of example and not by way of limitation, a subsequent: 1) nomination by one of the affected Service Requester(s); 2) nomination, submitted by a different Service Requester, which nomination has a higher scheduling priority than that previously confirmed and scheduled for the affected Service Requester; 3) capacity constraint affecting one or both of the Confirming Parties and the affected Service Requester; or, 4) loss of the affected Service Requester's supply, market or both; recognizing in all of these examples, of course, that the submission and processing of any such activity(ies) would be conducted consistent with applicable standards, regulations, statutes, and contractual rights) can cause a previously confirmed and scheduled nomination to be unscheduled.

"In such event, notification of such an occurrence should be delivered to the affected: 1) Confirmation Requester in a Confirmation Response (or Unsolicited Confirmation Response as applicable) document by the Confirming Party; 2) Confirming Party in a Request to Confirm document by the Confirmation Requester; and/or 3) Service Requester(s) in a Scheduled Quantity document by the applicable Confirming Party or Confirmation Requester on whose system the Service Requester(s) nomination(s) were made.

"Applicable notification(s) of such occurrences should be delivered to the affected parties reasonably proximate in time to the time during which the subsequent event was acted upon by the Confirmation Requester or Confirming Party, respectively."

CONCEPT - It is possible to become bumped/unscheduled by various causes. Timely notice is required to affected parties.

Proposed Standard 1.3.C12

"A Transportation Service Provider receiving an intraday nomination for a flow period prior to the applicable Grid-wide confirmation coordination process deadline applicable to such flow period may hold such nomination for processing (leave it standing) until the nomination receipt deadline applicable to such flow period has passed."

CONCEPT - Intraday noms tendered in advance can be held until valid

Proposed Standard 1.2.T5

"A transaction nominated for a gas day for which confirmation has not yet been sought is called a standing nomination."

TERM - "Standing Nomination"

Proposed Standard 1.2.T6

"A transaction nominated for a subsequent gas day which is sought to be confirmed but which does not get confirmed is called an unconfirmed nomination."

TERM - "Unconfirmed Nomination"

Proposed Standard 1.2.T7

"A transaction nominated and scheduled for a gas day which is also nominated and confirmed (or confirmable) for the subsequent gas day which nevertheless does not get scheduled due to a pipeline constraint is called an unscheduled nomination."

TERM - "Unscheduled Nomination"

Proposed Standard 1.2.T8

"A transaction nominated, confirmed and scheduled for a gas day which nevertheless gets cut by a Confirmation Requester or a Confirming Party subsequent to its having been scheduled is called a scheduled cut on the system of the party (the Confirmation Requester or the Confirming Party) not initiating the cut."

TERM - "Scheduled Cut"

Proposed Standard 1.2.T9

"A transaction nominated, confirmed and scheduled for a gas day which nevertheless gets cut by the subject Transportation Service Provider subsequent to its having been scheduled; due to the nomination of another Service Requester on the subject Transportation Service Provider is called a bump on the system of the subject Transportation Service Provider initiating the cut."

TERM - "Bump"

Proposed Standard 1.2.T10

"A transaction nominated, confirmed and scheduled for a gas day which nevertheless gets cut by the subject Transportation Service Provider subsequent to its having been scheduled due to physical circumstances on the subject Transportation Service Provider is called a curtailment on the system of the subject Transportation Service Provider initiating the cut."

TERM - "Curtailment"

Proposed Standard 1.2.T11

"Batch processing means that all transactions (nominations, confirmations and scheduled quantities) which are received after the last submission deadline are processed along with those received prior to the next deadline (or processing interval) as though they were all received at the same time."

TERM - "Batch"

Proposed Standard 1.2.T12

"With respect to intraday processes, continuous and contiguous scheduling means that those nominations received prior to the initiation of a confirmation and scheduling process and which nominations relate to (request) the next effective flow time are processed and scheduled contiguously with then current scheduled transactions. Nominations with later effective times, regardless of when they were received by the Transportation Service Provider, may be processed together or as they are received, but in either case, will be processed subsequent to nominations requesting earlier effective times."

TERM - "Continuous and Contiguous"

Proposed Standard 1.2.C13

"With respect to 'first-come-first-served' and 'continuous scheduling', the nomination with the earliest requested effective time will be scheduled prior to (served first or before) a later requested effective time. This capacity is 'first come', in the day, and, given that all quantities are daily quantities, if the capacity is requested and utilized, it is then not available to 'serve' nominations with later coming effective times."

CONCEPT - First-come first-served is based on Effective time (for Continuous scheduling)

Proposed Standard 1.2.C14

"Continuous and contiguous intraday scheduling is on a mutually agreed basis as between Confirming Parties. Those Transportation Service Providers offering continuous and contiguous scheduling should, when interacting with the Grid-wide confirmation coordination timelines, schedule at least according to the minimum grid-wide coordination timelines for effective flows at the grid-wide minimum synch up times."

CONCEPT - Continuous and Contiguous occurs as mutually agreed between Confirming Parties.

Proposed Standard 1.3.T13

"A Grid-wide synchronization time is that time at which, at a minimum, scheduled quantity activity is synchronized as between interconnected Transportation Service Providers. This means that, as between interconnected Transportation Service Providers, their scheduled daily quantities will be synchronized at each Grid-wide synchronization time. The Grid-wide synchronization times are 9:00 AM, 3:00 PM [or 2:00 PM depending on the compromise] and 9:00 PM."

TERM - "Grid-Wide synchronization time"

Proposed Standard 1.3.T14

"The Grid-wide minimum confirmation coordination process(es) are those process(es) which support the ability of Transportation Service Providers to coordinate their scheduling activities in conjunction with the Grid-wide synchronization times."

TERM - "Grid-Wide minimum confirmation coordination process"

Proposed Standard 1.3.C15

"All Transportation Service Providers should support the Grid-wide minimum nomination timeline and the Grid-wide minimum confirmation coordination process."

CONCEPT - Everyone should support the timeline

Existing Standard 1.3.10

Delete

Existing Standard 1.3.32

Delete

Proposed Standard 1.3.C16 [to replace the deleted standards]

"There is no limitation as to the number of intraday nominations (line items as per GISB Standard 1.2.1) which a Service Requester may submit at any one deadline or in total across all deadlines."

CONCEPT - No limit on the number of intraday transactions

Proposed Standard 1.2.C17

"The element of 'time' in a nomination is for informational purposes and serves to communicate the Service Requester's intentions to the applicable Transportation Service Provider(s) and does not determine the patterns of flow as between interconnected parties. The requested beginning or ending 'time' portion(s) of an intraday nomination can be for any time(s) within the subject gas day; such time(s) shall be for informational purposes only; such time(s) may assist the applicable Transportation Service Provider(s) and other Interconnected Party(ies) as to the intentions of the nominating Service Requester(s) but the ability to flow the daily quantities at the necessary flow rates are determined between the interconnected parties."

CONCEPT - Time element is informational only

Proposed Standard 1.3.C18

"Only interruptible services can be bumped and only by primary FT. There is no bumping of interruptible services by secondary (or lower priority) FT. There is no bumping of secondary (or lower priority) FT by primary FT."

CONCEPT - only I.T. can be bumped, and only by Primary F.T.

Proposed Standard 1.3.C19

"Intraday nominations have prospective effect, can not un-flow gas without the concurrence of all affected parties, and are for full gas day quantities."

CONCEPT - Intraday noms cannot unflow gas. Intraday noms are for full day quantities.

Existing Standard 1.2.7

Delete

Proposed Standard 1.3.T15 [replaces deleted Standard 1.2.7]

"Type (I) intraday nominations are defined as nominations received after the start and before the end of a gas day which pertain to that gas day. Type (ii) intraday nominations are nominations which pertain to the subsequent gas day; are received after the daily grid-wide nominations deadline and before 6 PM the calendar day before the start of the subsequent gas day."

TERMS - "Type (i) Intraday"; "Type (ii) Intraday"

Proposed Standard 1.3.C20

"Each nomination should indicate whether it is intended to be processed as a regular nomination (i.e., the 11:30 leave control of Service Requester deadline); a Type II nomination, or the first or second of the Type I nominations. Type II Intraday nominations for a gas day should be received by the subject Transportation Service Provider after the 11:30 AM 'leave control of the sender time' associated with the regular nominations deadline for a subsequent gas day (the same gas day to which the Type II intraday nomination relates). Type I Intraday nominations for a gas day should be received by the subject Transportation Service Provider after the last 'leave control of the sender time' associated with the Type II nominations deadline for a subsequent gas day (the same gas day to which the Type I intraday nomination relates)."

CONCEPT - Intraday noms should indicate their intended nom cycle (regular, type (ii), first type (i), etc)

Proposed Standard 1.3.C21

"Each Service Requester should receive a scheduled quantity (including unsolicited scheduled quantities) which should indicate what type of scheduled quantity it is. The following are the different types of scheduled quantities documents:

- 1) There is a prior to gas day scheduled quantity document (i.e., the 4:30 received by Service Requester scheduled quantity document);

- 2) There is a scheduled quantity document that is the result of the Type II grid-wide confirmation coordination process;
- 3) There is a scheduled quantity document that is the result of the first Type I grid-wide confirmation coordination process;
- 4) There is a scheduled quantity document that is the result of the second Type I grid-wide confirmation coordination process; and,
- 5) There is a scheduled quantity document that contains the end of gas-day scheduled quantities and this document provides the end result of all scheduling activity (the scheduled quantities) pertaining to the just completed gas day.

"Scheduled quantities documents type 2, 3, and 4, above are 'changes only' scheduled quantities documents and are intended to reflect only: a) the new scheduled quantities (daily quantities) scheduled by the Transportation Service Provider in response to the Service Requester's nomination(s) activities (i.e., nominations by the Service Requester receiving the scheduled quantities document); or, b) the changes (i.e., alterations to the Service Requester's previously scheduled quantities) as a result of scheduling activities by the Transportation Service Provider for other Service Requesters (an unsolicited Scheduled Quantity when no other Service Requester initiated activity applies)."

CONCEPT - Scheduled quantities documents should be incremental rather than cumulative.

Proposed Standard 1.3.C22

"Receivers of scheduled quantities documents may waive the obligation of the sender to send."

CONCEPT - Scheduled quantities docs can be waived.

Proposed Standard 1.2.T16

"Unused Capacity is that daily quantity at a location which, following the grid-wide confirmation coordination process with respect to a grid-wide coordination time, remains unscheduled and available to be scheduled for the subject gas day after taking into account all Service Requester(s) scheduled quantities and any quantities which, as between the interconnected Transportation Service Providers', was scheduled with respect to such Transportation Service Providers' scheduling of makeup or payback quantities under (an) applicable balancing agreement(s)."

TERM - "Unused Capacity".

Proposed Standard 1.2.T17

"Operationally Available Capacity is Unused Capacity."

TERM - "Operationally Available Capacity"

Existing Standard 1.3.13 [no rollover of intradays]

Remains as is.

CONCEPT - leave rollover language as is