

**TransCanada**

October 3, 1997

**TransCanada
International Ltd.**TransCanada PipeLines Tower
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Calgary, Alberta, Canada T2P 4K5
Telephone: (403) 267-6100
Fax: (403) 267-6444**VIA FAX: (713) 757-2491**Gas Industry Standards Board
1100 Louisiana, Suite 4925
Houston, Texas, 77002**Re: Request for Industry Comments on Proposed Standards
Request R97109**

Dear Sirs:

TransCanada PipeLines Limited has concerns regarding the proposed reduction in field size for the contract id data elements pursuant to Request R97109. We feel that this Request should not be approved for the following reasons:

- This Request does not support the ANSI X12 specification of a 30 character field length for these data elements.
- The Transportation Service Provider (TSP) controls the value and field length of these data elements. Thus, if less than 30 characters are used by the TSP for these data elements, the TSP should not have to change their existing systems to use 30 characters if they choose not to.
- TSPs may have already developed internal systems to utilize the 30 character field length. We are aware of one TSP that has done this and there may be others.
- Third party service providers may have developed their systems to utilize the 30 character field length. Specifically, NrG Highway has done this and there may be others.
- We are unaware of any GISB standard or regulatory order that would require a TSP to display the maximum field size on their EBB screens for data elements where the TSP determines the value of and where the TSP uses a field size less than the maximum.

We appreciate the opportunity to provide the above comments. If there are any further questions, please contact the undersigned at (403) 267-8606.

TRANSCANADA PIPELINES LIMITEDKen R. Schubert
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