

## **Comments from CGI**

CGI would like to thank the members of the Technical Sub-Committee and acknowledge the hard work done in completing the request R97064-D.

In reviewing the nomination and scheduled quantity transaction; a change has been made in the technical implementation of the pathed non-threaded nomination. It is clear that on the threaded segment of a pathed non-threaded nomination that the population of up and down identifier codes are ambiguous. But the annotations in the implementation guide create by the Technical Sub-Committee (see below) are a change in GISB business practice standards that need to be forwarded to BPS for their consideration.

“For GISB, the Upstream Identifier Code and Downstream Identifier Code are not used when the Model Type is Pathed Non-Threaded (Threaded Segment) (CS05 = 'T'). In this case, send "N/A".”

Based on the comments attributed to Kim Van Pelt in another request, that the new Nomination data set that was approved by ANSI requires that upstream/ downstream party initiates a loop, with all of the related data under that party (e.g., Package ID, ranks, upstream/downstream contract). The upstream/downstream party is the only information that is mandatory at that level. None of the other data is required, and therefore it is anchored by the party information. So GISB must establish some default identifier so a thread segment can be transmitted without ANSI translation errors.

This issue of GISB business practice standards that need to be forwarded to BPS for their consideration.

### **Response:**

The annotations in the implementation guide created by the Technical Subcommittee do not result in a change in business practice. When the N1 segment is used in the Pathed Model (for example) to communicate the Upstream Party, N101 = "US", N103 = "1" (to indicate DUNS number), and N104 = the Upstream Party DUNS number. When the N1 segment is used in the Pathed Non-threaded Model, Threaded Segment to begin the Upstream loop, the N101 = "US", but the N103 = "ZZ" and the N104 = "N/A". The N104 value is not intended to be the Upstream Party, and the N103 value of "ZZ" communicates that no Upstream Party applies in this case. The notes in N104 state that Upstream and Downstream identifiers are not used when Model Type is T. This is not implying that we are sending a replacement value for the Upstream Party (which would have to be implemented on the EBB), which would be a change in Business Practice. This "N/A" value does not get carried back into the back-office system and stored as the Upstream Party, and it is not a default identifier for an Upstream Party. It is a Technical means of indicating that no Upstream Party applies. There are no business practice changes associated with this annotation.

## **Comments from Enron North America and Dynegy Marketing and Trade**

In a combined effort, Enron North America and Dynegy Marketing and Trade would like to acknowledge the hard work done by the Technical Sub-Committee and submit the following comments and concerns on the R97064-D request.

Based on certain business and technical discrepancies found, our recommendation to the GISB Executive Committee is not to accept the modifications presented in request R97064-D at this time. With such a high magnitude of changes to such mission critical data, we feel that the document should be left as a working draft and sent back to the Technical Sub-Committee for additional refinement.

### **Response:**

Each of the issues documented below can be explained. It appears the authors of these comments did not have a thorough understanding of the Technical implementation of the new dataset and of some of the existing datasets. Please see Responses below for an explanation. There is no additional refinement needed from the Technical Subcommittee.

In addition, there should be a phase-in approach developed in order to provide a smooth transition to the new X12 data sets once the refinements are completed. This phase-in approach would need to involve the ability to parallel test the new X12 data sets for a period of time while the existing X12 data sets are still in production in order to ensure that there are no interruptions of service.

### **Response:**

I have no opinion on the use of a phase-in approach. The timing of the implementation of these datasets by GISB was not discussed by the Technical Subcommittee, and the Technical Subcommittee has not made a recommendation one way or the other.

Discrepancy Examples:

### **1.) GISB Documents are Out-of-Sync (Nomination and Quick Response specifically):**

a.) The Quick Response has two (2) date segments, the Nomination has one (1) date segment. The Quick Response will not be able to read the date segment sent from the Nomination.

#### **Response:**

The mapping of the Beginning Date, Beginning Time, Ending Date and Ending Time in one DTM segment in the Nomination vs. two DTM segments in the Nomination Quick Response is irrelevant. The Nomination Quick Response X12 mapping is not generated from the Nomination X12 mapping, it is generated from the validation of the GISB data elements within the Nomination X12 mapping. It is not true that the Quick Response will not be able to read the date segment sent from the Nomination.

b.) The Nomination dataset has two additional gas flow date formats that are not in the Quick Response. The Quick Response will not be able to read, process, or kick off errors due to this inconsistency.

#### **Response:**

Again, it is irrelevant which code values are used in the Nomination vs. which code values are used in the Nomination Quick Response. The data elements being validated and returned are the Beginning Date, Beginning Time, Ending Date, and Ending Time. These are four separate GISB data elements and it is not relevant how they are mapped in each document. The code values used in the new Nomination document are more efficient. The errors reported in the Nomination Quick Response are related to the GISB data elements, not to the X12 mapping of those data elements.

The different code values used in the Nomination will not affect the ability to generate errors in the Quick Response. (Applicable errors are: Invalid date/time qualifier (DTM01), Invalid date/time period qualifier (DTM06), Invalid nomination Beginning/Ending Date/Time, Missing nomination Beginning/Ending Date/Time, Nomination Beginning/Ending Date/Time is outside contract terms, Invalid Beginning Time, Invalid Ending Time, Incorrect Ending Time Defaulted to end of gas day, Beginning Time Not Processed)

c.) It is recommended that updates be made on the Quick Response and Nomination datasets simultaneously. If not done, chances for discrepancies between datasets increases and companies will be forced to make major code changes not once, but twice.

**Response:**

Implementing the new mapping of the Nomination prior to implementing the new mapping of the Nomination Quick Response in no way increases the chances for discrepancies or forces companies to make major code changes twice. The mapping of these two data sets is unrelated since it is the GISB data elements that are being validated and not the X12 mapping of them. The changes proposed in R97064D do not change the underlying structure or format of the data when sent to/received from the back-office system.

**2.) GISB Business Standards Changed:**

a.) New datasets would require shippers to send made-up data to pipelines using the pathed non-threaded model type. Duns numbers would be required on the threaded portion; since duns numbers are not applicable, new datasets ask that "N/A" be sent in its place (EBB conformity will also be required).

**Response:**

When looking at the new X12 mapping of the Nomination closely, one sees that DUNS numbers are not required on the threaded portion of the Nomination. What is required is a N1 segment to begin the Upstream/Downstream loop. In this N1 segment, N101 = "US", but the N103 = "ZZ" and the N104 = "N/A". Nowhere does this indicate a DUNS number is required. The N104 value is not intended to be the Upstream Party, and the N103 value of "ZZ" communicates that no Upstream Party applies in this case. The notes in N104 state that Upstream and Downstream identifiers are not used when Model Type is T. This is not implying that we are sending a replacement value for the Upstream Party (which would have to be implemented on the EBB). This "N/A" value does not get carried back into the back-office system and stored as the Upstream Party, and it is not a default identifier for an Upstream Party. It is a Technical means of indicating that no Upstream Party applies. There are no business practice changes associated with this annotation, and no EBB conformity is necessary.

b.) Clarification is needed on the Usage Codes; inconsistencies were found comparing the segment condition to the data element condition on the following elements: : upstream/downstream ranks, associated contract, activity code, deal type, upstream package ID, downstream package ID, nom user data 1, and nom user data 2. See example below:

[diagram of N9 segment position 1300 from Nomination included in original comments is omitted from this document]

**Response:**

The segment in this example is noted as business conditional because the GISB data elements within it are business conditional. The N901 and N902 elements are noted as Mandatory, because if the segment is used, the N901 and N902 elements are required. All the GISB datasets have this usage code notation for optional segments where some of the elements are mandatory. ANSI also uses this notation. This is not a change for R97064D, it has been in use since GISB version 1.0.

**3.) GISB Documents are Out-of-Sync with ANSI Standards: Should translators check compliance at the ANSI or GISB level? For compliance checking to be accomplished at the ANSI level, changes are needed to find ANSI elements that match GISB.**

**Response:**

Each of the issues below are not new for R97064D, but have been in existence for as long as GISB has been using X12.

a.) New datasets use ANSI optional segments and elements as mandatory.

**Response:**

There are no documents in ANSI X12 whose segment and element usages exactly match those of the needs of the company implementing the document. All industries take the ANSI X12 documents and then create implementation guides stating which ANSI optional segments/elements are mandatory for their implementation. If we created a ANSI document that met our needs exactly in terms of mandatory segments/elements, it would be too inflexible to use. All the GISB datasets have this convention for optional ANSI segments where the GISB usage is mandatory. This is not a change for R97064D, it has been in use since GISB version 1.0.

b.) New datasets are not consistent with ANSI field lengths.

**Response:**

Since GISB has not defined data field lengths for GISB data elements, we were forced to limit the field lengths of some fields in the ANSI segments to be the same as the field lengths of those data elements in previous versions of the GISB implementation guides so as not to require companies to change their database field sizes. The new documents do not actually change the ANSI field length values, but merely note that for GISB, the field lengths have been reduced. This is in line with GISB standard 4.1.38 in that we are not increasing any field lengths of GISB data elements.

c.) Translators would be required to change built-in compliance checking from the ANSI level to the GISB level.

**Response:**

This is not a new issue for R97064D. In every document we have today, there are differences in the ANSI X12 usages from what is in the GISB implementation guides. There is no GISB requirement that translators change to match the GISB level of compliance instead of the ANSI level.

d.) We do not understand the request to change the detail section of the Nomination datasets hierarchy from "contract, date" to "date, contract".

**Response:**

The hierarchy was not changed from "contract, date" to "date, contract". In both GISB version 1.4 and the proposed Nomination mapping for R97064D, the date and contract information are at the same level. The only difference is that the GISB version 1.4 mapping, contract is in a segment before date, while in the proposed Nomination mapping for R97064D, date is in a segment before contract. They are at the same level in both documents.

e.) The ANSI nomination batch id is 50 characters, the GISB nomination and quick response batch id is 22 characters. Programming errors could result from this inconsistency and cause the quick response to fail. .

**Response:**

There is no GISB data element for "nomination batch id". If this data is supposed to be sent in the Nomination and then echoed back in the Nomination Quick Response, then GISB should define a data element for it.

f.) The ANSI Nominator's Tracking ID field size is 20 characters, the GISB nomination and quick response Nominator's Tracking ID field size is 11 characters. Programming errors could result from this inconsistency and cause the Nomination Quick Response to fail.

**Response:**

The GISB data element for Nominator's Tracking ID is mapped to the SLN01 in the Nomination with R97064D. It is noted in the mapping that this field is reduced from the ANSI field length of 50 characters to the GISB field length of 11 characters. GISB cannot prevent ANSI from increasing the field size for its data elements as it moves forward with new versions of the X12 standards. All GISB can do is note that the GISB field length is 11 characters, which we have done in the mapping, and clearly state that this is different than the ANSI length. Again, this is in line with GISB standard 4.1.38. The GISB field lengths for the Nominator's Tracking ID in the Nomination and the Nomination Quick Response are the same and are clearly noted.

**4.) Other Changes/Concerns:**

a.) There is redundancy in how quantities can be submitted. Quantities submitted on the receipt side will be considered receipt quantities, quantities submitted on the delivery side will be considered delivery quantities. Yet, the quantity type indicator is still sent. What happens if the quantity type indicator is sent as "R", and the quantity is sent on the delivery side? There is no quick response error or warning message for this.

**Response:**

A new error and/or warning code can be defined for this case. Or, ENMQR510, Invalid Quantity Type Indicator, can be used.

b.) The Nomination file changes the SI segment pair descriptor UP from Upstream Package ID to Upstream Contract. This type of change could cause problems in coding.

**Response:**

This change is required to be ANSI compliant. In the GISB version 1.4 Nomination, the Upstream Package ID was mapped to an SI pair in element 1000, with code value "UP". ANSI Data Element 1000 does not have a specific list of code values, so GISB was able to pick their own code values and chose "UP". In the new Nomination document, which is ANSI Compliant, the SI segment is not appropriate for the Upstream Package ID. The SI segment is used to communicate Service Characteristic data. In the new Nomination document, the data element Upstream Package ID is mapped to an N9 Segment where Reference Information is communicated. The N901 element is where the code value goes, and code value UP is already being used by ANSI to mean "Upstream Shipper Contract Number". Since this is not appropriate for the Upstream Package ID, and since there were no existing code values appropriate, GISB requested a new code value from ANSI and was given PKU for "Upstream Package ID". Since the Upstream Contract Identifier is also mapped to the N9 segment, it seemed logical to choose the ANSI code value of UP - Upstream Shipper Contract Number to communicate this. It is unfortunate that this is the same code value previously chosen for Upstream Package ID. However, we could not continue to use the old code value of UK for Upstream Contract Identifier, since that means "Equivalent Course Number at Requesting Institution" in the ANSI standards.

c.) The Nomination DTM segment is being changed back to a date range (v.1.3 split the DTM date range into "Begin Date/Time" and "End Date/Time", requested change reverts date format back to

a range).

**Response:**

The reason the Nomination DTM segment date range was split into two DTM segments with version 1.3 was because the usage of Beginning Time was changed to business conditional, which could not be accommodated in a date range with the current code values for DTM. We have now two new code values from ANSI which allow us to send the Nomination date range in one DTM segment as a range (with an optional beginning date). This is a more efficient mapping and does not affect the business usage of the GISB data elements mapped here.

d.) Subtle changes were made to the date format which could easily be overlooked by programmers when updating code to both front and back end systems (i.e., current dates sent do not have century, new datasets do).

**Response:**

All GISB data elements relating to dates in the Nomination (1.4.x) datasets were previously mapped in a DTM segment which included the century. This has not changed with this new mapping. The only date that did not once include the century and now does is the date in the BEG05 (in GISB version 1.4), which does not have a GISB data element associated with it and therefore has no business relevance. In the proposed Nomination mapping, this date is in BGN05, and was increased by ANSI to include the century so that it would be Y2K compliant.

e.) Discrepancies were found between the Data Element Cross Reference to ASC X12: maximum rate indication usage, upstream/downstream id code (duns) usage, delivery side location includes receipt drn.

**Response:**

I could not locate any of the discrepancies mentioned above. More specific examples will need to be provided.

f.) Discrepancies were found in the Transaction Set Tables: DTM segment is missing, element refers to missing/incorrect usage note, N1 duns segment is missing, LCD drn segment is missing.

**Response:**

I found no elements referring to missing/incorrect usage notes. More specific examples will need to be provided. As for the missing tables, this is not a mistake. These segments are not included in the Transaction Set Tables section because there is no longer any ambiguity in the mapping and a table is not needed. All the mapping instructions are found in the X12 Mapping section.

g.) Discrepancies found in Sample ASC X12: Delivery side location includes receipt drn.

**Response:**

I could not locate any of the discrepancies mentioned above. More specific examples will need to be provided.