

To: Rae McQuade

From: Greg Lander - TransCapacity Limited Partnership

RE: TransCapacity's Comments on the January 3, 1997 Proposed Standards Changes

R96016 - New data element for "Reference Contract."

TransCapacity recommends that this issue be referred to the BPS because there is ambiguity as to the business practice and the method of implementing. It sounds like this is a title transfer or pooling type of activity. It sounds like this activity, as it is described in the request, is in fact a transfer from a contract on CNGT to another contract on CNGT and that this could be accomplished by means of two nominations. The first nomination would nominate the gas from the Appalachian Aggregation contract (receipt at the aggregation point) on to the shippers contract (delivery at the aggregation point). The second nomination would be to nominate the gas under the shipper's contract from the aggregation point to the delivery point. This would obviate any need for a new data element, and would eliminate any need to change the PDA's. In any case the BPS can decide.

If the EC fails to so recommend this disposition, TransCapacity notes that there is already an existing (pending membership ratification) data element for "Balancing Contract" and suggests that this data element be used to specify any reference contract information needed. This would negate the necessity for an additional data element and would not require any of the related new error messages proposed in this request.

Part 2 of R96016 - Add "Reference Contract" to the PDA, Allocation, and Invoice data sets.

TransCapacity notes that these data sets currently allow "looping" at the SLN contract level. Therefore, information on multiple contracts can currently be accommodated by the existing data sets. Addition of this new data element seems unnecessary. Parties wishing to communicate information pertaining to a reference contract can simply supply the reference contract information in the current PDA and then follow it with the information relevant to that contract.

R96045 - Addition of a Transaction Type Code for "fuel" on the Nominations and Scheduled Quantity documents.

TransCapacity notes that the request asks for a transaction type code, and this is consistent with the proposed code values revision table on the recommendation form. However, the abstract/discussion of the recommendation form references a "data element." These are two very different proposals. If the recommendation is truly for an additional transaction type code, TransCapacity has no objections. If the request is for an additional data element, TransCapacity opposes the request.

R96062 - Additional data element "Role" in the Nominations document

TransCapacity is unsure, either from the request or the recommendation form why this information is necessary and what concerns El Paso has regarding routing of a "shipper" or "pooler" nomination. The question we ask is why these nominations would have to be processed separately. In addition, TransCapacity suggests that the information if in fact required, could possibly be determined by the enveloping information (as suggested by METF) or GS level information contained in the EDI transactions. TransCapacity recommends the request be referred to the BPS.

R96068 - Additional data elements and transaction type codes to distinguish "Operator" type Nominations and Scheduled Quantities.

TransCapacity notes that the request was withdrawn by the requester, and that a new "Scheduled Quantity" document for Operators is being worked on by METF. Therefore it recommends this instant request be terminated.

R96069 - Additional warning messages for the Nomination Quick Response Document

These additional error messages, "Other Service Requester Warning," and "Other Service Requester Contract Warning," are too vague. It does not specify what effect these warnings would then have on the service requester. Standard 1.1.9 states in part, "Business practices should be sent to the Market Execution Task Force and meaningful error messages should only be developed for those practices." Clearly this language applies to warning messages also. This represents a business practices issue, and as such, should be sent to the BPS. TransCapacity recommends that this request be transferred to the BPS for further discussion and clarification.

R96070 - Add additional capacity type of "primary firm."

As this request was withdrawn by the requester as a duplicate of R96067, it should be terminated here without prejudice to determination of R96067.

R96071 - Modify level of response on the Nomination Quick Response document from transaction level to contract level

As this request was withdrawn by the requester as a duplicate of R96097, it should be terminated here without prejudice to determination of R96097.

R96072 - Addition of additional Reduction Reason Codes to the Scheduled Quantity document

As this request was withdrawn by the requester as a duplicate of R96081, it should be terminated here without prejudice to determination of R96081.

R96073 - Addition of Service Code of "Other" to the Invoice document

This code would be used to allow the billing of a new service during the period that GISB is reviewing the request. TransCapacity supports this request.

R96080 - Add Contact Information to the detail level to allow multiple instances of contact information in the Allocation document.

TransCapacity agrees with the concept of supplying any additional required information. However, we feel that this issue is properly decided at the BPS level. Therefore, TransCapacity recommends that this request be transferred to the BPS to further identify the specific problem and to ensure that the fix is appropriate.

R96081 - Add reduction reason codes to the Scheduled Quantity and Confirmation Response documents.

TransCapacity agrees with the recommendation from METF that "Market Reduction" and "Supply Reduction" are covered by existing codes. TransCapacity further agrees that a "Payback Reduction" reason code be added to the Scheduled Quantity Document only.

TransCapacity disagrees with the proposal to add this code to the Confirmation Response document, as it is not applicable there. Before we begin passing business information to non-transacting parties we

should be very careful. This request implies that a party responding to a confirmation requester will tell the Confirmation Requester that the upstream shipper is conducting a payback transaction. This is inappropriate.

TransCapacity recommends that the recommendation be modified to include only the Scheduled Quantity document, or that that addition of the codes be voted separately on the two documents.

R96085 - Add Reduction Reason Codes of "Capacity Recalled" and "Prior Period Adjustment" to the Scheduled Quantity and Confirmation Response documents.

TransCapacity supports the recommendation as modified from the request, to add "Capacity Recalled" only and remove "Prior Period Adjustment." In the form specified, TransCapacity supports the recommendation.

R96087 - Add Transaction Type code of "swing" to the Nomination and Scheduled Quantity documents.

As this request was withdrawn by the requester due to use of a currently available alternate method, it should be terminated.

R96092 - Split Begin Flow Date/Time and End Flow Date/Time into separate data elements and proposes default flow begin and end times in the flowing gas and invoicing data sets.

TransCapacity recommends this recommendation be rejected. Contrary to assertions in the request, there is no "standard language" to justify this change. Nor is the change necessary. Those senders or receivers of data which wish to store the data in two separate fields may do so by processing at their end. This request forces everyone to process for no good reason. Changes should only be made where standards or standardized business practices necessitate change. This is not the case here. This request should be rejected.

R96098 - Add new Charge Type Codes to Invoice documents.

Three new charge type codes of "Volumetric Relinquishment GRI Credit, Volumetric Relinquishments and Acquisitions, and Volumetric GRI" are proposed. These may be valid and necessary codes, but supporting information and detail are not provided in either the recommendation or the request. TransCapacity recommends this request be transferred to the BPS to further clarify the issues and determine a recommendation on the additional proposed codes.

R96100 - Restructure X12 mapping of Payment Remittance Statement document

This request proposes to re-map the payment remittance document to add "two more levels of detail to be allowed on a mutually agreeable basis. This would result in at least two different maps for the same document. Inadequate detail has been provided. Neither the need for the change or nor discussion of the effects of changing the resulting map are discussed. There is no standard language requiring or supporting this proposed change at this late date. TransCapacity recommends that this request be rejected.

R96101 - Change usage codes of Service Requester and Account Number from mutually agreeable (MA) to sender's option (SO) in the Payment Remittance document.

TransCapacity is opposed to this request. This is a major change to the usage codes, and, as proposed, would require the receiver of the document to now "receive and process" these data elements which are now mutually agreeable. (See standard 1.2.2.) As noted, this is a significant change and is not required or based on any current standards language. This change was not recommended by MSTF (see Sense

of the Room Results) and should not be undertaken at this late date. It would require parties who are in the process of developing systems to undertake not insignificant changes.

In addition, it makes the sender (in this case the service requester) able to unilaterally decline, without explanation or intention, to send to the pipeline (service provider), its ID and Account Number. Why is this a good idea?

R96102 - Modify Remittance Number data element in the Payment Remittance document to a maximum of 12 characters.

TransCapacity is opposed to this request and recommends rejection. As it is associated with the change to limit the length of the Package ID, which was rejected, this request too should be rejected. To begin with, the length of the EDI field this data element is mapped to is 30 characters. We should not "sub-string" EDI data fields, nor should this field be re-mapped for no good reason. A 12 character limit on a remittance number would require all trading partners to modify their translators and database to code an arbitrarily limit on this field. This request should simply be rejected.

R96103 - Invoice Document - change name of data element Beg Flow Date/Time to Beg Transaction Date/Time and End Flow Date/Time to End Transaction Date/Time. Default beginning and ending chart times when not provided.

TransCapacity agrees with the proposed name changes as long as the changes to the proposed data dictionary definitions, as detailed below, are made concurrently.

Business Name	Definition
Beg Transaction Date/Time	Where the transaction began during the invoice period, the Month, Day, and Year the transaction began, and where the transaction began during a prior invoice period, the beginning of the subject invoice period.

Ending Transaction Date/Time	Where the transaction ended during the invoice period, the Month, Day, and Year the transaction ended, and where the transaction is continuing as of the end of the invoice period, the end of the subject invoice period.
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TransCapacity is opposed to the adding to the definition the default beginning and ending times called for in the request.

Therefore TransCapacity will support the request only if the default beginning and ending time portion is removed and the above less ambiguous language is inserted.

R96104 - Change "Limit Value" definition in the PDA

Request asked to change "Limit Value" definition from: "Additional information for gas allocated using the ranking method to allow limitation of variances on a transaction." to - "Additional information for gas allocated to allow limitation of variances on a transaction." TransCapacity has several questions as to this

request and is not convinced the change is warranted. For instance, is this applicable to swing too? If so, what happens to the rest of the gas if flow is greater than the limit? This is not specified in the request. This issue, as well as the necessity of the change should be clarified at the BPS level.

TransCapacity recommends this request be properly assigned to the BPS for further review and clarification.

R96105 - Additional Warning codes for PDA Quick Response

The recommended additional warning codes are as follows. TransCapacity's recommended changes to some of the warning messages are displayed in "red-line" text.

PDA date/time range is longer than nomination period. Did not process beyond nomination period.

PDA date/time range is shorter than nomination period. PDA's for remaining nomination period will be defaulted to prorata if no PDA is submitted.

No PDA information is necessary.

Limit value not processed for under production.

TransCapacity supports this request if the red-lined changes above are adopted. If not, TransCapacity recommends rejection of the request, or in the alternative, voting of the additional warning codes separately.

R96106 - Change usage codes of data element "Contact Information" on all invoicing and flowing gas data sets from mandatory (M) to mutually agreeable (MA).

It is the receiver of these data sets who should determine whether this information is sent. Currently the only way to insure that this information is sent by the TSP is to make the data elements mandatory. The only other way to ensure that the receiver could get this information would be to have a new usage code of "Sender's Required" for these data elements. A proposed definition of "Sender's Required would be - "Must be sent when information in the sender's possession changes from that previously supplied to receiver." Its purpose would be most evident through the Invoicing and flowing gas standards where there is contact information which need not be sent every time but should be sent when it changes.

The alleged improvement in efficiency and cost are de minimus at best. The logic as to the argument that exclusion of information would somehow make the document "probably more accurate" escapes TransCapacity. TransCapacity recommends that this request be rejected or that the BPS undertake definition of an additional usage code of "Sender's required."

R96107 - New data element "Previous Balance Forward" in the Invoice document

TransCapacity is opposed to this request and recommends rejection. In addition to there being no standard language specifying this requirement, the recommendation form itself is confusing. The proposed Business Conditional (BC) usage code, when interpreted consistently with other BC data elements, would mean that the receiver of the document (the shipper) would be able to require the data element be sent to it. It would also require all other receivers who do not want the data element, but receive it anyway, to respond with a response document (which currently does not exist) indicating that the data element was ignored by the receiver (See standard no. 1.2.2). This was overwhelmingly opposed at the MSTF and should be rejected.

R96108 - Additional warning and error codes on the Nomination Quick Response document.

TransCapacity opposes the following specified warning and error messages that are contained in this request:

#### Error Codes

Invalid Downstream Contract Identifier (How could this be ascertained by the TSP?)

Invalid Downstream Contract Identifier (How could this be ascertained by the TSP?)

## Warning Codes

Zone limit exceeded

Access area zone limit exceeded

Receipt location not a firm point

Delivery location not a firm point

Invalid ending time. Defaulted to end of gas day.

Error codes mean that something did not happen because of the existence of the error. What does it mean to have a "warning" that a zone limit of some kind was exceeded? Is this a situation where sometimes the shipper can exceed and other times not? or that some shippers can and other shippers can't? Why is this not an overrun? why is this not a reduction reason code instead of a code in the nomination quick response. What is the effect of receiving this warning?

If these error and warning codes are included in the request, TransCapacity recommends rejection. However, if these error and warning codes are removed from the request, TransCapacity will support the remaining codes in the request. In the alternative, each error and warning code should be voted separately.

R96110 - Add "Aggregator's (sic) Supply Point" and Aggregator's Supplier as mutually agreeable (MA) fields to the Request for Confirmation and Confirmation Response documents.

TransCapacity recommends this be referred to the TTTPT TF. TransCapacity opposes these additional data elements and recommends rejection at this time. This information is not required or specified by any of the adopted GISB standards. It was rejected by a margin of over 2 to 1 at METF. If relevant, this information appears to be related to title transfer tracking. If not rejected, this request should await the outcome of the Title Transfer Tracking Pilot Test Task Force (TTT-PT-TF).

R96112 - Add codes to the "Adjustment Type" data element in the Measurement Information Statement Document.

TransCapacity has no specific objection to the additional codes, but believes that additional detail needs to be provided on the need for these codes (i.e., do they apply to proprietary or standardized business practices). TransCapacity recommends further detail be provided regarding the standards under which these codes are being proposed. To accomplish this, TransCapacity recommends this request be referred to the BPS for further detail and clarification.