

October 3, 1997

Rae McQuade, Executive Director
Gas Industry Standards Board
1100 Louisiana, Suite 4925
Houston, TX 77002

Dear Ms. McQuade:

Williston Basin Interstate Pipeline Company respectfully submits its comments relating to proposed standards R97058A and R97092. GISB requested that such industry comments be received by the GISB office by October 3, 1997.

Standard R97058A proposes to add to the Capacity Release related Standards' Implementation Guide the ability to use a transportation service provider's proprietary identifier when a trading partner's D-U-N-S number has not yet been issued or may not exist. Williston Basin opposes the use of the transportation service provider's proprietary identifier to be extended into the Nominations, Flowing Gas and Invoicing areas of GISB. GISB has not shown how this change will benefit the industry. In addition, since the lead time to obtain a D-U-N-S number is minimal, Williston Basin supports the utilization of a D-U-N-S number in place of the proposed service provider's proprietary identifier. This accomplishes the same purpose yet eliminates the need to extend the use of the transportation service provider's proprietary identifier into the Nominations, Flowing Gas and Invoicing areas of GISB. Finally, Williston Basin seeks clarification as to the April 30, 1998 deadline for using proprietary identifiers. Williston Basin believes that after such date, it should not have to accept transmissions of data sets which contain proprietary identifiers.

Standard R97092 proposes that the data element Accounting Period be added to the data dictionary for the Measurement Information dataset (Standard 2.4.5) with usage code Mandatory. Williston Basin believes that such data element should have a usage code of Senders Option not Mandatory. Williston Basin believes the accounting period can be determined from the beginning/ending dates and the only instance the usage code should be Mandatory is in cases of prior period adjustments.

Williston Basin appreciates the opportunity to comment on the proposed interpretations and standards.

Sincerely,

Keith A. Tiggelaar
Manager
Regulatory Affairs