



Westcoast Energy Inc.

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Chris Waller
Systems Developer

October 3, 1997

Ms. Rae McQuade
Executive Director
Gas Industry Standards Board
1100 Louisiana, Suite 4925
Houston, Texas 77002
email: gisb@aol.com

Dear Ms. McQuade

Westcoast Energy Inc. (WEI) would like to extend its thanks to all the Task Forces and Committees for the effort put forth to clarify and identify the requests for changes.

WEI is a major Canadian energy company specializing in natural gas infrastructure and services. WEI is a willing participant in the GISB initiatives and will realize the benefits the GISB standards provide when dealing with its' customers and interconnects. Over fifty percent of WEI business is transacted with pipelines and shippers residing in the United States. The attached document contains WEI's comments, which we respectfully submit for the purpose of providing clarification to those proposed changes which may affect successful implementation.

If you have any questions, please contact me at (604) 691-5107

Sincerely,

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**Gas Industry Standards Board
Proposed Standards Changes
For Consideration by the Executive Committee on
October 6, 1997**

**Comments of
Westcoast Energy Inc.**

Introduction

Westcoast Energy Inc. (WEI) is pleased to offer the following comments on those proposals that affect successful implementation of the GISB Standards.

As a participating pipeline in adopting GISB's standards, WEI is very sensitive to the significance of the business issues which will be addressed at the Executive Committee meeting on October 16. Enclosed are specific comments pertaining to Request R97109.

Request R97109

Change the filed length of the contract numbers associated with standards No.1.4.x, 2.4.x, 3.4.x and 5.4.x and their related implementation guides and change the remittance numbers associated with Standard No. 3.4.2 and related implementation guide items to utilize a field length of 12 characters instead of the current 30-character filed length.

WEI opposes the request due to the impact and cost it will have to WEI. WEI has recently completed development of new nomination business practices and the supporting gas management system to meet all of GISB's nomination standards. This included complying with the existing standard of a 30 character field length contract number. Our new gas management system extensively utilize contract identifiers longer than the suggested 12 character limit and less that the current 30 character limit. The current standards indicate 30 characters and WEI made use of that capability to service our customers.

To decrease the field length at this time, after current standards have been in effect for some time and adopted in our new business practices, will cause us severe, and costly changes in the method of assigning those identifiers and the supporting gas management system. It will also impact the ability of WEI to adopt and comply with the GISB nominations standards and complete business with our American customers and interconnects.