

Williams Gas Pipelines (WGP) has reviewed the recommendation for the resolution of the request filed in R97022. We agree with the recommendation to change the usage of the data element "Package ID" to Mutually Agreeable in the Request for Confirmation and the Confirmation Response. We also are not opposed to the addition of the data elements Upstream Package ID and Downstream Package ID as proposed to be Mutually Agreeable among all the effected parties.

However, we do have serious concerns about changing the usage of the data element Service Requester to Mandatory in the Request for Confirmation, Confirmation Response and unsolicited Confirmation Response. To require Service Requester to be communicated in all confirmation situations is inappropriate. For example, the issue can best be seen when a Request for Confirmation is sent to a wellhead operator, and the wellhead operator is merely the party operating the location and not the party who is providing the gas to the Service Requester on the TSP. The Operator may only have knowledge of who the Producers/Working Interest Owners are at that location. Therefore, it is not appropriate to communicate to the wellhead operator this level of detail. In this situation, the confirmation can be accomplished by the TSP sending the Request for Confirmation to the Operator based on the Upstream Party Identifier (i.e. the Producer) for the TSP's Service Requester. This is the level of detail that the Operator has knowledge of and yet doesn't communicate information that is unnecessary or inappropriate.

WGP would like to propose an alternative that will accomplish the business needs of having the Service Requester in the confirmation process when it is necessary without forcing it in all situations. We recommend that the usage of Service Requester be Sender's Option in the Request for Confirmation, Conditional in the Confirmation Response, with the condition being the same as it currently is in Version 1.2 - "Required if provided in the Request for Confirmation" and Business Condition in an Unsolicited Confirmation Response. In so doing, the confirmation can still be handled at the appropriate business party to business party level, which in some cases is the Service Requester level, without having to provide that information when it is not applicable.