

WGQ Request for Comments on Standard
submitted by: Midland Cogeneration Venture

Proposed Standard 0.3zL

This standard refers to "X" Business Days and "Y" Business Days where the value for X and Y are to be specified in the TSP's tariff. MCV would encourage that these values be stated explicitly in the standard.

Proposed Standard 0.3zN

Item 3 under this standard refers to "prepayment of service"; however, neither a value nor a limit is stated for such prepayment. MCV would like to have such value or limit provided in the standard. At the most, this amount should be explicitly stated to be not more than three months of demand charges, which MCV believes would be consistent with the Commission's position that a pipeline may not require more than three months payment from non-creditworthy shippers.

Proposed Standard 0.3xO

The term "alternate credit assurance" is used. What is considered alternate credit assurance, and what is the value of such credit assurance? MCV would like these details provided in the standard and again, such value should not exceed 3 months of demand charges to be consistent with the Commission's position as mentioned above.

Proposed Standard 5.3.zA

This standard states that the "TSP should give the replacement shipper notice before terminating service". How much notice will be given? Would it be the Commission's standard 30 days? MCV would like to have the notice period stated in the standard and would suggest the period of 30 days, as it is the Commission standard.

Proposed Standard 5.3.zC

This standard states that the SR should seek to prequalify its status with the TSP. Credit issues are an important concern; however MCV would not like to see this standard pass as written: For one reason, it seems to be contrary to the Commission's policy of open access to the Transportation Grid, and for a second reason, it requires a replacement shipper who may be noncreditworthy, but is able to timely meet all its financial obligations, to post collateral to the TSP just to get on the prequalifying list, which would tie up its working capital.