

Subj: FW: Williston Basin Comments on Proposed Standards and Interpretations
Date: 97-09-03 07:49:50 EDT
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Williston Basin has the following comments in regard to Request Nos. RP97006 and RP97050 contained in the August 4th memo:

Request No. R97006:

Williston Basin does not agree with the recommendation of submitting only the swing line item. The PDA for any delivery/receipt point needs to be all inclusive of those shippers nominating gas at a particular point. By submitting only the "swing" line item, a piece of the transaction is missing from the PDA. Standard 1.3.20 states the "receiver of nomination initiates confirmation with the caveat that the receiver of the confirmation may relieve the obligation of sender to send." If no confirmation is being sent to a particular point and a new shipper uses that point, there is no way to confirm such shipper is on the PDA for that point for that gas day. Williston Basin therefore requests clarification of this request or recommends sending two line items, one for the shipper(s) whole to nominations and one for the shipper(s) taking the swing.

Request No. R97050:

Williston Basin does not agree that all data elements in the nominations transaction key be included in the data dictionary for the invoice data set. Williston Basin does not believe the flow of the nomination data elements into the invoicing data elements needs to be consistent with the level of detail provided in the nomination process. Certain data elements are needed to nominate and confirm on a daily basis. However, Williston Basin does not believe that what is required through the nomination and confirmation process has to be incorporated into the invoicing process. In addition, Williston Basin believes that incorporating all of the nomination data element/codes increases the administrative burden in the programming and processing of these codes and does not add any value to its invoicing process. To the extent these data elements are necessary for other parties, Williston Basin believes they should be mutually agreeable (MA) between those parties.

If you have questions concerning these comments please call me.