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Benefits of the Valero/PGT Proposal:

- 1) Type 1 nomination/confirmation due early enough in the current gas day to permit “incremental” business all afternoon
- 2) Only 2 batch processes needed per day; the 11am “intra-day” nominations could be run with the “timely” nominations batch process at 11:45am; 2<sup>nd</sup> batch process run at 6pm, after close of “Type 2” nominations (process today’s gas day as well as next gas day)
- 3) “Non-timely” and “Timely” nominations begin flow at 9am

Assumptions Associated With Valero/PGT Proposed Timeline:

- 1) We are only agreeing to a *minimum*
- 2) We are only agreeing to the times per day which the interconnecting parties are going to “sync up” or confirm with one another
- 3) Utilizes the GISB Standard 1.2.7
- 4) Does not address the “bumping” issue; as with the “timely” nomination timeline, each interconnecting party is free to address bumping as mandated by their respective tariff
- 5) All times are Central Clock Times
- 6) Our charge as issued by FERC, Order 587-C:  
“...the focus, therefore, should not be on clarifying the existing standard, but on achieving the needed uniformity in the intra-day nomination process.”