

Enron Interstate Pipelines Intraday Nomination Strawman

Problem Statement:

A number of parties have commented that different implementations of the GISB intraday standards may preclude scheduling across multiple TSPs. They argue that if one TSP processes intraday nominations at 10 AM, and an upstream TSP processes intraday nominations at 8 AM, the service requester does not have a meaningful opportunity to nominate intraday gas at the interconnect point.

Proposed Standard:

Uniform minimum times would be established, at which time all TSPs would accept and confirm intraday nominations. Uniform times for intraday nominations received during the subject gas day would be 10 AM and 5 PM, and for untimely nominations for tomorrow's gas day would be 6 PM (Central Clock Time). At these times, a service requester could submit a nomination at any receipt point with the certainty that the nomination would not be rejected due to different intraday processing timing on the upstream TSP. A TSP that desires to offer continuous intraday processing could still provide such service, but service requester would understand that the ability to confirm during other times of the day may depend on agreement of the upstream/downstream party. This minimum confirmation availability commitment would apply regardless of whether the TSP employs a bump or no bump approach. This standard should not be interpreted to mean that a pipeline that employs a bump approach would be required by this standard to bump at all of the intraday and untimely confirmation times. A pipeline that employs a bump approach will specify any bump times in its tariff.

Intraday nominations will not be scheduled without explicit confirmation, unless upstream/downstream parties agree to confirm by exception. Unless otherwise agreed between the TSP and service requester, an intraday nomination should represent the service requester's good faith estimate of receipt and/or delivery quantities, and should not be submitted with the intention of creating an imbalance.

This standard is expressly intended to supplement and further define, and not to replace any other GISB standards, including the intraday standards. Untimely nominations will be subject to the same standards which apply to intraday nominations.