

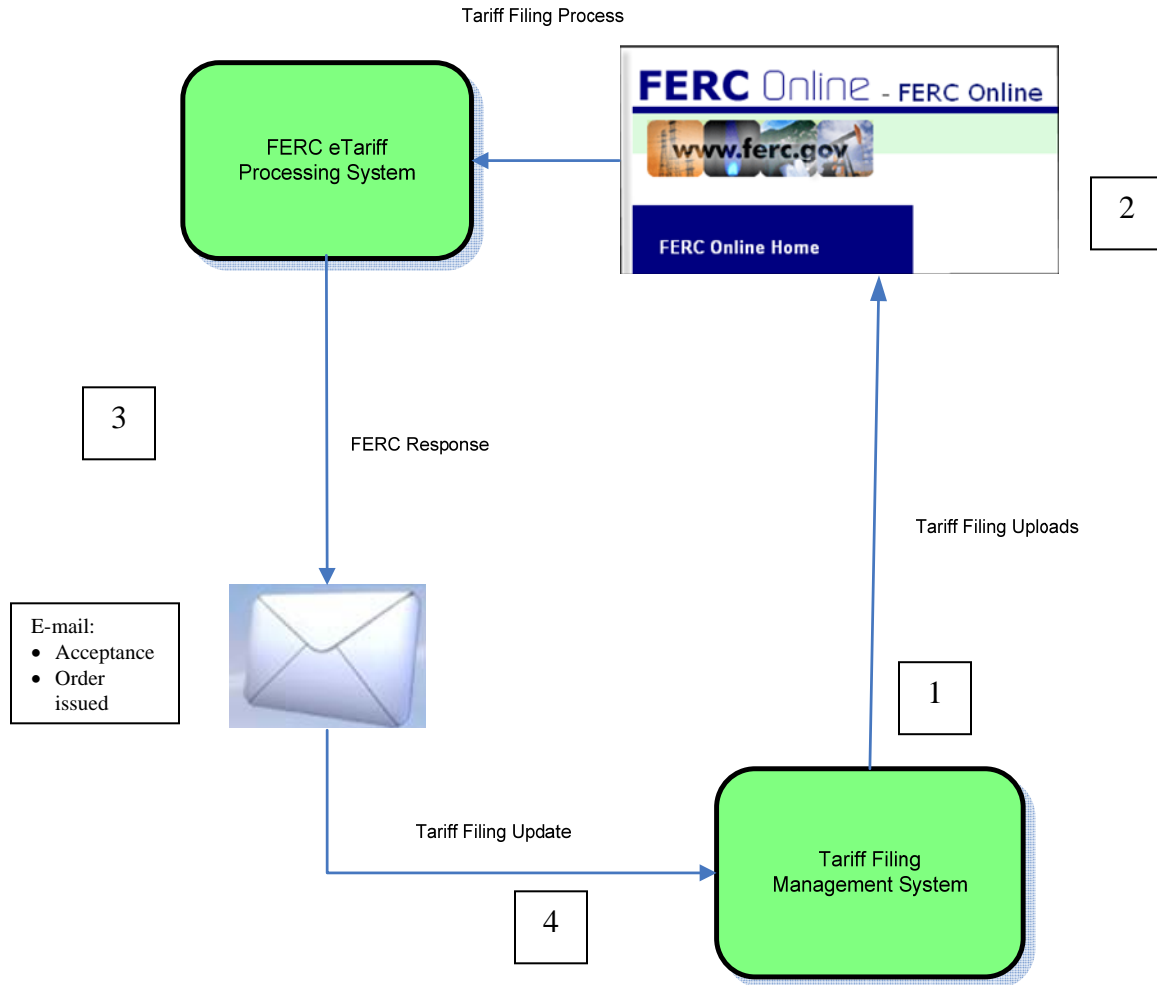
Interstate Natural Gas Association of America
Docket No. RM01-5-000
Meeting with the North American Energy Standards Board at the
Federal Energy Regulatory Commission
February 1, 2007

INGAA Positions with Respect to eTariff

- The natural gas pipeline industry supports an eTariff filing process that will provide the Commission with reasonably-developed and clearly defined metadata to efficiently manage tariff filings and permit the effectiveness of tariff filings.
- The industry transition to eTariff should be as simple, efficient and least costly to the industry as possible. This will only occur for the natural gas pipelines and their customers if:
 - The use of sheet-based tariffs is maintained.
 - Gas pipelines are allowed to continue to use their tariff management programs, recognizing a need to adapt for the metadata required.
 - The process used by natural gas pipelines can operate independently of what may be adopted for the oil and electric industries.
- The efficient development of eTariff may be accomplished through:
 - Modifications to FERC Online eFiling as the internet portal for accepting tariff filings.
 - Using an XML format, or some other mutually acceptable alternative, for submission of metadata. The other filing documents would be in native format. A pdf file of the entire filing suitable for posting to eLibrary would accompany the submittal.
 - Use of e-mail for notification of filing acceptance and orders.
 - See the eTariff Filing Architecture Proposal attached.
- The positions outlined above, if accepted by the Commission, will provide general guidance for detailed development efforts.
 - The natural gas pipeline industry has expended considerable time and effort in assisting the Commission in eTariff efforts to date and commits to continuing those efforts in the upcoming development phases.

eTariff Filing Architecture Proposal

The diagram below shows the information flow for an eTariff filing:



FERC eTariff Filing Architectural Proposal

Tariff Filing Management System Overview

Any third party or company-developed tariff filing software could be used. However, since UNICON's TFMS system is the most popular system utilized among natural gas pipelines (approximately 65), we chose to use UNICON's TFMS as an example for this demonstration. This proposal is designed to have minimum impact on the regulated industries while still meeting FERC's need to process tariff data electronically. The main change required for the TFMS software would be to export FERC's required metadata in XML format.

1. Tariff Filing Preparation and Exports

Create the tariff sheets, in TFMS and export them from TFMS
Export the metadata in XML format from TFMS
Export the marked tariff from TFMS
Prepare a PDF version of the filing for publishing in eLibrary

2a. FERC eTariff Online Web Interface (First Screen)

Based on filing type, upload the required files through the FERC eTariff Online Web Interface

In eTariff field software, there are currently 19 filing types available. The following is an example of an eTariff Online Web Interface's initial page. The "Filing Type" box would contain a drop down menu with all the available filing types. Next, the user would have two options, 1) create a filing or 2) look up by date, modify and resubmit an existing filing that has failed the FERC's checking process due to missing data.

Filing Type:

 ▾

Create Filing

or

Modify Existing Filing

Date Submitted:



2b. **FERC eTariff Online Web Interface (Second Screen)**

Filing Type: Sect. 154.203 Compliance Filings

XML Metadata:	<input type="text"/>	<input type="button" value="Browse..."/>
Tariff Sheets:	<input type="text"/>	<input type="button" value="Browse..."/>
Transmittal Letter:	<input type="text"/>	<input type="button" value="Browse..."/>
Certification of Services:	<input type="text"/>	<input type="button" value="Browse..."/>
Marked Tariff:	<input type="text"/>	<input type="button" value="Browse..."/>
Notice:	<input type="text"/>	<input type="button" value="Browse..."/>
Filing Document in PDF:	<input type="text"/>	<input type="button" value="Browse..."/>

Number of "Other support not otherwise specified" attachments:

Attachment 1:	<input type="text"/>	<input type="button" value="Browse..."/>
Description:	<input type="text"/>	<input type="button" value="Δ"/> <input type="button" value="▽"/>
Attachment 2:	<input type="text"/>	<input type="button" value="Browse..."/>
Description:	<input type="text"/>	<input type="button" value="Δ"/> <input type="button" value="▽"/>

The other filings types are similar to the compliance filing in terms of web interface. When a user clicks the Create Filing button, the required file upload fields are populated. By entering the number of "Other support not otherwise specified" attachments followed by selecting the "Add" button, the additional attachment input boxes are populated.

2c. **FERC eTariff Online Web Interface for Rate Case Filings**

Filing Type: Sect. 154.312 Gas - General Section 4 Rate Cases

Transmittal Letter:

Marked Tariff:

Notice:

Attachment:

Description:

Filing Document in PDF:

Rate case filing should be treated differently since such a filing could have more than 100 attachments. In a rate case filing, attachments should be compressed into one file using the current naming convention, for example, 059A0702. FERC might have a file size limit for online uploads, in which case the web interface might have to be altered accordingly.

3. **FERC Tariff Filing Process/E-mail Response**

Once the user submits the filing, an asynchronous checking process should follow. If checking is successful, the filing submission confirmation e-mail would be sent to the user. If checking is unsuccessful, an e-mail with an error message would be sent to the user.

FERC tariff filing process system should record every field the user inputs for the filing submitted with a time stamp. The user should be able to retrieve/modify any existing filing by date. For example, when the user receives an error e-mail from FERC, the user should be able to get back on the FERC eTariff Online Web Interface site, retrieve the filing with all the existing inputs, upload the updated files and re-submit the filing without re-entering everything. The same filing with a new time stamp should be recorded in FERC's database.

When an order of disposition for a filing is issued by FERC, an e-mail notification should be sent to the user.

4. **Tariff Filing Update**

The user would then update the TFMS program accordingly.