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National Fuel Gas Distribution (NFGD) appreciates the effort that went into developing the GEOC tariff examples. The concepts advocated by the LDC segment, particularly towards defining a means to provide for a coherent table of contents as and general organization of the tariff, appear to be included within the examples. However, without standards identifying the appropriate conditionality and usage for the metadata, it is yet clear that filers won't have so much discretion as to circumvent what is displayed within the examples. Never the less, the examples are a tremendous step forward. NFGD is hopeful that standards language can be developed within the Technical Task Force or within the business subcommittee to provide for both an appropriate level of flexibility and standard outcomes.

General Technical Issues

For the sheet based example, a separate record for each reserved sheet (90 - 98 in the Sheet example) should be shown. Otherwise, the example is more or less a hybrid sheet/section example.

It is not clear that filings should be 100% sheet based or 100% section based. While either seems possible, it also seems likely that some filings would be a combination or hybrid. As such, it makes sense to prepare a hybrid example.

Examples of sheet or section deletion would be useful.

For the high level Table of Contents Items, e.g. Table of Contents, Preliminary Statement, System Map, etc... it might make more sense from an organizational perspective to list the 'Record Identifier' for the Title Page (1000 in your example) as the 'Record Parent or Container Identifier', rather than leaving the field blank. While FERC's system could be programmed to implicitly treat a blank 'Record Parent or Container Identifier' as a highest level item, it could misinterpret a record that was inadvertently left blank.

NFGD would tend towards keeping 'Alternative Record Number' even though it may not have an apparent purpose today. A future use might arrive or for those filers that transition from sheet based to section based, it might be useful as a comment field, i.e. to contain the information shown in 'Contains Current Records' in the Gas Sectional example. There has not been sufficient discussion within the business subcommittee to determine this field will always be null. The iterative relationship between the task force and business subcommittee should determine the ultimate disposition of the field.

The 'Record Number' scheme in the Gas Sectional example seems consistent within itself but not necessarily appropriate for all potential cases. Like the Sheet based example, isn't there potential someday for a 'Second Revised Section 7.2'?

Even in the sheet based world, there are section numbers, although the sheet based construct prevents getting down to the x.y level. In the example for 'Record Identifier' = 1059, shouldn't the section number be part of the 'Record Title', e.g. instead of 'Definitions' shouldn't it be '1. Definitions'? Maybe this is another use for 'Alternative Record Number'