

## DRAFT

### **Timelines Associated with Technical Work Support WGO Standards** **Discussion and Proposed Changes**

GISB/WGO practice has been to consider our Implementation Guides<sup>1</sup> to be Standards themselves meaning that changes/additions require a full comment period followed by super-majority approval. Standards development has often been a two-stage process – typically we develop the ‘words’ in sub-committees such as BPS and Contracts while Information Requirements and Technical develop the implementation details, when and where required. This two-stage process is often referred to as “Full Staffing”.

For those who do not recall the rationale for “Full Staffing” – versions ago, GISB sent standards to FERC before the supporting datasets had been developed. This resulted in pipelines having to implement twice (once on a proprietary basis and a second time on a standard basis). This also affected shippers; they had to make a second round of changes too.

With the last major standards development effort, some concern was expressed about the WGO ratification ballot being held up for the technical work while the WEQ proceeded immediately following the Joint EC vote. Much thanks goes to both Information Requirements and Technical for expeditiously scheduling meetings and carrying out their charge. Technical had no changes but Information Requirements determined that verbiage needed to be added to the NAESB WGO Additional Standards Manual Executive Summary and the Business Process and Practices sections. Once the work was completed, a 30-day comment period began which was followed by a unanimous EC vote and subsequently ratification. In other words, we followed our process, just as we should have.

This said, the time to review our procedures may be at hand. Particularly when WGO deals with WEQ on matters that have the attention of the Regulator, there are cases where our process, may not make as much sense. My opinion on the verbiage offer by IR was that while it clearly added value, it didn't seem to justify delaying the ratification vote. I've reviewed the Implementation Guides and other than the data sets, data elements, technical mappings and coding structures, I have difficulty believing the surrounding verbiage carries the same weight as the standards contained within Standards Booklet 1 of 2 and Standards Booklet 2 of 2. In the interest of developing a more efficient process for NAESB, I think it's time to re-examine our current procedures.

This re-examination really boils down to two issues: 1) level of voting and 2) duration of comment period. Are the Implementation Guides really Standards or do they just contain Standards. While the Implementation Guides are reported to FERC, they are not adopted as regulations. Does this mean we should consider the guides to be models?

The other issue is duration of the comment period and applies whether or not we consider the Implementation Guides to be standards. Does technical work warrant a shorter comment period or should we delineate technical work into two categories: 1) Substantial -- i.e., changes to the data sets, data elements, technical mappings and coding structures and 2) Non-Substantial – i.e., all the verbiage. Should we keep the same process for Substantial technical work but have shorter comment periods (e.g. 10 days instead of 30 days) for Non-Substantial technical work? Additionally, should Non-Substantial work automatically go to a EC Notational Ballot instead having a conference call?

I'm sure there are other ideas and, of course, we can continue to do what we've always done. In any case, I would like EC members to reflect upon this issue and propose alternatives for voting at the November EC meetings.

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<sup>1</sup> Collectively: 0-ADDITIONAL STANDARDS, 1-NOMINATIONS RELATED STANDARDS, 2-FLOWING GAS RELATED STANDARDS, 3-INVOCING RELATED STANDARDS, 4-ELECTRONIC DELIVERY MECHANISM RELATED STANDARDS and 5-CAPACITY RELEASE RELATED STANDARDS

## EXECUTIVE SUMMARY

The WGQ NAESB implementation guides are organized into five distinct areas of business activity: Nominations, Flowing Gas, Invoicing, EDM, and Capacity Release. Certain standards are in addition to these specific business activities. They could be topic specific, such as creditworthiness, or general in nature applying to multiple business activities. These types of standards have been grouped together in this Additional Standards implementation guide.

### **Creditworthiness:**

This section includes standards which relate to the exchange of information, notification, and communication between parties during the creditworthiness evaluation process. Additional creditworthiness related standards can be found in the Capacity Release Related Standards Implementation Guide.

### **Gas/Electric Operational Communications:**

This section includes standards which relate to the operational communications between transportation service providers and parties responsible for electric gas-fired generation activity.

## BUSINESS PROCESS AND PRACTICES

### A. Overview

Creditworthiness:

In the natural gas industry, transportation service providers provide services for requesting parties. As a part of the process for contracting for these services, the transportation service provider may need to request credit information from the service requester and initiates an exchange of communication between the parties. Additionally, the service requester, once determined to be non-creditworthy, may request credit re-evaluation by the transportation service provider.

#### Gas/Electric Operational Communications

There is an ongoing need for improved communication of information between and among entities in the gas and electric industries. This includes communication of anticipated power plant generation fuel requirements to the appropriate transportation service provider(s). Likewise, standards for communications from the transportation service provider(s) to the entities responsible for gas-fired power generation will provide information related to operating conditions that might hinder power plants from generating at desired levels.

### General Standards

#### Principles:

- 0.1.1 An entity is a person or organization with sufficient legal standing to enter into a contract or arrangement with another such person or organization (as such legal standing may be determined by those parties) for the purpose of conducting and/or coordinating natural gas transactions.
- 0.1.2 For NAESB WGQ purposes, there should be a unique entity common code for each entity name and there should be a unique entity name for each entity common code.

#### Standard:

- 0.3.1 Entity common codes should be “legal entities”, that is, Ultimate Location, Headquarters Location, and/or Single Location (in Dun & Bradstreet Corporation (“D&B”) terms). However, in the following situations, a Branch Location (in D&B terms) can also be an entity common code:
  - 1. when the contracting party provides a D-U-N-S® Number at the Branch Location level; or