REQUEST FOR CLARIFICATION OR INTERPRETATION

Date: 4/24/00

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GISB Standard Number: 1.3.15

Clarification or interpretation request:

1.3.15 When the fuel reimbursement method is fuel in-kind, the results of the fuel reimbursement calculations for the nomination process should be rounded to the nearest dekatherm or Gigajoule (Canada).

If the calculation results in a reimbursement of less than 0.5 decatherm, does the pipeline round down (mathematically correct) to zero or up to 1 (creating a 1 dth minimum fuel-in-kind charge)? Is "zero" a decatherm?

Possible interpretations or clarifications, if known:

The 1 decatherm minimum fuel charge creates a case where smaller shippers are charged a -- potentially-- much higher fuel charge than larger shippers. A small shipper who nominates 10 dth would be charged a minimum of 1 dth and thus a 10% fuel charge, when the tariff calls for less than 1% fuel-in-kind charge. This is a discriminatory practice against smaller shippers.

The rounding process mathematically calls for less than 0.5 to round down to zero.

This form is to be submitted to the GISB office, both in electronic and written form.