REQUEST FOR INITIATION OF A NAESB BUSINESS PRACTICE STANDARD

Date of Request: December 12, 2003

1. Submitting Entity & Address: KeySpan
   One Metrotech Center
   20th Floor
   Brooklyn, NY 11201

2. Contract Person: Dolores Chezar
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3. Description:
   Delete existing WGQ Standard 5.3.zD. Develop new standard regarding the
   prequalification of potential replacement shippers for capacity release offers that reflects
   FERC policy detailed in Dominion Cove Point LNG order in RP03-545 dated November

4. Use of Proposed Standard:
   Will aid in the development of an efficient capacity release process.

5. Description of Any Tangible Benefits:
   Ensures that only qualified shippers bid on capacity release offers.

6. Estimate of Incremental Specific Costs: NA

7. Description of Any Specific Legal or other Considerations:
   Existing Standard is contrary to existing FERC Policy (see Dominion Cove
   Point order dated November 18, 2003) and must be deleted. Suggested revised Standard
   properly implements stated FERC policy on the need for bidders on capacity release
   offers to prequalify. (See work paper submitted by KeySpan that was discussed at the
   December 11 WGQ EC meeting and posted with other December EC materials on the
   NAESB web site.)

8, 9, and 10  NA