

**Request for Initiation of a GISB Standard for Electronic Business Transactions or
Request for Enhancement of a GISB Standard for Electronic Business Transactions**
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**Gas Industry Standards Board
Request for Initiation of a GISB Standard for Electronic Business Transactions
or
Enhancement of an Existing GISB Standard for Electronic Business Transactions**

Date of Request: April 8, 1996

1. Submitting Entity & Address:

Associated Gas Distributors
1001 Pennsylvania Ave. NW
Washington, DC 20004-2595

2. Contact Person, Phone #, Fax #, Electronic Mailing Address:

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3. Description of Proposed Standard or Enhancement:

Electronic filing of documents at the FERC: AGD is requesting that GISB evaluate the various options available for pipelines and others to file documents at the FERC by electronic means. Some, but not all of the options available are: Native wordprocessing format, ASCII text format, PDF format, ANSI delimited format. AGD has no predisposition as to the format or formats that might be appropriate, but feel that GISB should be the forum to make recommendations to the FERC regarding such standards.

4. Standard or Enhancement (include how the standard will be used, documentation on the description of the proposed standard, any existing documentation of the proposed standard, and required communication protocols):

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Standardization of filing formats will allow for easier access, review and commenting on FERC documents. By filing formats, it is meant that a standard computer file format be utilized, ie. Wordperfect, ASCII, ...

5. Description of Any Tangible or Intangible Benefits to the Use of the Proposed Standard or Enhancement:

The primary benefits to standardizing the filing format will be timely review of FERC documents, comparison of filings, especially tariffs, and quicker turn-around times for comments.

6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:

Implementation of a standardized file format should have minimal cost impact to the industry.

7. Description of Any Specific Legal or Other Considerations:

There may be a concern if a particular vendor's software is recommended as the industry standard.

8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):

Not applicable

9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners :

Not applicable

10. Attachments (such as : further detailed proposals, transaction data descriptions, information flows, implementation guides, business process descriptions, examples of ASC ANSI X12 mapped transactions):

Not applicable

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the terms of Order No. 582 to provide that all pipeline rate increase filings in electronic media were required to include all the formulas and all the links necessary to understand and analyze all elements of the rate filing. This understanding of Order No. 582 was based in part on pp. 167-168 of the memo edition of that Order, which includes this statement: "These spreadsheets must include all the formulas and all links to other spreadsheets filed in the same rate case." This language appears immediately after a reference to Statement I (as well as Statements J and H), which is the pipeline's cost of service presentation and therefore is integrally related to every other component of the rate filing.

AGD is now advised that the Commission Staff's interpretation (as provided at the December 1, 1995 informal technical conference in these Dockets) of Order No. 582 is different. Staff apparently understands Order No. 582 to require only the formulas and links between Statements I, J and H to be provided with the rate filing and that the links between Statement I and all other components of the rate case will not be provided.

This interpretation of Order No. 582 is in direct conflict of the purpose of that Order. As indicated above, the Commission agreed with the parties (which included AGD) arguing for a rate filing format in which the formulas necessary to understand the pipeline's position would be included with its filing. This is particularly important in the case of any link between Schedule I and other parts of the rate filing because the pipeline's cost of service information in that Schedule is the center piece of its rate case. Since these links and formulas are (a) in the pipeline's possession and (b) important to its customers' analysis of the rate increase proposal, there is no common sense reason why they should not be routinely provided with each rate filing.

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Order No. 582 could be clarified on this point in at least two ways. First the Commission could simply state that the p. 168 language regarding "all the formulas" and "all the links" was intended to mean that any formula and any link employed in preparing a rate filing will be provided as a part of that filing. Alternatively, Order No. 582 could be supplemented to include language in the regulations to provide for the filing of whatever formulas or links are used in constructing any statements, schedules or spreadsheets in a rate filing, whether the formulas are considered to be "complex" or not.¹

AGD respectfully requests that one of these approaches be followed by the Commission so that both pipeline customers and the Commission Staff will have all the information they need to analyze a pipeline rate filing as soon as that filing is provided. Without a requirement that the pipelines' filing include all formulas and all links used in its preparation, the pipeline customers and Commission Staff are in the position of either waiting until the pipeline responds to a request for this information or undertaking the laborious process of deriving links and formulas from the information that is routinely furnished. Each of these is a costly, inefficient answer to a legitimate concern that could be easily met if the pipeline simply provided the information on all formulas and links as part of its rate filing.

2. AGD supports the near term filing of textual data in pipeline rate filings in both native word processing software formats and ASCII. AGD also supports the

¹ See Order No. 582, mimeo p. 168, suggesting that only the formulas used in Statements H, I and J of rate filings are "of a complex nature."

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referral to the Gas Industry Standards Board of the question of what specifications should be adopted in regulations governing filing of pipeline rate cases in a word processing format.

At the informal technical conference on December 1, 1995, in these proceedings, the parties addressed several issues raised by the Commission in Order Nos. 581 and 582 on Electronic Filing Requirements for interstate natural gas pipeline filings. The parties successfully resolved all of the issues dealing with the Discount Rate Report and the Index of Customers. However, the Staff requested further comments from the parties concerning the use, and alternatives to the use, of Rich Text Format ("RTF") in filing textual documents.

Staff noted at the conference that the results of its testing showed RTF to be of limited value, if not totally unacceptable, for electronic filing of textual documents. The major problem is that the translation from native word processor file format to RTF and back again is not error-free. In fact, the errors noted were inconsistent from one word processing package to another. It was also determined that RTF was not compatible for use in databases.

Based on the results of the RTF testing, AGD's position is that it should not be adopted as the standard format for electronic filing of textual information. Among the alternatives discussed at the conference, the most practical alternatives to RTF appeared to be filing the document in native word processing software format using certain standard fonts, margins, etc. or filing the data in "TIFF" graphical format.

AGD supports the filing of textual data in native word processing software format using standard fonts, margins, etc. Many of the word processing software packages currently available

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FERC Masthead

Filing and Reporting Requirements for Interstate Natural Gas Companies Rate Schedules and Tariffs))	Docket No. RM95-3-000
Revisions to Uniform System of Accounts Forms, Statements, and Reporting Requirements for Natural Gas Companies))	Docket No. RM95-4-000

**COMMENTS OF ASSOCIATED GAS DISTRIBUTORS
ON ELECTRONIC FILING ISSUES**

In accordance with the schedule adopted at the December 1, 1995 Informal Technical Conference in these proceedings, Associated Gas Distributors (AGD) hereby submits the following comments on issues presented at the December 1, 1995 Conference and the December 12, 1995 Working Group meeting.

1. Pipeline rate filings as submitted to FERC should include all formulas and all links between all components of each Schedule and Statement.

A primary purpose of the revisions made to the Commission's rate increase filing regulations in Order No. 582 was to insure that rate filings are provided in a manner that facilitates their analysis by those most interested in pipeline rates, i.e., by the Commission Staff and by the pipelines' customers. ("The Commission agrees with the parties arguing for a spreadsheet format where the formulas in the work paper or statement are important to the understanding of the pipeline's filing." Order No. 582 at mimeo, p. 167.) Given that purpose, AGD had interpreted

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have import filters which enable users to work with files created by other word processing software. This alternative will allow most users access to the filed data, largely retain the original formatting, and involve little or no additional cost to the user. Additionally, AGD recommends that textual documents also be made available in standard ASCII format in the event that users experience difficulty in utilizing the native word processing software files.

As for the use of TIFF files, AGD is concerned that the use of the TIFF graphical format will make downloading the data from FERC EBS systems impractical due to the relatively large files generated by that format. Additionally, the TIFF format does not allow text search or data manipulation since the image saved is graphical in nature. Therefore, users would also be required to purchase some form of Optical Character Recognition ("OCR") software and a scanner in order to utilize those capabilities.

The industry participants at the conference also discussed the option of the Gas Industry Standards Board setting up a project to study software standardization for the natural gas industry. AGD supports such a review as standardization would solve most problems users might experience in attempting to utilize electronic filing data.

In summary, the AGD supports the filing of textual data in both native word processing software formats and ASCII. AGD suggests that the detailed specifications for the filing of data in native word processing formats be a focus of the working groups created at the informal technical conference. The working group forum would facilitate the testing and study of the myriad of possible combinations to determine the standards that provide the most flexibility to the most users.

EXHIBIT B

CONFIRMING NOMINATIONS FOR _____

OPERATIONAL BALANCING AGREEMENT

BY AND BETWEEN

_____ and

Name of Interconnection Point: _____

___ Agreement No. _____

___ Agreement No. _____

___ Meter No. _____

___ Meter No. _____

Preparer's Name _____ Phone Number (____) _____

Fax Number (____) _____

Effective Date of this Statement _____ Date Prepared _____

Shipper Name & Contract Number	Shipper Name & Contract Number	Corrected Amount of Nomination MMBtu	Previous Nomination MMBtu	Change
_____	_____	_____	_____	_____

Operational Imbalance as of _____ is _____ MMBtu of gas owed _____
by _____. This imbalance shall be corrected in the
following manner:

