R97117
Gas Industry Standards Board
Request for Initiation of Standard for Electronic Business Transactions
or
Enhancement of an Existing GISB Standard for Electronic Business Transactions

1. Submitting Entity & Address:
TransCapacity Limited Partnership
83 Pine Street, Suite 101
West Peabody, MA 01960
Phone: (508) 535-7500
Facsimile: (508) 535-7744
E-mail: LEGALJB@TCAPSERV.COM

2. Contact Information:
Jim Buccigross, Legal Counsel
Gregory M. Lander, President

3. Description of Proposed Standard or Enhancement:
In order to facilitate trading and netting of imbalances, TransCapacity requests two new business practice standards, one new associated data set (EDI document) to facilitate the posting of Shippers’ Imbalances, and a new code value for the Data Sets Requested data element in the Upload of Request for Download of Posted Data Sets (GISB Standard No. 5.4.14) and Response to Upload of Request for Download of Posted Data Sets (GISB Standard No. 5.4.15) which are used in requesting the Imbalance Posting data sets and in the applicable response to the request.

These additional standards, data set and code value would be used to enable those service requesters wishing to have their imbalance positions posted (provided to those requesting the information) to so indicate, and then to facilitate the requesting and providing of that information concerning those service requesters’ imbalances when requested. This group of standards, dataset and code value would provide the mechanisms necessary to effectuate “Cross Contract Balancing” as specified in FERC Order No. 587-F.

Proposed Business Practice Standard 2.3.X:
“Service Requesters may request of their Transportation Service Provider (TSP), and until notified otherwise, such TSP should make such Service Requester’s imbalance information (as set forth in the Imbalance Posting data set) available upon request to those requesting such information.”

Proposed Standard 1.3.X:
“Transportation Service Providers should allow Service Requesters, via the nomination process, to net imbalances across and among Service Requesters as well as across and among Service Requesters’ contracts.”
New Data Set (Document) Name: Imbalance Posting
Proposed data dictionary would be as follows:

<table>
<thead>
<tr>
<th>Data Element</th>
<th>Usage</th>
<th>Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Requester</td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>Service Requester Name</td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>Transportation Service Provider</td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>Imbalance Quantity</td>
<td>C</td>
<td>Based upon service requester's notification to TSP that this information be (or not be) provided in downloads.</td>
</tr>
<tr>
<td>Long/Short Indicator</td>
<td>C</td>
<td>Based upon service requester's notification to TSP that this information be (or not be) provided in downloads.</td>
</tr>
<tr>
<td>Contact Person</td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>Contact Phone Number</td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>Posting Date/Time</td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>Imbalance Settlement Deadline</td>
<td>M</td>
<td></td>
</tr>
</tbody>
</table>

1. Service Requesters notifying their TSP that they wish to have their imbalance information provided to requesting parties should also notify the TSP's that they wish to have either, both or neither of these data elements be provided in the download.

2. Based upon Service Requester notification that deadline is always a fixed period of time prior to TSP's settlement deadline or defaults to TSP's settlement deadline.

The new code value addition to the Data Sets Requested data element would simply be entitled "Imbalance Postings."

4. Use of the Proposed Standard or Enhancement:

The proposed 2.3.X business standard is necessary to create the "posting" capability for imbalances and in addition gives service requesters the option of making that information available or not and where service requesters do wish to have such information made available, what the extent of that information should be.

The data set would then be used by transportation service providers to communicate imbalance the specific information of those service requesters wishing to have their information made available (to those requesting such information) in order to facilitate trading of imbalances across contracts. As stated above, this data set would make available the information necessary to effectuate "Cross Contract Balancing" as specified in FERC Order No. 587-F.

The code value in the Upload of Request and Response to Upload of Request data sets would be used by data requesters to request available Imbalance Posting data sets and would of course, be used by responders in the response document to the request.

The proposed 1.3.X business practice standard implements the manner of transferring imbalances (i.e., through the nominations and scheduled quantity datasets and not for use in the confirmation related datasets).

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

The standards define the rights and responsibilities of the relevant parties in the imbalance transfer process as well as the mechanism for posting and transferring imbalances.
As to the data set, there is not one currently in existence which allows transportation service requesters to post this imbalance information, yet the information is clearly necessary if a service requester desires to disseminate information concerning the possibility that there is an opportunity to trade imbalances across contracts. The proposed data set contains all information necessary, it will facilitate posting of the required information and will facilitate service requesters ability to trade imbalances across contracts.

The addition of the code value in the upload of request and response allows service requesters and data requesters to request imbalance data from the transportation service provider.

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

The standard language itself has essentially no associated implementation costs.

As to the Imbalance Posting data set, this is a new data set so there is a cost associated with the initial mapping and implementation issues. The data set however, is small and therefore relatively easy to map. Also, a trading partner using the GISB Electronic Delivery Mechanism will not incur variable transmission cost in sending and/or receiving the data set. The majority of costs therefore are "one-time."

The addition of a code value to the Data Sets Requested data element has a very small one-time cost only of mapping the new code value. No new data elements or other changes to these data sets are required.

7. Description of Any Specific Legal or Other Considerations:

None.

8. If This Proposed Standard or Enhancement is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement

TransCapacity is certainly willing and able to undertake testing with any party regarding this proposal.

Contact is: Mike Coombs, Product Leader
TransCapacity Limited Partnership
83 Pine Street, Suite 101
West Peabody, MA 01960
Phone: (508) 535-7500
Facsimile: (508) 535-7744

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

N/A.

10. Attachments

None.