

# R98011

## 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:

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### 2. Contact Information:

Jim Buccigross, Legal Counsel  
Gregory M. Lander, President

### 3. Description of Proposed Standard or Enhancement:

TransCapacity requests new GISB definitions and standards as detailed below:

#### Proposed Definition No. 2.2.A

A Point Operator is a party which operates one side of a physical interconnect between the facilities of two parties.

#### Proposed Definition No. 2.2.B

At a location which is not covered by an OBA, the Allocating Party is the Point Operator which receives PDA statements from others and calculates the allocations based upon the PDA statement(s).

#### Proposed Definition No. 2.2.C

At a location which is covered by an OBA, both Point Operators can be an Allocating Party with respect to calculating allocations on their side of the location.

#### Proposed Standard No. 2.3.A

At a location which is not covered by an OBA, a Service Requester which submits more than one nomination line item for a gas at such location is permitted to submit a PDA statement (PDA) to the party receiving the nomination. The party receiving the PDA should employ it for the purpose of allocating the gas (which was allocated to the PDA Submitting party) to the PDA Submitting party's downstream line items.

#### Proposed Standard No. 2.3.B

At a location which is not covered by an OBA, a Confirming Party which participates in the confirmation process and is not the Allocating Party is permitted to submit a PDA statement (PDA) to the Allocating Party. The party receiving the PDA should employ it for the purpose of allocating the gas (which was allocated to the PDA Submitter) to the PDA Submitter's downstream party(ies).

Proposed Standard No. 2.3.C

A PDA submitted by the Confirming Party to the Allocating Party with respect to a location should conform to the level of detail exchanged between such parties during the confirmation process.

Proposed Standard No. 2.3.D

A PDA submitted by a Service Requester to an Allocating Party with respect to a location should conform to the level of detail exchanged between such parties during the nomination process.

Proposed Standard No. 2.3.E

A PDA may not be used to allocate gas to a transaction which was not identified in the nomination or confirmation process, as applicable.

Proposed Standard No. 2.3.F

In order to achieve the intent of 2.3.E., a Transportation Service Provider, upon receipt of a PDA referencing a transaction not otherwise present in a nomination or confirmation, is permitted (but not required), to generate a nomination transaction (of zero or null quantity) corresponding to the PDA line item not otherwise associated with an applicable nomination or confirmation transaction from the party submitting the PDA.

Proposed Standard No. 2.3.G

In cases where there is sufficient gas to fulfill all scheduled quantities at a location, a PDA statement should not cause a quantity to be allocated to a party or transaction (as applicable based upon level of allocation) which quantity is less than the corresponding scheduled quantity(ies) for that party or transaction (as applicable based upon level of allocation).

Proposed Standard No. 2.3.H

In cases where there is insufficient gas to fulfill all scheduled quantities at a location, a PDA statement should not cause a quantity to be allocated to a party or transaction (as applicable based upon level of allocation) which quantity is greater than the corresponding scheduled quantity(ies) for that party or transaction (as applicable based upon level of allocation).

Proposed Standard No. 2.3.I

In absence of a PDA from the Service Requester to the Service Provider, the Service Provider should use the ranking supplied on the relevant nomination(s).

**4. Use of the Proposed Standard or Enhancement:**

These definitions and standards would clarify and standardize the PDA / allocation process as well as standardize the terms parties use when referring to the various processes known as allocation.

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

The proposed definitions would do the obvious - that is define. Parties do currently use the same terms to signify different processes, and vice-versa, when describing the allocation process. These definitions would add certainty and clarity to the allocations process.

The proposed standards, building on the definitions, clearly outlines the rights and responsibilities of the various parties present in the allocation process, the service requester, the transportation service provider, the confirming party, and the allocating party. The combination of definitions and standards

These standards and definitions do not necessarily require any technical changes. The various datasets required to undertake these standards are already in place.

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

This proposed definitions and standards, by themselves, have a zero to minimal implementation cost. This is due to the fact that the proposed standards are primarily definitional in nature, and secondarily, add certainty to a uncertain process. It should be noted that the requester believes that all necessary datasets and technical effort required to meet the proposed standards are already in place via the flowing gas related datasets. No additional technical changes to those datasets, other than those already under consideration, should be necessary.

**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.

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

N/A

**10. Attachments**

None.