Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

or

Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

Instructions:

1. Please fill out as much of the requested information as possible. It is mandatory to provide a contact name, phone number and fax number to which questions can be directed. If you have an electronic mailing address, please make that available as well.

2. Attach any information you believe is related to the request. The more complete your request is, the less time is required to review it.

3. Once completed, send your request to:
   Rae McQuade
   NAESB, Executive Director
   1301 Fannin, Suite 2350
   Houston, TX  77002
   Phone:  713-356-0060
   Fax:      713-356-0067

   by either mail, fax, or to NAESB’s email address, naesb@aol.com.

Once received, the request will be routed to the appropriate subcommittees for review.

Please note that submitters should provide the requests to the NAESB office in sufficient time so that the NAESB Triage Subcommittee may fully consider the request prior to taking action on it. It is preferable that the request be submitted a minimum of 3 business days prior to the Triage Subcommittee meetings. Those meeting schedules are posted on the NAESB web site at http://www.naesb.org/monthly_calendar.asp.
North American Energy Standards Board

Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

or

Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

Date of Request: December 11, 2003

1. Submitting Entity & Address:
   Florida Power & Light Company
   700 University Boulevard, EMT/JB
   Juno Beach, FL 33058

2. Contact Person, Phone #, Fax #, Electronic Mailing Address:
   Name : Dona Gussow
   Title : Contracts Coordinator
   Phone : 561-691-7886
   Cell: 561-301-8598
   Fax : 561-625-7567
   E-mail : dgussow@fpl.com

3. Description of Proposed Standard or Enhancement:

   Establish standards relating to gas quality specifications and measurement, as follows:

   A. Establish web-based reports for tracking all physical and chemical properties of natural gas defined in pipeline tariffs, including timelines for reporting.

   B. Develop a uniform process, including the underlying assumptions and methodologies, for determining gas quality specifications from measured data.

   C. Examine the need to establish gas quality specification standards taking into consideration, (i) the specification needs of end users and providers of service to end users, and (ii) sources of supply (e.g. land-based, the Gulf, LNG). Draft such standards as appropriate.
4. Use of Proposed 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):

Development of the gas quality specification standards would assist end users by providing a means to determine fuel quality (needed for optimizing operation of gas powered electric power generation equipment), facilitate emissions reporting to regulatory agencies, and facilitate electric power generation planning.

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

The proposed standards would make standardized gas quality information, including the derivation of gas quality specifications, available to the industry.

A multi-quadrant task force (assuming multi-quadrant assignment by the quadrant Executive Committees) can be formed to review the issues resulting from participating gas and electric representatives having a full understanding of the costs vs. the benefits of standardizing gas quality specifications.

Given the realities in the marketplace and positive impact these standards would have on electricity generation, Florida Power & Light Company anticipates being actively involved on these issues.

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

Cannot be ascertained at this time.

7. Description of Any Specific Legal or Other Considerations:

Cannot be ascertained at this time. However, standards produced could result in the need to modify pipeline tariffs.
8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):

    Not determined at this time.

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):

    A comparison table of current gas quality specification calculations is attached.
## DRAFT COMPARISON OF PIPELINE NATURAL GAS QUALITY SPECIFICATIONS

**[REVISED 12/15/03]**

<table>
<thead>
<tr>
<th>PIPELINE</th>
<th>HOW HV DETERMINED</th>
<th>HEAT VALUE (HV) [BTU/SCF]</th>
<th>WATER (H2O) [lbs/million cf]</th>
<th>HYDROGEN SULFIDE (H2S) [grains/100 cuft]</th>
<th>MERCAPTAN [grains/100 cuft]</th>
<th>TOTAL SULFUR (S) [grains/100 cuft]</th>
<th>OXYGEN (O) [% by volume]</th>
<th>NITROGEN (N) [% by volume]</th>
<th>CARBON DIOXIDE (CO2) [% by volume]</th>
</tr>
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<tbody>
<tr>
<td>A</td>
<td>Industry Practice</td>
<td>≥960</td>
<td>≤7</td>
<td>&lt;1</td>
<td>No Spec</td>
<td>≤20</td>
<td>No Spec</td>
<td>No Spec</td>
<td>No Spec</td>
</tr>
<tr>
<td>B</td>
<td>Standard Instrument</td>
<td>967-1200</td>
<td>≤7</td>
<td>≤1/4 - Mainline ≤1 – SE &amp; SW</td>
<td>No Spec</td>
<td>≤20</td>
<td>≤1</td>
<td>≤3</td>
<td>≤2</td>
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<tr>
<td>C</td>
<td>Not Defined</td>
<td>≥978</td>
<td>≤7</td>
<td>≤1</td>
<td>No Spec</td>
<td>≤20</td>
<td>≤1</td>
<td>4 less % by volume of CO2</td>
<td>≤3</td>
</tr>
<tr>
<td>D</td>
<td>AGA Rpt#5 –or- Other</td>
<td>967-1100</td>
<td>≤7</td>
<td>≤1/4</td>
<td>No Spec</td>
<td>≤20</td>
<td>≤4.2</td>
<td>≤4 + NOTE 2.a</td>
<td>≤3 + NOTE 2.a</td>
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<tr>
<td>E</td>
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<td>≤7</td>
<td>≤0.25</td>
<td>≤0.75</td>
<td>≤5</td>
<td>≤5.2</td>
<td>NOTE 2.b</td>
<td>NOTE 2.b</td>
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<tr>
<td>F</td>
<td>GPA Std 2172</td>
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<td>≤7</td>
<td>≤1/4</td>
<td>No Spec</td>
<td>≤10</td>
<td>≤1/4</td>
<td>NOTE 2.c</td>
<td>NOTE 2.c</td>
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<tr>
<td>G</td>
<td>Continuous Sampling</td>
<td>No Spec</td>
<td>≤7</td>
<td>≤0.25</td>
<td>No Spec</td>
<td>≤20</td>
<td>≤2</td>
<td>2 + NOTE 2.c</td>
<td></td>
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<tr>
<td>H</td>
<td>Standard Methods</td>
<td>1000-1075</td>
<td>≤7</td>
<td>≤1/4</td>
<td>No Spec</td>
<td>≤10</td>
<td>≤0.25</td>
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<td>NOTE 2.c</td>
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<td>I</td>
<td>AGA Rpt#3</td>
<td>950-1175</td>
<td>≤7</td>
<td>16 PPM</td>
<td>No Spec</td>
<td>320 PPM</td>
<td>≤2</td>
<td>≤3</td>
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<tr>
<td>J</td>
<td>Not Defined</td>
<td>≥950</td>
<td>≤4</td>
<td>≤1</td>
<td>No Spec</td>
<td>≤20</td>
<td>≤2</td>
<td>4 less % by volume of CO2</td>
<td>≤3</td>
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<tr>
<td>K</td>
<td>Not Defined</td>
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<td>≤7</td>
<td>≤1/4</td>
<td>≤1/4</td>
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<td>10 PPM</td>
<td>≤3</td>
<td>≤2</td>
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<tr>
<td>L</td>
<td>Not Defined</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PIPELINE</td>
<td>HOW HV DETERMINED</td>
<td>HEAT VALUE (HV) [BTU/SCF]</td>
<td>WATER (H₂O) [lbs/million cf]</td>
<td>HYDROGEN SULFIDE (H₂S) [grains/100 cuft]</td>
<td>MERCAPTAN [grains/100 cuft]</td>
<td>TOTAL SULFUR (S) [grains/100 cuft]</td>
<td>OXYGEN (O) [% by volume]</td>
<td>NITROGEN (N) [% by volume]</td>
<td>CARBON DIOXIDE (CO₂) [% by volume]</td>
</tr>
<tr>
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<td>-----------------------------------</td>
<td>-------------------------</td>
<td>--------------------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td>M</td>
<td>Standard Instrument</td>
<td>≥970</td>
<td>≤7</td>
<td>≤1/4</td>
<td>≤1/4</td>
<td>≤5</td>
<td>≤.2</td>
<td>NOTE 2.c</td>
<td>NOTE 2.c</td>
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<tr>
<td>N</td>
<td>Not Defined</td>
<td>≥950</td>
<td>≤7</td>
<td>≤10</td>
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<td>≤1</td>
<td>3 total (combined with CO₂)</td>
<td>3 total (combined with N)</td>
</tr>
<tr>
<td>O</td>
<td>Not Defined</td>
<td>≥967</td>
<td>No Spec</td>
<td>≤0.25</td>
<td>No Spec</td>
<td>≤20</td>
<td>No Spec</td>
<td>No Spec</td>
<td>No Spec</td>
</tr>
<tr>
<td>P</td>
<td>Not Defined</td>
<td>≥967</td>
<td>≤7</td>
<td>≤.5 -or- 8PPM</td>
<td>No Spec</td>
<td>≤10</td>
<td>No Spec</td>
<td>4 less % by volume of CO₂</td>
<td>≤3</td>
</tr>
<tr>
<td>Q</td>
<td>Not Defined</td>
<td>≥967</td>
<td>≤7</td>
<td>≤1/4</td>
<td>No Spec</td>
<td>≤20</td>
<td>No Spec</td>
<td>4 less % by volume of CO₂</td>
<td>≤3</td>
</tr>
<tr>
<td>R</td>
<td>Not Defined</td>
<td>980-1100</td>
<td>≤7</td>
<td>≤.3</td>
<td>No Spec</td>
<td>≤20</td>
<td>No Spec</td>
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<td>S</td>
<td>Not Defined</td>
<td>950-1100</td>
<td>≤7</td>
<td>≤1/4</td>
<td>1</td>
<td>≤5</td>
<td>≤.05</td>
<td>No Spec</td>
<td>≤2</td>
</tr>
</tbody>
</table>

**NOTES:**

1. Total Sulfur Content Notes
   1.a Total Sulfur content not specified.
   1.b Total Sulfur includes mercaptan.
   1.c Total Sulfur excludes mercaptan.
   1.d Total Sulfur includes H₂S.
   1.e Total Sulfur excludes H₂S.

2. Nonhydrocarbon Gases Notes
   2.a Gas shall not contain more than 5% by volume of nonhydrocarbon gases including, but not limited to, carbon dioxide, nitrogen, oxygen.
   2.b Gas shall not contain more than 3% by volume of nonhydrocarbon gases including, but not limited to, carbon dioxide, nitrogen, oxygen, helium.
   2.c Gas shall not contain more than 3% by volume of carbon dioxide + nitrogen.