Comments to R17005 and Proposed Standard 4.3.{z.1}

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Upon further review and through discussion with certain LDC’s, I have several concerns regarding proposed Standard 4.3.{z.1}. Below is a revised proposal.

The proposed standard should be edited to clarify that the “most recent ninety-day period” should begin only after the indicated informational postings are no longer active.

Further, the proposed standard should be clear that the 90 day period is a minimum, so as not to incent the many pipelines which currently retain such information for longer periods to change their policy. Below is a recommended revised version with key language changes highlighted:

**On the Informational Postings Web site, data and notices that were active but are no longer applicable or in effect should be retained on the Informational Posting Website-at a minimum- for a ninety- day period immediately following their expiration for the following subcategories:**

**Original Language:** On the Informational Postings Web site, data should be made available for the most recent ninety-day period for the following subcategories

|  |  |
| --- | --- |
| **CATEGORIES** | **SUBCATEGORIES** |
| **Capacity** | **Operationally Available** |
| **Notices** | **Critical** |
|  | **Non-Critical** |
|  | **Planned Service Outage** |

Beyond the initial ninety-day period, the historical data should be made available offline in accordance with regulatory requirements