



**RECOMMENDATION TO GISB EXECUTIVE COMMITTEE**

**Requester: NGPL**

**Request No.: C99003**

**1. Recommended Action:**

- Accept as requested
- Accept as modified below
- Decline

**Effect of EC Vote to Accept Recommended Action:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle (x.1.z)
- Definition (x.2.z)
- Business Practice Standard (x.3.z)
- Document (x.4.z)
- Data Element (x.4.z)
- Code Value (x.4.z)
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
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- Principle (x.1.z)
- Definition (x.2.z)
- Business Practice Standard (x.3.z)
- Document (x.4.z)
- Data Element (x.4.z)
- Code Value (x.4.z)
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**INTERPRETATIONS LANGUAGE:**

**GISB Interpretation No. 7.3.z**

GISB standard 5.3.2 states that “offers should be tendered by 1:00 p.m. the day before nominations for short term releases”. It further states that the “open season ends no later than 2:00 p.m. on the day before nominations are due...” GISB standard 5.3.24 states “Capacity Release facilitator should post offers and bids, including prearranged deals, upon receipt, unless releasing shipper requests otherwise”. These standards seem to imply that the open season could begin at either the time of posting or the next subsequent 1:00 p.m. after posting and in either case, remain open until the requested end of posting. Clarification is requested for the situation where the offer is tendered after the 1:00 p.m. deadline on business day one, but before 1:00 p.m. on business day 2 and the releasor requests that the offer be posted immediately.

**Interpretation:**

A Service Requester may have its offer posted for review either immediately or at another specified time and if not specified then, at the Transportation Service Provider's option, the offer can be posted for review either immediately or at the next occurrence of 1:00 p.m. on a business day. GISB has no requirement that bidding upon such posting be available prior to the next occurrence of 1:00 p.m. on a business day. Neither is there any prohibition on bidding occurring upon a posting provided that bidding upon such posting continue to be available through at least the next occurrence of 1:00 p.m. to 2:00 p.m. on a business day or the longer period where such offer is a long term offer.



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### **STANDARDS LANGUAGE:**

#### **GISB Standard No. 5.3.33**

When a Transportation Service Provider (*TSP*) receives an upload of an offer or a bid in association with a deadline, it should process such offer or bid (as applicable) and post valid offers or bids (as applicable) for review within fifteen minutes and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party within fifteen minutes. When a ~~Transportation Service Provider~~ *TSP* receives an upload of an offer or a bid not in association with a deadline, it should process and post for review valid offer(s) or bid(s) (as applicable) which are received prior to one quarter hour period by the end of the next succeeding quarter hour period and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party by the end of the next succeeding quarter hour period. The quarter hour periods are on the hour, fifteen minutes after, thirty minutes after and forty-five minutes after an hour.

*The releasing shipper may request a later posting time for posting of such offer insofar as such request comports with the standard Capacity Release timeline specified in GISB Standard No. 5.3.2.*

~~Transportation Service Provider's~~ *TSP's* nightly processing and routine maintenance occurring outside of normal business hours are apt to interrupt the normal schedule of applicable validation documents. Such delays should be kept to a minimum. The normal schedule should be resumed at the earliest opportunity and no later than the start of the next business day.

#### **GISB Standard No. 5.3.24**

Capacity release facilitator should post offers and bids, including prearranged deals, upon receipt, ~~unless releasing shipper requests otherwise. If a releasing shipper requests a posting time~~ *A releasing shipper may request a later posting time for posting of such offer, and* the capacity release service facilitator should support such request insofar as it comports with the standard *Capacity Release* timeline ~~set forth~~ *specified in standard* ~~GISB Standard No. 5.3.2.~~

## **4. SUPPORTING DOCUMENTATION**

### **a. Description of Request:**

Clarification or interpretation request:

GISB standard 5.3.2 states that “offers should be tendered by 1:00 p.m. the day before nominations for short term releases”. It further states that the “open season ends no later than 2:00 p.m. on the day before nominations are due...” GISB standard 5.3.24 states “Capacity Release facilitator should post offers and bids, including prearranged deals, upon receipt, unless releasing shipper requests otherwise”. These standards seem to imply that the open season could begin at either the time of posting or the next subsequent 1:00 p.m. after posting and in either case, remain open until the requested end of posting. Clarification is requested for the situation where the offer is tendered after the 1:00 p.m. deadline on business day one, but before 1:00 p.m. on business day 2 and the releasor requests that the offer be posted immediately.

Possible interpretations or clarifications, if known:



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We (NGPL) believe that at least two possible clarifications exist which will provide for the same business results. The first possibility is that the offer be immediately posted for display (only) and then become available for bid at 1:00 p.m. the following business day, remaining open until the requested end of posting (ending at 2:00 p.m.). The second possibility is that the release be open for bid immediately upon posting, and remain open until requested end of posting (ending at 2:00 p.m.). In either case, the business results are the same in that all interested parties would have the opportunity to view the offer without bias, and all interested parties would have the opportunity to bid on the offer without bias.

**b. Description of Recommendation:**

**Interpretations Subcommittee** (August 6, 1999)

Language: A Service Requester may have its offer posted for review either immediately or at another specified time and if not specified then, at the Transportation Service Provider's option, the offer can be posted for review either immediately or at the next occurrence of 1:00 p.m. on a business day. GISB has no requirement that bidding upon such posting be available prior to the next occurrence of 1:00 p.m. on a business day. Neither is there any prohibition on bidding occurring upon a posting provided that bidding upon such posting continue to be available through at least the next occurrence of 1:00 p.m. to 2:00 p.m. on a business day or the longer period where such offer is a long term offer.

Discussion: Mr. Love explained his request. Mr. Lander the above suggested language as a clarification. Mr. Love noted that the language seemed acceptable but needed an opportunity to review it further.

Action: A vote will be taken after further discussion on the next call.

**Interpretations Subcommittee** (August 13, 1999)

Proposed Interpretation Language: A Service Requester may have its offer posted for review either immediately or at another specified time and if not specified then, at the Transportation Service Provider's option, the offer can be posted for review either immediately or at the next occurrence of 1:00 p.m. on a business day. GISB has no requirement that bidding upon such posting be available prior to the next occurrence of 1:00 p.m. on a business day. Neither is there any prohibition on bidding occurring upon a posting provided that bidding upon such posting continue to be available through at least the next occurrence of 1:00 p.m. to 2:00 p.m. on a business day or the longer period where such offer is a long term offer.

Discussion: Mr. Lander noted that he had received communication from Ms. Corman that she supported the above language. There was no discussion. The vote was taken to support the above language as the interpretation. The vote was unanimous in favor. The remaining committee members will be polled for their vote.

Action: The vote was unanimous in favor. The remaining committee members will be polled for their vote.

**Executive Committee** (September 16, 1999)



## RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

**Requester: NGPL**

**Request No.: C99003**

Mr. Lander described the recommended interpretation for Request No. C99003 and the potential inconsistency with existing GISB Standard No. 5.3.33. The motion was made to:

Transfer Request No. C99003 to the BPS to review GISB Standard Nos. 5.3.24 and/or 5.3.33 in light of the recommended interpretation. The subcommittee should recommend changes to GISB Standard Nos. 5.3.24 and/or 5.3.33 if needed to correct any inconsistencies. The request should be treated as a high priority. BPS should use best efforts so that it can be addressed at the November EC meeting.

Mr. Keeler noted that language changes were needed for GISB Standard No. 5.3.33 and that the proposed interpretation should not be changed. He offered that GISB Standard No 5.3.33 could be made consistent through the following bolded under-lined changes, and asked that BPS consider it at the time that it discusses the issue:

5.3.33 When a Transportation Service Provider receives an upload of an offer or a bid in association with a deadline, it should process such offer or bid (as applicable) and post valid offers or bids (as applicable) for review within fifteen minutes **unless the offeror or bidder requests otherwise;** and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party within fifteen minutes. When a Transportation Service Provider receives an upload of an offer or a bid not in association with a deadline, it should process and post for review valid offer(s) or bid(s) (as applicable) which are received prior to one quarter hour period by the end of the next succeeding quarter hour period **unless the offeror or bidder requests otherwise;** and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party by the end of the next succeeding quarter hour period. The quarter hour periods are on the hour, fifteen minutes after, thirty minutes after and forty-five minutes after an hour.

The motion to transfer the issue to the BPS carried unanimously.

### **Business Practices Subcommittee** (September 23, 1999)

GISB standard 5.3.2 states that “offers should be tendered by 1:00 p.m. the day before nominations for short term releases”. It further states that the “open season ends no later than 2:00 p.m. on the day before nominations are due...” GISB standard 5.3.24 states “Capacity Release facilitator should post offers and bids, including prearranged deals, upon receipt, unless releasing shipper requests otherwise”. These standards seem to imply that the open season could begin at either the time of posting or the next subsequent 1:00 p.m. after posting and in either case, remain open until the requested end of posting.

Clarification is requested for the situation where the offer is tendered after the 1:00 p.m. deadline on business day one, but before 1:00 p.m. on business day 2 and the releasor requests that the offer be posted immediately. Possible interpretations or clarifications, if known: We (NGPL) believe that at least two possible clarifications exist which will provide for the same business results. The first possibility is that the offer be immediately posted for display (only) and then become available for bid at 1:00 p.m. the following business day, remaining open until the requested end of posting(ending at 2:00 p.m.). The second possibility is that the release be open for bid immediately upon posting, and remain open until requested end of posting(ending at 2:00 p.m.). In either case, the business results are the same in that all interested parties would have the opportunity to view the offer without bias, and all interested parties would have the opportunity to bid on the offer without bias.

Discussion:



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Mr. Scheel gave a brief description of the issue. Ms. McVicker noted that based on discussion at the EC, some language was proposed by Paul Keeler. Based on the discussion additional language was proposed. The proposed red-line standard would be as follows:

5.3.33 When a Transportation Service Provider (TSP) receives an upload of an offer or a bid in association with a deadline, it should process such offer or bid (as applicable) and post valid offers or bids (as applicable) for review within fifteen minutes and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party within fifteen minutes. When a ~~Transportation Service Provider~~ TSP receives an upload of an offer or a bid not in association with a deadline, it should process and post for review valid offer(s) or bid(s) (as applicable) which are received prior to one quarter hour period by the end of the next succeeding quarter hour period and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party by the end of the next succeeding quarter hour period. The quarter hour periods are on the hour, fifteen minutes after, thirty minutes after and forty-five minutes after an hour.

The releasing shipper may request a different posting time insofar as it comports with the standard Capacity Release timeline.

~~Transportation Service Provider's~~ TSP's nightly processing and routine maintenance occurring outside of normal business hours are apt to interrupt the normal schedule of applicable validation documents. Such delays should be kept to a minimum. The normal schedule should be resumed at the earliest opportunity and no later than the start of the next business day.

Note:

Ms. Hess assumed the chair at a point in this discussion when Ms. McVicker had to leave the call.

Action: This item will be up for discussion and vote at the next meeting.

**Business Practices Subcommittee** (September 30, 1999)

Discussion:

The final proposed draft from the last call was as follows:

5.3.33 When a Transportation Service Provider (TSP) receives an upload of an offer or a bid in association with a deadline, it should process such offer or bid (as applicable) and post valid offers or bids (as applicable) for review within fifteen minutes and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party within fifteen minutes. When a ~~Transportation Service Provider~~ TSP receives an upload of an offer or a bid not in association with a deadline, it should process and post for review valid offer(s) or bid(s) (as applicable) which are received prior to one quarter hour period by the end of the next succeeding quarter hour period and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party by the end of the next succeeding quarter hour period. The quarter hour periods are on the hour, fifteen minutes after, thirty minutes after and forty-five minutes after an hour.

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delays should be kept to a minimum. The normal schedule should be resumed at the earliest opportunity and no later than the start of the next business day.

Mr. Keisler raised the point as to whether we should put in the standard number for the capacity release timeline (which is 5.3.2) into the standard, or leave the reference to the Capacity Release timeline.

Mr. Scheel then noted that the "different" word in this paragraph should be replaced by the word "later" since you can't necessarily specify a posting time earlier than the 15 minutes specified in the standard.

Thus the second paragraph is reworded as follows: "The releasing shipper may request a later posting time for posting of such offer insofar as such request comports with the standard Capacity Release timeline specified in GISB Standard No. 5.3.2."

Motion:

Mr. Buccigross made the motion to adopt the following modifications to standard number 5.3.33. It was seconded by Ms. Hess:

5.3.33 When a Transportation Service Provider (TSP) receives an upload of an offer or a bid in association with a deadline, it should process such offer or bid (as applicable) and post valid offers or bids (as applicable) for review within fifteen minutes and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party within fifteen minutes. When a ~~Transportation Service Provider~~ TSP receives an upload of an offer or a bid not in association with a deadline, it should process and post for review valid offer(s) or bid(s) (as applicable) which are received prior to one quarter hour period by the end of the next succeeding quarter hour period and, in the event such document is not valid, respond with the applicable validation document to the applicable submitting party by the end of the next succeeding quarter hour period. The quarter hour periods are on the hour, fifteen minutes after, thirty minutes after and forty-five minutes after an hour.

The releasing shipper may request a later posting time for posting of such offer insofar as such request comports with the standard Capacity Release timeline specified in GISB Standard No. 5.3.2.

~~Transportation Service Provider's~~ TSP's nightly processing and routine maintenance occurring outside of normal business hours are apt to interrupt the normal schedule of applicable validation documents. Such delays should be kept to a minimum. The normal schedule should be resumed at the earliest opportunity and no later than the start of the next business day.

Action: The motion was adopted. See voting records for additional detail.

**Sense of the Room:** September 30, 1999      17 In Favor      0 Opposed

**Segment Check** (if applicable):

In Favor:      \_\_\_ End-Users      \_\_\_ LDCs      13 Pipelines      \_\_\_ Producers      4 Services

Opposed:      \_\_\_ End-Users      \_\_\_ LDCs      \_\_\_ Pipelines      \_\_\_ Producers      \_\_\_ Services

Discussion:

Mr. Aschbrenner brought up the question as to whether modifications to 5.3.24 should also be considered in light of the EC's instructions. Some believed that since this was not on the agenda it should not be discussed. Others agreed that it should not be discussed.

Motion:

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Ms. Van Pelt then made the following motion which was seconded by Ms. Hess: There is no need to send this modification to the Information Requirements or Technical Subcommittees. The modified standard will not be posted for industry comment until completion of processing of related standard 5.3.24 per EC instructions.

Action: There was no objection to the motion.

**Business Practices Subcommittee** (October 7, 1999)

Discussion:

Mr. Aschbrenner noted that the language included in the proposed revised 5.3.33 might affect 5.3.24. The original language for 5.3.24 is:

5.3.24: Capacity release facilitator should post offers and bids, including prearranged deals, upon receipt, unless releasing shipper requests otherwise. If a releasing shipper requests a posting time, the capacity release service facilitator should support such request insofar as it comports with the standard timeline set forth in standard 5.3.2.

Mr. Scheel and Ms. Van Pelt discussed the need for changes to the standard based on the releasing shipper allowing for a later posting time, with a similar construction in 5.3.24 as is present in the revised 5.3.33. Mr. Lander offered the language below, which was accepted by Mr. Aschbrenner as describing his intent:

5.3.24 Capacity release facilitator should post offers and bids, including prearranged deals, upon receipt. A releasing shipper may request a later posting time for posting of such offer, and the capacity release service facilitator should support such request insofar as it comports with the standard Capacity Release timeline specified in GISB Standard No. 5.3.2.

Motion:

The motion was made by Mr. Aschbrenner and seconded by Ms. McVicker to adopt the above language. The motion passed unanimously.

**Sense of the Room:** October 7, 1999 11 In Favor 0 Opposed

**Segment Check** (if applicable):

In Favor: 1 End-Users    LDCs 7 Pipelines    Producers 3 Services

Opposed:    End-Users    LDCs    Pipelines    Producers    Services

**c. Business Purpose:**

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**