

TransCapacity

an Eastern Utilities Services Corp. Company

August 26, 1996

Ms. Rae McQuade
Executive Director
Gas Industry Standards Board
1100 Louisiana Street, Suite 4925
Houston, TX 77002

**RE: Proposed GISB Standards for Electronic Business Transactions
Real Time Available Capacity Information**

Dear Ms. McQuade:

In response to the Federal Energy Regulatory Commission's ("FERC") desire expressed in Order No. 587, regarding availability of real time information surrounding available capacity, TransCapacity respectfully submits this proposal for GISB standards relating to Real Time Available Capacity Information.

TransCapacity believes the definitions and standards as proposed will accomplish the goals of the order and looks forward to discussion and possible improvement of the proposal through the GISB adoption process.

Should you have any questions or require any additional information, please feel free to contact me at (508) 535-7500. Thank you.

Sincerely,



James H. Buccigross, Esq.
Legal Counsel

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

Date of Request: August 21, 1996

1. Submitting Entity & Address:

TransCapacity Limited Partnership
83 Pine Street, Suite 101
W. Peabody, MA 01960

2. Contact Person, Phone #, Fax #, Electronic Mailing Address:

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3. Description of Proposed Standard or Enhancement:

The proposed standard encompasses new business practice standards, definitions, and data elements necessary to enhance an existing GISB standard (GISB Capacity Release - Operationally Available and Unsubscribed Capacity, G840OAU, 003040, June 14, 1996) as requested by the Federal Energy Regulatory Commission in Order No. 587 in order to provide available capacity information on a real time basis.

The proposed enhanced GISB Capacity Release - Operationally Available and Unsubscribed Capacity ("OA") standard will remain along with the ANSI X.12 840 document, with the addition of certain data elements, as discussed below.

In its Order No. 587, the Federal Energy Regulatory Commission ("FERC") instructed GISB to "explore making information available, on a real time basis, on the availability of capacity on the mainline and at individual receipt and delivery points." The order went on to state, "Some of the needed information can be obtained through compliance with the existing Operationally Available and Unsubscribed Capacity datasets . . . [h]owever, improvements are needed. Current data is not available on a real time basis."

The order then addressed the necessity for information to be available regarding zone-to-zone capacity stating that "information is not available on whether gas can be scheduled into or out of a particular zone."

The Order also stated that current data does not "reflect capacity scheduled during the day" and that users should be able to "request information that changed after a specified date and time, i.e., the quantity of available capacity at individual locations which changed due to a newly scheduled quantity." The FERC's Order No. 587 differs from the current GHSB OA datasets which are time-stamped when, and only when, they are posted by the pipeline. The current situation requires that those requesting OA data, and those responding to the request, must ask for/deliver all OA data even if only one point, or one zone-to-zone transfer capacity was changed. Order No. 587 provides that users should be able to download only the information which has changed (as a result of newly scheduled quantities) since a user-specified date and time. Implementation of this requirement would enable those requesting information to keep track of when their last request was processed and subsequently request only the data which changed since their last request process time.

In order to fashion these improvements and the infrastructure (i.e., the datasets and requirements for data elements) necessary to fulfill the requirements of Order No. 587 with respect to Real Time Available Capacity, TransCapacity Limited Partnership ("TransCapacity") proposes that GHSB enhance the existing OA standard by adopting and incorporating the following new definitions, business process standards and data elements to GHSB's existing OA standard.

Proposed Definitions:

1) "Operationally Available Capacity" is the estimated operationally useable capacity, expressed as a 24 hour quantity, remaining at each nominatable point and/or from one zone to another zone, for a gas day after taking into account the scheduled quantity(ies) for the gas day as determined by the Transportation Service Provider and communicated to Service Requesters through the standard nominating process.

2) "Real Time Operationally Available Capacity" is the quantity of capacity available at each nominatable point and/or from one zone to another zone, expressed as a 24 hour quantity, after taking into account the quantity most recently scheduled at such nominatable point and/or from one zone to another zone and either adding or subtracting the newly scheduled quantity as applicable from the previously determined Operationally Available Capacity at the nominatable point and/or from zone to another zone, for the gas day.

3) “Real Time Available Unsubscribed Capacity” is the quantity of capacity available at each nominatable point and/or from one zone to another zone, expressed as a 24 hour quantity, after taking into account capacity acquisition and/or expiration through contracting activities at each nominatable point and/or from one zone to another zone, by subtracting or adding, as applicable, the most recently acquired or expired quantity, from the Unsubscribed Capacity quantity available at the nominatable point and/or from one zone to another zone prior to the contracting activities.

Proposed Business Process Standards:

1) **Operationally Available and Unsubscribed Capacity data**, regarding the availability of capacity on the mainline and at all individual points, should be made available from Transportation Service Providers on a real time basis using the existing Operationally Available and Unsubscribed Capacity datasets, as enhanced to accommodate the provision of this information in a real time format.

2) **Zone-to-zone available capacity information** should be made available from Transportation Service Providers on a real time basis using the existing Operationally Available and Unsubscribed Capacity datasets, as enhanced by data additions and business process changes necessary to fulfill the requirements of real time availability of information.

3) For “pathed” pipelines, the zone-to-zone capacity information should include the capacity available from each zone to the adjacent zone(s) on the full path of the pipeline. For “non-pathed” pipelines, the zone capacity information should include the capacity available into and out of each zone from every other zone on the Transportation Service Provider’s facilities. In the event a non-pathed pipeline determines that the zone-to-zone transfer capacity for a particular combination of zones is operationally not feasible, a Quantity of zero and the IT Indicator set at “No” within the dataset will communicate to Service Requesters the unfeasibility of such zone to zone combinations.

4) The “IT Indicator” data element should be supported for real time operationally available capacity information relating to mainline capacity, point capacity, and zone-to-zone capacity.

5) Standardized codes for identifying each zone should be defined by the Transportation Service Provider. These zone codes should be treated in a manner similar to segment code numbers for the purpose of communicating information through the standard datasets.

6) One or more standard qualifiers identifying the code as a zone code should be established and used by the Transportation Service Providers to enable Service Requesters to identify zone-to-zone capacity, point capacity and other non-zone segment capacity.

7) The Posting Date and Posting Time for real time available capacity information should be reported at the individual point and/or mainline or zone-to-zone record level, as applicable, in order to facilitate Service Requesters ability to request only the information which has changed since a specified date and time.

8) Operationally Available Capacity for a gas day should be posted within one hour of the delivery of Scheduled Quantities information concerning the gas day to Service Requesters.

9) Updating Operationally Available Capacity information so as to reflect real time scheduling activity should be accomplished and the information concerning the updated available capacity should be posted within one half hour of the scheduling activity which caused the change to the quantity of capacity available.

10) At any point in time, a Transportation Service Provider should have the most current record of operationally available capacity for each nominatable point, mainline segment, and applicable zone-to-zone combination for a gas day and should provide for the prompt download of this information to a Service Requester upon request. A Transportation Service Provider is not required to save or provide download(s) of other than the most current record of operationally available capacity for each nominatable point, mainline segment, and applicable zone-to-zone combination for a gas day. A Service Requester may specify that only the latest record of operationally available capacity for each nominatable point, mainline segment, and applicable zone-to-zone combination for a gas day be provided in response to its request for Operationally Available information.

11) Only those records for nominatable points, mainline and/or zone-to-zone whose quantity of Operationally Available Capacity changed as a result of scheduling activity should be posted and have the quantity and posting date and time updated. If a scheduling activity does not change the quantity of available capacity for a nominatable point, mainline or zone-to-zone combination, no change should be made to the quantity or posting date and time for the location.

12) Changes to Operationally Available Capacity for a given gas day which are not the result of scheduling activity for such gas day are not required to be reflected in Operationally Available Capacity information records for such gas day subsequent to the Transportation Service Provider's delivery of Scheduled Quantity information for such gas day pursuant to the GTSB standard nominations timeline.

13) Unsubscribed Capacity information should be updated upon execution by the Transportation Service Provider and a Service Requester of a contract which to changes the quantity of unsubscribed capacity at a nominatable point, mainline and/or zone-to-zone combination.

14) Unsubscribed Capacity information should reflect the quantity of nominatable capacity available at point, mainline and/or zone-to-zone combination and the begin date and end date of the unsubscribed capacity availability time period.

15) Where the difference between the begin date and end date of the time period during which a quantity of Unsubscribed Capacity a nominatable point, mainline and/or zone-to-zone combination is greater than one year, the Transportation Service Provider may provide any end date it deems appropriate. Where the difference between the begin date and end date of the time period during which a quantity of Unsubscribed Capacity at a nominatable point, mainline and/or zone-to-zone combination is less than or equal to one year, the Transportation Service Provider should provide the actual end date.

Proposed Data Elements:

The framework exists, in the form of GISB's current Operationally Available and Unsubscribed Capacity standard datasets and the related data elements, to effectively post the real time data. Changes to the current dataset are relatively minor and are as follows:

1) Point qualifiers should be added for zone codes and mainline codes in order to specify where the available capacity is available.

2) Posting Date and Posting Time data elements, which are currently specified at the entire document level should become mandatory data elements and should be provided at the detail level.

3) The Begin Date and Begin Time data elements, which are currently optional data elements at the detail level, should be reported as mandatory data elements at the detail level associated with each nominatable point, mainline and/or zone-to-zone combination

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):

Under the proposed enhancement to GISB's OA standard, Operationally Available Capacity is the quantity, defined as the capacity available for the gas day at a point, mainline and/or zone-to-zone combination, which remains following the conclusion of nomination and scheduling activities for the day. Real time operationally available capacity means that operationally available

capacity information is updated whenever subsequent scheduling activity causes a change to the quantity of capacity available at the point, mainline and/or zone-to-zone combination. As nominations are processed and scheduled quantity documents are generated, the estimated quantity of capacity available for the gas day at a specific point can change. The quantity can either increase or decrease. If the estimated available capacity quantity at a point changes, the available capacity quantity information and the posting date time of the changed data would be updated and made ready for delivery to those who might request the information.

Those seeking updated information would submit a request to the Transportation Service provider which would specify an historic posting date and time which would tell the Transportation Service provider that the requester only needs data which has changed since the specified date and time. The Transportation Service provider would then prepare and issue a response document containing only the records which were posted (because the quantity changed) after the requester's specified date and time. If the available capacity at a point remains unchanged, it would not be updated and posted with each scheduling activity.

Baseline data on the quantity of capacity available at all nominatable points could still be requested using the current Operationally Available and Unsubscribed Capacity dataset request. Of note, the current GISB Standards adopted in Order No. 587 allow a data requester to separately request operationally available capacity or unsubscribed capacity.

With the proposed enhancements, the Unsubscribed Capacity information would only need to be updated upon execution of a new firm transportation or storage contract. Flexibility with respect to presenting the unsubscribed capacity to the market should reside with the Transportation Service Provider in those instances where the capacity is unsubscribed for one or more years. Capacity known to the Transportation Service Provider to only be available for one year or less should be identified so that potential Transportation Service Requesters can know that as of the posting date, the capacity will not be available from the Transportation Service Provider beyond the identified period.

TransCapacity believes there has been misunderstandings concerning the notion of real time available capacity quantity information. Some parties have represented that this would entail real-time defined as in "continuously updated" flow data at all points on a pipeline. In other words, the available capacity quantity would be updated and data provided on a minute-by-minute or second-by-second basis. Using this definition of real-time, the costs would indeed be enormous, the data of questionable practical value and implementation of a standard could take years. It is TransCapacity's belief that this is not what the FERC is expecting in Order No. 587 when it refers to real time and that the

enhancements proposed herein by TransCapacity will meet the FERC's requirements.

The proposed enhanced OA standard datasets would be communicated using customary and usual communications protocols associated with file transfer by means of public telephone systems, proprietary dial in and delivery scripts, VAN mechanisms or Internet as mutually agreed to between trading partners.

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

TransCapacity believes that the proposed changes will enable the industry to meet any requirements promulgated by the FERC as described in Order No. 587. The technical changes required to the datasets and EDI documentation are reasonably small as compared to the number of changes recently required by the Order No. 587 standards.

As second benefit of the proposed enhancement is improved communication efficiency as Service Requesters and Transportation Service Providers are able to precisely define and communicate only the data needed by the market to support capacity acquisition activities.

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

There are cost factors involved in the process, but the majority of these are one-time development costs. The incremental specific cost to implement the proposed enhancement to the GISB OA Standard for those parties already compliant with the FERC's capacity release and related Orders is expected to be negligible. The marginal cost to issue the EDI documents once the processes are up and running will be relatively minor.

There are likely to be substantial cost savings as both Transportation Service Providers and Service Requesters are able to pare down the quantity of data sent with each response to a request. Once the parties are able to exchange only the data which changed since a service requester specified date and time the amount of data in each download should drop dramatically.

7. Description of Any Specific Legal or Other Considerations:

At this time, there are no known legal or other considerations to be addressed.

8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):

TransCapacity LP
National Registry

Greg Lander
Cheryl Loewen

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 ANST X12 mapped transactions).

Not applicable.