Severe Weather Information Needs

1. Transportation

Current FERC reporting requirements for interstate pipelines are sufficient for customers to maintain situational awareness during the operating horizon, including during severe weather events. Those requirements are shown *verbatim* in Attachment 1. In general, information available to customers includes:

* Critical notices detailing issues with the pipeline, including reduced pressure, by location.
* Constraint notices that identify issues other than those with the pipeline itself, such as areas where demand exceeds the capability of the pipeline to deliver gas. These notices typically show where there is available capacity, where demand exceeds capacity, and where there is capacity that is still available albeitin limited quantities.
* Some pipelines post weekend outlooks on Thursday or in advance of severe weather. This would be helpful information from all pipelines, though not required under FERC rules.
* Pipelines provide critical condition notifications in the face of likely under deliveries.

Needs: We feel we have what we need from interstate pipelines. We would benefit from similar information from intrastate pipelines.

1. Supply

* Suppliers should provide notice of service interruptions as soon as reasonably possible.
  + A mechanism to provide such notifications does not exist currently, short of phone calls/emails. Suppliers may want to consider developing a mechanism.
* In the face of service interruptions, suppliers should provide customers with notification about supply alternatives within their portfolios.
* Service interruption notifications should be accompanied by detailed information about where the interruption has occurred and why.
* Suppliers should provide notification of expected duration of interruption.
* Suppliers should provide notification of mitigation/corrective actions taken to remedy interruption.
* Suppliers should be required to post notification of their performance in severe weather situations to provide information that may be of use to purchasers as sellers with more reliable supplies.

Attachment 1

FERC Reporting Requirements for Interstate Pipelines

18 CFR 284.13 Reporting Requirements for Interstate Pipelines

An interstate pipeline that provides transportation service under [subparts B](https://www.ecfr.gov/current/title-18/part-284/subpart-B) or [G of this part](https://www.ecfr.gov/current/title-18/part-284/subpart-G) must comply with the following reporting requirements.

(a) **Cross references.** The pipeline must comply with the requirements in [Part 358](https://www.ecfr.gov/current/title-18/part-358), [Part 250](https://www.ecfr.gov/current/title-18/part-250), and [Part 260 of this chapter](https://www.ecfr.gov/current/title-18/part-260), where applicable.

(b) **Reports on firm and interruptible services.** An interstate pipeline must post the following information on its Internet web site, and provide the information in downloadable file formats, in conformity with [§ 284.12 of this part](https://www.ecfr.gov/current/title-18/part-284/section-284.12), and must maintain access to that information for a period not less than 90 days from the date of posting.

(1) For pipeline firm service and for release transactions under [§ 284.8](https://www.ecfr.gov/current/title-18/section-284.8), the pipeline must post with respect to each contract, or revision of a contract for service, the following information no later than the first nomination under a transaction:

(i) The full legal name of the shipper, and identification number, of the shipper receiving service under the contract, and the full legal name, and identification number, of the releasing shipper if a capacity release is involved or an indication that the pipeline is the seller of transportation capacity;

(ii) The contract number for the shipper receiving service under the contract, and, in addition, for released transactions, the contract number of the releasing shipper's contract;

(iii) The rate charged under each contract;

(iv) The maximum rate, and for capacity release transactions not subject to a maximum rate, the maximum rate that would be applicable to a comparable sale of pipeline services;

(v) The duration of the contract;

(vi) The receipt and delivery points and the zones or segments covered by the contract, including the location name and code adopted by the pipeline in conformance with [paragraph (f)](https://www.ecfr.gov/current/title-18/section-284.13#p-284.13(f)) of this section for each point, zone or segment;

(vii) The contract quantity or the volumetric quantity under a volumetric release;

(viii) Special terms and conditions applicable to a capacity release transaction, including all aspects in which the contract deviates from the pipeline's tariff, and special details pertaining to a pipeline transportation contract, including whether the contract is a negotiated rate contract, conditions applicable to a discounted transportation contract, and all aspects in which the contract deviates from the pipeline's tariff.

(ix) Whether there is an affiliate relationship between the pipeline and the shipper or between the releasing and replacement shipper.

(x) Whether a capacity release is a release to an asset manager as defined in [§ 284.8(h)(3)](https://www.ecfr.gov/current/title-18/section-284.8#p-284.8(h)(3)) and the asset manager's obligation to deliver gas to, or purchase gas from, the releasing shipper.

(xi) Whether a capacity release is a release to a marketer participating in a state-regulated retail access program as defined in [§ 284.8(h)(4)](https://www.ecfr.gov/current/title-18/section-284.8#p-284.8(h)(4)).

(2) For pipeline interruptible service, the pipeline must post on a daily basis no later than the first nomination for service under an interruptible agreement, the following information:

(i) The full legal name, and identification number, of the shipper receiving service;

(ii) The rate charged;

(iii) The maximum rate;

(iv) The receipt and delivery points between which the shipper is entitled to transport gas at the rate charged, including the location name and code adopted by the pipeline in conformance with [paragraph (f)](https://www.ecfr.gov/current/title-18/section-284.13#p-284.13(f)) of this section for each point, zone, or segment;

(v) The quantity of gas the shipper is entitled to transport;

(vi) Special details pertaining to the agreement, including conditions applicable to a discounted transportation contract and all aspects in which the agreement deviates from the pipeline's tariff.

(vii) Whether the shipper is affiliated with the pipeline.

(c) **Index of customers.**

(1) On the first business day of each calendar quarter, an interstate pipeline must file with the Commission an index of all its firm transportation and storage customers under contract as of the first day of the calendar quarter that complies with the requirements set forth by the Commission. The Commission will establish the requirements and format for such filing. The index of customers must also posted on the pipeline's Internet web, in accordance with standards adopted in [§ 284.12 of this part](https://www.ecfr.gov/current/title-18/part-284/section-284.12), and made available from the Internet web site in a downloadable format complying with the specifications established by the Commission. The information posted on the pipeline's Internet web site must be made available until the next quarterly index is posted.

(2) For each shipper receiving firm transportation or storage service, the index must include the following information:

(i) The full legal name, and identification number, of the shipper;

(ii) The applicable rate schedule number under which the service is being provided;

(iii) The contract number;

(iv) The effective and expiration dates of the contract;

(v) For transportation service, the maximum daily contract quantity (specify unit of measurement), and for storage service, the maximum storage quantity (specify unit of measurement);

(vi) The receipt and delivery points and the zones or segments covered by the contract, including the location name and code adopted by the pipeline in conformance with [paragraph (f)](https://www.ecfr.gov/current/title-18/section-284.13#p-284.13(f)) of this section for each point, zone or segment;

(vii) An indication as to whether the contract includes negotiated rates;

(viii) The name of any agent or asset manager managing a shipper's transportation service; and

(ix) Any affiliate relationship between the pipeline and a shipper or between the pipeline and a shipper's asset manager or agent.

(3) The requirements of this section do not apply to contracts which relate solely to the release of capacity under [§ 284.8](https://www.ecfr.gov/current/title-18/section-284.8), unless the release is permanent.

(4) Pipelines that are not required to comply with the index of customers posting and filing requirements of this section must comply with the index of customer requirements applicable to transportation and sales under Part 157 as set forth under [§ 154.111(b)](https://www.ecfr.gov/current/title-18/section-154.111#p-154.111(b)) and [(c) of this chapter](https://www.ecfr.gov/current/title-18/section-154.111#p-154.111(c)).

(5) The requirements for the electronic index are available through the Commission's website, [*https://www.ferc.gov*](https://www.ferc.gov).

(d) **Capacity and flow information.**

(1) An interstate pipeline must provide on its Internet web site and in downloadable file formats, in conformity with [§ 284.12 of this part](https://www.ecfr.gov/current/title-18/part-284/section-284.12), equal and timely access to information relevant to the availability of all transportation services whenever capacity is scheduled, including, but not limited to, the availability of capacity at receipt points, on the mainline, at delivery points, and in storage fields, whether the capacity is available directly from the pipeline or through capacity release, the total design capacity of each point or segment on the system, the amount scheduled at each point or segment whenever capacity is scheduled, and all planned and actual service outages or reductions in service capacity. An interstate pipeline must also provide information about the volumes of no-notice transportation provided pursuant to [§ 284.7(a)(4)](https://www.ecfr.gov/current/title-18/section-284.7#p-284.7(a)(4)). This information must be posted at each receipt and delivery point before 11:30 a.m. central clock time three days after the day of gas flow and must reflect the pipeline's best estimate. Updated information must be posted at each receipt and delivery point as necessary within ten business days after the month of gas flow.

(2) An interstate pipeline must make an annual filing by March 1 of each year showing the estimated peak day capacity of the pipeline's system, and the estimated storage capacity and maximum daily delivery capability of storage facilities under reasonably representative operating assumptions and the respective assignments of that capacity to the various firm services provided by the pipeline.

(e) **Notice of bypass.** An interstate pipeline that provides transportation (except storage) to a customer that is located in the service area of a local distribution company and will not be delivering the customer's gas to that local distribution company, must file with the Commission, within thirty days after commencing such transportation, a statement that the interstate pipeline has notified the local distribution company and the local distribution company's appropriate regulatory agency in writing of the proposed transportation prior to commencement.

(f) **Location codes.** An interstate pipeline must maintain a posting on its publicly available Internet Web site of the pipeline's location names and codes for all current and inactive receipt and delivery points on its system, including, for each point: Direction of flow, the location of the point, the location zone if such exists, the Commission company identification code (CID), if any, of the upstream and/or downstream entity, the location type, the current status as active and inactive, and the date(s) the point becomes active or inactive. The pipeline must provide the information in downloadable file formats, in conformity with the requirements of [18 CFR 284.12](https://www.ecfr.gov/current/title-18/section-284.12) of this chapter.