

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

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
- 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

3. RECOMMENDATION

SUMMARY: Modify GISB Standard Nos. 5.3.2, 5.3.6, 5.3.7, 5.3.31, 5.3.32, 5.3.35, 5.3.36, 5.3.41.
Propose new GISB Standard Nos. 5.2.z1, 5.3.z1, 5.3.z2, 5.3.z3.

STANDARDS LANGUAGE:

Proposed revision to GISB Standard No. 5.3.2:

5.3.2 For ~~short-term~~ biddable releases (less than ~~5 months~~ 1 year):

- ~~Offers~~ should be tendered by ~~4:00~~ 12:00 P.M. on ~~the~~ a Business dDay ~~before nominations for short-term releases (less than 5 months);~~
- open season ends no later than ~~21:00~~ 21:00 P.M. on ~~the~~ a Business dDay ~~before nominations are due~~ (evaluation period begins at ~~21:00~~ 21:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken);
- evaluation period ends at ~~3:15~~ 2:00 P.M.;
- match or award is communicated by ~~3:15~~ 2:00 P.M.;
- match response by ~~42:30~~ 42:30 P.M.;
- award posting by ~~53:00~~ 53:00 P.M.;

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

- ~~posting of pre-arranged deals not subject to bid by 9 A.M. the day of nominations;~~
- ~~contract tendered with contract # by 10 A.M. 4:00 P.M.; contract executed; nomination possible for next day gas flow beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)~~

For longer term biddable releases (~~five months~~ 1 year or more):

- offers should be tendered by ~~1:00~~ 12:00 P.M. four ~~Business~~ 4 Days before award for long-term releases;
- open season ends no later than ~~21:00~~ P.M. on the Business 4 Day before timely nominations are due (open season is three ~~Business~~ 4 Days);
- evaluation period begins at ~~21:00~~ P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken;
- evaluation period ends at ~~3:15~~ 2:00 P.M.;
- match or award is communicated by ~~3:15~~ 2:00 P.M.;
- match response by ~~4:30~~ P.M.;
- award posting by ~~5:30~~ P.M.;
- ~~posting of pre-arranged deals not subject to bid by 9 A.M. the day of nominations;~~
- ~~contract tendered with contract # by 10 A.M. 4:00 P.M.; contract executed; nomination possible for next day gas flow beginning at the next available nomination cycle for the effective date of the contract. (Central Clock Time)~~

For non-biddable releases:

Timely Cycle

- ~~posting of prearranged deals not subject to bid are due by 9:30 A.M. on a Business Day;~~
- ~~contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for Timely Cycle.~~

Evening Cycle

- ~~posting of prearranged deals not subject to bid are due by 4:00 P.M. on a Business Day;~~
- ~~contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for Evening Cycle.~~

Intraday 1 Cycle

- ~~posting of prearranged deals not subject to bid are due by 8:00 A.M. on a Business Day;~~
- ~~contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for Intraday 1 Cycle.~~

Intraday 2 Cycle

- ~~posting of prearranged deals not subject to bid are due by 3:00 P.M. on a Business Day;~~
- ~~contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for Intraday 2 Cycle. (Central Clock Time)~~

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Proposed revision to GISB Standard No. 5.3.6:

5.3.6 *Recall terms should be agreed to in advance between the releasing and acquiring shippers.*

- ~~If~~ *Where* the releasing shipper wishes to recall capacity to be effective for a gas day, *releases with an award posting date prior to [month day, year] are grand-fathered and* the *recall* notice should be provided to the transportation service provider and the acquiring shipper no later than 8:00 A.M. Central Clock Time on *the* nomination day.

For releases with an award posting date on or after [month day, year]:

- *Timely recall notice should be provided to the transportation service provider and the acquiring shipper no later than 9:30 A.M. and 9:45 A.M., respectively, Central Clock Time on the nomination day such that the releasing shipper may place a timely nomination for the next day's gas flow.*
- *Evening recall notice should be provided to the transportation service provider and the acquiring shipper no later than 1:00 P.M. and 1:15 P.M., respectively, Central Clock Time on the nomination day such that the releasing shipper may place an evening nomination for the next day's gas flow.*
- *Flowing Day Recall notice effective for the Intraday 2 nomination cycle should be provided to the transportation service provider and the acquiring shipper no later than 2:45 P.M. and 3:00 P.M., respectively, Central Clock Time on nomination day such that the releasing shipper may place an Intraday 2 nomination for the current day's gas flow. Such recalls should be limited to situations where the acquiring shipper has not scheduled the capacity. Further, the nomination by the releasing shipper should be scheduled on a basis that does not bump any flowing gas.*

Proposed revision to GISB Standard No. 5.3.7:

5.3.7 ~~There should be no partial day recalls of capacity.~~ Transportation service providers should support *Flowing Day Recall and* the function of reputting by releasing shippers. *Reput rights, if any, should take effect at the beginning of a gas day.*

Proposed revision to GISB Standard No. 5.3.31:

5.3.31 Transportation Service Providers which support capacity release should accept and process uploads of capacity release offers from releasing shipper(s) (or its authorized third party service provider), provided the offer is received by the Transportation Service Provider at their designated site by ~~12:45 P.M.~~ *11:45 A.M.* CCT on a Business Day. Such received offer, if determined to be valid, should be posted as an Offer and should be available for bidding by ~~1:00~~ *12:00* PM CCT (the normal posted-by deadline and start of bidding time) on that Business Day or the Releasing Shipper's specified Business Day (if later than the received Business Day).



RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Proposed revision to GISB Standard No. 5.3.32:

- 5.3.32** Transportation Service Providers which support capacity release should accept and process uploads of capacity release bids from potential acquiring shipper(s) (or its authorized third party service provider), provided the bid is time-stamped as leaving control of the bidder no later than ~~2:00~~ 1:00 P.M. of the applicable deadline day and is received by the Transportation Service Provider at their designated site by ~~2:15~~1:15 P.M. Such timely bid, if determined to be valid, should be evaluated by the Transportation Service Provider for the purpose of identifying the winning bidder associated with the Offer upon which the bid was made.

Proposed revision to GISB Standard No. 5.3.35:

- 5.3.35** Unless the affected party and the Transportation Service Provider (TSP) have agreed to exclusive notification via EDI/EDM, the affected party should provide the TSP with at least one Internet E-mail address to be used for Electronic Notice Delivery of intraday bumps, operational flow orders, recall notices and other critical notices. The obligation of the TSP to provide notification is waived until the above requirement has been met.

Proposed revision to GISB Standard No. 5.3.36:

- 5.3.36** Transportation Service Providers (TSP) should support the concurrent sending of electronic notification of intraday bumps, operational flow orders, recall notices and other critical notices to two Internet E-mail addresses for each affected party. If the TSP elects to delegate the notice requirement to the original recalling shipper, that shipper, upon provision of applicable contact information, if available, from the TSP, should issue the recall notice to all affected contracting parties in the release chain.

Proposed revision to GISB Standard No. 5.3.41:

- 5.3.41** The display of capacity release data for an Offer should be selected from a summary list of Offers. The summary list should be comprised of the following:

Offer Number
Release Term Start Date
Release Term End Date
Recall Cycle Indicator
Location Information as applicable, and/or navigation to detail
Maximum Offer Quantity – Contract
Biddable Deal Indicator
other data elements, if applicable

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Proposed new GISB Standard No. 5.2.z1:

5.2.z1 A Flowing Day Recall is a recall of capacity that becomes effective during the same gas day.

Proposed new GISB Standard No. 5.3.z1:

5.3.z1 A release which takes effect during a gas day shall not be available for recall until the day following the effective date of the release.

Proposed new GISB Standard No. 5.3.z2:

5.3.z2 Recall notices should contain at least the affected Service Requester Contract(s) and the effective date/cycle.

Proposed new GISB Standard No. 5.3.z3:

5.3.z3 Where a Flowing Day Recall has been issued and made effective, volumetric charges, including commodity charges, should be billed to the parties that utilize the capacity.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Review timelines for modifications including accommodation of intraday or partial day capacity releases (Affects GISB Standard No. 5.3.2 and related interpretations).

b. Description of Recommendation:

Business Practices Subcommittee, June 30, 2000 p.m. conference call

Capacity release standards and related interpretations were identified followed by a review of each on a one by one basis. The standards identified were:

- 5.3.2
- 5.3.6
- 5.3.7

The related interpretations identified were:

- 7.3.2
- 7.3.15
- 7.3.3
- 7.3.44
- 7.3.45



RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

In addition, the proposed response to C99003 was identified for review. This proposed response is pending adoption by the Executive Committee.

Standard 5.3.2 was reviewed.

Issues Identified:

Are the last two bullets of the short term section of 5.3.2 still appropriate in light of the intraday release language of FERC?

Is a new section of 5.3.2 needed to deal with intraday pre-arranged releases?

Is there any requirement that an intraday release be only for the balance of the first day?

Is there a need to be clear that the duration of the release is what determines the bidding requirement and not the intraday nature of the first day of the release?

Is there a need for an “end” to the current longer term releases section of 5.3.2 at a period less than a year (i.e., greater than or equal to five months and less than a year), then a third category added for those releases whose duration is equal to or greater than a year?

Discussion:

This issue was identified because the thought was that there was no longer a waiver of bidding for deals less than a year, as there was no longer a maximum rate for deals less than a year. This may be an issue because for deals that are greater than 31 days in duration and less than a year in duration there is no longer a non-biddable status. All these deals have to be posted for open bidding. There is no longer the greater than five months non-biddable prearranged deals at max rate exemption from bidding.

Additional Issues:

Is there a need to rearrange the structure of 5.3.2 to take account of intra day, 31 days or less, greater than 31 days to five months, then five months to a year and over a year?

Discussion:

There needs to be careful review of any possible new language to ensure that there are not any loopholes in any possible new language.

Interpretation 7.3.2 was reviewed.

It was agreed that there were no issues identified within Interpretation 7.3.2

Interpretation 7.3.15 was reviewed.

It was agreed that there were no issues identified within Interpretation 7.3.15

Interpretation 7.3.3 was reviewed.

It was agreed that there were no issues identified within Interpretation 7.3.3

Interpretation 7.3.44 was reviewed.

It was agreed that there were no issues identified within Interpretation 7.3.44

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Standard 5.3.6 was reviewed

The issue identified was whether an intra day release can be recalled.

Standard 5.3.7 was reviewed.

The issue identified was whether an intra day release can be recalled.

Interpretation 7.3.45 was reviewed.

It was agreed that there were no issues identified within Interpretation 7.3.45.

The proposed response in C99003 was reviewed. It consists of a proposed interpretation and a proposed revision to GISB Std. 5.3.24

- Text below of the proposed 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.

It was agreed that there were no issues identified within the proposed for interpretation C99003.

- Proposed revised Standard 5.3.24 was reviewed. Text of the proposed revised standard follows:

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.

It was agreed that there were no issues identified within proposed revised Standard 5.3.24.

Business Practices Subcommittee, August 8-9, 2000

Discussion:

Review issues identified with GISB Standard 5.3.2 from the minutes of June 30, 2000:

- *Are the last two bullets of the short-term section of 5.3.2 still appropriate in light of the intraday release language of FERC?*
- *Is a new section of 5.3.2 needed to deal with intraday pre-arranged releases?*

What actions are necessary to achieve comparability of nomination rights between firm service purchased from the TSP and firm service purchased through capacity release? Discussion began with prearranged deals not subject to bidding and extended to biddable releases. Some participants requested a standardized process to address the issue of nominations in each of the four nomination cycles for both types of releases. There was not consensus on the issue of intraday biddable deals. A suggestion was made to continue the discussion; addressing non-biddable releases separate from biddable releases.

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Prearranged Deals not subject to bidding

Mr. Fava explained one approach for prearranged deals, notification to TSP 1 hour and 45 minutes prior to each nomination cycle. The TSP processes the deal and provides the replacement shipper with a contract in an hour or less; the replacement shipper then has 45 minutes to submit a nomination. Other TSP representatives offered a different solution, in which the TSP processes the prearranged deal in an hour and makes the contract available for the next nomination cycle. The releasing and replacement shippers would be responsible to submit their prearranged deal to the TSP with sufficient time to submit a nomination in the nomination cycle to achieve the needed service, taking into account the one hour processing time for contracting by the TSP.

Development of a strawman (as modified during the discussion):

Cycle	Prearranged non/bid deal due to TSP (Posted)	Contract Due	Noms Leave Control of Nominator	Noms Received by TSP	Gas Flow (Nom Effective)
Timely	9:30 AM	10:30 AM	11:30 AM	11:45 AM	9:00 AM next day
Evening	4:00 PM	5:00 PM	6:00 PM	6:15 PM	9:00 AM next day
Intraday 1	8:00 AM	9:00 AM	10:00 AM	10:15 AM	5:00 PM same day
Intraday 2	3:00 PM	4:00 PM	5:00 PM	5:15 PM	9:00 PM same day

Some participants expressed the desire to have a one hour turn around. Others expressed concerns that this could require a 24 by 7 capacity release desk. Mr. Young asked if the strawman allowed time for contract execution? Mr. Payne asked if the strawman should include a column for deal posting time? It was determined that the column labeled "Prearranged non/bid deal due to TSP" was the deal posting time.

Mr. Fava made the following motion, second by Mr. Young:

Motion:

Adopt the above strawman as the timeline for processing prearranged deals not subject to bidding.

Discussion on motion:

Mr. Scheel requested the column labeled "Contract Due" should be changed to "contract tendered and executed" to mirror the language in GISB Standard 5.3.2. Others pointed to the FERC Order stating execution of contract should not inhibit the ability to nominate. Mr. Payne expressed his belief that there should be additional time in the strawman to allow replacement shippers the ability to process the contract and communicate with its parties once the contract is received from the TSP. Mr. Whatley asked if the motion makers would modify the strawman to allow an additional 30 minutes in the posted time. Mr. Fava and Mr. Young agreed to the change.

Mr. Whatley then requested the strawman include a clarification that the contract is available for nomination when received by the replacement shipper be included in the "Contract Due" column. In response, some participants expressed their concern that the business practices in regards to nomination and contract execution vary between companies and this was not the arena to address those contract execution practices. Mr. Whatley explained he needs to receive a contract that is useful, in other words, be able to nominate. Mr. Young expressed his understanding of the language in FERC Order 637-A that the hour is for issuance of the contract and does not require execution of the contract. Mr. Young feels the phrase "contract executed" in GISB Standard 5.3.2 should be included in any proposal to modify this standard.

Mr. Young offered the following language for the group's consideration:

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

For prearrange deals the following timeline shall govern the processing of contracts based upon when prearranged/non-biddable releases are submitted to the TSP. Contracts may be executed in a variety of ways; however, contracts should be executed no later than the time of nominations.

Discussion on “the time of nomination” versus “before gas flow” did not achieve consensus in the group.

Mr. Whatley proposed the following language for addition to GISB Standard 5.3.2 for the group’s consideration:

Timely Cycle

- posting of pre-arranged deals not subject to bid by 9:30 A.M. the day of nominations
- contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for next day gas flow at 9:00 A.M. (Central Clock Time)

Evening Cycle

- posting of pre-arranged deals not subject to bid by 4:00 P.M. the day of nominations
- contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for next day gas flow at 9:00 A.M. (Central Clock Time)

Intraday 1 Cycle

- posting of pre-arranged deals not subject to bid by 8:00 A.M. the day of nominations
- contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for same day gas flow at 5:00 P.M. (Central Clock Time)

Intraday 2 Cycle

- posting of pre-arranged deals not subject to bid by 3:00 P.M. the day of nominations
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for same day gas flow at 9:00 P.M. (Central Clock Time)

Revised motion:

Mr. Fava and Mr. Young agreed to modify their motion as follows:

Adopt the following modifications to GISB Standard 5.3.2.

For short-term releases (less than 5 months):

- Offers should be tendered by 1:00 P.M. on the day before nominations for short-term releases (less than 5 months);
- open season ends no later than 2 P.M. on the day before nominations are due (evaluation period begins at 2 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken);
- evaluation period ends at 3:15 P.M.;
- match or award is communicated by 3:15 P.M.
- match response by 4 P.M.;
- award posting by 5 P.M.;
- ~~Posting of pre-arranged deals not subject to bid by 9 A.M. the day of nominations;~~
- contract tendered with contract # by 10 A.M.; contract executed; nomination possible for next day gas flow. (Central Clock Time)

For longer term releases (five months or more):

- offers should be tendered by 1:00 P.M. four business days before award for long-term releases;
- open season ends no later than 2 P.M. on the day before nominations are due (open season is three business days)

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

- evaluation period begins at 2 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken;
- evaluation period ends at 3:15 P.M.;
- match or award is communicated by 3:15 P.M.;
- match response by 4 P.M.;
- award posting by 5 P.M.;
- ~~Posting of pre-arranged deals not subject to bid by 9 A.M. the day of nominations;~~
- contract tendered with contract # by 10 A.M.; contract executed; nomination possible for next day gas flow. (Central Clock Time)

For non-biddable releases:

Timely Cycle

- posting of pre-arranged deals not subject to bid are due by 9:30 A.M.
- contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for Timely cycle.

Evening Cycle

- posting of pre-arranged deals not subject to bid are due by 4:00 P.M.
- contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for Evening cycle.

Intraday 1 Cycle

- posting of pre-arranged deals not subject to bid are due by 8:00 A.M.
- contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for Intraday 1 cycle.

Intraday 2 Cycle

- posting of pre-arranged deals not subject to bid are due by 3:00 P.M.
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for Intraday 2 cycle. (Central Clock Time)

Discussion on revised motion:

The group had a lengthy discussion on availability of contract for nomination, what it means and how to convey this point in a standard.

Segments	Vote For	Balanced For	Vote Against	Balanced Against
End Users	0	0	0	0
LDCs	0	0	0	0
Services	4	2	0	0
Producers	0	0	0	0
Pipelines	9	2	0	0
Totals	13	4	0	0

Motion passes

Discussion on biddable releases and scheduling equality with firm service:

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Mr. Scheel offered the following modifications to proposed Standard 5.3.2 (above) as a possible way to address biddable releases.

- If a TSP is able to post the award by 5 P.M., can they also provide the contract contemporaneous with the award posting?
 - Mr. Young suggested the contract be provided at 9:00 A.M. the morning following the award.
- On longer-term releases it is four business days before award, can this time be reduced to two or three?
 - Mr. Scheel stated a desire to tighten up the timeline.
- Do we want to define short term and long term to make the rules comparable?

It was pointed out for Mr. Scheel's first proposed change, there may need to be time for the TSP to be able to process the contract between the time when the award is posted and when the contract is available. In response to Mr. Scheel's second proposed modification, it was pointed out that the bidding period was an issue for those parties evaluating the offers and bids. Due to the long term nature of these deals, these parties had previously wanted this amount of time in order to do their evaluations. Further, some participants expressed their continued concern that treasury for credit approval and contract desk for producing the contract will not be staffed 24 X 7 or after 5:00 P.M.

After some discussion and reiteration of issues, participants are asked to take these issues back to their office and it will be discussed at the next meeting.

Discussion on issues identified during the June 30, 2000 afternoon conference call:

- *Is there any requirement that an intraday release be only for the balance of the first day?*

The sense of the room was there is not a requirement that an intraday release be only for the balance of the first day. There was no objection.

- *Is there a need to be clear that the duration of the release is what determines the bidding requirement and not the intraday nature of the first day of the release?*

The sense of the room was the duration of the release determines the bidding requirements. There was no objection.

- *Is there a need for an "end" to the current longer term releases section of 5.3.2 at a period less than a year (i.e., greater than or equal to five months and less than a year), then a third category added for those releases whose duration is equal to or greater than a year?*

Discussion (from the June 30 minutes):

This issue was identified because the thought was that there was no longer a waiver of bidding for deals less than a year, as there was no longer a maximum rate for deals less than a year. This may be an issue because for deals that are greater than 31 days in duration and less than a year in duration there is no longer a non-biddable status. All these deals have to be posted for open bidding. There is no longer the greater than five months non-biddable prearranged deals at max rate exemption from bidding.

What is the amount of time that is reasonable to analyze an offer and determine what an acceptable bid would be? One participant responded that the open season requirements do not require changes. GISB Standard 5.3.2 defines the open season; it does not address what is biddable or non-biddable.

The sense of the room was there is not a need for an "end" to the current longer-term release section of 5.3.2 at a period less than a year. There was no objection.

The sense of the room was a third category should not be added for those releases whose duration is equal to or greater than a year. There was no objection.

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

- *Is there a need to rearrange the structure of 5.3.2 to take account of intraday, 31 days or less, greater than 31 days to five months, then five months to a year and over a year?*

The sense of the room was no change in the structure of 5.3.2 is required. There was no objection.

GISB Standard 5.3.6 and 5.3.7

- *The issue identified was whether an intraday release can be recalled.*

The sense of the room was upon the review of GISB Standards 5.3.6 and 5.3.7 no changes are required. Specifically, there is no need to eliminate the prohibition on partial day recalls. There was no objection.

Business Practices Subcommittee, August 15, 2000

Mr. Scheel made the following motion, seconded by Mr. Whatley:

Motion:

Modify GISB Standard No. 5.3.2 as follows (which includes modification made by BPS on 8/9/2000):

5.3.2 For short-term releases (less than 5 months):

- Offers should be tendered by 1:00 P.M. on the day before nominations
- open season ends no later than 2 P.M. on the day before nominations are due (evaluation period begins at 2 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken);
- evaluation period ends at 3:15 P.M.;
- match or award is communicated by 3:15 P.M.;
- match response by 4 P.M.;
- award posting by 5 P.M.;
- contract tendered with contract # by ~~10:0~~ A.M.; contract executed; nomination possible for next day gas flow. (Central Clock Time)

For longer term releases (five months or more):

- offers should be tendered by 1:00 P.M. four business days before award for long-term releases;
- open season ends no later than 2 P.M. on the day before nominations are due (open season is three business days)
- evaluation period begins at 2 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken;
- evaluation period ends at 3:15 P.M.;
- match or award is communicated by 3:15 P.M.;
- match response by 4 P.M.;
- award posting by 5 P.M.;
- contract tendered with contract # by ~~10:0~~ A.M.; contract executed; nomination possible for next day gas flow. (Central Clock Time)

For non-biddable releases:

Timely Cycle

- posting of pre-arranged deals not subject to bid are due by 9:30 A.M.

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

- contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for Timely cycle.

Evening Cycle

- posting of pre-arranged deals not subject to bid are due by 4:00 P.M.
- contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for Evening cycle.

Intraday 1 Cycle

- posting of pre-arranged deals not subject to bid are due by 8:00 A.M.
- contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for Intraday 1 cycle

Intraday 2 Cycle

- posting of pre-arranged deals not subject to bid are due by 3:00 P.M.
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for Intraday 2 cycle. (Central Clock Time)

Discussion:

There was discussion and disagreement as to whether Order 637 gives direction to biddable deals, in addition to pre-arranged capacity release deals. It was discussed by some that biddable deals was out of scope of GISB's work for Order 637. It was discussed by others that to the extent scheduling equality can be offered, the order does not preclude parties to give scheduling equality to biddable as well as pre-arranged capacity releases. There was further discussion that this issue may not be ripe for standards development.

Ms. Hopkins reported that the Enron pipelines reviewed the order again (since the last meeting) and they feel the Commission did not mean to include biddable deals at this time.

Mr. Whatley observed that we ought to at least address the timelines in 5.3.2 so that they refer to the time and date that gas flows and not the time and date of nomination. In response, some felt that now is probably not the time to clean up the standards.

Mr. Scheel stated that even though it is his opinion that Order 637 does address scheduling equality for biddable deals, in light of the feeling by some participants that the FERC did not give direction to scheduling equality for biddable deals, he agreed to withdraw his motion and wait for further direction from the FERC.

Motion withdrawn

Mr. Whatley made the following motion, seconded by Mr. Scheel:

Motion:

Modify GISB Standard No. 5.3.2 as follows:

5.3.2 For short-term biddable releases (less than 5 months):

- ~~Offers~~ should be tendered by 1:00 P.M. on the Business Day before timely nominations ~~for short-term releases (less than 5 months);~~

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

- open season ends no later than 2:00 P.M. on the Business 4Day before timely nominations are due (evaluation period begins at 2:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken);
- evaluation period ends at 3:15 P.M.;
- match or award is communicated by 3:15 P.M.;
- match response by 4:00 P.M.;
- award posting by 5:00 P.M.;
- contract tendered with contract # by 10:00 A.M.; contract executed; timely nomination possible for next day gas flow. (Central Clock Time)

For longer term biddable releases (five months or more):

- offers should be tendered by 1:00 P.M. four ~~b~~Business 4Days before award ~~for long-term releases~~;
- open season ends no later than 2:00 P.M. on the Business 4Day before timely nominations are due (open season is three ~~b~~Business 4Days);
- evaluation period begins at 2:00 P.M. during which contingency is eliminated, determination of best bid is made, and ties are broken;
- evaluation period ends at 3:15 P.M.;
- match or award is communicated by 3:15 P.M.;
- match response by 4:00 P.M.;
- award posting by 5:00 P.M.;
- contract tendered with contract # by 10:00 A.M.; contract executed; timely nomination possible for next day gas flow. (Central Clock Time)

For non-biddable releases:

Timely Cycle

- posting of pre-arranged deals not subject to bid are due by 9:30 A.M. on a Business Day;
- contract tendered with contract # by 10:30 A.M.; contract executed; nomination possible for Timely eCycle.

Evening Cycle

- posting of pre-arranged deals not subject to bid are due by 4:00 P.M. on a Business Day;
- contract tendered with contract # by 5:00 P.M.; contract executed; nomination possible for Evening eCycle.

Intraday 1 Cycle

- posting of pre-arranged deals not subject to bid are due by 8:00 A.M. on a Business Day;
- contract tendered with contract # by 9:00 A.M.; contract executed; nomination possible for Intraday 1 eCycle.

Intraday 2 Cycle

- posting of pre-arranged deals not subject to bid are due by 3:00 P.M. on a Business Day;
- contract tendered with contract # by 4:00 P.M.; contract executed; nomination possible for Intraday 2 eCycle. (Central Clock Time)

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

BPS Order 637 Priority Action Items 1 and 2 (Priority 6)

Segments	Vote For	Balanced For	Vote Against	Balanced Against
End Users	0	0	0	0
LDCs	0	0	0	0
Services	4	2	0	0
Producers	0	0	0	0
Pipelines	10	2	0	0
Totals	14	4	0	0

Motion passes unanimously

c. Business Purpose:

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