



REQUEST FOR CLARIFICATION OR INTERPRETATION

Date: <u>4/24/00</u>
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GISB Standard Number: 1.3.15

Clarification or interpretation request:

1.3.15 When the fuel reimbursement method is fuel in-kind, the results of the fuel reimbursement calculations for the nomination process should be rounded to the nearest dekatherm or Gigajoule (Canada).

If the calculation results in a reimbursement of less than 0.5 decatherm, does the pipeline round down (mathematically correct) to zero or up to 1 (creating a 1 dth minimum fuel-in-kind charge)? Is "zero" a decatherm?

Possible interpretations or clarifications, if known:

The 1 decatherm minimum fuel charge creates a case where smaller shippers are charged a -- potentially-- much higher fuel charge than larger shippers. A small shipper who nominates 10 dth would be charged a minimum of 1 dth and thus a 10% fuel charge, when the tariff calls for less than 1% fuel-in-kind charge. This is a discriminatory practice against smaller shippers.

The rounding process mathematically calls for less than 0.5 to round down to zero.