

C97015

Gas Industry Standards Board

Request For Clarification Or Interpretation

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GISB Standard Number: 1.2.1 "The level of information required to define a nomination for communications purposes is a line item containing all defined components."

GISB Standard Number: 1.3.5 "All nominations should include shipper defined begin dates and end dates. All nominations excluding intra-day nominations should have roll-over options. Specifically, shippers should have the ability to nominate for several days, months, or years, provided the nomination begin and end dates are within the term of the shipper's contract."

GISB Standard Number: 1.3.7 "All nominations should be considered original nominations and should be replaced to be changed.

When a nomination for a date range is received, each day within that range is considered an original nomination. When a subsequent nomination is received for one or more days within that range, the previous nomination is superseded by the subsequent nomination only to the extent of the days specified. The days of the previous nomination outside the range of the subsequent nomination are unaffected. Nominations have a prospective effect only."

GISB Standard Number: 1.3.27 "The key should be composed of: service requester contract (Service Agreement), transaction type, upstream party, upstream contract (when applicable), receipt location (as applicable), downstream party (as applicable), downstream contract (when applicable), delivery location (as applicable), package ID, capacity type indicator (where mutually agreed), service provider activity code (where mutually agreed). Upon receipt by a service provider of a transaction whose key elements match those previously received by the service provider from the service requester, the service provider should then process the begin date/time and end date/time consistent with the intentions of the standard 1.3.7 and then process the rest of the transaction's data elements consistent with the applicable standards to determine the business results. When data is not supplied (e.g. is not applicable, is not supported or is not mutually agreed upon) the pertinent portion of the key would be determined to be null."

Clarification or interpretation request:

Do GISB Standards 1.2.1, 1.3.5, 1.3.7, and 1.3.27 mean that a pipeline can require a service requester to place into one GISB standard EDI document (ST to SE loop) (GISB Standard 1.4.1

Implementation Guide version 1.0, 1.1, and/or 1.2) nominations with only the identical beginning and ending dates, which nominations are balanced with respect to receipts and deliveries over the identical beginning and ending date range; and impose a practice where if the shipper does not provide their nominations in this fashion, reject, as unbalanced ,all such nominations even though the total of nominations present in the database (for that contract or shipper; or in the case of pathed pipelines, the paths as applicable) at the time of a processing deadline is/are balanced?

Can a pipeline require that a shipper using GISB standard EDI nominations datasets (GISB standard 1.4.1) submit transactions other than the changed (i.e., re-nominate non-changed individual nominations) nomination(s)?

Can a pipeline require a shipper to submit more than one line item in a GISB standard nomination document (GISB Standard 1.4.1)?

When a service requester is seeking to submit a changed nomination, can a pipeline employing the non-pathed or pathed non-threaded models require a that a shipper submit transactions other than the changed nomination (i.e., re-nominate non-changed individual nominations)?

Example 1:

To set the stage; The Transportation Service Provide “TSP-PNT” is a pathed non-threaded pipeline and it has a Service Requester “SR”, having a Transportation Service Agreement with Contract Identifier “FT-A1”. For this example, there are the following transactions (nominations) (all of which are excluding fuel for the purpose of the example) residing in the database of TSP-PNT:

- 1) There is one non-pathed supply nomination (receipt)
 - a) The supply nomination is for 10,000 of supply (a receipt nom) from seller “P1” at point “S1” for a date range of 1 through 4.
- 2) There is one pathed nomination for 10,000 from location S1 to location “M1” for a date range of 1 through 4.
- 3) At location M1, there are four non-pathed market nominations (deliveries);
 - a) one such delivery is for 5,000 to “buyer “B1” at point “M1” for a date range of 1 through 4;
 - b) another one such delivery is for 2,000 to “buyer “B2” at point “M1” for a date range of 1 through 4;
 - c) another such delivery is for 1,500 to “buyer “B3” at point “M1” for a date range of 1 through 4; and,
 - d) the last one is for 1,500 to “buyer “B4” at point “M1” for a date range of 1 through 4.
- 3) Thus, there are a total of 6 line items or six nominations.

A review of the database for this shipper makes it clear that over the entire date range and for each day in the date range, the shipper's contract FT-A1 (excluding fuel for the sake of the example) is balanced.

Case 1:

Now, let's change the seller at S1, used by SR to supply their markets, for just Day 2. To do this according to the GISB standards, the SR would submit one line item (a nomination) taking the nomination for P1 at S1 for Day 2 to zero, and submit another line item; this one for P2 at S1 for Day 2 in the amount of 10,000.

Can a pipeline reject the above set of transactions due to the fact that there was no market nominated (or re-nominated) for the same time period of time?

Example 2:

Again, in this example, the Transportation Service Provide "TSP-PNT" is a pathed non-threaded pipeline and it has a Service Requester "SR", having a Transportation Service Agreement with Contract Identifier "FT-A1". For this example, there are the following transactions (nominations) (all of which are excluding fuel for the purpose of the example) residing in the database of TSP-PNT:

- 1) There is one non-pathed supply nomination (receipt)
 - a) The supply nomination is for 10,000 of supply (a receipt nom) from seller "P1" at point "S1" for a date range of 1 through 4.
- 2) There is one pathed nomination for 10,000 from location S1 to location "M1" for a date range of 1 through 1.
- 3) There is one pathed nomination for 5,000 from location S1 to location "M1" for a date range of 2 through 2.
- 4) There is one pathed nomination for 5,000 from location S1 to location "ST1" for a date range of 2 through 2.
- 5) There is one pathed nomination for 2,000 from location S1 to location "M1" for a date range of 3 through 3.
- 6) There is one pathed nomination for 8,000 from location S1 to location "ST1" for a date range of 3 through 3.
- 7) There is one pathed nomination for 10,000 from location S1 to location "M1" for a date range of 4 through 4.
- 8) At location M1, for the date range 1 through 1 there are four non-pathed market nominations (deliveries);
 - a) one such delivery is for 5,000 to buyer "B1" at point "M1" for a date range of 1 through 1;
 - b) another such delivery is for 2,000 to buyer "B2" at point "M1" for a date range of

- 1 through 1;
- c) another such delivery is for 1,500 to buyer “B3” at point “M1” for a date range of 1 through 1; and,
- d) the last one is for 1,500 to buyer “B4” at point “M1” for a date range of 1 through 1.
- 9) At location M1, for the date range 2 through 2 there are three non-pathed market nominations (deliveries);
- a) one such is for 2,000 to buyer “B2” at point “M1” for a date range of 2 through 2;
- b) another such is for 1,500 to buyer “B3” at point “M1” for a date range of 2 through 2;
- c) the last such is for 1,500 to buyer “B4” at point “M1” for a date range of 2 through 2;
- 10) At location ST1 (a storage location in this example), for the date range 2 through 2 there is one non-pathed market nomination (delivery);
- a) it is for 5,000 to buyer “SR” at point “ST1” for a date range of 2 through 2;
- 11) At location M1, for the date range 3 through 3 there is one non-pathed market nomination (delivery);
- a) it is for 2,000 to buyer “B2” at point “M1” for a date range of 3 through 3;
- 12) At location ST1 (a storage location in this example), for the date range 3 through 3 there is one non-pathed market nomination (delivery);
- a) it is for 8,000 to buyer “SR” at point “ST1” for a date range of 3 through 3;
- 13) At location M1, for the date range 4 through 4 there are four non-pathed market nominations (deliveries);
- a) one such delivery is for 5,000 to buyer “B1” at point “M1” for a date range of 4 through 4;
- b) another such delivery is for 2,000 to buyer “B2” at point “M1” for a date range of 4 through 4;
- c) another such delivery is for 1,500 to buyer “B3” at point “M1” for a date range of 4 through 4; and,
- d) the last one is for 1,500 to buyer “B4” at point “M1” for a date range of 4 through 4.
- 14) Thus, there are a total of 21 line items or twenty-one nominations.

A review of the database for this shipper makes it clear that over the entire date range and for each day in the date range, the shipper’s contract FT-A1 (excluding fuel for the sake of the example) is balanced.

Case 2:

Assuming all of the entity, location, contract, and transaction type information is correct, can a pipeline reject any of these nominations as “unbalanced”?

Example 3:

The Transportation Service Provide “TSP-NP” is a non-pathed pipeline (or accepts non-pathed nominations) and it has a Service Requester “SR”, having a Transportation Service Agreement with Contract Identifier “FT-A1”. For this example, there are the following transactions (nominations) (all of which are excluding fuel for the purpose of the example) residing in the database of TSP-NP:

- 1) There is one non-pathed supply nomination (receipt)
 - a) The supply nomination is for 10,000 of supply (a receipt nom) from seller “P1” at point “S1” for a date range of 1 through 4.
- 2) There are four non-pathed market nominations (deliveries);
 - a) one such delivery is for 5,000 to “buyer “B1” at point “M1” for a date range of 1 through 4;
 - b) another one such delivery is for 2,000 to “buyer “B2” at point “M2” for a date range of 1 through 4;
 - c) another such delivery is for 1,500 to “buyer “B3” at point “M3” for a date range of 1 through 4; and,
 - d) the last one is for 1,500 to “buyer “B4” at point “M4” for a date range of 1 through 4.
- 3) Thus, there are a total of 5 line items or five nominations.

A review of the database for this shipper makes it clear that over the entire date range and for each day in the date range, the shipper’s contract FT-A1 (excluding fuel for the sake of the example) is balanced.

Case 3:

Now, let’s change the seller at S1, used by SR to supply their markets, for just Day 2. To do this according to the GISB standards, the SR would submit one line item (a nomination) taking the nomination for P1 at S1 for Day 2 to zero, and submit another line item; this one for P2 at S1 for Day 2 in the amount of 10,000.

Can a pipeline reject the above set of transactions due to the fact that there was no market nominated (or re-nominated) for the same time period of time?

Example 4:

Again, in this example, the Transportation Service Provider “TSP-NP” is a non-pathed pipeline (or accepts non-pathed nominations) and it has a Service Requester “SR”, having a Transportation Service Agreement with Contract Identifier “FT-A1”. For this example, there are the following transactions (nominations) (all of which are excluding fuel for the purpose of the example) residing in the database of TSP-NP:

- 1) There is one non-pathed supply nomination (receipt)
 - a) The supply nomination is for 10,000 of supply (a receipt nom) from seller “P1” at point “S1” for a date range of 1 through 4.
- 2) At location M1, for the date range 1 through 1 there are four non-pathed market nominations (deliveries);
 - a) one such delivery is for 5,000 to buyer “B1” at point “M1” for a date range of 1 through 1;
 - b) another such delivery is for 2,000 to buyer “B2” at point “M1” for a date range of 1 through 1;
 - c) another such delivery is for 1,500 to buyer “B3” at point “M1” for a date range of 1 through 1; and,
 - d) the last one is for 1,500 to buyer “B4” at point “M1” for a date range of 1 through 1.
- 3) At location M1, for the date range 2 through 2 there are three non-pathed market nominations (deliveries);
 - a) one such is for 2,000 to buyer “B2” at point “M1” for a date range of 2 through 2;
 - b) another such is for 1,500 to buyer “B3” at point “M1” for a date range of 2 through 2;
 - c) the last such is for 1,500 to buyer “B4” at point “M1” for a date range of 2 through 2;
- 4) At location ST1 (a storage location in this example), for the date range 2 through 2 there is one non-pathed market nomination (delivery);
 - a) it is for 5,000 to buyer “SR” at point “ST1” for a date range of 2 through 2;
- 5) At location M1, for the date range 3 through 3 there is one non-pathed market nomination (delivery);
 - a) it is for 2,000 to buyer “B2” at point “M1” for a date range of 3 through 3;
- 6) At location ST1 (a storage location in this example), for the date range 3 through 3 there is one non-pathed market nomination (delivery);
 - a) it is for 8,000 to buyer “SR” at point “ST1” for a date range of 3 through 3;

- 7) At location M1, for the date range 4 through 4 there are four non-pathed market nominations (deliveries);
 - a) one such delivery is for 5,000 to buyer “B1” at point “M1” for a date range of 4 through 4;
 - b) another such delivery is for 2,000 to buyer “B2” at point “M1” for a date range of 4 through 4;
 - c) another such delivery is for 1,500 to buyer “B3” at point “M1” for a date range of 4 through 4; and,
 - d) the last one is for 1,500 to buyer “B4” at point “M1” for a date range of 4 through 4.
- 8) Thus, there are a total of 15 line items or fifteen nominations.

A review of the database for this shipper makes it clear that over the entire date range and for each day in the date range, the shipper’s contract FT-A1 (excluding fuel for the sake of the example) is balanced.

Case 4:

Assuming all of the entity, location, contract, and transaction type information is correct, can a pipeline reject any of these nominations as “unbalanced”?

Suggested Interpretation(s) or clarification(s), if known:

As GISB standard 1.2.1, states: “The level of information required to define a nomination for communication purposes is a line item containing all defined components”. In addition there is no standard which requires that any particular set of nominations be sent at any particular time. As well, the standard with respect to the “Key”, (GISB Standard 1.3.5 states that “Specifically, shippers should have the ability to nominate for several days, months, or years, provided the nomination begin and end dates are within the term of shipper’s contract.” Standard 1.3.7 also states in relevant part “When a nomination for a date range is received, each day within the range is considered an original nomination[.]” and “The days of the previous nomination outside of the range of the subsequent nomination are unaffected.”

This means that it is the information, present, after loading of the submitted nominations, in the database (or other storage mechanism used to record and) from, upon, or with respect to which the Transportation Service Provider relies, to process service requesters’ nominations, which is the information which should be processed to determine whether any particular set of nominations; or, in the case of pathed non-threaded and non-pathed nominations, contracts or service requesters, as applicable, are “in balance” with respect to any particular scheduling day.

Because each nomination for a date range is an individual nomination for each day in the range,

there is no requirement that nominations be submitted with like beginning and ending dates, but rather that, at processing time, for the day (or other scheduling interval (i.e., intraday) being processed) that all nominations which relate to the subject day or scheduling interval, be the transactions processed for the purposes of balancing, confirming and scheduling.