

C97016

Gas Industry Standards Board

Request for Clarification or Interpretation

Date of Request: October 1, 1997

1. Submitting Entity & Address :

NGC Corporation
1000 Louisiana, Suite 5800
Wells Fargo Bank Plaza
Houston, TX. 77002

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

Name : Mark Scheel
Title : Manager Governmental Affairs
Phone: (713) 507 - 6787
Fax : (713) 507 - 6834
Email : masc@ngccorp.com

3. GISB Standard Number : 4.3.6

4. Clarification or Interpretation Request:

According to Standard 4.3.6, notices are now supposed to be posted on the Transportation Service Provider's (TSP) Web pages. Does this mean that a TSP is not required to provide any alternative form of communication for notices, such as telephone or fax, particularly for those issued outside of business hours and on weekends?

5. Possible Interpretations or Clarifications, if known:

The short answer is no.

It needs to be clarified that Standard 4.3.6 does not specifically address the issue of alternative forms of communication for notices, either during business hours or outside of business hours. Standard 4.3.6 was passed to begin the migration of non-transactional data from the EBB to the Internet. It is silent as to the issue of alternative forms of communication that may still be required for certain situations such as emergency backup or after hours coverage.

In addition, it was recognized in standard 1.3.4 that even though parties must support a seven-days-a-week, twenty-four-hours-a-day nomination process that "party contacts need not be at their ordinary work sites but should be available by telephone or beeper". Therefore, the same reasoning ought to apply for the notices that might effect those nominations.

Since 4.3.6 is silent on the issue it cannot possibly be used to conclude that parties are not required to provide alternate forms of communication, such as telephone or faxes, for purposes of sending notices after hours and on weekends. A request for a new standard would need to be initiated and adopted in order to come to such a conclusion.