

Pipeline Comments in Support of Annual Plan Item 2

The Wholesale Gas Quadrant (“WGQ”) 2004 Annual Plan Item # 2 required the WGQ to review and develop standards for Federal Energy Regulatory Commission (“FERC”) Order 2004. The WGQ Business Practices Subcommittee (“BPS”) held a series of meetings and developed a recommendation to accommodate the Internet posting requirements of Order 2004 (Affiliate Order Recommendation). The Affiliate Order Recommendation was sent out for industry comment on March 19, 2004 and is included on the WGQ EC agenda for May 6, 2004. The Pipeline segment of the WGQ participated in each of the BPS meetings that resulted in the development of the Affiliate Order Recommendation and fully supports the posted recommendation .

On April 16, 2004, subsequent to the compilation of the Affiliate Order Recommendation and the issuance of the recommendation for industry comment, the FERC issued its order on rehearing with respect to Order No. 2004.¹ The Pipeline segment of the WGQ met to review Order No. 2004-A to ensure that the Affiliate Order Recommendation fully addresses any new internet posting requirements of Order 2004-A. Below is a chart listing the new internet posting requirements of Order 2004-A and references to the provisions of the Affiliate Order Recommendation that accommodate such requirements.

Action Item Table Order 2004-A :

Paragraph or Order Reference	Action Item	Action
Par. 211	Transmission Provider must post advance notice on its Internet website of its intent to conduct a meeting with its Energy Affiliate.	No action necessary. Standard 4.3.23 category “Notices”, subcategory “Non-Critical” accommodates posting requirement.
358.5(b)(4)	Transmission Provider must post notice on its internet website of a customer consent to share its non-affiliated customer information with a Marketing or Energy Affiliate along with a statement that it did not provide and preferences, either operational or rate related in exchange for the customers voluntary consent.	Accommodated by the proposed modification to WGQ Standard 4.3.23 to add a category of “Non-discrimination Reqmts” with a subcategory of “Information Disclosure”

The Pipeline segment requests that the EC approve the Affiliate Order Recommendation at its May 6, 2004 meeting as submitted by the BPS. Interstate Pipelines need to implement the changes for compliance of Order No. 2004 and 2004-A by September 1, 2004 and to include such posting requirements in their affiliate training material.

¹ *Standards of Conduct for Transmission Providers*, 68 Fed. Reg. 69134 (Dec. 11, 2003), III FERC Stats. & Regs., ¶ 31,155 (Nov. 25, 2003) (“Order No. 2004”); *order on reh’g*, 107 FERC ¶ 61,032 (2004) (“Order No. 2004-A”).