Request No.: C00003

Requester: Part of the R98041 request Sent to Interpretations From BPS

 Recommended Action: Accept as requested Accept as modified below Decline 	Effect of EC Vote to Accept Recommended Action:Change to Existing PracticeStatus Quo
2. TYPE OF MAINTENANCE	
Per Request:	Per Recommendation:
InitiationX_ModificationInterpretationWithdrawal	InitiationModificationXInterpretationWithdrawal
Principle (x.1.z)Definition (x.2.z)Business Practice Standard (x.3.z)Document (x.4.z)X Data Element (x.4.z)Code Value (x.4.z)X12 Implementation GuideBusiness Process Documentation	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 GuideBusiness Process Documentation

3. RECOMMENDATION

INTERPRETATIONS LANGUAGE:

Interpretation Request:

"Please interpret the meaning and intent of what a 'super-nomination' is. Also, please clarify whether a Transportation Service Provider permitting (and not requiring) a shipper to nominate across pipelines in the same family is exceeding the GISB standard".

Proposed Interpretation response:

"The infrastructure exists within, and using, the GISB standards for a Service Requester to move gas from wellhead to burner-tip. In particular, the last sentence of GISB Standard 1.1.3 which states:

'A super-nomination is a nomination that contains all the nominations describing the path from the wellhead to the burner-tip.'

should be interpreted to mean:

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'A super-nomination is a transmittal that contains all the line items describing the path from the receipt point to the delivery point.'

4. SUPPORTING DOCUMENTATION

a. Description of Request:

1. Submitting Entity and Address:

Columbia Gas Transmission Corp. 1700 MacCorkle Avenue, SE Charleston, WV 25314

2. Contact Person

Chuck Stodola, Sr. Computer Applications Analyst phone: 304-357-2498 fax: 304-357-2304 e-mail: cstodola@columbiaenergygroup.com

3. Description of Proposed Standard or Enhancement

Add contract data elements and bid rate data elements to allow the nomination of a "Super-Nom." These data elements need to be repeating data elements that would allow any number of contracts and bid rates to be included on the nomination.

These data elements should be mutually agreed. A bid rate must have a corresponding contract. However, it is not necessary to supply a bid rate with every contract.

The example explained in "11. Abstract" uses four additional contracts and comes from functionality currently offered by Columbia Gas Transmission and Columbia Gulf Transmission. The four contracts are offshore, onshore, mainline, and distribution.

These data elements are needed in the Nomination and Scheduled Quantity.

4. Use of Proposed Standard or Enhancement

The new standard would allow a Service Requester to create one nomination for transporting gas from the wellhead to the citygate.

Columbia Gas Transmission and Columbia Gulf Transmission would use the new data elements to reduce the number of nominations that a service requester needs to transport gas from the Gulf of Mexico to market.

5. Description of any Tangible or Intangible Benefits to the Use of Proposed Standard or Enhancement

The data elements will provide a level of service that has been a part of Columbia's nomination process since the implementation of Order 436. The "Super-Nom" will reduce the number of nominations required to transport gas.

6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement None. These data elements would be used by TSPs that support a "Super-Nom." These TSPs would already have this information. Therefore, no incremental costs would be incurred.

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- Description of any Specific Legal or Other Considerations: None.
- 8. If this Proposed Standard or Enhancement is not tested yet, list the Trading Partners willing to test Standard or Enhancement?

 The "Super-Nom" was a feature allowed when Gas*Flow maintained the EDI implementation guides. At that time, the trading partners were Columbia Gas Transmission, Columbia Gulf Transmission, Enron, and Gaslantic.
- 9. If this Proposed Standard or Enhancement is in use, who are the trading partners?
- 10. Attachments
- 11. Abstract

The nomination screen on Columbia's EBB contains Service Requester Contract, Associated Contract, and four other contracts with associated bid rates. By using these contracts/bid rates, a Service Requester can submit a single nomination that defines the path to transport gas from the Gulf of Mexico to a market in the northeast.

When using the current GISB nomination data elements, a Service Requester must submit four nominations. With the additional contracts/bid rates on Columbia's EBB, only one nomination is required.

The four Columbia contracts/bid rates are:

- Offshore Used to transport gas from offshore locations to onshore locations
- Onshore Used to transport gas from onshore locations to Rayne, Louisiana.
- 3. Mainline Used to transport gas from Rayne, Louisiana to Leach, Kentucky.
- 4. Distribution Used to transport gas from Leach, Kentucky to market.

The elimination of these four contracts/bid rates would require a Service Requester to submit four nominations.

b. Description of Recommendation:

Interpretations Subcommittee (June 1, 2000)

C. C00003 Tansfer of portion of R98041 from BPS to Interpretations Subcommittee

2. A. R98041/C00003 Transfer of Request from BPS.

Interpretation Request:

"Please interpret the meaning and intent of what a 'super-nomination' is. Also, please clarify whether a Transportation Service Provider permitting (and not requiring) a shipper to nominate across pipelines in the same family is exceeding the GISB standard".

Proposed Interpretation response:

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"The infrastructure exists within, and using, the GISB standards for a Service Requester to move gas from wellhead to burner-tip. In particular, the last sentence of GISB Standard 1.1.3 which states:

'A super-nomination is a nomination that contains all the nominations describing the path from the wellhead to the burner-tip.'

should be interpreted to mean:

'A super-nomination is a transmittal that contains all the line items describing the path from the receipt point to the delivery point.'

Given this interpretation of the last sentence of GISB Standard 1.1.3, the infrastructure does exist for a Service Requester to send multiple Transportation Service Provider (TSP) nominations to a party receiving multiple TSP nominations for retransmission to the applicable TSPs.

Lastly, a Transportation Service Provider (TSP) which permits (but does not require) a Service Requester to submit a nomination or nominations which traverse multiple TSPs (including those TSPs in the same corporate family) is exceeding the GISB standard."

Moved by Greg Lander and seconded by Mark Scheel. Vote was recorded as Vote 1 on the Attendance list passed.

After the vote passed there was discussion as to what to do next. The recommendation was made to send the C00003 portion to the GISB Office to be sent out for industry comment and forwarded to the EC and to send the R98041 portion (the same text) to BPS as an answer to its request to Interpretations. The BPS could then decide to process the R98041 portion or to await EC and membership action.

Interpretations Subcommittee (May 26, 2000)

B. R98041/C00003 Transfer of Request from BPS.

Interpretation Request:

"Please interpret the meaning and intent of what a 'super-nomination' is. Also, please clarify whether a Transportation Service Provider permitting (and not requiring) a shipper to nominate across pipelines in the same family is exceeding the GISB standard".

Mr. Lander stated the history of the issue and referred participants to the record from EII, IR and the BPS. Mr. Lander stated his view of the matter. In his opinion, the infrastructure does exist, as is, and it should be considered exceeding the standard for a TSP to permit multiple TSP nominations on one screen as long as the service requester is not required to submit a multiple pipeline nomination in one line item or screen. Bill Griffith said that in his opinion the infrastructure exists. He also stated that in his opinion, the wording of GISB Standard 1.1.3 could be improved. He summed up his view by stating that the TSP and shippers should be permitted but not required to effectuate multiple TSP nominations in one place. Paul Love stated that one of the key considerations in the initial drafting of the standard was that the support for "super-nominations" be there but that it was not required of the TSP. He stated that there was concern at that time that a TSP might have to receive nominations from shippers for a number of TSP's and then have to figure out how to get them all separated and distributed.

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Proposed Interpretation response:

"The infrastructure exists within, and using, the GISB standards for a Service Requester to move gas from wellhead to burner-tip. In particular, the last sentence of GISB Standard 1.1.3 which states:

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Given this interpretation of the last sentence of GISB Standard 1.1.3, the infrastructure does exist for a Service Requester to send multiple Transportation Service Provider (TSP) nominations to a party receiving multiple TSP nominations for retransmission to the applicable TSPs.

Lastly, a Transportation Service Provider (TSP) which permits (but does not require) a Service Requester to submit a nomination or nominations nominations (line item or line items) which traverse multiple TSPs (including those TSPs in the same corporate family) is exceeding the GISB standard."

The above, proposed, interpretation was discussed. There was general agreement that it would form the basis for the vote on interpretation request R98041/C00003 to be scheduled for the next Interpretations Subcommittee meeting.

c. Business Purpose:

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