RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

Requester: Enron Capital and Trade **Request No.: C98003**

1. Recommended Action:

___Accept as requested
_X_Accept as modified below
___Decline

Effect of EC Vote to Accept Recommended Action:

_X_Change to Existing Practice
___Status Quo

2. TYPE OF MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	_X_Initiation
___Modification	___Modification
_X_Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle (x.1.z)	___Principle (x.1.z)
___Definition (x.2.z)	___Definition (x.2.z)
_X_Business Practice Standard (x.3.z)	_X_Business Practice Standard (x.3.z)
___Document (x.4.z)	___Document (x.4.z)
___Data Element (x.4.z)	___Data Element (x.4.z)
___Code Value (x.4.z)	___Code Value (x.4.z)
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

STANDARD LANGUAGE (for addition, modification or deletion of a principle, definition or business practice standard)

Standard No. and Language: New Standard 3.3.x
Where a Transportation Service Provider (TSP) performs daily allocations, the Beginning Transaction Date/Time and the Ending Transaction Date/Time in the Invoice should be the date/time that a transaction (line item) began (or ended respectively) where such transaction began (or ended respectively) within the subject invoice period. Where the TSP allocates daily and a transaction began prior to the subject invoicing period, the Beginning Transaction Date/Time in the Invoice should be the beginning date of the invoicing period. Where the TSP allocates daily and a transaction was continuing as of the end of the subject invoicing period, the Ending Transaction Date/Time in the Invoice should be the ending date of the invoicing period.
Where a TSP performs only monthly allocations, the Beginning Transaction Date/Time and the Ending Transaction Date/Time are permitted to be the date/time that the subject invoicing period began (or ended respectively). In the instance where the TSP allocates monthly, invoices on allocated quantities, and defaults the Beginning Transaction Date/Time and Ending Transaction Date/Time to the beginning and ending of the subject invoicing period, the TSP should indicate on the invoice the document to which the Service Requester may refer for documentation supporting the invoice quantities. In the instance where the TSP allocates daily, rolls up to monthly for invoicing, and defaults the Beginning Transaction Date/Time and Ending Transaction Date/Time to the beginning and ending of the subject invoicing period, the TSP should indicate on the invoice the document to which the Service Requester may refer for documentation supporting the invoice quantities.

RECOMMENDATION TO GISB EXECUTIVE COMMITTEE

Requester: Enron Capital and Trade **Request No.: C98003**

* Note: Beginning and Ending Transaction Date/Time, as used in this standard, represent four data elements: Beginning Transaction Date, Beginning Transaction Time, Ending Transaction Date, and Ending Transaction Time.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Clarification or interpretation request:

Can an Invoice Statement "Beginning Transaction Date" and "Ending Transaction Date" be defaulted in each transaction to the first day of the month and the last day of the month without accurately reflecting the correct dates associated with the beginning and ending of a transaction?

Possible interpretations or clarifications, if known:

No. The standard states clearly that the Month, Day, and Year should be reflected for the beginning and ending of a transaction. Many transactions occur for portions of a month and should be reflected as such on the Invoice Statement. This enables the two parties to reconcile any differences efficiently. When a transaction spans from one month to the next, the ending transaction date for the period ending should be the last day of the month and the beginning transaction date should be the first day of the subsequent month.

b. Description of Recommendation:

Interpretations Subcommittee - May 1, 1998

C98003 Can an invoice Statement "Beginning Transaction Date" and "Ending Transaction Date" be defaulted in each transaction to the first day of the month without accurately reflecting the correct dates associated with the beginning and ending of a transaction?

Request:

GISB Standard Number: 3.4.1: The Invoice Statement standard states that the "Beginning Transaction Date" is a mandatory data element defined as "Where the transaction began during the invoice period, the Month, Day, and Year. Where the transaction began during a prior invoice period, the beginning of the subject invoice period. The "Ending Transaction Date" is a mandatory data element defined as "Where the transaction ended during the invoice period, the Month, Day, Year. Where the transaction is continuing as of the end of the invoice period, the end of the subject invoice

Clarification Request

Can an Invoice Statement "Beginning Transaction Date" and "Ending Transaction Date" be defaulted in each transaction to the first day of the month and the last day of the month without accurately reflecting the correct dates associated with the beginning and ending of a transaction?

Response:

No, in GISB Standard 3.4.1 (the invoice data dictionary) the definition of the data element "Beginning Transaction Date" states "Where the transaction began during the invoice period, the Month, Day, Year. Where the transaction began during a prior invoice period, the beginning of the subject invoice period." This means that the party sending the invoice can default the invoice's Beginning Transaction Date to the

beginning date of an invoicing period only when the underlying transaction began before the beginning date of the invoice period. When the transaction's Beginning Transaction Date occurs within the date range set by the invoice period's beginning and ending date, then the date (at least gas day if no time detail is sent) during which the transaction began should be present in the invoice's Beginning Transaction Date field.

Likewise, elsewhere in GISB Standard 3.4.1 (the invoice data dictionary) the definition of the data element "Ending Transaction Date" states "Where the transaction ended during the invoice period, the Month, Day, Year. Where the transaction is continuing as of the end of the invoice period, the end of the subject invoice period." This means that the party sending the invoice can default the invoice's Ending Transaction Date to the ending date of an invoicing period only when the underlying transaction was continuing as of the passage of the ending date of the subject invoice period. When the transaction's Ending Transaction Date occurs within the date range set by the invoice period's beginning and ending date, then the date (at least gas day if no time detail is sent) during which the transaction ended should be present in the invoice's Ending Transaction Date field.

Discussion:
Mr. Lander described the work paper. Ms. Scott agreed that the work paper addressed her concerns.

Action:
The above interpretation shown in the work paper was adopted unanimously. A ballot will be sent to the absent members for recording their votes. The ballot results will not change the outcome, as the recommended interpretation has a majority of support from the members.

Sense of the Room: May 1, 1998		7 In Favor		0 Opposed		
Segment Check (if applicable):						
In Favor:	2 End-Users	LDCs	7 Pipelines	1 Producers	2 Services	
Opposed:	End-Users	LDCs	Pipelines	Producers	Services	
(Includes notational votes)						

Business Practices Subcommittee - April 9, 1999

C98003
The group began reviewing the following documents related to this request: Interpretations Subcommittee minutes from June 19, 1998; BPS minutes from July 23, 1998; BPS minutes from June 25, 1998; BPS minutes from July 2, 1998 and the associated work paper submitted by TransCapacity; and the recommendation to the EC dated June 11, 1998. Mr. Keisler suggested the group consider re-ordering the requests on this agenda item. It was noted that three out of four of the requests deal with dates on the invoice. After discussion, it was determined that the documentation related to C98003 would be reviewed and then the group would discuss the issues related to all the requests that concern dates. Mr. Lander offered the following questions about the issue:

Invoice Date/Time:
1. Where should it be? One per Service Requester? Per contract? Per "path"? Per line item? Rate?
2. What should the contents be for daily allocating? For monthly allocating? For daily allocations that are rolled up monthly?
3. Should it be associated with nomination level transaction?
4. Should there be an invoice line item key?

5. Should there be multiple Charge Types, Charge Type Rates, and/or Price Tiers per "line number"?

The group refined and added questions to the list during the discussion.

Mr. Lander suggested that the group determine what data elements are at various "levels" on the invoice. The following is a result of those discussions:

"Top" level: Service Requester, TSP, Accounting Period
"Second" level: Service Requester Contract, Date
"Third" level: Location Indicator (Mandatory), Locations, Quantity, Unit Price, Amount Due (Mandatory), Line Number (Mandatory), Package ID, Transaction Type (Mandatory), Price Tier, Upstream ID, Downstream ID, Upstream Contract, Downstream Contract, Receipt Zone, Delivery Zone, Accounting
Adjustment Method, Charge Indicator (Mandatory)

It was asked whether the group needed to discuss the issue at this level of the detail. Ms. Scott, as the requester, noted that all she wants is to be able to determine where the information that supports the numbers in the invoice can be located. Ms. McNeal suggested that, if the work paper submitted by TransCapacity for the July 2, 1998 meeting satisfies at least part of Ms. Scott's request, the group should start with that work paper. If it is determined that the work paper may ultimately conflict with the other requests being discussed today, the group can always modify the work paper.

There was discussion about whether an indicator is really needed. Several noted that there is a link between the parties' Trading Partner Agreements and the TSP's Implementation Guides that will spell out where the supporting documentation can be found. Ms. Scott does not feel this link is clear enough and she would like to see TSP Implementation Guides spell out this detail. She also clarified that she intends for this information to be provided via computers, not through a manual, paper process. Mr. Young noted that by the time the EDI testing process is complete between trading partners, it should be clear to the Service Requester where the supporting detail can be found, and he did not understand what value an indicator would add.

There was further discussion on this issue. It was suggested that the group re-focus, and examine the requests in order. Concepts from each individual request would be captured without extensive word-smithing and then once the group gets through all the requests, it can fine-tune the proposed solutions. Others agreed with this suggestion.

Ms. Scott stated that she felt that the work paper from the July 2, 1998 BPS meeting may address several of her concerns. It was suggested that it be captured as a concept. The content of the work paper is:

Where a Transportation Service Provider (TSP) performs daily allocations (without regard to whether the TSP bills on scheduled or allocated) the Beginning Transaction Date/Time and the Ending Transaction Date/Time in the Invoice should be the date/time that a transaction (line item) began (or ended respectively) where such transaction began (or ended respectively) within the subject invoice period. Where the TSP allocates daily and a transaction began prior to the subject invoicing period the Beginning Transaction Date/Time in the Invoice should be the beginning date of the invoicing period. Where the TSP allocates daily and a transaction was continuing as of the end of the subject invoicing period the Ending Transaction Date/Time in the Invoice should be the ending date of the invoicing period. Where a TSP performs only monthly allocations and bills only on allocated quantities, the Beginning Transaction

Date/Time and the Ending Transaction Date/Time are permitted to be the date/time that the subject invoicing period began (or ended respectively).

In this instance, the TSP should indicate on the invoice the document to which the Service Requester may refer for documentation supporting the invoice quantities.In the instance where the TSP allocates monthly, invoices on allocated quantities, and defaults the Beginning Transaction Date/Time and Ending Transaction Date/Time to the beginning and ending of the subject invoicing period the TSP should indicate on the invoice the document to which the Service Requester may refer for documentation supporting the invoice quantities. In the instance where the TSP allocates daily, rolls up to monthly for invoicing, and defaults the Beginning Transaction Date/Time and Ending Transaction Date/Time to the beginning and ending of the subject invoicing period, the TSP should indicate on the invoice the document to which the
Service Requester may refer for documentation supporting the invoice quantities.

* Note: Beginning and Ending Transaction Date/Time, as used in this concept, represent four data elements: Beginning Transaction Date, Beginning Transaction Time, Ending Transaction Date, and Ending Transaction Time. Changes were made to the motion to reflect Ms. Barnum's concern that she could not find her company's practice in the proposed standard. She allocates daily, but rolls up the allocations
to a monthly quantity.

It was determined that after lunch, the group would discuss R98091.
After lunch, the question was raised whether Beginning and Ending Transaction Time should remain in the concept. There was some disagreement about whether they should remain, but it was agreed that because this is only a concept, this issue will likely be discussed again at a later date and prior to resolution of the request.

Business Practices Subcommittee - April 22, 1999

C98003
Concept (from the minutes of April 8, revised during this meeting's discussion):

Concept: Where a Transportation Service Provider (TSP) performs daily allocations, the Beginning Transaction Date/Time and the Ending Transaction Date/Time in the Invoice should be the date/time that a transaction (line item) began (or ended respectively) where such transaction began (or ended respectively) within the subject invoice period. Where the TSP allocates daily and a transaction began prior to the subject invoicing period, the Beginning Transaction Date/Time in the Invoice should be the beginning date of the invoicing period. Where the TSP allocates daily and a transaction was continuing as of the end of the subject invoicing period, the Ending Transaction Date/Time in the Invoice should be the ending date of the invoicing period.

Where a TSP performs only monthly allocations, the Beginning Transaction Date/Time and the Ending Transaction Date/Time are permitted to be the date/time that the subject invoicing period began (or ended respectively). In the instance where the TSP allocates monthly, invoices on allocated quantities, and defaults the Beginning Transaction Date/Time and Ending Transaction Date/Time to the beginning and ending of the subject invoicing period, the TSP should indicate on the invoice the document to which the Service Requester may refer for documentation supporting the invoice quantities. In the instance where the TSP allocates daily, rolls up to monthly for invoicing, and defaults the Beginning Transaction

Date/Time and Ending Transaction Date/Time to the beginning and ending of the subject invoicing period, the TSP should indicate on the invoice the document to which the Service Requester may refer for documentation supporting the invoice quantities.

* Note: Beginning and Ending Transaction Date/Time, as used in this standard, represent four data elements: Beginning Transaction Date, Beginning Transaction Time, Ending Transaction Date, and Ending Transaction Time.

Motion: Accept the above concept as an invoicing business practice standard (3.3.x).

Discussion: Questions were answered specific to examples. For defaulting the times, a default can be to the beginning or ending of the gas day. There was discussion on the need for delineating scheduled from allocated. After discussion, it was removed.

Segment	In Favor	Balanced In Favor	Opposed	Balanced Opposed
End Users	0	0	0	0
LDCs	0	0	0	0
Producers	0	0	0	0
Svcs	2	2	0	0
PLs	9	2	0	0
TOTAL	**11**	**4**	**0**	**0**

c. Business Purpose:

Determine where the information that supports the numbers in an invoice can be located.

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

See relevant minutes contained herein.