C97011

REQUEST FOR CLARIFICATION OR INTERPRETATION

	Date : _June 9, 1997
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GISB Standard Number: _3.3.15 (see also 2.3.14 and 2.3.26)

Clarification or interpretation request:

Prior period adjustments are limited to six (6) months from the date of the initial transportation invoice. Can a pipeline which became GISB compliant on April 1, 1997 include in its September 1997 transportation invoice a prior period adjustment for May 1996 production?

Possible interpretations or clarifications, if known:

GISB invoicing standards, as well as measurement reporting standards, are not applicable for pre-GISB compliance months. Adjustments for such months would be governed by the pipeline's then applicable tariff provisions.

This form is to be submitted to the GISB Office, both in electronic and written form.

GAS INDUSTRY STANDARDS BOARD OPERATING PRACTICES

PROCEDURES FOR INTERPRETATION

1.0 request for interpretation or clarification

Interpretations or clarifications shall be initiated, as warranted, in accordance with the procedures set forth herein, and in compliance with section 5.0 of the GISB Operating Practices -- "Procedures for Adopting Standards".

Requests for interpretation or clarification shall be submitted in writing to the GISB Executive Director and accompanied by an electronic copy using the attached form. The request will be forwarded to the Executive Committee and Interpretation Subcommittee. The Interpretation Subcommittee shall prepare a response for the Executive Committee. The request will be noticed in the GISB Standards Action Bulletin, and the request will be posted on the GISB home page. Requests that are not provided in the correct form, both in writing and electronically, will not be considered.

2.0 interpretation subcommittee

The Executive Committee shall form a standing Interpretation Subcommittee, whose membership shall be comprised of two GISB members from each segment, as selected by the respective segment. The members of the subcommittee can invite others to participate as needed. The subcommittee's only function is to respond to written requests for interpretation or clarification. The subcommittee reports to the Executive Committee. The responses prepared by the Interpretation Subcommittee shall be forwarded to the Executive Director for distribution to the Executive Committee.

The Interpretation Subcommittee shall meet as often as is necessary to prepare responses to the requests for clarification or interpretation. The meetings can be held via phone conference.

3.0 <u>RESPONSES to requests for clarification or interpretation</u>

The responses drafted by the Interpretation Subcommittee will be forwarded to the Executive Director for distribution to the Executive Committee. The Executive Committee shall consider the responses at the next regularly scheduled meeting and vote on adoption of the clarification or interpretation.

The Executive Committee must approve all requests for clarification or interpretation following the voting requirements in Article V, Section 4 of the Certificate of Incorporation. If interpretation requires a clarification to be added to the standard text, the procedures for revising a standard will be used, as defined Section 2 of the GISB Operating Practices -- "Procedures for Adopting Standards".

The action taken by the Executive Committee and the resulting clarification or interpretation shall be forwarded to the requester, posted on the home page, and noticed in the Standards Action Bulletin. The response should be forwarded to the requester within 90 days of receipt of the request.

GAS INDUSTRY STANDARDS BOARD OPERATING PRACTICES

PROCEDURES FOR INTERPRETATION

4.0 Steps to be followed for an interpretation

- 1. Request for interpretation should be submitted both electronically and in writing to the GISB office using the approved form.
- 2. The request is posted on the GISB home page and reported in the Standards Action Bulletin. The request is sent to the Executive Committee and Interpretation Subcommittee.
- 3. An industry comment period follows on the submitted request with comments to be filed with the GISB office both on electronic and in writing. The comments will be posted on the GISB home page. The comments will be forwarded to the Interpretation Subcommittee.
- 4. Meeting notices and agenda items would be posted on the home page prior to the time when the Interpretation Subcommittee meets to discuss the submitted request and comments filed on the request.
- 5. The meetings are open, preference for the meetings is telephone conferences.
- 6. The Interpretation Subcommittee drafts a response to the request, which is posted on the GISB home page. At that time, an agenda item is added to the next Executive Committee meeting to discuss and act on the response.
- 7. Another industry comment period follows regarding the response from the Interpretation Subcommittee. Comments should be submitted to the GISB office both electronically and in writing. The comments will be posted and forwarded to the Executive Committee and Interpretation Subcommittee.
- 8. At the next EC meeting, the EC will consider the response and submitted comments, and vote on the response. To adopt the response a total of 17 affirmative EC votes are required, with at least two affirmative votes from each segment.
- 9. General membership vote, to ratify the EC adoption, will be called, as appropriate.
- 10. Overall, the Interpretation Subcommittee and Executive Committee are encouraged to act expediently such that the timeline of the above 9 steps not exceed 60 days. This may require shortened time-frames for comments and meeting notices.