R97053

Gas Industry Standards Board Request for Initiation of Standard for Electronic Business Transactions or

Enhancement of an Existing GISB Standard for Electronic Business Transactions

1. Submitting Entity & Address:

2. Contact Information:

TransCapacity Limited Partnership 83 Pine Street, Suite 101 West Peabody, MA 01960 Phone: (508) 535-7500 Facsimile: (508) 535-7744 E-mail: LEGALJB@TCAPSERV.COM Jim Buccigross, Legal Counsel Gregory M. Lander, President

3. Description of Proposed Standard or Enhancement:

TransCapacity proposes to add a new standard to the GISB Capacity Release standards regarding presentation of rates and surcharges in the relevant capacity release documents. TransCapacity's proposed standard is as follows:

"All Capacity Release business practices with respect to rates, charges and surcharges, should be accommodated through one or more of the following manners:

- 1) total reservation charge/unit of reserved service,
- 2) total usage charge/unit of provided (or minimum commitment quantity of) service,
- 3) total surcharge/contract (unrelated to units of service reserved or provided),
- 4) total of demand surcharges/unit of reserved service, and

5) total of usage surcharges/unit of provided (or minimum commitment quantity of) service.

Where there are separate components that make up the above five charges, the individual components should not be individually communicated as a part of the standardized EDI datasets."

4. Use of the Proposed Standard or Enhancement:

There have been a number of requests for additional surcharge identification codes in order to comply with GISB standard No. 5.3.27. These codes are necessary where surcharges are stated separately and in some cases, where they are actually separately biddable. This modification would solve the issues surrounding surcharges and negate any need for a number of current and future change requests related to surcharge identification codes.

Rates would be stated as a total number which would include all surcharges, including demand surcharges and contract surcharges. It would be used in all capacity release documents in which rates and surcharges are contained.

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

Sending these codes separately requires the receiver of the document to total up all transportation charges plus surcharges to come up with a total number. In the cases where bidding is involved, these surcharges are not only stated separately but are separately biddable. This would be akin to stating rates as made up - on a per unit of capacity basis - of O&M, Taxes, Depreciation, Profit, Amortization, interest on debt, and so forth. We don't do it with rates, why should it be done with surcharges. It makes much more sense to simply state a total price for the capacity where possible.

It would greatly simplify the relevant capacity release EDI documents, both for the sender and the receiver. It would standardize interpretation of rates, and would simplify the bidding process. Opposite of the case in other requests where additional data elements or codes are requested, this request would actually *remove* data elements and code values from the relevant capacity release documents.

6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:

Any costs associated with this proposed enhancement are *de minimus*. The required information is already contained on the Transportation Service Provider's computer system(s). This modification would change only the way the surcharges are totaled and presented in the EDI document. There would be a one-time minor mapping change, however this change would then in fact simplify these documents and decrease slightly the volume of data sent.

7. Description of Any Specific Legal or Other Considerations:

None.

8. If This Proposed Standard or Enhancement is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement

The change is minor and relatively little testing will be required. All Transportation Service Providers who do not have separately biddable surcharges currently send data in this manner, thus the EDI maps are already done and are currently in use by many trading partners. Nevertheless, TransCapacity would certainly be willing to undertake testing with any other party. Contact is: Steve Hinton, Operations Manager TransCapacity Limited Partnership 83 Pine Street, Suite 101 West Peabody, MA 01960 Phone: (508) 535-7500 Facsimile: (508) 535-7744

9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners:

As noted, it is currently in use by all parties exchanging capacity release data via EDI. This proposed standard would only change the way rates are totaled and presented in the relevant capacity release EDI datasets.

10. Attachments

None.