

R97104

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:

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2. Contact Information:

Jim Buccigross, Legal Counsel
Gregory M. Lander, President

3. Description of Proposed Standard or Enhancement:

The request is to add a new standard to the current GISB Electronic Delivery Mechanism standards. This proposed standard deals with testing, and as such can and should be read in conjunction with existing GISB Standard No. 4.3.14 which reads in part: "The industry should use standard policies and guidelines for testing new data sets."

Proposed Standard:

"Testing of new data sets includes testing of the current and/or future electronic delivery mechanisms including related EDI implementation issues (i.e., enveloping and security). Standard policies and guidelines should be developed to test these aspects."

4. Use of the Proposed Standard or Enhancement:

While standard 4.3.14 indicates that the industry use standard testing methodology for testing of the GISB standardized datasets, this is only a piece of the overall testing which must take place. TransCapacity believes that this standardized testing methodology should be applied to the underlying communication methodology (Electronic Delivery Mechanisms), security features, and EDI enveloping, as well as to the datasets themselves.

This new standard would apply to testing of the electronic delivery mechanisms and communication procedures. Mere testing of datasets, without the surrounding methods of communication, accomplishes neither the purpose or spirit of the existing standards.

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

Standardized testing methodologies are clearly beneficial to the goal of a seamless electronic marketplace for natural gas. Participants in the GISB standards initiation and adoption process recognized this in enacting the existing GISB standard No. 4.3.14. However, this standard - as written - is arguably applicable only to the datasets themselves. (Though this is not TransCapacity's view, it can rationalize a reading of the standard in this manner.)

The proposed additional standard language will clarify the issue that standardized testing also applies to the electronic delivery mechanism including related EDI implementation issues (i.e., enveloping and security). This will ease implementation for all parties involved and will identify any potential obstacles earlier in the process.

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

Certainly testing has a cost associated with it. However, this testing must be undertaken, and currently is. The only difference is the standardization aspect that this language would add. Therefore, the true *incremental* cost is marginal, and we believe it will be recovered through a less labor intensive (and smoother) implementation down the line.

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

TransCapacity is willing and able to undertake testing with any party regarding this proposal.

Contact is: Mike Coombs, Product Leader
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9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners:

Not applicable at this time.

10. Attachments

None.