R97114

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:

The request is to reclassify the usage of the Upload to Pipeline of Prearranged Deal (Bidder Confirmation and Bidder Confirmation Validation) data elements Bid Number and Offer Number from Mandatory to Business Conditional. These data elements are present in the UPPD - Bidder Confirmation document (GISB Standard No. 5.4.10), and in the UPPD - Bidder Confirmation Validation document (GISB Standard No. 5.4.11).

This request is made in order to expedite the UPPD process by allowing pre-arranged deal bidders to simultaneously transmit their confirmation of the deal while the UPPD is being uploaded to the pipeline by the releasing shipper or its agent, without the necessity of waiting for the UPPD - Notification (GISB Standard No. 5.4.9) to be first transmitted from the Transportation Service Provider to the bidder. This allows TSPs who do not wish to support the UPPD - Notification to nonetheless support receipt of Bidder Confirmation documents.

4. Use of the Proposed Standard or Enhancement:

All documents of the UPPD process contain the data element UPPD Number, defined as "the releasing shipper-generated identifier for the UPPD." This number is unique, and tracks all documents, required or optional, of the UPPD process.

The UPPD - Notification document itself is optional. It originates with the Transportation Service Provider, who transmits it to the bidder along with the terms of the release characterized in a UPPD which has been sent by the releasing shipper to the TSP. The TSP supplies the mandatory elements in the UPPD - Notification (i.e. the Bid Number and Offer Number).

Since these elements are currently mandatory in the UPPD - Bidder Confirmation response to the UPPD - Notification, the bidder cannot (nor can the TSP), should it wish to do so, transmit (or provide for the transmission of) its confirmation of the deal concurrently with (or near in time to) the transmittal of the UPPD by the releasing shipper. The bidder must first wait for the deal to be received and reviewed by the TSP, who then assigns a Bid Number and Offer Number. The bidder must then wait for the TSP to generate and transmit the UPPD - Notification, so that the mandatory elements of Bid Number and Offer Number can be received and then echoed back in the Bidder Confirmation. These data elements are not necessary to identify the transaction at this stage in the process; the UPPD Number is sufficient.

If these data elements were classified as Business Conditional, the UPPD - Bidder Confirmation could be transmitted without the TSP having to first generate a UPPD - Notification and without the bidder having to await receipt of the UPPD - Notification. If, however, the TSP's business practices require the UPPD - Notification to be transmitted before receiving confirmation from the bidder, the classification of Bid Number and Offer Number as Business Conditional would not change the fact that the TSP could assign and include these numbers in the UPPD - Notification and receive them back in the Bidder Confirmation.

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

By reclassifying Bid Number and Offer number as Business Conditional instead of Mandatory, substantial flexibility and efficiencies are added, without negatively affecting any current practices. The entire UPPD process can be streamlined without loss of security or clarity. The UPPD - Notification can be eliminated in those business conditions where the TSP wants to know bidders are confirming the deal at the same time as (or by the deadline by which) the deal itself is uploaded and without having to generate an additional EDI document to obtain it. But, should the TSP desire, current business practices can continue.

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

Any costs associated with this proposed enhancement are zero to minimal. The request does not propose to increase the volume of data sent or require any additional processing. Only minor remapping is required.

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 little or no testing will be required. Nevertheless, TransCapacity would certainly be willing to undertake testing with any other party.

Contact is: Will Lowenthal, Product Leader

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:

The requested change itself is obviously not in practice at this time. However, several trading partners have indicated their desire to support a streamlined UPPD process, which this proposed changed is designed to accomplish.

10. Attachments

None.