

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Contract Reporting Requirements of)
Intrastate Natural Gas Companies)

Docket No. RM09-2-000

**COMMENTS OF THE
AMERICAN GAS ASSOCIATION**

Pursuant to the Notice of Proposed Rulemaking (“NOPR”) issued July 16, 2009,¹ and the Notice Requesting Comments On Proposed Standardized Electronic Information Collection (“Notice”) issued August 26, 2009,² by the Federal Energy Regulatory Commission (“Commission”) in the above-referenced proceedings, the American Gas Association (“AGA”) respectfully submits these comments.

I. SUMMARY

AGA supports the Commission’s efforts to improve market transparency by obtaining meaningful information. While AGA believes that the Commission has dramatically underestimated the cost of compliance with the proposed rules, particularly the standardized electronic filing requirements, AGA believes that in general the Commission has taken the right approach. Quarterly reporting of jurisdictional transactions strikes an appropriate balance between increased market transparency and the burden associated with increased reporting. AGA offers several modifications to help reduce the burden on intrastate and Hinshaw pipelines.

AGA urges the Commission to clearly state that Hinshaw pipelines are required to report only those contracts authorized by their limited jurisdiction certificates and are not required to report on retail or intrastate activities that are not regulated by the Commission.

¹ *Contract Reporting Requirements of Intrastate Natural Gas Companies*, 74 Fed. Reg. 37,658 (July 29, 2009), FERC Stats. & Regs., Proposed Regs. ¶ 32,644 (2009) (“NOPR”).

² *Contract Reporting Requirements of Intrastate Natural Gas Companies*, 74 Fed. Reg. 38,757 (Sep. 3, 2009), 128 FERC ¶ 61,187 (2009) (“Notice”).

AGA also urges the Commission to clarify that Hinshaw pipelines are required to report their “contracts” on a quarterly basis in a manner similar to what they currently report. Requiring information to be reported separately for each individual “transaction” may be unduly burdensome and unnecessary. By allowing Hinshaw pipelines to report “contracts,” the Commission would still receive transaction information; the transaction information would simply be aggregated under the appropriate contract.

With regard to standardized shipper identification and common industry codes, AGA supports the use of the D-U-N-S® Number as a common company identifier. For the identification of receipt and delivery points, AGA recommends that intrastate and Hinshaw pipelines be able to use an interstate pipeline’s Data Reference Number (“DRN”) for points of interconnection with an interstate pipeline and use a proprietary code for any points where a DRN has not already been assigned. As an alternative, if the Commission believes that DRN numbers unique to non-interstate pipeline receipt and delivery points are necessary, AGA recommends that the Commission explore entering into a relationship with the company that assigns the DRNs on behalf of all non-interstate pipelines.

Regarding electronic information collection, the jurisdictional contracting activities of Hinshaw pipelines are sufficiently varied that a one-size-fits-all approach would help some but burden others no matter which method the Commission chooses. AGA, therefore, recommends that the Commission support a variety of filing methods including, both XML Schema and ASP.NET methods. The Commission should also consider, as a third alternative, developing a simple spreadsheet with the data in tabular form that intrastate and Hinshaw pipelines could complete and file so as to make it as easy as possible to comply with the electronic filing requirements.

AGA further recommends that the Commission develop a Frequently Asked Questions webpage or other web-based Query System to assist intrastate and Hinshaw pipelines in complying with the new standardized electronic information filing requirements. Given the potential for inadvertent errors when dealing with uncertain and potentially confusing electronic filing requirements, AGA also recommends that the Commission explicitly state as part of the final rule in this proceeding that it will not prosecute, penalize or otherwise impose remedies on parties for inadvertent errors in reporting.

Finally, AGA urges the Commission to consider when the new reporting requirements would become effective following the issuance of the final rule in this proceeding and afford intrastate and Hinshaw pipelines sufficient time to take the necessary measures to comply.

II. COMMUNICATIONS

All pleadings, correspondence and other communications filed in this proceeding should be served on the following:

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III. IDENTITY AND INTERESTS

The AGA, founded in 1918, represents 202 local energy companies that deliver clean natural gas throughout the United States. There are more than 70 million residential, commercial and industrial natural gas customers in the U.S., of which almost 93 percent — more than 65 million customers — receive their gas from AGA members. AGA is an advocate for local

natural gas utility companies and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international gas companies and industry associates.³

AGA's members would be directly affected by the Commission's decisions regarding the issues raised in the NOPR and the Notice. AGA's member companies own and/or operate natural gas pipelines and local distribution systems that have been and may be classified as Hinshaw pipelines. In addition, AGA's members conduct transactions in interstate commerce under blanket certificates issued pursuant to Part 284.224 of the Commission's regulations, and would be directly affected by any changes in the reporting requirements under such regulations. Accordingly, AGA and its members have a direct and substantial interest in the issues raised in this proceeding.

IV. COMMENTS

A. Introduction

The NOPR and Notice follow from the Commission's earlier Notice of Inquiry ("NOI") in this proceeding.⁴ The Commission sought comments on whether additional reporting requirements should be imposed on intrastate pipelines providing interstate services under § 311 of the Natural Gas Policy Act of 1978 and LDCs or Hinshaw pipelines providing interstate services subject to limited jurisdiction certificates granted under § 284.224 of the Commission's regulations. In particular, the Commission asked whether it should require intrastate and Hinshaw pipelines to post the details of their transactions with individual shippers in a manner more comparable to the reporting requirements applicable to interstate pipelines under 18 C.F.R. § 284.13(b).

³ For more information, please visit www.aga.org.

⁴ *Contract Reporting Requirements of Intrastate Natural Gas Companies*, 73 Fed. Reg. 72,395 (Nov. 28, 2008), FERC Stats. & Regs., Notices ¶ 35,559 (2008) ("NOI").

In comments responding to the NOI, AGA stated that the business operations of LDCs are comprehensively regulated by their state utility commissions, and while many LDCs with Hinshaw pipelines are authorized to provide interstate services under § 284.224 certificates, the number and kinds of interstate services provided by LDCs are fairly limited – infrequent, with few counterparties, multi-month or long-term, and generally subject to cost-based rates approved by this Commission or a state commission. AGA urged the Commission not to impose burdensome reporting requirements that outweigh the value of the information that would be provided. Specifically, AGA stated that it would not oppose a requirement that Hinshaw pipelines providing interstate services under limited jurisdiction blanket certificates file with the Commission on a quarterly basis a report of jurisdictional activities that includes the same type of contract information that LDCs currently provide in their annual transportation reports and semi-annual storage reports under § 284.126. AGA argued that if the Commission believes additional transparency would be valuable, a quarterly filing requirement would strike an appropriate balance between any added transparency to the wholesale, interstate natural gas markets and the burden on LDCs and the markets in producing additional contract information. In addition, AGA recommended that the Commission clearly limit the scope of any revised reporting requirements for Hinshaw pipelines to the jurisdictional services they provide under their § 284.224 blanket certificates.

In the NOPR, the Commission proposed to require intrastate and Hinshaw pipelines to file the existing annual reports under § 284.126(b) on a quarterly basis covering both storage and transportation transactions and including additional information, *i.e.*, (1) the rate charged under each contract, including a separate statement of each rate component; (2) the duration of the contract; (3) the primary receipt and delivery points covered by the contract; (4) the quantity of

natural gas the shipper is entitled to transport, store or deliver; and (5) whether there is an affiliate relationship between the pipeline and the shipper.⁵ The Commission also proposed to require that the quarterly reports be filed in a uniform electronic format and posted on FERC's website, and that the reports be made public and not filed with information redacted as privileged.⁶ Under the Commission's proposal, intrastate and Hinshaw pipelines would continue to file the same semi-annual storage activity reports currently required by § 284.126(c). Further, the quarterly reports would include not only the full legal name but also the identification number of each shipper and include the industry common code for each receipt and delivery point. The Commission sought comments on the types of shipper identification numbers and receipt and delivery point common industry codes that are currently used or readily available to intrastate and Hinshaw pipelines, and the shipper identification standard or standards and receipt and delivery point codes that should be used.⁷

In the Notice, the Commission proposed to adopt for reporting purposes an XML Schema under which intrastate and Hinshaw pipelines would submit the quarterly reports in an XML filing package using the Commission's eFiling portal.⁸ The Commission also sought comment on whether it should adopt an ASP.NET method under which intrastate and Hinshaw pipelines would fill in data on a web-based form created by the Commission and accessible on the Commission's website.⁹

⁵ NOPR at PP 18-19.

⁶ *Id.* at PP 28, 30.

⁷ *Id.* at P 34.

⁸ Notice at P 4.

⁹ *Id.* at P 5.

B. AGA Supports A Quarterly Reporting Requirement.

AGA supports the Commission's efforts to improve market transparency by obtaining information that is meaningful and necessary for the Commission to fulfill its statutory obligations, including monitoring rates for jurisdictional services to see that they remain just and reasonable. As noted above, the jurisdictional services that LDCs with Hinshaw pipelines provide under § 284.224 certificates are fairly limited, and the burden of reporting information regarding such jurisdictional activities should not outweigh the value of the information that would be provided. To be sure, the increased reporting requirements proposed in the NOPR would be an additional burden on Hinshaw pipelines that often have small staffs available to develop and maintain standardized electronic reporting systems for the few jurisdictional services they provide. In that regard, AGA believes that the Commission has dramatically underestimated the cost of complying with the proposed rule. At least one company has estimated the cost of developing an in-house solution for XML Schema reporting to be approximately \$30,000, with annual reporting to take more than 12 hours to complete. By that company's estimate then, the NOPR's assumed 125 respondents would spend \$3.75 million initially and \$900,000 annually – well above the NOPR's estimated \$262,500 annual cost of compliance.¹⁰

Nonetheless, AGA believes that in general the Commission has taken the right approach. A quarterly reporting requirement for the jurisdictional services provided by intrastate and Hinshaw pipelines strikes an appropriate balance between increased market transparency and the burden associated with increased reporting. AGA offers several modifications as set forth below

¹⁰ See NOPR at P 36.

to help reduce the burden on Hinshaw pipelines of the increased reporting and standardized electronic information collection requirements.

1. The Commission should clarify that the reporting is limited to jurisdictional activities.

AGA recommends that the Commission clearly limit the scope of the reporting requirements for Hinshaw pipelines to the jurisdictional services they provide under their § 284.224 blanket certificates. In its earlier comments in this proceeding, AGA argued that any expanded reporting requirements should apply only to jurisdictional activities. AGA asked the Commission to ensure that the reporting requirements for transactions under § 284.224 were limited to only those services authorized by the certificate and would not apply to an LDC's retail or intrastate services that are not regulated by the Commission. AGA believes the Commission did not intend in the NOPR to expand the jurisdictional scope of the activities to be reported by Hinshaw pipelines holding § 284.224 certificates.¹¹ However, the Commission did not explicitly state that it agreed with AGA that the reporting requirements under § 284.224 were limited to only those services authorized by the certificate.

AGA contends that it would be unduly burdensome to require Hinshaw pipelines with § 284.224 certificates to report all storage and transportation transactions without regard to the jurisdictional nature of such transactions. Accordingly, AGA urges the Commission to clearly state in the final rule in this proceeding that Hinshaw pipelines holding limited jurisdiction blanket certificates under § 284.224 are required to report only those contracts authorized by the

¹¹ See, e.g., proposed § 284.126(c) (requiring a report “for each transportation and storage service provided during the preceding calendar quarter *under* § 284.122”) (emphasis added). See also, Notice, Appendix A, line 5, C, field 5, D (Instruction and Detailed Instructions) all requiring the confirmation of gas transported “*under* § 284.122” (emphasis added).

certificate and are not required to report on retail or intrastate activities that are not regulated by the Commission.

2. The Commission should clarify that Hinshaw pipelines are to report “contracts.”

The NOPR proposes to require intrastate and Hinshaw pipelines to provide certain additional information about their transactions not currently required to be reported under § 284.126(b), namely: (1) the rate charged under each contract, including a separate statement of each rate component; (2) the duration of the contract; (3) the primary receipt and delivery points; (4) the quantity of gas the shipper is entitled to transport, store, or deliver; and (5) whether there is an affiliate relationship between the pipeline and the shipper.¹² The revised § 284.126(b) would retain the requirement to report the total volumes transported, stored, injected, or withdrawn for the shipper, and the total revenues received from the shipper. The data elements for proposed FERC-549D provide that the information for each shipper should be broken out by type of service – firm transportation, interruptible transportation, firm storage, interruptible storage, park and loan, and other.¹³

AGA believes that there is some ambiguity as to the level of detail that is required to be reported for each shipper. The NOPR and the Notice appear to use the terms “contract” and “transaction” interchangeably; whereas, oftentimes market participants refer to a “contract” as the master agreement establishing the overall relationship between the parties for a type of service, and a “transaction” as an agreement setting forth specific terms, such as quantity, price, and duration. Thus, while a Hinshaw pipeline may have a single firm transportation contract with a shipper, it may have several, even numerous, transactions under that contract during the

¹² NOPR at P 19.

¹³ Notice, Appendix A.

course of a calendar quarter or a year. At present, Hinshaw pipelines report their transportation “contracts” on an annual basis. In other words, information regarding individual “transactions” over the course of the year is aggregated under the various “contracts” for each shipper, so that the Hinshaw pipeline reports the total activities for each shipper.

With this understanding in mind, AGA requests that the Commission clarify that Hinshaw pipelines are required to report their “contracts” on a quarterly basis in a manner similar to what they currently report. AGA contends that requiring the information to be separately reported for each individual “transaction” goes far beyond merely reporting more frequently what Hinshaw pipelines already report and may indeed be unduly burdensome. By allowing Hinshaw pipelines to report “contracts,” the Commission would still receive transaction information; the transaction information would simply be aggregated under the appropriate contract.

The proposals appear to contemplate that intrastate and Hinshaw pipelines would report “contracts.” Revised § 284.126(b) uses the term “contract” and requires the reporting of total volumes and total revenues “for the shipper.” Moreover, the data elements for proposed FERC-549D provide that the information for each shipper is to be broken out by type of service. Further, the requirement to report an index of customers on a quarterly basis applicable to interstate pipelines under § 284.13(c) of the Commission’s regulations contemplates the reporting of “contracts.” For these reasons, AGA requests that the Commission confirm that it intended to require the reporting of aggregated data under each “contract,” and that intrastate and Hinshaw pipelines are not required to report separately each individual “transaction.”

3. The Commission should allow Hinshaw pipelines to use established DRN codes when available and proprietary receipt and delivery point codes.

The NOPR proposed to require that the quarterly reports include an identification number for each shipper and to include an industry common code for each receipt and delivery point.¹⁴ The NOPR sought comment on the types of shipper identification numbers and receipt and delivery point common industry codes that are currently used or readily available to intrastate and Hinshaw pipelines, and the shipper identification standard or standards and receipt and delivery point codes that should be used.¹⁵

In Order No. 563, the Commission adopted final rules requiring the standardization of information included on and provided to interstate pipeline Electronic Bulletin Boards.¹⁶ In that proceeding, the Commission accepted the recommendation that a third-party code assignor, the Petroleum Information Corporation (“PI-GRID”), would prepare a computerized cross-reference table correlating the proprietary codes used by interstate pipelines to a common code. Subsequently, the North American Energy Standards Board (“NAESB”) developed standards governing both procurement and use of common codes within the wholesale natural gas industry. These standards are primarily intended for use with nominations submitted to interstate pipelines via Electronic Data Interchange (“EDI”). With regard to shipper identification, NAESB has adopted the D-U-N-S® Number as a common company identifier. The D-U-N-S® Number is assigned to companies by the Dun & Bradstreet Corporation (“D&B”). For receipt and delivery point common codes, NAESB has adopted the PI-GRID Data Reference Number (generally

¹⁴ NOPR at P 33.

¹⁵ *Id.* at P 34.

¹⁶ *Standards for Electronic Bulletin Boards Required Under Part 284 of the Commission’s Regulations*, Order No. 563, 59 Fed. Reg. 516 (Jan. 5, 1994), FERC Stats. & Regs., Regs. Preambles ¶ 30,988 (1994), *order on reh’g*, Order No. 563-A, 59 Fed. Reg. 23,624 (May 9, 1994) FERC Stats. & Regs., Regs. Preambles ¶ 30,994 (1994).

referred to as “DRN”) which is a one-to-nine digit, non-intelligent number assigned by a vendor, IHS Energy (“IHS”). As AGA understands, interstate pipelines enter into a contract with IHS under which a pipeline provides its proprietary receipt and delivery point location information and IHS assigns an industry common DRN for each such point.

Against this background, AGA believes that it is reasonable to look at what is required of the interstate pipelines for standardized shipper information and use common industry codes. As to shipper identification, AGA supports use of the D-U-N-S® Number as a common company identifier. It is likely that a Hinshaw pipeline would have a pre-existing relationship with D&B and would thus be able to obtain company identifiers. Moreover, recordkeeping would be consistent as between interstate and non-interstate pipelines.

With regard to receipt and delivery point codes, AGA appreciates the Commission’s concerns regarding the cost-effectiveness and usefulness of mandating a particular standard. In that regard, AGA does not support imposing on Hinshaw pipelines the NAESB standards applicable to interstate pipelines. Few Hinshaw pipelines accept nominations via EDI, and thus the likelihood that a Hinshaw pipeline would have a pre-existing relationship with IHS is remote. Moreover, because Hinshaw pipelines will have only a limited number of receipt and delivery points that would be required to be identified, it would not be cost-effective to require each Hinshaw pipeline to enter into a contract with IHS for the assignment of DRNs.

Accordingly, AGA recommends that for the identification of receipt and delivery points, Hinshaw pipelines should be able to use an interstate pipeline’s DRN for points of interconnection with an interstate pipeline. For any points where a DRN has not already been assigned, Hinshaw pipelines should be able to use a proprietary code. Relative to transactions on interstate pipelines, the jurisdictional transactions of Hinshaw pipelines are few, so ambiguity

and confusion would not be likely in this particular circumstance. If the Commission were to adopt this proposal, recordkeeping would be consistent with what is required for interstate pipelines, but more cost-effective for non-interstate pipelines.

As an alternative, if the Commission believes that DRN numbers unique to non-interstate pipeline receipt and delivery points are necessary, AGA recommends that the Commission explore entering into a relationship with IHS on behalf of all non-interstate pipelines. The Commission could achieve an economy of scale in its relationship with IHS that would be unattainable collectively by non-interstate pipelines.

4. The Commission should support several methods for data collection including XML Schema, ASP.NET, and spreadsheets.

The NOPR proposed to adopt for reporting purposes an XML Schema under which intrastate and Hinshaw pipelines would submit the quarterly reports in an XML filing package using the Commission's eFiling portal. The NOPR also sought comment on whether the Commission should adopt an ASP.NET method under which intrastate and Hinshaw pipelines would fill in data on a web-based form created by the Commission and accessible on the Commission's website.

Regarding electronic information collection methods, the jurisdictional contracting activities of Hinshaw pipelines are sufficiently varied that a one-size-fits-all approach would help some and burden others no matter which method the Commission chose. Some Hinshaw pipelines would prefer the XML Schema approach, as it may enable filers to more efficiently input information and may be able to be integrated with companies' business systems. For other Hinshaw pipelines, particularly those with only a few jurisdictional contracts per year, an on-line form method such as ASP.NET would be a simple and less costly way of providing the necessary information, particularly if the form could be designed to retrieve data from the prior

submission as a default. An on-line form method may also be a simple way to assure uniform reporting of contract data. If the Commission were to choose the XML Schema method, Hinshaw pipelines with only a few jurisdictional contracts would be unduly burdened by having to develop systems to compile the data and assemble it into the necessary XML packages in order to prepare the quarterly reports; whereas, if the Commission were to adopt an ASP.NET approach, other Hinshaw pipelines would be expending significant resources each quarter preparing the on-line form.

As a third approach, the Commission should consider developing a simple spreadsheet with the data in tabular form that intrastate and Hinshaw pipelines could complete and file with the Commission using the eFiling portal. The spreadsheet could then be saved and updated for each upcoming quarterly filing. The Commission could then use its own software to convert the data on the spreadsheet into an XML package or some other internal format that would allow the data to be maintained in a consistent format for analysis and dissemination. The burden on all filers would thus be significantly lessened, and the Commission would be able to receive the information it seeks in its own prescribed format.

A flexible approach to the submission of quarterly filings would lessen the reporting burden imposed on Hinshaw pipelines while providing the Commission the information it seeks. AGA, therefore, recommends that the Commission support a variety of filing methods including the XML Schema method, an ASP.NET method, and a simple spreadsheet method as described above. Each Hinshaw pipeline should be permitted to choose which filing method it will use. Some Hinshaw pipelines may find it to be more cost-effective to use the XML Schema method for filing purposes, in which case, they should be permitted to submit their quarterly report in an XML package using the Commission's eFiling portal. Other Hinshaw pipelines may find it to

be more cost-effective to use the ASP.NET approach. Still others with very few jurisdictional activities to report each quarter would benefit from being able to file the data in spreadsheet form. In all events, the Commission should not adopt only one electronic filing method.¹⁷ The Commission should make it as easy as possible for intrastate and Hinshaw pipelines to comply with the electronic filing requirements.

5. The Commission should provide guidance on complying with any new standardized information collection system.

AGA believes that any standardized electronic information collection requirement will entail some amount of uncertainty and confusion among those required to provide the information, and respondents will invariably encounter technical questions that the Commission Staff must address. As with new Form No. 552, AGA and its members would like to gain a complete understanding of how a new contract reporting form must be completed and to avoid any unintended misinterpretations in order to ensure full compliance with the Commission's reporting requirements. Accordingly, AGA recommends that the Commission develop a Frequently Asked Questions webpage or web-based Query System to assist intrastate and Hinshaw pipelines in complying with the new standardized electronic information filing requirements. In that regard, included as an attachment to these comments is a list of questions regarding the proposed data elements in Appendix A of the Notice. AGA requests that the Commission provide the clarifications requested in the attachment and set up a FAQs webpage to address further questions that may arise.

Further, given the potential for inadvertent errors when dealing with uncertain or confusing requirements, filers would like some assurance that their good faith efforts to comply

¹⁷ If the Commission does not allow for electronic filing of spreadsheets, it should at least support both the XML Schema and ASP.NET methods.

with these new requirements will not result in exposure to enforcement actions. As the Commission expressed in Order No. 704, the goal in new reporting requirements is to obtain information not to penalize efforts at compliance.¹⁸ AGA thus recommends that the Commission explicitly state as part of the final rule in this proceeding that it will not prosecute, penalize or otherwise impose remedies on parties for inadvertent errors in reporting under any new standardized information collection system developed in this proceeding.

6. The Commission should afford filers sufficient time to comply with the new reporting requirements.

Neither the NOPR nor the Notice proposed when the new reporting requirements would take effect. AGA contends that the Commission should not simply allow the requirements to go into effect immediately upon issuance of the final rule and force Hinshaw pipelines to meet the new requirements in the next quarter's filing. Depending upon what new requirements will be established, Hinshaw pipelines may be required to develop new systems to compile and assemble data into new forms, revise procedures, and expend considerable time and resources, much of which may not be achievable within 30 days after the close of an upcoming calendar quarter. When it established new electronic tariff filing requirements that involved use of XML Schema, the Commission recognized the need to provide sufficient time for software development and testing to ensure that the electronic filings would have as few bugs as possible.¹⁹ AGA urges the Commission, in determining when the new reporting requirements will become effective following the issuance of the final rule in this proceeding, to afford filers sufficient time to take the necessary measures to comply.

¹⁸ See *Transparency Provisions of Section 23 of the Natural Gas Act*, Order No. 704, 73 Fed. Reg. 1,014 (Jan. 4, 2008), FERC Stats. & Regs., Regs. Preambles ¶ 31,260 at P 114 (2007).

¹⁹ See *Electronic Tariff Filings*, Order No. 714, 73 Fed. Reg. 57,515 (Oct. 3, 2008), FERC Stats. & Regs., Regs. Preambles ¶ 31,276 at P 102 (2008).

V. CONCLUSION

Wherefore, for the reasons stated above, the American Gas Association respectfully requests that the Commission consider the comments and recommendations stated herein.

Respectfully submitted,

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ATTACHMENT A

- 1) Do cashouts, administrative charges, customer charges, transportation charges, fuel, meter installation cost reimbursement, meter reading charges if their phone line goes down, late charges, exit fee, overrun charges, etc. all need to be reported separately?
- 2) Would cashouts be reported in the quarter in which they are collected, even if they result from a prior period measurement adjustment to a production month in a previous quarter?
- 3) If a contract has primary receipt and delivery points, and all other points are secondary, is every point listed or only those used in the quarter, and can a catch-all description be used such as, “All Physical Receipt”?
- 4) Must it be stated that the filer will not be reporting on any on-system non-jurisdictional delivery component of a reportable contract?
- 5) In Field No. 2 of Form 549D, is “FERC ID” generic to the company such that a combination gas and electric utility can use the same ID, or do the electric and gas business lines each need a separate ID?
- 6) In Field No. 16, can the person identified as the contact in Line 9 sign the form if not an officer, or must an officer sign?
- 7) In Field No. 22, should Parking and Lending be given separate columns?
- 8) In Field Nos. 27 and 28, please clarify the use of the term “current.”
- 9) In Field No. 28, please clarify how the ending month and year of an evergreen contract should be expressed; should 999999 be used?
- 10) In Field Nos. 33, 34, 47, 48, and 61, please clarify that “peak” in “peak day” or “peak capacity” refer to the common contract elements Maximum Daily Quantity (MDQ), Maximum Daily Injection Quantity (MDIQ), or Maximum Daily Withdrawal Quantity (MDWQ) depending on the type of service.
- 11) In Field Nos. 35, 36, 49, 50, and 62, please clarify that “annual volumes” refers to the common contract element Maximum Storage Quantity (MSQ).
- 12) In Field No. 43, please define and provide an example of “Initial Day or Single One-Part Rate”; in particular, please clarify what is meant by a “Single One-Part Rate.”
- 13) In Field Nos. 44 and 58, please define and provide an example of “Consecutive Days”; in particular, please clarify whether “Consecutive Days” includes Day 1.

- 14) In Field Nos. 46, 60, and 67, please define or provide examples of “Other Charges”; in particular:
- a. please clarify whether “Other charges” would include fuel and lost and unaccounted for gas charges;
 - b. please clarify whether “Other Charges” would include rates, quantities, and revenues related to overrun;
 - c. please clarify whether “Other Charges” would include usage rates, quantities, and revenues related to off-season injections and withdrawals.
- 15) In Field Nos. 61 and 62, the designation is identical; please identify and clarify the distinction between the fields.
- 16) In Field No. 66, should Storage and Lending be given separate columns?
- 17) In Field No. 23 of the example of data entries, the service listed under “P/L” is designated as “S”; please clarify.
- 18) In Field No. 27 of the example of data entries, there appears to be an extra digit for the date; please clarify.
- 19) In Field Nos. 43 and 44 of the example of data entries, there appears to be reported a contract that has both an initial rate and a follow up rate; please clarify whether Field No. 44 will accommodate a contract with only a single rate that applies for all days.
- 20) In Field No. 22 of the proposed data dictionary, in the Staff Suggested Definition, please clarify whether “O=Other”, or some other designation for “Other” should be used.
- 21) In Field Nos. 29 and 30 of the proposed data dictionary, the Staff Suggested Definition states that each additional point should be indicated in a footnote or comment field; please clarify the location of such footnote or comment field.
- 22) In Field Nos. 33 and 35 of the proposed data dictionary, please clarify whether the reference in the “Required” column is correct. Should it read “Required if field #22 is firm”?