NGPL Comments on MSTF Recommendations to EC on Requests R96125 and R96131
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In response to the Market Settlement Task Force recommendations to the EC on requests R96125 and R96131 (addition of Statement Type Code to PDA, PDA Quick Response, Allocation Statement and subsequent documentation changes): NGPL agrees with the recommendations that are documented, but must submit that the MSTF recommendations are incomplete. At the February 19th MSTF meeting, the group unanimously agreed that another code value, "A9" was to be included as a part of the MSTF recommendations. The "A9" value has inadvertently been omitted from the recommendations and therefore NGPL requests the recommendations be returned to MSTF for completion before being voted on by the EC.

A short abstract of the A9 code value follows:

A9 - "Service Requester to Service Requester Contract and/or Downstream Party"

As a PDA Statement Type Code, A9 allows the Service Requester to define the allocation method for all gas the Service Requester has title to at a location. The Service Requester can define the allocation method for their quantities 1) leaving the location under a contract, and /or 2) sold at the location. This is accomplished on a single document.

As an Allocation Statement Type Code, A9 allows for reporting of quantities at a location pursuant to the Service Requester's PDA. In addition, the quantities which were allocated to the Service Requester (by parties upstream of the Service Requester) are also reported. This allows for reporting of all allocations for the Service Requester at a location(s) on a single document.

Pathed nomination models do not require Service Requester Allocation Statements since the necessary reporting is accomplished via the Imbalance Statement. However, Service Requester Allocation Statements (A9) are necessary for NGPL's implementation of the Pathed Non-Threaded model. This is because the Imbalance Statement (for this nom model) deals only with <u>quantity</u> <u>imbalances</u> <u>at</u> <u>a</u> <u>path</u> <u>level,</u> i.e. service contracts only. No regard is given to parties, which renders the Imbalance Statement incomplete in terms of reporting allocations.

A9 is designed to support the practice of reporting PDAs and Service Requester Allocation Statements at the contract and/or downstream party level in the context of the Pathed Non-Threaded model.