

**Compliance Plan** 

# GAS/ELECTRIC COORDINATION FERC ORDER 698



#### Standard 0.3.11

The Transportation Service Provider (TSP) / Power Plant Operator (PPO) communication standards set forth in NAESB WEQ Standard Nos. WEQ- 011-0.1, WEQ-011-0.2, WEQ-011-0.3, WEQ-011-1.1, WEQ-011-1.2, WEQ- 011-1.3, WEQ-011-1.4, WEQ-011-1.5, and WEQ-011-1.6 and NAESB WGQ Standard Nos. 0.2.1, 0.2.2, 0.2.3, 0.3.11, 0.3.12, 0.3.13, 0.3.14, and 0.3.15 do not convey any rights or services beyond or in addition to those contained in the TSP's tariff and/or general terms and conditions and/or do not impose any obligations that would otherwise be inconsistent with the requirements of applicable regulatory authorities, including affiliate code of conduct requirements. These communication standards should be used in addition to the NAESB WGQ standard nomination timeline and scheduling processes for the TSP's contract / tariff services. In the event of a conflict between any of these communication standards and the TSP's tariff or general terms and conditions, the latter will prevail.

#### Standard 0.3.12

The Power Plant Operator (PPO) and the Transportation Service Provider(s) (TSP) that is directly connected to the PPO's Facility(ies) should establish procedures to communicate material changes in circumstances that may impact hourly flow rates. The PPO should provide projected hourly flow rates as established in the TSP's and PPO's communication procedures.



#### Standard 0.3.13

Subject to the conditions of NAESB WEQ Standard No. WEQ-011-1.1 and NAESB WGQ Standard No. 0.3.11, this standard applies to a Power Plant Operator (PPO) and the Transportation Service Provider (TSP) to whose system the PPO facility(ies) is directly connected or with whom the PPO is a Service Requester.

A PPO should not operate without an approved scheduled quantity pursuant to the NAESB WGQ standard nomination timeline and scheduling processes or as permitted by the TSP's tariff and/or general terms and conditions, and/or contract provisions. However, if the PPO reasonably determines that it has circumstances requiring the need to request gas scheduling changes outside of the above-referenced nomination and scheduling processes and the affected TSP(s) supports the processing of such changes, the PPO should provide its requested daily and hourly flow rates to the TSP(s) (1) as established in the TSP's and PPO's communication procedures pursuant to NAESB WEQ Standard No. WEQ-11-1.2 and NAESB WGQ Standard No. 0.3.12 and/or (2) as specified in the TSP's(s') tariff or general terms and conditions.

Based upon whether or not the PPO's request can be accommodated in accordance with the appropriate application of the affected TSP's(s') tariff requirements, contract provisions, business practices, or other similar provisions, and without adversely impacting other scheduled services, anticipated flows, no-notice services, firm contract requirements and/or general system operations, the PPO and all of the affected TSPs should work together to resolve the PPO's request.

Where the affected TSP determines that it is feasible to provide the PPO with changes in flow rates without additional communications, no additional communications are required. These procedures will govern such communications unless the applicable parties mutually agree to create alternative communication procedures.



#### Standard 0.3.14

A Transportation Service Provider should provide Regional Transmission Organizations (RTO), Independent System Operators (ISO), any other appropriate independent transmission operators (ITO), and Power Plant Operators (PPO) with notification of operational flow orders and other critical notices through the RTO / ISO / ITO / PPO's choice of Electronic Notice Delivery mechanism(s) as set forth in NAESB WGQ Standard Nos. 5.2.1, 5.2.2, and 5.3.35 – 5.3.38.

#### Standard 0.3.15

Regional Transmission Organizations, Independent System Operators, other independent transmission operators, independent Balancing Authorities and/or Regional Reliability Coordinators should establish written operational communication procedures with the appropriate gas Transportation Service Provider(s) and/or Power Plant Operator(s). These procedures should be implemented when an extreme condition could occur, as defined in such procedures.

These procedures will govern unless the applicable parties in the gas and electric industry mutually agree to create alternative written communication procedures that are more appropriate and meet the parties' collective regional operational needs. Training on and testing of such communication procedures should occur periodically



## Communications when hourly flows may be affected

- Transco is obligated to provide operating information to all parties at the same time so that no party is advantaged by having operation information before others. To accomplish this, Transco uses 1Line as primary vehicle for communicating operating information to customers
- Communications can be "pushed" to interested parties
- Currently, Transco does not require information on projected hourly flow rates from PPO's



## Communications for nominations and scheduling process

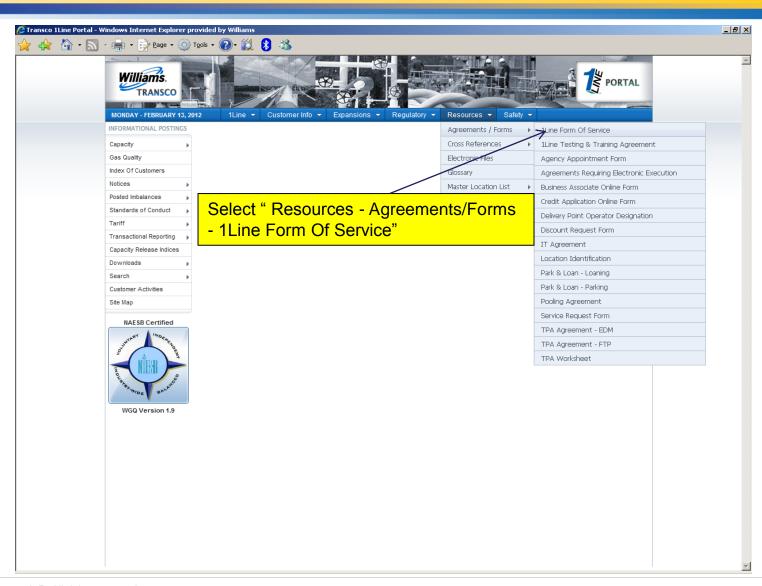
- Transco's tariff provides for the NAESB capacity release and nomination deadlines in General Terms and Conditions, Section 42 (capacity release) and 28 (nominations)
- Transco provides firm and interruptible services with several unique attributes
  - Services are considered "no-notice" service in that scheduling penalties are not assessed except during specific Critical Day conditions
  - Point Operators are provided a mechanism to identify which contracts will absorb over-deliveries or under-deliveries
  - Transportation imbalances should be managed throughout the month and are "cashed-out" after the NAESB defined trading period



## Access to Operational Information on Transco

- Go to <u>www.1line.williams.com</u>
- Select Transco
- Select Informational postings
- Select Resources
- Select Agreements/ Forms
- Select 1line Form of Service
- Complete and submit form online







## Communications from electric system operators

- Transco's recommendations for "operational communication procedures"
  - What should be communicated
    - Expectations of high demand (ex. load management day)
    - Unexpected disruptions on the electric system that have an immediate impact on gas consumption
  - Communications should go to Gas Control
    - Via e-mail to identified personnel
    - 800-231-1290 (manned 24x7 by Transco's Gas Control Department)
    - Fax to 713-215-2547