

FERC Staff's Responses to Discussion Questions from eTariff@FERC.gov

1. If a record change type of CHANGE is filed in a filing for record id 1234 version 2.0.0 and then is subsequently withdrawn in a later filing via a record change type of WITHDRAW, can record id 1234 version 2.0.0 be filed again at some later date? Upon processing the latter (WITHDRAW) filing, is the earlier filed record physically delete from FERC's eTariff database?

A: Neither the Filing Identifier (filing_id) number nor the Tariff Record's Record Version Number (record_version_num) can be reused. Once the SOC has accepted a filing, the filing is an official document with the Commission. A withdraw filing initiates a set of FERC processes. The withdraw filing type does not result in the tariff filing or the Tariff Record data being removed from the FERC's databases.

2. Under what circumstances will a filing include tariff record versions that do not contain tariff content?
 - Withdrawal filings?
 - Cancellation filings?
 - Motion filings?
 - Are there other filing types?

A: The Record Version Number (record_version_num) is not used in any automated fashion. It is not required for the Type of Filing (filing_type) identified as a Motion, Withdraw or Cancellation category. All other categories of Type of Filing that require Tariff Record Content Data require a Record Version Number.

3. (a) For which types of filings is an associated_filing_id required in a filing? Amendment? Compliance? Motion? Withdraw? Report? Other?

A: The Baseline, Normal and Cancellation Type of Filing categories do not require an Associated Filing Identifier (associated_filing_id). All other Type of Filing categories require an Associated Filing Identifier.

(b) Which types of filings can BE the associated filing for a filing being filed?

A: The Commission's program specific regulations and business rules specify which types of filings may be associated with which filings. For example, Withdraw and Amendment Type of Filings can only be associated with tariff

filings that the Commission has not acted upon. A Compliance Type of Filing can only be associated with a tariff filing that the Commission has acted upon.

4. Is FERC willing to add the valid file extensions for each type of file identified in the attachment-content-type.csv file? This would enable software to automatically identify the attachment type based on the file's extension. In the event that the file extension is not unique to an attachment type, software could present users with a short list of file types from which they could choose.

A. Staff will look into the possibility of providing additional information.

5. In the FERC documentation there are references to automated actions (amendment type filings, suspension motions, status_change_timeout) to update the status of filings and tariff records. Are these things that happen automatically within FERC's tariff software? Are the owners of the affected tariffs notified? Will every tariff filing result in a FERC order?

A. The referenced Amendment and Motion Type of Filing categories will in many cases automatically update the status of filings. An amendment filing for example will automatically change the filing date for the proceeding and the 30 or 60 day date on which the Commission is required to act. In some cases, the Commission may issue a notice indicating that the filing has been made, but no explicit notification of the status change will be issued. The filer needs to be aware of the regulatory implications of its actions.

6. Currently, there is no way for software to understand and enforce the quantity of each type of attachment that may be placed into a filing. For example, it wouldn't make sense for a filing to have two transmittal letters, but it would make sense for a filing to have two "Other Support not otherwise specified" attachments. Is FERC willing to add a column to the attachment-reference-code.csv file that specifies whether multiple attachments of a particular type are allowed in a filing?

A. Attachments are governed by the current Secretary's filing rules and in many cases, multiple documents and filing types are used for almost all types of documents. For example, a transmittal letter may consist of a Word document with an Excel spreadsheet containing an appendix. Also, confidential information with redacted and unredacted copies may require the same attachment type be used more than once. Thus, designating which documents can be used multiple times is not worthwhile.

7. (a) Can there be only one baseline filing (new_type=Y) for a tariff/database?

A. Yes. The Baseline Type of Filing category is a special case used to establish a new Tariff Identifier (tariff_id) for a company. Once the Tariff Identifier has been established, then all subsequent modifications to that tariff_id's database must be one of the other Type of Filing categories. For example, an applicant may file in its Baseline Type of Filing filing only one record_id: the first section of its tariff. That would establish the Tariff Identifier. Subsequently, and for the first time, the applicant could file 1,000 record_ids that compose the rest of the tariff and do not yet exist in the database. This second filing must use a Type of Filing category other than Baseline.

7.(b) Under what circumstances can a filing of refiled_type=Y be filed?

A. Many FERC programs' regulations require different business rules depending on whether a tariff is filed with the Commission for the first time (for example, a new company: refiled_type = N), or is simply a restatement of what the Commission has already reviewed and accepted (refiled_type = Y).

7.(c) Are there rules regarding the filing of root tariff records (those without a parent) within such a filing? Or are they treated the same as tariff records that do have a parent?

I suppose at the crux of this topic is the difference in FERC's eyes between a single tariff/database that contains multiple root tariff records VS multiple tariffs/databases each of which containing a single root tariff record.

A. A Tariff Identifier database can have multiple parent (root) Tariff Record Identifiers (record_ids). For example, Part 154 requires pipelines to maintain Volume No. 1 for their open access transportation and sales services, and a Volume No. 2 for their traditionally certificated services. Both of these Volumes can be placed in a single Tariff Identifier database under different parent Tariff Record Identifiers.

8. How does the "ETariff Filing Rules Table" PDF relate to the type-of-filing.csv? Are these supposed to convey the same information, the former in human readable format and the latter in machine readable format? When is the next time that these resources will be updated with the latest information?

A. The ETariff Filing Rules Table in PDF format is the human readable format of the type-of-filing.csv document. The version posted concurrent with Order No.

714 reflects the discussions from the August 2005 technical conferences in this proceeding. The table will be updated prior to the April 1, 2010 implementation date to reflect technical conferences to be held in conformance with the requirements of Order No. 714.

9. Discuss "PRO FORMA" record change type relative to version numbers. It seems that "PRO FORMA" tariff records will "use up" a version. Could PRO FORMA tariff record versions use version numbers in the 1000's, for example, so that they do not collide with the natural progression of version numbers? Are there any tariff record filing rules that are relaxed for records filed with a "PRO FORMA" change type?

A. Order No. 714 gave applicants some discretion in creating Record Version Number (record_version_num) entries, and the application of such discretion to Pro Forma Tariff Records would be reasonable. As applicants usually file Pro Forma tariff sections as part of a request for a full review of the proposed tariff changes, all the Tariff Record Content Data should be filed for each Pro Forma Tariff Record.

10. Tariff Record Proposed Effective Date: this XML field is marked as required in the "SOC Implementation Guide," however, it wouldn't be needed for a withdrawal filing, for example. Is this right? Aside from withdrawal filings, are there other types of filings for which Tariff Record Proposed Effective Date would not be required?

A. Currently, there is no Withdraw category Type of Filing Code (filing_type) that requires a Tariff Record Proposed Effective Date (proposed_effective_date) to implement the Commission's regulatory business rules. However, that may not be the case in the future.

11. When filing a tariff record with multiple options, do all tariff records in the filing have to have the same number of options? For example, if tariff record #12 was being filed with option codes "A" and "B," would tariff record #23 also need to be filed as an option "A" and an option "B" even if only one version of record #23 was desired?

A. The Commission's normal business practice, and adopted in the SOC Implementation Guide, is to accept one option in its entirety, reject the others, and require a compliance filing to include proposals in other options where accepted. Given this business practice, applicants proposing different Option Code sets may choose to file complete sets to reduce the likelihood of a subsequent compliance filing or the number of Tariff Records that must be included in a subsequent compliance filing.

12. The "Record Content Type Code" file (record-content-type-code.csv) provides a "security_level" column but no "record_content_type_code" column. The "security_level" column should be changed to "record_content_type_code," right?

A. This error has been corrected.

13. Under eTariff, when filing a new version of a given tariff record, in addition to the content of the record being updated, the organization of tariff can also be changed. Specifically, the "Tariff Record Collation Value" and the "Tariff Record Parent Identifier" can also be changed. I present here an example filing scenario followed by some questions.

Scenario

Given the following tariff records which represent only a portion of the overall tariff:

```
#17 v0.0.0 General Terms & Conditions
|
+---#1120 v3.0.0 Gas Quality
```

Record id 17 is the "General Terms & Conditions" section. Record id 1120 is the "Gas Quality" section, which has some history as it is on version 3.0.0. Record 1120 is a child of record 17.

Filing scenario: Two new sections are being added: "Rate Guarantees" and "Issue Resolution Response". Like "Gas Quality," these sections speak to "Pipeline Performance." As such, a new section called "Pipeline Performance" will also be added. Its parent will be "General Terms & Conditions" (record 17). "Gas Quality," "Rate Guarantees," and "Issue Resolution Response" will all be children of "Pipeline Performance".

Therefore, the new structure of the tariff will be as follows:

```
#17 v0.0.0 General Terms & Conditions
|
+---#???? v?.?.? Pipeline Performance
|
|   +---#???? v?.?.? Gas Quality
|   |
|   +---#9217 v0.0.0 Rate Guarantees
|   |
|   +---#9218 v0.0.0 Issue Resolution Response
```

There are 3 ways to file these changes to the tariff that all have roughly the same results. They are presented below:

- (1) File 3 new records for "Pipeline Performance," "Rate Guarantees," and "Issue Resolution." File "Gas Quality" as v4.0.0. of record id 1120 and change its parent to be the "Pipeline Performance" record.
- (2) File v4.0.0 of record id 1120 changing it over to be the "Pipeline Performance" record, which obviates the need to change its parent. In addition, file 3 new records for "Gas Quality," "Rate Guarantees," and "Issue Resolution."
- (3) Cancel record id 1120. In addition, file 4 new records for "Pipeline Performance," "Gas Quality," "Rate Guarantees," and "Issue Resolution."

Questions

13(a) For industry members: How often does such a filing scenario occur?

A. Some of this data is available from the Commission's FASTR data, available at <http://www.ferc.gov/industries/gas/gen-info/fastr/htmlall/index.asp>. Every Volume No. 1 with a revision above "Original" constitutes a reorganized tariff. Adding sections to existing tariffs most frequently is associated with the Commission imposing new tariff requirements.

13(b) For FERC: What is the preferred filing method (1, 2, or 3) for such a filing?

A. All the proposed filing methods require the use of a Tariff Record Collation Value (collation_value) to organize the Tariff Records in the proposed fashion. Filing method 1 is preferred: retain the use of Tariff Record No. 1120, and relocate its position in the tariff through a new Tariff Record Collation Value. This method preserves the history of Tariff Record No. 1120.

14. How are the energy companies to use the parent relationship in a sheet-based tariff to meet the needs of the eTariff process and FERC's public viewer?

A. NAESB's April 4, 2008 Implementation Guide for Electronic Tariff Filings, NAESB WGQ Standards 11.4.1 and WEQ Standards WEQ-014, has extensive Use Case Descriptions starting at page 44. The Use Cases show examples of how to use the Tariff Record Identifier (record_id) and Tariff Record Parent Identifier (record_parent_id) that will be used by the FERC's public viewer to show the structure of the Tariff Records in the Table of Contents pane.

15. (a) Should the Title Sheet of Volume X be the parent and all the tariff sheets in Volume X be its children?

A. This suggestion would work. See response to Question No. 7(c).

15(b) Would this solution cause problems in generating the Table of Contents?

A. No.

16. Can a column be added to the 'Type of Filing' csv that provides a shorter name for each type of filing? From a software display standpoint, the description column provided is too long for some display scenarios.

A. There does not appear to be any benefit to providing another column with essentially identical information. The names for each Type of Filing can be discussed at a technical conference to be held later.