

Docket No. RM01-5-000
Electronic Tariff Filings

Frequently Asked Questions and Answers:

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Existing guides:

A guide on how to install the FERC eTariff Field software:

<http://www.ferc.gov/docs-filing/etariff/install-guide.pdf>

A draft guide for starting the baseline creation process:

<http://www.ferc.gov/docs-filing/etariff/baseline-tariff-guide.pdf>

Software Related Questions:

Q. Will the Field eTariff software be enhanced to convert existing tariff documents in an unlimited number of software and organizational formats into the section based format?

A. No. Existing documents are maintained by companies in a wide range of software formats, and most tariff documents have unique organizational structures. It took human intelligence to create each document that software techniques cannot be expected to duplicate.

Q. Who are the testing companies?

A. These are the ones that volunteered (or were volunteered by their associations) as of August 1:

Electric - Arizona Public Service
Electric - MISO
Electric - NEPOOL/ISO-NE
Electric - PG&E
Electric - Westar Resources
Electric and Gas - Duke Energy
Gas - NiSource
Gas - Northern Natural
Gas - Williams
Gas/311/Agent - John & Hengerer

Oil - Buckeye Pipe Line Company
Oil - Shell Pipeline Company

Q. Are more volunteer testing companies needed?

A. Since the issuance of NOPR, several other companies have volunteered. Given the limited number of OMTR staff assigned to the task of testing, and the level of the expected dialog as they work with each other to test the software, we will consider adding or replacing testing companies on a case-by-case basis.

Q. I am an agent that often makes tariff filings on behalf of clients. Will I continue to be able to make filings on behalf of my client?

A. Yes. Anyone may download the Field eTariff software from the Commission's web site. For the purposes of this prototype testing period, all companies requesting a download are required to register and obtain a PIN number. This PIN number will be required to actually make tariff filings that will modify the eTariff data base on the FERC server. If your company does not consistently represent a particular regulated company with a tariff, request a generic company registration that will permit you to submit practice filings to the Commission's test site.

Q. How many sections can I have per level of tariff?

A. At the moment 9,999.

Q. The software permits a company to have more than one tariff. What are the pros and cons of this functionality?

A. Staff recommends that most regulated companies establish only one tariff. The tariff filing part of this software assumes that regulated entities will file to revise only one tariff at a time. This basically follows the current structure of tariff filings, wherein a proposed change must be accompanied by all the proposed changed tariff sheets. Thus, in concept, a single tariff can be viewed as all the terms, conditions, services and rates linked by a lowest common denominator within the tariff. What could be that lowest common denominator? An example, in the gas industry, would be Volume Nos. 1 and 2 are usually linked by their rate design. When a pipeline with both Volumes files a new general rate case, they usually propose to change the rates for services in both Volumes Nos. 1 and 2. Under this proposed software, the most efficient way to manage the tariffs and rate filings would be to make Volume Nos. 1 and 2 a single "tariff."

Multiple tariffs are useful for companies with several operating divisions that are restricted from communicating with each other. For example, some public utilities have a transmission division and an energy marketing division. Communication between these divisions is limited by Order No. 2004. Access by one division to the working tariff revision data base of another division could

compromise efforts by the company to minimize unauthorized information flow. These companies can establish different tariffs that are the responsibility of different divisions, and maintain each tariff separately on separate machines and servers.

Q. Where do I report software problems?

A. First check available resources to ensure that the problem hasn't been addressed elsewhere – including the guides available at <http://www.ferc.gov/docs-filing/etariff.asp>. If working with an OMTR tester, discuss the problem with him/her. If not one of the testing companies, submit the problem to etariff@ferc.gov with a copy of the FERC log file. Staff will attempt to respond as time permits.

Q. How do I make suggestions to improve the software?

A. If working with an OMTR tester, discuss the idea with him/her. If not one of the testing companies, submit the suggestion to etariff@ferc.gov with an explanation on the benefits of the enhancement, idea of how to implement it, and any other support for the idea.

Electric (Public Utilities and Power Authorities) related questions:

Q. I am a public utility company. What is the importance of Order No. 614 as discussed in the NOPR? ¹

A. Order No. 614 introduced several concepts to public utility tariffs maintenance. First: supersession. This is the concept that tariff language that is no longer effective must be removed from the effective tariff. Second: a tariff should only identify any applicable rate or charge for a service, and include all terms and conditions associated with the service, and address only FERC jurisdictional services. Further, the Commission has also found public utility tariffs often contain extraneous material, such as supporting documentation best left as part of the tariff filing, and not part of the actual tariff.² Staff is of the opinion that many public utility paper rate schedules and service agreements could be significantly reduced in size if refiled consistent with Order No. 614 standards. Taking advantage of the guidelines provided by Order No. 614 can significantly reduce the burden of converting paper tariffs into an electronic format.

¹ Designation of Electric Rate Schedule Sheets, Order No. 614, 65 FR 18221, FERC Stats. & Regs., ¶ 31,096 (2000).

² *E.g.*, Boston Edison Company, 98 FERC ¶ 61,292 (2002).

Q. I am a public utility company. What is the importance of Order No. 2001 as discussed in the NOPR?³

A. Order No. 2001 permitted public utilities to maintain conforming service agreements solely through the Electric Quarterly Report (EQR). Public utilities were offered the opportunity to report conforming service agreements to the Commission, and the Commission removed those service agreements from the public utility tariffs. The Commission also suggested that public utilities could review their tariffs to find filed contracts that were basically identical and convert them to conforming service agreements with the filing of a standard form of agreement reportable only under the EQR. However, the Commission also stated that if public utilities choose not to report the conforming service agreements in their tariff for removal, they were required to maintain those agreements in the traditional paper format.⁴ Staff is aware that several dozen public utilities filed reports of conforming service agreements, and a handful of public utilities have filed for Commission approval new standard forms of agreement for the purpose of converting bilateral agreements into conforming agreements reportable solely on the EQR. The NOPR suggests public utilities should re-examine their tariffs again to determine if additional conforming agreements can be removed from the paper tariffs, or if groups of identical bilateral agreements exist that could be converted into conforming agreements through the filing of a standard form of agreement, for the purpose of further reducing the paper tariff. Taking advantage of the guidelines provided by Order No. 2001 can significantly reduce the burden of converting paper tariffs into an electronic format.

Oil Pipeline Related Questions:

Q. I am an oil pipeline. The NOPR redefines the term of “tariff” as it applies to oil pipelines. If I make a “tariff” filing, will all sections of the tariff, both those in effect and those that are the subject of the tariff filing, subject to protest and suspension?

A. Only the requested changed sections are subject to suspension. All other aspects of the tariff, whether in that schedule or any other schedule under the tariff, remain unchanged and effective, and are not subject to suspension.

Gas Pipeline (NGA and NGPA) related questions:

³ Revised Public Utility Filing Requirements, Order No. 2001, 67 FR 31043, (May 8, 2002), FERC Stats. & Regs., ¶ 31,127 (2002).

⁴ Revised Public Utility Filing Requirements, Order No. 2001-C, 101 FERC ¶ 61,314 (2002).

Q. Are NGPA gas pipelines' conditions of service and rate filings encompassed by this NOPR?

A. Yes. Conditions of service are proposed to be required to be filed and maintained by the FERC's eTariff data base.