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

Q1:   If a record change type of CHANGE is filed in a filing for record id 1234 version 2.0.0 and then is subsequently withdrawn in a later filing via a record change type of WITHDRAW, can record id 1234 version 2.0.0 be filed again at some later date?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?

A1:   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.

Q2:   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?

A2.   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.

Q3(a)   For which types of filings is an associated_filing_id required in a filing? Amendment? Compliance? Motion? Withdraw? Report? Other?

A3(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.

Q3(b)   Which types of filings can BE the associated filing for a filing being filed?

A3(b).   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.

Q4.   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.

A4.   Staff will look into the possibility of providing additional information.

Q5.   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?

A5.   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.

Q6.   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?

A6.   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.

Q7(a).   Can there be only one baseline filing (new_type=Y) for a tariff/database?

A7(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.

Q7(b).   Under what circumstances can a filing of refiled_type=Y be filed?

A7(b).   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).

Q7(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.

A7(c).   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.

Q8.   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?

A8.   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.

Q9.   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?

A9.   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.

Q10. 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?

A10. 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.

Q11. 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?

A11. 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.

Q12. 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?

A12. This error has been corrected.

Q13. 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

Q13(a).   For industry members: How often does such a filing scenario occur?

A13(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.

Q13(b),   For FERC: What is the preferred filing method (1, 2, or 3) for such a filing?

A13(b).   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.

Q14. 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?

A14. At NAESB's public web site is a Draft Implementation Guide 01/25/08 (Redline) (http://www.naesb.org/pdf3/etariff012308a2.doc). It has an extensive set of Use Case Descriptions starting at approximately 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.

Q15(a).   Should the Title Sheet of Volume X be the parent and all the tariff sheets in Volume X be its children?

A15(a).   This suggestion would work. See response to Question No. 7(c).

Q15(b).   Would this solution cause problems in generating the Table of Contents?

A15(b).   No.

Q16. 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.

A16. 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.

Q17. These questions all relate to filings having associated filings and tariff records having associated tariff records.

17(a)   When a filing has an associated filing, is it necessarily true that every tariff record contained within will be associated with the same filing?

A17(a).   The Associated Filing Identifier (associated_filing_id) is the Filing Identifier (filing_id) for the previous Tariff Filing to which the subject Tariff Filing or Tariff Record pertains. The Filing Data's Associated Filing Identifier does not necessarily determine the appropriate Tariff Record Content Data's Associated Filing Identifier. See A17(d) for examples.

Q17(b).   When a tariff record being filed is associated with a previously filed tariff record, the Associated Filing Identifier, Associated Record Identifier, and Associated Option Code work together to uniquely identify the associated record. True?

A17(b).   True.

Q17(c).   When a tariff record being filed is associated with a previously filed tariff record, must the filing within which it is being filed also be associated with a previously filed filing? Must they be the same filing?

A17(c).   No.

Q17(d).   Can you provide an example where the Associated Fling ID at the Filing level would differ from the Associated Filing ID at the Tariff record level?

A17(d).   Example A: A COMPLIANCE Type of Filing that CHANGEs Tariff Records from a NORMAL Type of Filing category filing (e.g., RP01-234-000) and Tariff Records from two subsequent and associated AMENDMENT Type of Filing category filings (RP01-234-001 and RP01-234-002).

Example B: A Compliance Type of Filing that CHANGEs a Tariff Record from a NORMAL Associated Filing, which would have the association data, and introduces a NEW Tariff Record, which would have no association data.

Example C: A Motion Type of Filing that moves into effect suspended Tariff Records from a NORMAL and its AMENDMENT Tariff Filings.

Q17(e).   Could there be multiple Associated Filing IDs at the Tariff record level?

A17(e).   Multiple Tariff Records can have different Associated Filing IDs, but any given Tariff Record Identifier can have no more than one Associated Filing ID.

Q18. Under what circumstances will a filing include tariff records that do not contain tariff content such that fields record_content_type_code, record_binary_data, and record_plain_text will be blank.
   • Withdrawal filings?
   • Cancellation filings?
   • Motion filings?
   • Are there other filing types?

A18. The MOTION, WITHDRAW and CANCELLATION Type of Filing catagories (filing_type) do not require content for the record_content_type_code, record_binary_data, and record_plain_text fields. Further, regardless of the Type of Filing, Tariff Records with a Record Change Type (record_change_type) populated with CANCEL or WITHDRAW do not require content for the record_content_type_code, record_binary_data, and record_plain_text fields.

Q19. Could record binary data in .rtf format contain a page break? For instance, because there appears to be no limitation of content on a tariff sheet, one could presumably have the content run over to the next sheet but continue to name that Sheet No. 200, thus one would need to have a break to make it work.

A19.   Yes. The eTariff software system will not be altering any of the binary content of the tariff record. If the material is retrieved as an rtf file, then the page

break codes should show up as they were entered. However, in a web page viewer, or any other conversion to other formats, page breaks may or may not be recognized.

Q20. In the *SOC Implementation Guide* under Tariff Record Content Data -- Tariff Record Title (record_title) and Record Content Description (record_content_desc), it states that "this field may be used in a database generated Table of Contents." Can FERC commit that these are the fields they will use in an automated table of contents?

A20. Tariff Record Title (record_title) will definitely be used in an automated table of contents. How the Record Content Description (record_content_desc) will be displayed has not be determined, and may be a topic of a later Technical Conference.

Q21. Will a workspace be created (FERC e-Tariff portal) to allow the testing of the e-tariff document package against FERC's e-tariff verification prior to going live on April 1, 2010 and during the implementation period?

A21. The scope of testing with respect to all eTariff verification checks is still being discussed. A sandbox will be available on February 2, 2009 to permit developers to test whether their XML packages can be parsed as described in Order No. 714, at P 87.

Q22. During FERC's e-Tariff verification check and assuming the file is readable, will sufficient error information be provided to determine reason for validation failure and will notification be timely (hours or minutes after filing)?

A22. We intend to send out error messages that are understandable to humans. Unless we receive a number of simultaneous large filings beyond our planning horizon, we expect that verification checking will be completed within a relatively short time frame.

Q23. Concerning the various software packages used for Attachments: how best can the acceptable software versions be determined? If software versions are too new will this create problems in the upload of the electronic tariff package?

A23. The Secretary of the Commission determines which electronic document formats may be electronically filed with the Commission. SOC posts this information on the www.ferc.gov web site, and SOC is delegated the responsibility of maintaining the Attachment Content Type Codes (att_content_type_code).

Q24. The Attachment Reference Code list posted on FERC's site contains a cross-reference to Filing Type. Will this list be normalized across Filing Types?

A24.   Staff is looking into whether some Attachment Reference Codes (att_ref_code) can be normalized.

Q25. The Type of Filing list posted on FERC's web site contains a lot of information that does not appear to be directly relevant to the eTariff process (e.g. amendment type, withdrawal type, refilled type). Why are these included?

A25. The Type of Filing data shows the business rules eTariff applies to each and every Type of Filing Code (filing_type) available to applicants. The data provides information on how a tariff filing and the attached Tariff Records are processed. The information is provided to enhance applicants' tariff filing and tariff maintenance software. How these codes may be used to enhance applicants' tariff filing and tariff maintenance software can be seen from the non-functional software posted at http://www.ferc.gov/docs-filing/etariff/fil-soft-help.asp.

Q26. Are there plans to standardize the Subject or content of eTariff filing response e-mails so that they can be processed automatically?

A26. Staff will take this into consideration.

Q27. Are there plans for development of any web services to provide feedback on a filing's status?

A27. The FERC viewer should indicate the status of posted tariff provisions. There is no plan to build a separate website with metadata on status.

Q28. Transmission of the tariff with an existing standard secure protocol. NAESB EDM version 1.7 has received good review and analysis and is used quite extensively in the Energy industry. Was it or can it be considered here? We should discuss the need for Privacy, Authentication, Integrity, and Non-repudiation (origin and receipt).

A28. This question is outside of the scope of this proceeding. Tariff filings will be made through the Commission's eFiling portal, with the same security as other eFiled documents. In Order No. 714, the Commission addressed the issue of security of the eFiling system (P 72).

Q29. RTF was chosen as one of the "standards". Was SGML (Standard Generalized Markup Language) considered?

A29. RTF was one of two Record Binary Data (record_binary_data) versions of software recommended to the Commission by NAESB and accepted by Order No. 714. As noted by Order No. 714, the standards are the result of a consensus after a long process starting in 2001.

Q30: Since Office 2007/Word 2007 supports many more features than RTF, is there any guideline on how to translate these features to RTF?

A30. There are no guidelines at this time. Each company needs to asses the use of its wordprocessing capabilities with respect to creation of RTF files. Our guidance would be that tariff provisions should not use complex formats. A reasonable test is to view the document after it has been saved in RTF.

Q31. A Word 2007 DOCX saved as a RTF may expand tremendously. There may be a problem with size of files once translated to RTF from DOCX. E.g. I saved a 10mb DOCX as a RTF and it became 243 MB. However zipping that same file it became 23 MB while the DOCX zipped yielded 8MB (a resulting 3x difference).

A31. Each company needs to asses the use of its wordprocessing capabilities with respect to creation of RTF files. Our guidance would be that tariff provisions should not use complex formats. There is a 10MB limit to the Record Binary Data (record_binary_data). Tariff creation software should be chosen and configured to conform to the technological limits of RTF and the *SOC Implementation Guidelines*.

Q32. When will the FERC test system become available?

A32. The Commission's test system will become available February 2, 2009. This system will check tariff filing packages to determine if they are readable, conduct limited data verification checks, and issue email report(s) of the checks. SOC will issue a notice confirming the date and providing additional information.

Q33(a) Is the Tariff Record key = Tariff record Identifier + Option Code + Tariff Record Effective Date Record + Effective Priority Order as shown on page 11 of the NAESB Implementation Guide?

(b) Is the Tariff Filing key = Company Identifier + Filing Identifier + Tariff Identifier as shown on page 11 of the NAESB Implementation Guide?

A33. Unique identifier keys will likely be data base specific. A "Tariff Record key" is not a required XML filing package data element.