

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

List of Issue Groups

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Business Rules

| | Question | Answer | Date |
|---|---|---|---------------------|
| 1 | <p>If a record change type of CHANGE is filed in a filing for record id 1234 version 2.0.0 and then is subsequently withdrawn in a later filing via a record change type of WITHDRAW, can record id 1234 version 2.0.0 be filed again at some later date?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?</p> | <p>Neither the Filing Identifier (filing_id) number nor the Tariff Record's Record Version Number (record_version_num) can be reused once the filing has been accepted by the OSEC. Once the OSEC has accepted a filing, the filing is an official document with the Commission. A withdraw filing initiates a set of FERC processes. Neither the WITHDRAW filing type nor the WITHDRAW Record Change Type results in the removal of the tariff filing or the Tariff Record data being from the FERC's databases.</p> | 1/15/10 |
| 2 | <p>Under what circumstances will a filing include tariff record versions that do not contain tariff content?</p> <ul style="list-style-type: none"> • Withdrawal filings? • Cancellation filings? • Motion filings? • Are there other filing types? | <p>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.</p> | 12/19/08 |
| 3 | <p>For which types of filings is an associated_filing_id required in a filing? Amendment? Compliance? Motion? Withdraw? Report? Other?</p> | <p>The Baseline, Normal and Cancellation Type of Filing categories do not require an Associated Filing Identifier (associated_filing_id). Compliance may require an Associated Filing Identifier depending on the circumstance. All other Type of Filing categories require an Associated Filing Identifier.</p> | 12/19/08 5/25/10 |

| | Question | Answer | Date |
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| 4 | Which types of filings can BE the associated filing for a filing being filed? | 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. | 12/19/08 5/25/10 |
| 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? | 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 after the 30 th or 60 th day 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 tariff filing or tariff record change will be issued. The filer needs to be aware of the regulatory implications of its actions. | 12/19/08 1/15/10 |
| 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 | 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 as 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. | 12/19/08 |

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| | in a filing? | | |
| 7 | Can there be only one baseline filing (new_type=Y) for a tariff/database? | 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 performed by 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. | 12/19/08 1/15/10 |
| 8 | Under what circumstances can a filing of refiled_type=Y be filed? | 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). | 12/19/08 |
| 9 | 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 | 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. | 12/19/08 |

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| | 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. | Both of these Volumes can be placed in a single Tariff Identifier database under different parent Tariff Record Identifiers. | |
| 10 | 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? | The Etariff Filing Rules Table in PDF format is the human readable format of the type-of-filing.csv and att_ref_code.csv documents. The table and related CSV files may be updated to reflect business and regulatory changes. | 12/19/08 3/6 /09 5/25/10 |
| 11 | 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, refiled type). Why are these included? | 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. . | 12/19/08 1/15/10 5/25/10 |
| 12 | If Companies A, B and C have a joint rate schedule, and Company A has agreed to be the party responsible to maintain the rate schedule, and Companies B and C have tariff records for the rate schedule which incorporates by reference Company A's rate schedule, must Companies B and C make a tariff filing to modify their tariff records when Company A makes a tariff filing affecting the joint rate | No. However, Order No. 714 did not change Companies B's or C's responsibilities for service and supporting any changes to the joint rate schedule as required by the statutes and Commission regulations. | 3/6 /09 |

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| | schedule? | | |
| 13 | Companies A, B and C have a joint rate schedule, and Company A has filed a proposed change to that rate schedule. Companies B and C wish to file additional material to the record to support their parts of the proposed change. How can they do this? | Companies B and C can file through eTariff utilizing a REPORT filing type, such as FPA program's Type of Filing Code (filing_type) 150. When Companies B and C make such a filing, they must use Company A's Company Identifier (company_id) and Filing Identifier (filing_id) to ensure their material is properly routed to Company A's tariff filing proceeding. | 3/6 /09 1/15/10 |
| 14 | Companies A, B and C have a joint rate schedule, and Company B wishes to make a change to the joint rate schedule that only affects them. Can Company B make the tariff filing? | <p>The responsibilities of Companies A, B and C with regard to filing and maintaining the joint rate schedule, and responsibilities for satisfying all other statutory and regulatory requirements related to proposed changes and compliance, are a matter of the certificate of concurrence agreement. If Companies A, B and C wish to treat Company A's joint rate schedule as a shared rate schedule (see Order No. 714 at P 65-73), the Tariff Filing XML schema will support such tariff filings.</p> <p>If Company B makes such a filing, it must use Company A's Company Identifier (company_id), Tariff Identifier (tariff_id) and an appropriate Filing Identifier (filing_id).</p> | 3/6 /09 1/15/10 |
| 15 | Regarding the first two lines of the XML Schema, can anything be removed, edited or added to these lines without resulting in an error? | No. The first two lines of the XML Schema must be provided exactly as shown. If they are not provided exactly as shown, the OSEC cannot process the filing and it will be rejected. | 1/15/10 |
| 16 | My type of filing does not require all the data elements provided in the XML Schema. May I | No. Every row of information for every sequence must be provided, even if there is no information to convey. | 1/15/10 |

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| | omit that row of information? | If all the data elements are not provided exactly as shown, the OSEC cannot process the filing and it will be rejected. | |
| 17 | What is the proper format for data elements that are not populated? | <p>Depending on the Type of Filing definition, different data elements need not be populated. For example, a BASELINE type of filing should not have an associated_filing_id. However, the XML Schema requires that all tariff filings provide that data element:</p> <pre data-bbox="961 602 1541 662"><xs:element name="associated_filing_id" type="xs:integer" nillable="true"/></pre> <p>The tariff filing's XML code for this data element should appear as follows:</p> <pre data-bbox="961 805 1493 833">< associated_filing_id xsi:nil="true" /></pre> <p>Please note the guidance provided at the XML Schema's note in the <i>OSEC Implementation Guide</i> with regard to known issues for certain XML software tools.</p> | 1/15/10 |
| 18 | If 0 (zero) is used to populated an XML Schema data element, will it be read by the Commission's software the same as "null"? | No. Zero and null are different. Zero is read as populating the data element. Null is read as not populating the data element. | 1/15/10 |
| 19 | Can the order of the XML Schema's data elements be changed? | No. The data elements must be provided in the same order as given in the XML Schema. | 1/15/10 |
| 20 | My filing had an ERROR and was rejected by the OSEC. May I correct the filing, use the same filing_id and resubmit it to the Commission? | Yes. | 1/15/10 |
| 21 | Can the clean tariff have headers and footers? | Yes. Order No. 714 removed the regulations that required some program's tariffs to include headers and footers. Headers may be included in the tariff text, or | 6/25/2010 |

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| | | left as part of the RTF file's page definition. However, information in the headers or footers cannot be contrary to any Commission finding, such as effective date, or contrary to other meta data provided by the company, such as section titles. | |
| 22 | Must the tariff or rate schedule have a table of contents? | If the Commission's regulations or order requires a table of content for a tariff, rate schedule or any other tariff document, it must be included. | 6/25/2010 |
| 23 | Can a company continue use of the old designation system? | Yes. However, if a company chooses to use its old system, it still must abide by the general rule that the designations must be unique so as not to create confusion. See RP10-563-000 . | 6/25/2010 |
| 24 | Order No. 714 permits companies sharing joint tariffs to incorporate a tariff by reference. Joint tariffs are most common in the FPA program. May other programs incorporate tariffs by reference? | Yes, Order No. 714's findings apply to all the tariff programs, not just the Part 35 program. | 6/25/2010 |
| 25 | As a non-designated party to a joint tariff, what should be included on the tariff section incorporating the designated filer's tariff? | Generally, the non-designated tariff section should have an informative section title, the name of the designated party, tariff and, as necessary, section title, and any other information or limitations applicable to the tariff and non-designated party. See Portland General Electric Company for an example of a designated party filing, and Puget Sound Energy, Inc. for an example of a non-designated filing, especially the accepted tariff sheet. | 6/25/2010 |
| 26 | Company A's paper version of the OATT was maintain and filed with the Commission under a Service Company B designation. That OATT | This is similar to a Joint tariff situation. Yes, Company A can provide a single tariff record incorporating Company C's OATT by reference in the baseline | 6/25/2010 |

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| | will now be in another Company C's tariff. Can Company A's Order No. 714 baseline tariff filing incorporate Company C's OATT by reference? | filing. The Transmittal Letter of Company A must clearly explain that Company C will be the location of the OATT in place of what used to be Service Company B's tariff, and confirm that no other significant changes are in the baselined Company C incorporated tariff. | |
| 27 | Company A's paper rate schedule is identical to Company B's paper rate schedule. Can Company A incorporate Company B's rate schedule as part of its Order No. 714 compliance filing? | <p>If the rate schedules are clearly marked as a joint tariff and are identical in all respects, Company A can incorporate Company B's rate schedule provided the appropriate letters of concurrence are provided. The Transmittal Letter must clearly state the nature of the incorporation by reference. See also answers to Qu. 12 and 14 above.</p> <p>Any proposals to change the rate schedule or only incorporate parts of the rate schedule by reference imply that the rate schedules, or their application, are not identical. In that case, Company A needs to make a normal/statutory filing either before or after the baseline filing with its proposal for incorporation by reference.</p> | 6/25/2010 |
| 28 | In a contested proceeding before an ALJ, the parties wish to file a settlement with the ALJ. Can eTariff be used to file the Settlement? | <p>Technically, eTariff can be used to file Settlements. However, parties should follow the instructions of the ALJ.</p> <p>Any Settlement that claims to have real tariff records as part of the Settlement and is not filed through eTariff must be followed up with an eTariff Compliance filing to enter the tariff records into the</p> | 6/25/2010 |

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| | | eTariff data base. | |
| 29 | A Settlement contains tariff records. Can eTariff be used to file the Settlement? | Any filing that contains real tariff records must be filed in eTariff. | 6/25/2010 |
| 30 | A Settlement contains tariff records and provides that the agreed upon tariff records will go into effect upon Commission approval. What date should be used to populate the Tariff Record Proposed Effective Date? | When an applicant does not know or have a proposed effective date, the Tariff Record Proposed Effective Date should be populated with 12/31/9998. <u>Note special case when establishing a new Tariff Identifier: Tariff Record Related Codes, Qu. 32.</u> | 6/25/2010 <u>10/4/2011</u> |
| 31 | The ISO has, under one of its tariffs, tariff documents of its members. As the eTariff XML schema only contains the Company Identifier of the owner of the Tariff Identifier, how can the other party to the shared tariff be made a co-applicant to the proceeding? | eFiling provides functionality to add co-applicants to an eTariff filing. eFiling's instructions are located at https://ferconline.ferc.gov/efiling-help.asp . | 1/27/2011 |
| 32 | My Transmittal Letter requested that several names be added to the Commission maintained service list in my proceeding. However, only the name on the service list is the one associated with the Company Profile. Why are the names in the Transmittal Letter not on the service list? | Since Order No. 703, eFiled material is not read by staff to transcribe names to the Commission service list. Populating the Commission's service list is performed by the applicant as part of the eFiling process. eFiling's instructions on how to add names to the Commission's service list are located at https://ferconline.ferc.gov/efiling-help.asp . If a party wishes to add more names to the Commission's service list, they may do so by using the electronic Documentless Intervention function. Those instructions are available at https://ferconline.ferc.gov/efiling-help.asp#intervention . | 1/27/2011 |
| 33 | I ZIPped my XML tariff filing using Apple's OS X's embedded compression software. However, | Apple's OS X's embedded compression software is known to include a sub-folder and a file in that sub | 4/18/11 |

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| | <p>upon making the filing with the Commission, I received an error message that the eTariff Zip file contains more than one file. I looked at the file and I do not see anything other than the XML file. What is happening?</p> | <p>folder that is usually hidden from OS X users. The subfolder contains another file with the identical name as the file at the parent level, but whose content is different. eFiling screens ZIP files to ensure that only one file is included, and that the file is an XML file. The subfolder is considered by eFiling as a second file. eTariff filers should not use compression software that uses proprietary formats.</p> | |

Attachment Related Codes

| | Question | Answer | Date |
|---|---|--|---------------------|
| 1 | 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. | The extension information is now provided in the att_content_type_code.csv file. | 12/19/08 1/15/10 |
| 2 | 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? | This error has been corrected. | 12/19/08 |
| 3 | 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? | The Secretary of the Commission determines which electronic document formats may be electronically filed with the Commission. OSEC posts this information on the www.ferc.gov web site, and OSEC is delegated the responsibility of maintaining the Attachment Content Type Codes (att_content_type_code). | 12/19/08 |
| 4 | The Attachment Reference Code list posted on FERC's site contains a cross-reference to Filing Type. Will this list be | The Attachment Reference Codes for Transmittal Letter, Tariff, Marked Tariff and Other have been normalized across Types of Filings as of 12/7/2009. | 12/19/08 1/15/10 |

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| | normalized across Filing Types? | | |
| 5 | RTF was chosen as one of the “standards”. Was SGML (Standard Generalized Markup Language) considered? | 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. | 12/19/08 |
| 6 | Since Office 2007/Word 2007 supports many more features than RTF, is there any guideline on how to translate these features to RTF? | <p>Microsoft provides compatibility documentation for various versions of Word with RTF entitled Rich Text Format (RTF) Specification.</p> <p>There are no OSEC guidelines at this time. Each company needs to assess the use of its word processing 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.</p> | 12/19/08 5/25/10 |
| 7 | 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). | <p>Each company needs to assess the use of its word processing 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 <i>OSEC Implementation Guidelines</i>.</p> <p>See also the response to Question 12 below.</p> | 12/19/08 4/18/11 |
| 8 | A map/line drawing/diagram greatly increased the size of the RTF versions of the Record | Maps/line drawings/diagrams in JPG format can significantly increase the RTF file size. Try converting | 5/25/10 4/18/11 |

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| | Binary Data file. What are the alternatives means of creating this data? | <p>from JPG to GIF format, and saving in grey scale. An alternative is to file the Maps/line drawings/diagrams as a separate tariff section in PDF format.</p> <p>See also the response to Question 12 below.</p> | |
| 9 | My eTariff filing was rejected by the Commission as it failed to include a Clean Tariff. However, the att_ref_code.csv table indicates that a Clean Tariff is not required. Why was my filing rejected? | <p>Order No. 714 did not change the documentation requirements for a complete tariff filing. The convention for eTariff filings permits the Clean Tariff to be part of the Transmittal Letter or attached as a separate document. The flexibility eTariff provides users to satisfy the attachment requirement does not change the requirement that the documentation must be provided.</p> <p>Note that the OSEC and the Commission have the ability to change the eTariff attachment filing requirements to mandate the attachment of a separate Clean Tariff document as a means of ensuring the regulatory requirement is satisfied.</p> | 5/25/10 |
| 10 | My formula rates tariff sheets are creating large tariff sections when converted into RTF files. What can I do? | <p>Many formula rate paper tariff sheets were constructed by printing directly from the spreadsheet software or copying spreadsheets into a word processor and saving in the native file format before printing.</p> <p>RTF is capable of receiving some forms of embedded objects and rendering tables. However RTF is not as efficient as native file formats for tables and styles.</p> <p>When converting formula rate tariff sheets to RTF, review the tariff sheets to ensure that the existing tariff</p> | 6/10/10 4/18/11 |

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| | | <p>sheets are compliant with the minimum font size required by the Commission’s regulations (10 point font: sec. 385.2003(a)(4) (2010)).</p> <p>Review whether a table structure is required, or whether columns or tabs will suffice.</p> <p>Review whether tables contain unnecessary rows or columns.</p> <p>Consider converting the formula rate into a plain-text format to remove most table and style codes. For example, Excel provides Save As MS –DOS text format. For an example of this technique for rendering large rate designs, see http://www.ferc.gov/industries/gas/gen-info/rate-filings/rate_fnl.pdf.</p> <p>See also the response to Question 12 below.</p> | |
| 11 | Can I leave active hyper-links in my tariff sections? | No. Leaving hyper-links in a tariff creates a security risk for both FERC and site that the link is directed. | 6/10/10 |
| 12 | My Microsoft Word file has graphics in it, and RTF conversion file size is large. Can I set some default in Word to reduce the file size? | Yes. However, it should only be done with great caution and some companies may limit access to the necessary files to IT support personnel only. The Microsoft information and instructions are located here: http://support.microsoft.com/kb/224663 | 4/18/11 |
| 13 | How can I improve the attachment descriptions that appear in eLibrary? | eLibrary prominently displays the hyperlinked Attachment Document File Name as the lead item, followed by the Attachment Description. As a result, many applicants believe that the Attachment Document | 5/25/11 |

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| | | <p>File Name is the attachment’s description. However, it is not. Further, many applicants who try to name their attachment file names with complete descriptions quickly run into the 60-character limit for the Attachment Document File Name data element. The effective available Attachment Document File Name character limit is really about 55, as the remaining characters must be reserved for the extension (“dot” and the extension characters).</p> <p>eLibrary’s description of the attachment follows the hyperlinked Attachment Document File Name. Applicants should use the Attachment Description to pass the attachment’s description to eLibrary. The Attachment Description data element has an 80 character limit. Many applicants do not change their software’s default Attachment Description of “Other”, and thereby miss an opportunity to provide eLibrary and the public a more informative description of the attachment’s content.</p> | |

Tariff Record Related Codes

| | Question | Answer | Date |
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| 1 | 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? | 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. | 12/19/08 |
| 2 | Tariff Record Proposed Effective Date: this XML field is marked as required in the "OSEC <i>Implementation Guide</i> ," 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? | 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. | 12/19/08 |
| 3 | 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 | The Commission's normal business practice, and adopted in the <i>OSEC Implementation Guide</i> , is to accept one option in its entirety, reject the others, and require a compliance filing to include proposals in other options | 12/19/08 |

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| | 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? | 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. | |
| 4 | <p>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.</p> <p style="text-align: center;">Scenario</p> <p>Given the following tariff records which represent only a portion of the overall tariff:</p> <pre>#17 v0.0.0 General Terms & Conditions +---#1120 v3.0.0 Gas Quality</pre> <p>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.</p> <p>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:</p> <pre>#17 v0.0.0 General Terms & Conditions +---#???? v?.?.? Pipeline Performance</pre> | | |

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| | <pre> +---#???? v?.?.? Gas Quality +---#9217 v0.0.0 Rate Guarantees +---#9218 v0.0.0 Issue Resolution Response </pre> <p>There are 3 ways to file these changes to the tariff that all have roughly the same results. They are presented below:</p> <p>(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.</p> <p>(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."</p> <p>(3) Cancel record id 1120. In addition, file 4 new records for "Pipeline Performance," "Gas Quality," "Rate Guarantees," and "Issue Resolution."</p> | | |
| 4a | For industry members: How often does such a filing scenario occur? | 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. | 12/19/08 |
| 4b | For FERC: What is the preferred filing method (1, 2, or 3) for such a filing? | 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. | 12/19/08 |

| | Question | Answer | Date |
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| 5 | 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 eTariff Viewer? | 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 eTariff Viewer to show the structure of the Tariff Records in the Table of Contents pane. | 12/19/08 10/8/10 |
| 6 | Should the Title Sheet of Volume X be the parent and all the tariff sheets in Volume X be its children? | This suggestion would work. See response to Business Rules, Question No. 9. | 12/19/08 |
| 7 | Would this solution cause problems in generating the Table of Contents? | No. | 12/19/08 |
| 8 | These questions all relate to filings having associated filings and tariff records having associated tariff records. | | |
| 8a | When a filing has an associated filing, is it necessarily true that every tariff record contained within will be associated with the same filing? | 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 8(d) for examples. | 12/19/08 |
| 8b | 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 | True. | 12/19/08 |

| | Question | Answer | Date |
|----|---|---|---------------------|
| | identify the associated record. True? | | |
| 8c | 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? | No. | 12/19/08 |
| 8d | Can you provide an example where the Associated Filing ID at the Filing level would differ from the Associated Filing ID at the Tariff record level? | <p>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).</p> <p>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.</p> <p>Example C: A Motion Type of Filing that moves into effect suspended Tariff Records from a NORMAL and its AMENDMENT Tariff Filings.</p> | 12/19/08 |
| 8e | Could there be multiple Associated Filing IDs at the Tariff record level? | Multiple Tariff Records can have different Associated Filing IDs, but any given Tariff Record Identifier can have no more than one Associated Filing ID. | 12/19/08 |
| 9 | Under what circumstances will a filing include tariff records that do not contain tariff content such that fields record_content_type_code, | The MOTION, WITHDRAW and CANCELLATION Type of Filing categories (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 | 12/19/08 10/8/10 |

| | Question | Answer | Date |
|----|---|---|-------------|
| | <p>record_binary_data, and record_plain_text will be blank.</p> <p>>Withdrawal filings?</p> <p>>Cancellation filings?</p> <p>>Motion filings?</p> <p>Are there other filing types?</p> | <p>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.</p> <p>In addition, no tariff text may be required for some tariff organization. For example, a parent record may only have text in the Record Content Description and/or Tariff Record Title.</p> | |
| 10 | <p>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.</p> | <p>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.</p> | 12/19/08 |
| 11 | <p>Consider the following scenario:</p> <p>(A) An eTariff record is filed with FERC.</p> <p>(B) FERC accepts the changes subject to conditions.</p> <p>(C) The record is filed again in a compliance filing (like today's Substitute tariff sheets) with the same effective date as in (A) above.</p> <p>Is it necessary that the two filed</p> | <p>Yes, the Record Effective Priority Order (priority_order) is required: Tariff status is largely controlled by dates (think of the statutory clock and notice periods as examples). The problem becomes what happens for the same tariff record of a single date with multiple tariff record changes hitting on the same date.</p> <p>1) Two tariff record changes: In this scenario, which is the same as in the question for date 1/1/2020, the "substitute" record is likely to take precedence over the "original" record, and the objective is to show as "effective" the substitute record for the whole day.</p> | 3/6 /09 |

| | Question | Answer | Date | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------|--|---|--------------------|----------------------|----------|-------------------|----------------------|-------------|-------|-----|--------------------|------------|-------------|-------|-----|----------|-----------|---------|----------|----------|-------------------|----------------------|-------------|-------|-----|--------------------|------------|-------------|-------|-----|----------|-----------|---------|----------|----------|-------------------|----------------------|-------------|-------|-----|--------------------|------------|-------------|-------|-----|----------|------------|-------------|-------|-----|----------|-----------|---------|----------|----------|-------------------|----------------------|-------------|-------|-----|--------------------|------------|-------------|-------|-----|----------|------------|-------------|-------|-----|----------|-----------|--|
| | <p>records (in (A) and (C) above) have different Record Effective Priority Order values?</p> | <table border="1"> <thead> <tr> <th>Section</th> <th>Revision</th> <th>Priority</th> <th>Order Disposition</th> <th>Tariff Record Status</th> </tr> </thead> <tbody> <tr> <td>Section 156</td> <td>6.0.0</td> <td>500</td> <td>Minimal Suspension</td> <td>Superseded</td> </tr> <tr> <td>Section 156</td> <td>6.1.0</td> <td>520</td> <td>Accepted</td> <td>Effective</td> </tr> </tbody> </table> <p>2) But scenario 1) is simplistic, and there are often more complex issues. Suppose the example below for a given date 1/1/2020:</p> <table border="1"> <thead> <tr> <th>Section</th> <th>Revision</th> <th>Priority</th> <th>Order Disposition</th> <th>Tariff Record Status</th> </tr> </thead> <tbody> <tr> <td>Section 156</td> <td>6.0.0</td> <td>500</td> <td>Minimal Suspension</td> <td>Superseded</td> </tr> <tr> <td>Section 156</td> <td>7.0.0</td> <td>600</td> <td>Accepted</td> <td>Effective</td> </tr> </tbody> </table> <p>If a change in the tariff record text was required to v6.0.0, but not 7.0.0, then the compliance filing would be:</p> <table border="1"> <thead> <tr> <th>Section</th> <th>Revision</th> <th>Priority</th> <th>Order Disposition</th> <th>Tariff Record Status</th> </tr> </thead> <tbody> <tr> <td>Section 156</td> <td>6.0.0</td> <td>500</td> <td>Minimal Suspension</td> <td>Superseded</td> </tr> <tr> <td>Section 156</td> <td>6.1.0</td> <td>520</td> <td>Accepted</td> <td>Superseded</td> </tr> <tr> <td>Section 156</td> <td>7.0.0</td> <td>600</td> <td>Accepted</td> <td>Effective</td> </tr> </tbody> </table> <p>If a change in the tariff record text was required to v6.0.0, and if affected the tariff text of 7.0.0, then the compliance filing would be:</p> <table border="1"> <thead> <tr> <th>Section</th> <th>Revision</th> <th>Priority</th> <th>Order Disposition</th> <th>Tariff Record Status</th> </tr> </thead> <tbody> <tr> <td>Section 156</td> <td>6.0.0</td> <td>500</td> <td>Minimal Suspension</td> <td>Superseded</td> </tr> <tr> <td>Section 156</td> <td>7.0.0</td> <td>600</td> <td>Accepted</td> <td>Superseded</td> </tr> <tr> <td>Section 156</td> <td>7.1.0</td> <td>620</td> <td>Accepted</td> <td>Effective</td> </tr> </tbody> </table> | Section | Revision | Priority | Order Disposition | Tariff Record Status | Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | Section 156 | 6.1.0 | 520 | Accepted | Effective | Section | Revision | Priority | Order Disposition | Tariff Record Status | Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | Section 156 | 7.0.0 | 600 | Accepted | Effective | Section | Revision | Priority | Order Disposition | Tariff Record Status | Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | Section 156 | 6.1.0 | 520 | Accepted | Superseded | Section 156 | 7.0.0 | 600 | Accepted | Effective | Section | Revision | Priority | Order Disposition | Tariff Record Status | Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | Section 156 | 7.0.0 | 600 | Accepted | Superseded | Section 156 | 7.1.0 | 620 | Accepted | Effective | |
| Section | Revision | Priority | Order Disposition | Tariff Record Status | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 6.1.0 | 520 | Accepted | Effective | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section | Revision | Priority | Order Disposition | Tariff Record Status | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 7.0.0 | 600 | Accepted | Effective | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section | Revision | Priority | Order Disposition | Tariff Record Status | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 6.1.0 | 520 | Accepted | Superseded | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 7.0.0 | 600 | Accepted | Effective | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section | Revision | Priority | Order Disposition | Tariff Record Status | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 6.0.0 | 500 | Minimal Suspension | Superseded | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 7.0.0 | 600 | Accepted | Superseded | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Section 156 | 7.1.0 | 620 | Accepted | Effective | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | <p>What are the status conditions for Natural Gas Act (natural gas pipeline) tariff records?</p> | <p>Status conditions vary over time and in accordance with a variety of statutory, regulatory and business rules. The combination of the meta data required by the XML schema and the business rules permit at least the following tariff record status conditions:</p> | 3/6 /09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | Question | Answer | Date |
|----|---|--|-------------|
| | | Pending Accepted Effective Suspended Superseded Rejected Withdrawn Overtaken by events Pro Forma | |
| 13 | What are the status conditions for Federal Power Act (public utility) tariff records? | Status conditions vary over time and in accordance with a variety of statutory, regulatory and business rules. The combination of the meta data required by the XML schema and the business rules permit at least the following tariff record status conditions: Pending Pending (tolled) Accepted Effective Suspended Superseded Rejected Withdrawn Overtaken by events Pro Forma | 3/6/09 |
| 14 | What are the status conditions for Interstate Commerce Act (oil pipeline) tariff records? | Status conditions vary over time and in accordance with a variety of statutory, regulatory and business rules. The combination of the meta data required by the XML schema and the business rules permit at least the following tariff record status conditions: Conditionally Accepted | 3/6 /09 |

| | Question | Answer | Date |
|----|---|---|-------------|
| | | Conditionally Effective Accepted Effective Suspended Superseded Rejected Withdrawn Overtaken by events Pro Forma | |
| 15 | What are the status conditions for Part 284 program (NGPA intrastate and NGA Hinshaw gas pipelines) tariff records? | Status conditions vary over time and in accordance with a variety of statutory, regulatory and business rules. The combination of the meta data required by the XML schema and the business rules permit at least the following tariff record status conditions: Conditionally Accepted Conditionally Effective Accepted Effective Superseded Rejected Withdrawn Overtaken by events Pro Forma | 3/6 /09 |
| 16 | What are the status conditions for Power Administration tariff records? | Status conditions vary over time and in accordance with a variety of statutory, regulatory and business rules. The combination of the meta data required by the XML schema and the business rules permit at least the following tariff record status conditions: Conditionally Accepted Conditionally Effective | 3/6 /09 |

| | Question | Answer | Date |
|----|---|---|--|
| | | Accepted Effective Superseded Rejected Withdrawn Overtaken by events Pro forma | |
| 17 | What is the tariff record status condition of “Overtaken by events”? | <p>The tariff record status condition of “Overtaken by events” indicates the disposition of a tariff record whose status before the Commission is moot because it has been overtaken by some other filing. Currently, if an applicant files a correction to an initial filing’s tariff record or a correction to a compliance filing’s tariff record, the applicant should indicate that the underlying record is withdrawn. If it fails to do so, the Commission should reject the tariff record as moot.</p> <p>In eTariff, AMENDMENTS to a NORMAL/STATUTORY or another AMENDMENT, or COMPLIANCE to a COMPLIANCE Type of Filing should target the underlying tariff record utilizing the associated date elements: Associated Filing Identifier, Associated Record Identifier and Associated Option Code. Upon OSEC acceptance of the later tariff filing, the associated tariff record’s status will convert to “Overtaken by events” without further action by the applicant or the Commission.</p> | 3/6 /09 1/15/10 5/25/10 1/27/11 |
| 18 | What is the FPA program’s tariff record status condition of “Pending (tolled)”? | The “Pending (tolled)” status condition indicates that the Commission has issued an order finding a NORMAL/STATUTORY FPA program type of filing (a filing type for which there is a statutory time the | 3/6 /09 1/15/10 5/25/10 |

| | Question | Answer | Date |
|----|--|---|-------------|
| | | Commission must act) tariff filing deficient and cannot be processed. The statutory time for the Commission to act is no longer applicable. The tariff filing and tariff records will remain in this status until (a) an AMENDMENT type of filing is filed, which will reset the filing date for the statutory clock to the date of the AMENDMENT filing; (b) the Commission rejects the tariff record; or (c) the filing is withdrawn. | |
| 19 | What is the difference between the tariff record status conditions of “Accepted” and “Effective”? | The tariff record status condition of “Accepted” indicates that the tariff record has been accepted by the Commission or pursuant to some other statutory or business rule, and may become effective some date in the future. The tariff record status condition of “Effective” indicates that the tariff record has been Accepted and is in effect. | 3/6 /09 |
| 20 | What is the tariff record status condition of “Conditionally Accepted”? | Certain programs’ statutory, regulatory or business rules permit a tariff record to become effective before Commission action is required. Conditionally Accepted indicates a tariff record change is proposed to be effective on a specified future date. | 3/6 /09 |
| 21 | What is the tariff record status condition of “Conditionally Effective”? | Certain programs’ statutory, regulatory or business rules permit a tariff record to become effective before Commission action is required. The tariff record status condition of “Conditionally Effective” indicates that the tariff record is effective, but that final Commission action is still pending. | 3/6 /09 |
| 22 | NGA section 7 certificate filings commonly contain “Pro Forma” tariff records. Are NGA section 7 certificate filings’ “Pro Forma” tariff | Not at this time. If the Commission decides to require NGA section 7 certificate filings to be filed utilizing the eTariff gateway of eFiling, that requirement will be the subject of a separate Notice and/or rulemaking. | 3/6 /09 |

| | Question | Answer | Date |
|----|---|--|-------------|
| | records required to be filed utilizing eTariff. | All NGA section 4 compliance filings to Commission orders on NGA section 7 certificate filings must utilized eTariff. These compliance filings may contain Pro Forma, New or Changed tariff records. | |
| 23 | If a Conditionally Accepted or Conditionally Effective tariff record is Suspended or Rejected, must the applicant refile the tariff record that was formerly effective? | No. The status of the tariff record that was superceded by the Conditionally Accepted or Conditionally Effective tariff record will revert to tariff record status of Effective. | 3/6 /09 |
| 24 | Can the Associated Filing Identifier (associated_filing_id) reference a Filing Identifier (filing_id) other than the filer's? | No. The Associated Filing Identifier (associated_filing_id) must reference only Filing Identifiers (filing_id) made by the filer as identified by the Company Identifier (company_id). | 3/6 /09 |
| 25 | Can the Associated Record Identifier (associated_record_id) reference a Tariff Record Identifier (record_id) of another Company Identifier (company_id) or Tariff Identifier (tariff_id)? | No. The Associated Record Identifier (associated_record_id) must reference only a Tariff Record Identifier (record_id) that exists in the Tariff Filing's Tariff Identifier (tariff_id) for the of the Tariff Filing's Company Identifier (company_id). | 3/6 /09 |
| 26 | In a situation of multiple option sets – Options A, B and C, and a new Tariff Record Identifier (record_id) is being created, what should the different option sets' Record Change Type (record_change_type) contain? | There must be at least one Record Change Type (record_change_type) of NEW in the first option the proposed new Tariff Record Identifier (record_id) appears. Thereafter and within the tariff filing's option sets, Tariff Record Identifier (record_id) of either NEW or CHANGE are acceptable. Acceptable examples for a new Tariff Record Identifier (record_id) of "1234": Example 1: Option Record Change Type | 5/25/10 |

| | Question | Answer | Date |
|----|--|---|---------|
| | | <p>A NEW B CHANGE C CHANGE</p> <p><u>Example 2:</u> <u>Option Record Change Type</u> A NEW B NEW C CHANGE</p> <p><u>Example 3:</u> <u>Option Record Change Type</u> A null B NEW C CHANGE</p> | |
| 27 | For tariff records with a Record Change Type (record_change_type) of PRO FORMA, must the Option Code (option_code) be populated? | Yes. There can be multiple PRO FORMA option sets. However, PRO FORMA option sets should avoid Option Code (option_code) "A", as that code designates the applicant's primary real (as opposed to pro forma) tariff change proposal. | 5/25/10 |
| 28 | I found a mistake in a tariff record in a tariff filing that is still pending before the Commission. How do I correct the tariff record? | If the pending tariff filing is a Normal/Statutory filing, then file an Amendment category type of filing; or if the pending tariff filing is a Compliance filing, then file a Compliance category type of filing. The corrected tariff records should contain all the associated tariff record information (associated_filing_id, associated_record_id, and associated_option_code) to properly target the incorrect tariff record. Providing the associated tariff record information informs the Commission that the targeted tariff record is replaced. The Commission will | 6/10/10 |

| | Question | Answer | Date |
|----|---|---|-------------|
| | | reflect the targeted tariff record's status as OBE (Overtaken By Events). | |
| 29 | I found a mistake in tariff record 123 in a tariff filing that is still pending before the Commission. Tariff record 123 had several child records with Record Change Type NEW. I filed a single tariff record consisting of (a) a correction to tariff record 123 with a Record Change Type WITHDRAW to withdraw the record or (b) an associated tariff record 567 with tariff record 123 to OBE tariff record 123. Now all the child records with Record Change Type NEW to tariff record 123 are no longer visible in the Public Tariff Viewer and appear to have been either (a) withdrawn or (b) OBE. What happened? | <p>Any proposal to withdraw or OBE a pending tariff record with pending child records, regardless of whether the child records are in the proceeding or another proceeding, will be deemed either withdrawn or OBE, as there is no longer a parent record for the child records to attach. All tariff records must have a parent to provide the tariff with structure and continuity. Tariff records cannot "float" in a tariff, and must be "anchored."</p> <p>Another analog to visualize the situation: imagine a NEW section to an outline, and the section has several subsections. If the highest level of the section is removed, all the subsections will be removed at the same time.</p> | 6/25/2010 |
| 30 | My filing was rejected by the Commission as it failed an eTariff validation test. I corrected the error. However, the filing was rejected again as it failed another test not previously identified. How can this happen? | Many of the Secretary's validation tests are complex, requiring use of several data elements from the XML file and comparing to several other data elements in the Commission's eTariff data base. If the expected data from the XML filing are not available or unexpected, the validation test results will find that there was an error and reject the filing. The complex validation tests will not run. Once the filing has been refiled with the previously noted errors corrected, then the complex tests can run. The result of those complex tests can be other error | 1/27/2011 |

| | Question | Answer | Date |
|----|--|--|----------------|
| | | messages and rejection of the filing. It is always a good idea to first test your XML filing in the Sandbox to ensure the filing will pass all validation tests. | |
| 31 | I tried to upload my test tariff filing into the Sandbox, but I received an error message that the site is unavailable, that I do not have rights to the site, or nothing happens. What is wrong with your Sandbox site? | <p>In most instances the problem is with the user's internet browser's security settings with regard to access to and use of an FTP site. Either use your browser's HELP feature to research the appropriate settings or discuss your requirement to access the Sandbox's FTP site with your IT personnel.</p> <p>Frequently, browser settings permitting access to the Sandbox are lost when browsers are upgraded. If you formerly had access to the Commission's Sandbox but have lost access, check your FTP security settings.</p> | 5/25/11 |
| 32 | <u>A new company is creating a new tariff, but does not know when it will go into service. What Tariff Record Proposed Effective Dates should the Baseline filing contain?</u> | <u>Baseline tariff filings with "to be determined" proposed effective dates of 12/31/9998 need to include at least one tariff record with a Tariff Record Proposed Effective Date in the near future – date of filing is acceptable. The reason is that the earliest Tariff Record Proposed Effective Date in a Baseline filing becomes the establishment date for the Tariff Identifier. No Tariff Record can have an effective date that predates the Tariff Identifier's establishment date. Therefore, if a Tariff Identifier has an establishment date of 12/31/9998, once the company goes into service and informs the Commission of its in-service date, it will not be able to provide a Tariff Record Proposed Effective Date earlier than 12/31/9998. The company will have to file a Cancellation of the Tariff Identifier with the 12/31/9998 establishment date and file a new Baseline filing to create</u> | <u>10/4/11</u> |

| | Question | Answer | Date |
|--|-----------------|--|-------------|
| | | <u>a new Tariff Identifier with the in-service date.</u> | |

Type of Filing Related Questions

| | Question | Answer | Date |
|---|--|---|----------|
| 1 | 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. | 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. | 12/19/08 |
| 2 | 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? And Is the Tariff Filing key = Company Identifier + Filing Identifier + Tariff Identifier as shown on page 11 of the NAESB Implementation Guide? | Unique identifier keys will likely be data base specific. A "Tariff Record key" is not a required XML filing package data element. | 12/19/08 |
| 3 | Is the Associated Filing Identifier required for every COMPLIANCE type of filing? | No. Many COMPLIANCE type of filings will be required for which there is no Associated Filing Identifier. For example: <ul style="list-style-type: none"> ➤ Compliance tariff filings pursuant to a Commission rule making; ➤ During the transition from paper tariff filings to eTariff filings, all compliance filings referencing paper tariff filings. | 3/6 /09 |

| | Question | Answer | Date |
|---|---|--|--------------------|
| 4 | I forgot to include an attachment in a tariff filing. How do I correct this mistake? | File the omitted attachment using a Report category Type of Filing. This Type of Filing requires the Associated Filing Identifier at the filing level. | 5/25/10 |
| 5 | I made a mistake with a tariff record in a COMPLIANCE Type of Filing. How do I correct this mistake? | Use a COMPLIANCE Type of Filing to correct a tariff record. Including the Associated Filing Identifier at the filing level to ensure proper docketing and posting in eLibrary. Include the Associated Filing Identifier, Associated Record Identifier, and Associated Option Code at the tariff record level to reflect the fact that the targeted tariff record should be OBE'd. NOTE that AMENDMENT Type of Filings ARE NOT used to correct COMPLIANCE Type of Filings. | 5/25/10 |
| 6 | I made a mistake on my COMPLIANCE category Type of Filing – it should have been a NORMAL/STATUTORY filing. How do I correct this mistake? | The COMPLIANCE filing will have to be withdrawn using a WITHDRAW filing, and refiled using a NORMAL/STATUTORY filing code. | 5/25/10 10/8/10 |
| 7 | I am making a Compliance filing to a proceeding that predates the Baseline filing of my company. How do I ensure that the old docket number will be assigned to this Compliance filing? | The Commission has converted, for tariff filings, to automatic docketing. Compliance filings that are to tariff filings that predate a company's Baseline filing will lack the Filing Identifier necessary to populate the eTariff XML schema. The Commission will issue Compliance filings that lack an Associated Filing Identifier a new docket number. The Commission, in its January 21, 2010 order , advised applicants in this situation to put the source docket number in the Filing Title/Description. | 6/10/10 |
| 8 | I wish to extend the date by which the Commission must act on a NORMAL/STATUTORY, AMENDMENT, | File an AMENDMENT filing with at least one tariff record. As with any statutory type of filing, the new statutory period depends on the proposed effective | 10/8/10 |

| | Question | Answer | Date |
|---|--|---|---------------------------|
| | BASELINE/NEW or CANCELLATION filing. How do I do it? | date(s) in the AMENDMENT filing. | |
| 9 | Must a motion to extend the date by which the Commission may act be filed through eTariff? | <p>Yes. See Order No. 714 at P 83.</p> <p><u>Such a filing should use an AMENDMENT category Type of Filing Code, as such a motion is a proposal to amend the proceeding' action dates. The company has a choice as to how long the Commission action date may be extended:</u></p> <p><u>A) A simple statutory extension (30 or 60 days): Refile any tariff record from the underlying filing with the same proposed effective date (Tariff Record Proposed Effective Date) and content, but increase the Record Effective Priority Order and Record version number, and populate the associated tariff record information to OBE the underlying and duplicative record;</u></p> <p><u>B) To extend the Commission action date to a given date beyond the statutory date (beyond the 30 or 60 days): Refile any tariff record from the underlying filing with the proposed effective date and content, but increase the Record Version Number, and populate the associated tariff record information to OBE the underlying and duplicative record. The proposed effective date should be the day after the company wishes the Commission to act. If the company wishes to maintain the proposed effective date(s) of the underlying filing, the tariff record in the amendment filing should not have the associated tariff record information.</u></p> <p><u>C) To extend the Commission action date indefinitely:</u></p> | 10/8/10 <u>10/4/11</u> |

| | Question | Answer | Date |
|----|--|---|---------|
| | | <p><u>Refile any tariff record from the underlying filing with a well into the future proposed effective date and content, but increase the Record Version Number, and populate the associated tariff record information to OBE the underlying and duplicative record. The proposed effective date should be the day after the company wishes the Commission to act. If the company wishes to maintain the proposed effective date(s) of the underlying filing, the tariff record in the amendment filing should not have the associated tariff record information. When the company decides to restart the proceeding, it should file another motion through the AMENDMENT category Type of Filing Code with another tariff record, and populate the associated tariff record information to OBE the underlying and duplicative record with the indefinite date.</u></p> | |
| 10 | <p>I need to motion suspended tariff records into effect. However, there have been intervening changes. How do this?</p> | <p>File all the records that the company wishes to move into effect (both changed and unchanged) using a COMPLIANCE filing. The Tariff Record Proposed Effective Date for each of the record should conform with the motion filing rules.</p> | 4/18/11 |
| 11 | <p>Should my MOTION category filing's tariff records contain tariff text or modified Record Version Number?</p> | <p>No. MOTION category filings' tariff records should not contain tariff text or a revised Record Version Number, as the applicant is not supposed to be proposing any change to the suspended tariff records' tariff text. A Motion filing is only for the purpose of changing a proposed effective date for a suspended tariff record.</p> | 5/25/11 |

eTariff Viewer

| | Question | Answer | Date |
|---|--|---|--|
| 1 | In the <i>OSEC Implementation Guide</i> 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? | 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. At the April 28, 2009 technical conference, Record Content Description, Tariff Record Title and Record Version Number, <u>in this arrangement</u> , were identified as the data elements to be used. <u>Commission orders commonly refer to this set of data elements as the "section title."</u> | 12/19/08 1/15/10 10/8/10 <u>10/4/11</u> |
| 2 | If leading spaces are placed in Tariff Record Title (record_title), Record Content Description (record_content_description), Record Version Number (record_version_num) or Record Narrative Name (record_narrative_name), how will the spaces appear in the eTariff Viewer? | Leading spaces will likely be removed for the eTariff Viewer's display. ETariff will not modify the data submitted to the Commission, including leading spaces. | 2/9 /09 |
| 3 | When a tariff filing is made, how long does it take for the new tariff records to appear in the eTariff Viewer? | The new tariff records should appear within a few minutes of the Secretary accepting the tariff filing for filing before the Commission. | 10//8/10 |
| 4 | When the Commission acts on a tariff filing, how long does it take for the Commission's actions to be reflected in the eTariff Viewer? | There may be up to a 5-day delay between the time the Commission order issues and the time the actions are reflected in the eTariff Viewer. | 10/8/10 |
| 5 | My RTF tariff text does not appear the same as the Clean Tariff I provided as an attachment. Why are they | There are many reasons why the RTF representation of the tariff text in the eTariff | 10/8/10 |

| | Question | Answer | Date |
|---|--|---|---------|
| | different? | <p>Viewer does not match the Clean Tariff. Users should be aware that the Commission did not promise it could render tariff material in the eTariff Viewer with the same fidelity intended by the applicant. The Clean Tariff requirement is the applicant's rendition of its tariff.</p> <p>Reasons for the lack of fidelity include one or more of the following possible explanations:</p> <ul style="list-style-type: none"> ➤ Creating the tariff document in a format other than RTF and converting to RTF (note Discussion items above regarding incompatibilities between Microsoft Word formats and RTF); ➤ Creating the tariff document in a format other than RTF, creating the Clean Tariff document from that document, then converting to RTF, instead of creating the Clean Tariff document from the RTF document. ➤ Use of conversion software (including word processing conversions, binary64 conversions and XML generators) that do not recognize the same character sets or features. These conversion issues can be located with the tariff creators or with FERC. | |
| 6 | I have lost access to the company's tariff data base and I need to restore it to continue making filings. How can I do that? | The eTariff Viewer provides a feature that permits any person to download in an XML format enough of the tariff to continue business. | 4/18/11 |

| | Question | Answer | Date |
|---|---|--|---------|
| | | The instructions on how to use this feature are located under Help on the eTariff Viewer home page. | |
| 7 | I have lost access to the company's past XML and ZIPped eTariff filings. Can I obtain a copy from the Commission? | No. The Commission does not retain a copy of the XML or ZIPped tariff filings. All the material from these tariff filings, including the meta data, are available on eLibrary. | 4/18/11 |