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

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Business Rules

	Question	Answer	Date
1	If a record change type of CHANGE is filed in a filing for record id 1234 version 2.0.0 and then is subsequently withdrawn in a later filing via a record change type of WITHDRAW, can record id 1234 version 2.0.0 be filed again at some later date? Upon processing the latter (WITHDRAW) filing, is the earlier filed record physically delete from FERC's eTariff database?	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.	1/15/10
2	Under what circumstances will a filing include tariff record versions that do not contain tariff content? • Withdrawal filings? • Cancellation filings? • Motion filings? • Are there other filing types?	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.	12/19/08
3	For which types of filings is an associated_filing_id required in a filing? Amendment? Compliance? Motion? Withdraw? Report? Other?	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.	12/19/08 5/25/10

	Question	Answer	Date
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 (defined as all open tariff filings within the root docket number set) 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 8/12/13
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 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	12/19/08

	Question	Answer	Date
	attachments of a particular type are allowed in a filing?	multiple times is not worthwhile.	
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?	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	12/19/08

	Question	Answer	Date
	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.	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.	
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	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

	Question	Answer	Date
	makes a tariff filing affecting the joint rate 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?	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. 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). NOTE: Certificates of concurrences are NOT tariff records. Certificates of concurrence are agreements between the companies with tariffs defining who is responsible for tariff maintenance, identifying the	3/6 /09 1/15/10 1/6/14

	Question	Answer	Date
		tariffs subject to the agreement, and memorializing any limitations. Certificates of concurrence should only be filed as a supporting document – NOT as a tariff record.	
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 omit that row of information?	No. Every row of information for every sequence must be provided, even if there is no information to convey. If all the data elements are not provided exactly as shown, the OSEC cannot process the filing and it will be rejected.	1/15/10
17	What is the proper format for data elements that are not populated?	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: <pre> </pre> <a associated_filing_id"="" href="mailto:xs:element name=" nillable="true" type="xs:integer"> The tariff filing's XML code for this data element should appear as follows:	1/15/10
		<pre>< associated_filing_id xsi:nil="true" /> Please note the guidance provided at the XML Schema's note in the OSEC Implementation Guide with regard to known issues for certain XML software tools.</pre>	
18	If 0 (zero) is used to populated an XML Schema	No. Zero and null are different. Zero is read as	1/15/10

	Question	Answer	Date
	data element, will it be read by the	populating the data element. Null is read as not	
	Commission's software the same as "null"?	populating the data element.	
19	Can the order of the XML Schema's data	No. The data elements must be provided in the same	1/15/10
	elements be changed?	order as given in the XML Schema.	
20	My filing had an ERROR and was rejected by	Yes.	1/15/10
	the OSEC. May I correct the filing, use the same		
	filing_id and resubmit it to the Commission?		
21	Can the clean tariff have headers and footers?	Yes. Order No. 714 removed the regulations that	6/25/10
		required some program's tariffs to include headers and	1/6/14
		footers. Headers may be included in the tariff text, or	
		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.	
		Headers that do not identify the proper tariff program	
		may also result in the Commission requiring the	
		applicant to refile the tariff records. The Commission	
		is responsible for five different tariff programs,	
		including two different electric and two different gas	
		tariff programs. "FERC Electric Tariff" and "FERC	
		Gas Tariff" are not adequate to identify the tariff	
		program. See 149 FERC ¶ 61,283, at P 89. If headers	
		are used, they should use the program identifiers	
		provided in the OSEC Implementation Guide.	
22	Must the tariff or rate schedule have a table of	If the Commission's regulations or order requires a	6/25/10
	contents?	table of content for a tariff, rate schedule or any other	
		tariff document, it must be included.	

	Question	Answer	Date
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. <i>See</i> RP10-563-000.	6/25/10
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.	6/25/10
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 record.	6/25/10 10/11/13
26	Company A's paper version of the OATT was maintain and filed with the Commission under a Service Company B designation. That OATT 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?	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 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.	6/25/10
27	Company A's paper rate schedule is identical to Company B's paper rate schedule. Can	If the rate schedules are clearly marked as a joint tariff and are identical in all respects, Company A can	6/25/10 10/11/13

	Question	Answer	Date
	Company A incorporate Company B's rate schedule as part of its Order No. 714 compliance filing?	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. If Company A's incorporation by reference is limited or conditional, any proposals by either Company A or B to change the incorporated rate schedule imply that the rate schedules, or their application, are not	
		identical. In that case, Company A needs to make a Normal/Statutory filing with its proposal for the incorporated by reference rate schedule.	
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?	Technically, eTariff can be used to file Settlements. However, parties should follow the instructions of the ALJ.	6/25/10
		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 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.	6/25/10
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. Note special case when establishing a new Tariff Identifier: Tariff Record Related Codes, Qu. 32.	6/25/10 10/4/2011

	Question	Answer	Date
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 coapplicant 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, upon making the filing with the Commission, I received and error message that the eTariff Zip file contains more that one file. I looked at the file and I do not see anything other than the XML file. What is happening?	Apple's OS X's embedded compression software is known to include a sub-folder and a file in that sub 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.	4/18/11

	Question	Answer	Date
34	I made a Normal/Statutory filing in the NGA Gas program. I entered "Y" in the Suspension Motion data element. The Transmittal Letter stated that the pipeline was motioning into effect the tariff record if the Commission suspended the tariff record. The Commission suspended the tariff record for more than one day. Why does the Public Viewer show the tariff record as Suspended after the end of the suspension period?	The Suspension Motion data element is only to reflect the NGA pipeline's motion proposal in the event of minimal suspension consistent with the filing requirements of section 154.7(a)(9) of the Commission's regulations. A Transmittal Letter statement that the pipeline motions tariff records suspended for more than the minimal period does not comport with the Commission's electronic tariff filing requirements to place suspended tariff records into effect. If the tariff records were: 1. suspended for more than the minimal period, 2. for which the Suspended Motion data element was populated with "N", or 3. the Commission rejected the pipeline's minimal suspension motion into effect, neither a Suspension Motion data element populated with "Y" nor a statement in the Transmittal Letter is adequate to place the suspended tariff records into effect. If the NGA pipeline wishes to motion into effect tariff records that remain in Suspended status, it must do so pursuant to section 154.206 of the Commission's regulations. Such filings require a TOFC 610 Motion category filing with a proposed effective date for each record equal to or later than the end of the suspension period. Motion filings cannot propose a retroactive effective date. Motions filings can be made any time after the	11/13/13 1/6/14

	Question	Answer	Date
		tariff record is suspended and before the end of	
		the Commission's suspension period or later	
		effective date as proposed by the pipeline in its	
		TOFC 610 Motion filing. See 149 FERC ¶ 61,123,	
		<u>at P 30</u> .	
<u>35</u>	I need access to the eTariff XML file that	The Commission does not retain a copy of the	<u>5/12/16</u>
	was filed with the Commission. Can I	eTariff XML file once the data within the file has	
	request a copy of that file from the	been extracted.	
	Commission?		
<u>36</u>	I, as an eTariff filing agent, made an eTariff	eLibrary and the Commission's Notices are	<u>5/12/16</u>
	filing. However, I forgot to select the co-	dependent upon eTariff filing agents properly	
	applicants of the filing. How do I correct this	identifing all co-applicants as part of the eFiling	
	mistake and add co-applicants to the	process. If co-applicants are not properly	
	proceeding?	identified in the eFiling process, they will not	
		appear as co-applicants in eLibrary, the Notice	
		and, possibly, the Commission order.	
		To add co-applicants to an Open eTariff	
		proceeding, prepare a new eTariff filing under the	
		same CID as the one initially used. Select a Type	
		of Filing category of AMENDMENT or	
		COMPLIANCE as appropriate for the Associated	
		Filing Identifier. File as a normal eTariff filing	
		through eFiling, this time selecting the appropriate	
		co-applicants.	
		NOTE 1: Type of Filing category AMENDMENT	
		eTariff filings must have at least one Tariff	
		Record. Type of Filing category COMPLIANCE	

	Question	Answer	Date
37	The company wishes to file a NORMAL/STATUTORY filing without a Tariff Record and still achieve a statutory action date. Is that possible?	eTariff filings do not have to have a Tariff Record. Both type of filings will receive a new sub-docket. NOTE 2: The eTariff filing agent must also be listed as an eTariff filing agent in each coapplicant's CID profile. If the agent is not listed in a company's CID, eFiling will not list that company for the agent to select as a co-applicant. No. Order No. 714-A provides that applicants may only make tariff filings designated as a statutory filing through eTariff. Designating a tariff filing as a statutory filing is accomplished through the applicant choosing a NORMAL/STATUTORY or AMENDMENT Type of Filing Code appropriate for the program. Statutory action dates are a function of the date of filing and the Tariff Record's Tariff Record Proposed Effective Date metadata is part of a proposed Effective Date metadata is part of a proposed Tariff Record. If there is no Tariff Record, the will be no Tariff Record Proposed Effective Date and	<u>5/12/16</u>
		a statutory action date cannot be calculated.	

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 normalized	The Attachment Reference Codes for Transmittal Letter, Tariff, Marked Tariff and Other have been normalized across Types of Filings as of	12/19/08 1/15/10

	Question	Answer	Date
	across Filing Types?	12/7/2009.	
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?	Microsoft provides compatibility documentation for various versions of Word 2007 with RTF entitled Rich Text Format (RTF) Specification. There are no OSEC guidelines at this time. Each company needs to asses 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 in an alternative software reader than what was used to create the RTF, such as WordPad.	12/19/08 5/25/10 8/12/13
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).	Each company needs to asses 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 OSEC Implementation Guide. See also the response to Question 12 below.	12/19/08 4/18/11

	Question	Answer	Date
8	A map/line drawing/diagram greatly increased the size of the RTF versions of the Record Binary Data file. What are the alternatives means of creating this data?	Maps/line drawings/diagrams in JPG format can significantly increase the RTF file size. Try converting 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.	5/25/10 4/18/11
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?	See also the response to Question 12 below. 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. Note that the OSEC and the Commission have the	5/25/10
10		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.	C/10/10
10	My formula rates tariff sheets are creating large tariff sections when converted into RTF files. What can I do?	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. RTF is capable of receiving some forms of embedded objects and rendering tables. However RTF is not as	6/10/10 4/18/11
		efficient as native file formats for tables and styles.	

	Question	Answer	Date
		When converting formula rate tariff sheets to RTF, review the tariff sheets to ensure that the existing tariff sheets are compliant with the minimum font size required by the Commission's regulations (10 point font: sec. 385.2003(a)(4) (10)). Review whether a table structure is required, or whether columns or tabs will suffice. Review whether tables contain unnecessary rows or columns. 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. See also the response to Question 12 below.	
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

	Question	Answer	Date
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 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).	5/25/11
		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.	
14	I made a mistake and did not identify a document as Privileged/CEII in the Attachment Security Code. What should I do to correct this mistake?	All documents that are part of an eTariff filing are, upon acceptance by OSEC as a tariff filing, automatically and immediately uploaded into eLibrary and made part of the public record with the security status provided by the Applicant. FERC is not responsible for detecting	1/6/14

Question	Answer	Date
	and correcting filer errors.	
	Applicants cannot change the security status of a document once in the public record through an eTariff filing. When such an error occurs:	
	1. The Applicant should email FERCOnLineSupport@ferc.gov. The email should identify the Applicant, docket number, date of filing and accession number of the specific document at issue, and request FERC staff to change the status of the document to either privileged or CEII, as	
	appropriate. 2. The Applicant is responsible for correcting their filing. The Applicant should modify their filing using the appropriate TOFC to ensure the proper set of documents are before the Commission and the public consistent with 18 C.F.R. 388.112 (2014). This regulation requires:	
	 a. A redacted pubic version of the document b. An unredacted non-public version of the document, and c. A proposed form of protective agreement. 	
	Alternatively, instead of modifying the filing, the Applicant may Withdraw the filing and start over. Note that Withdraw of a tariff filing does not remove the filing or any of its documents from eLibrary or change the security status of any document.	

Tariff Record Related Codes

	Question	Answer	Date
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 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?	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 OSEC Implementation Guide, 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

	Question	Answer	Date
	tariff record #12 was being filed with	where accepted. Given this business practice,	
	option codes "A" and "B," would	applicants proposing different Option Code sets may	
	tariff record #23 also need to be	choose to file complete sets to reduce the likelihood of a	
	filed as an option "A" and an option	subsequent compliance filing or the number of Tariff	
	"B" even if only one version of	Records that must be included in a subsequent	
	record #23 was desired?	compliance filing.	
4	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		

	Question	Answer	Date
	+#???? v?.?.? Gas Quality +#9217 v0.0.0 Rate Guarantees +#9218 v0.0.0 Issue Resolution		
	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."		
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
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 have records.	aving associated filings and tariff records having associated	l tariff
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	True. However, if a set of several tariff records with the same Tariff Record Identifier and Option Code are in the associated tariff filing, the action will be against the whole Tariff Record Identifier set.	12/19/08 8/12/13

	Question	Answer	Date
	Code work together to uniquely		
	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 Fling ID at the Filing level would differ from the Associated Filing ID at the Tariff record level?	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.	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	The MOTION, WITHDRAW and CANCELLATION Type	12/19/08

	Question	Answer	Date
	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?	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 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. 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.	10/8/10
10	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.	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.	12/19/08
11	Consider the following scenario: (A) An eTariff record is filed with FERC. (B) FERC accepts the changes subject to conditions. (C) The record is filed again in a compliance filing (like today's	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? 1) Two tariff record changes: In this scenario, which is	3/6 /09

Question			A	nswer		Date
Substitute tariff sheets) with the	the same	as in the	e questic	on for date 1/1/20	20, the	
same effective date as in (A) above.	"substitut	e" record	l is likely	to take preceder	nce over the	
	"original"	record, a	and the c	objective is to sho	w as	
Is it necessary that the two filed	"effective	" the sub	stitute re	ecord for the who	le day.	
records (in (A) and (C) above) have						
different Record Effective Priority	Section Status	Revision	Priority	Order Disposition	Tariff Record	
Order values?	Section 156 Section 156	6.0.0 6.1.0	500 520	Minimal Suspension Accepted	Superceded Effective	
	,	nplex iss	ues. Su	plistic, and there ppose the examp		
	Section	Revision	Priority	Order Disposition	Tariff Record	
	Status Section 156 Section 156	6.0.0 7.0.0	500 600	Minimal Suspension Accepted	Superceded Effective	
	1	_		cord text was requ the compliance fi		
	Section	Revision	Priority	Order Disposition	Tariff Record	
	Status Section 156 Section 156 Section 156	6.0.0 6.1.0 7.0.0	500 520 600	Minimal Suspension Accepted Accepted	Superceded Superceded Effective	
	•	nd if affe	cted the	cord text was requestariff text of 7.0.0		
	Section Status	Revision	Priority	Order Disposition	Tariff Record	
	Section 156	6.0.0	500	Minimal Suspension	Superceded	

	Question	Answer	Date
		Section 156 7.0.0 600 Accepted Superceded Section 156 7.1.0 620 Accepted Effective	
12	What are the status conditions for Natural Gas Act (natural gas 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: Pending Accepted Effective Suspended Superceded Rejected Withdrawn Overtaken by events Pro Forma	3/6 /09
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 Superceded Rejected Withdrawn Overtaken by events	3/6/09

	Question	Answer	Date
		Pro Forma	
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 Conditionally Effective Accepted Effective Suspended Superceded Rejected Withdrawn Overtaken by events Pro Forma	3/6 /09
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 Pending (Tolled) Accepted Effective Superceded Rejected Withdrawn Overtaken by events	3/6 /09 11/13/13

	Question	Answer	Date
		Pro Forma	
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 Accepted Effective Superceded Rejected Withdrawn Overtaken by events Pro forma	3/6 /09
17	What is the tariff record status condition of "Overtaken by events"?	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. 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	3/6 /09 1/15/10 5/25/10 1/27/11

	Question	Answer	Date
		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.	
18	What is the FPA and NGPA programs' tariff record status condition of "Pending (tolled)"?	The "Pending (tolled)" status condition indicates that the Commission has issued an order finding a NORMAL/STATUTORY or AMENDED FPA or NGPA program type of filing (a filing type for which there is a statutory or regulatory time the Commission must act) tariff filing deficient (FPA and NGPA programs) or protested (NGPA program) and cannot be processed within the time-line. The statutory or regulatory 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 or regulatory clock to the date of the AMENDMENT filing; (b) the Commission rules upon the tariff record; or (c) the filing is withdrawn. Note that in the NGPA program, the optional procedures of 284.123(g) provide for regulatory tolling (without Commission order) of the tariff records in the event the filing remains protested by the 60 th day from the date of filing, and the tolling status may be removed by regulation (without Commission order) if the protest is withdrawn within the reconciliation period.	3/6 /09 1/15/10 5/25/10 11/13/13
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	3/6 /09

	Question	Answer	Date
		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.	
20	What is the tariff record status	Certain programs' statutory, regulatory or business rules	3/6 /09
	condition of "Conditionally	permit a tariff record to become effective before	
	Accepted"?	Commission action is required. Conditionally Accepted	
		indicates a tariff record change is proposed to be	
	1.00	effective on a specified future date.	2/2/22
21	What is the tariff record status	Certain programs' statutory, regulatory or business rules	3/6 /09
	condition of "Conditionally	permit a tariff record to become effective before	
	Effective"?	Commission action is required. The tariff record status	
		condition of "Conditionally Effective" indicates that the	
		tariff record is effective, but that final Commission action	
22	NO. 11 7 115 1 115	is still pending.	0/0/00
22	NGA section 7 certificate filings	Not at this time. If the Commission decides to require	3/6 /09
	commonly contain "Pro Forma" tariff	NGA section 7 certificate filings to be filed utilizing the	
	records. Are NGA section 7	eTariff gateway of eFiling, that requirement will be the	
	certificate filings' "Pro Forma" tariff	subject of a separate Notice and/or rulemaking.	
	records required to be filed utilizing	All NICA coetion 4 compliance filings to Comprise or	
	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	
23	If a Conditionally Asserted or	Forma, New or Changed tariff records. No. The status of the tariff record that was superceded	3/6 /09
<i>23</i>	If a Conditionally Accepted or Conditionally Effective tariff record	by the Conditionally Accepted or Conditionally Effective	3/0/09
	is Suspended or Rejected, must the	tariff record will revert to tariff record status of Effective.	
	applicant refile the tariff record that	tann record will revent to tann record status of Effective.	
	was formerly effective?		
24	Can the Associated Filing Identifier	No. The Associated Filing Identifier	3/6 /09

	Question	Answer	Date
	(associated_filing_id) reference a Filing Identifier (filing_id) other than the filer's?	(associated_filing_id) must reference only Filing Identifiers (filing_id) made by the filer as identified by the Company Identifier (company_id).	
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 A NEW B CHANGE C CHANGE Example 2: Option Record Change Type A NEW B NEW C CHANGE	5/25/10
		Example 3:	

	Question	Answer	Date
27	For tariff records with a Record	Option Record Change Type A null B NEW C CHANGE Yes. There can be multiple PRO FORMA option sets.	5/25/10
	Change Type (record_change_type) of PRO FORMA, must the Option Code (option_code) be populated?	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.	
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 reflect the targeted tariff record's status as OBE (Overtaken By Events).	6/10/10
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	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."	6/25/10

	Question	Answer	Date
	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?	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.	
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 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.	1/27/2011
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?	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. Frequently, browser settings permitting access to the	5/25/11

	Question	Answer	Date
		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.	
32	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?	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 a new Tariff Identifier with the in-service date.	10/4/11
33	The company needs to make a Normal/Statutory, Amendment or Compliance filing that requires several tariff records to reflect intermediate changes; or, the company wishes to propose several different changes to a tariff record, each change with a different prospective effective date. How can this be done?	There are two methods to make tariff filings that involve a set of tariff records with the same Tariff Record Identifier. Assume an example were one tariff record needs 4 versions. Method 1: This method requires 4 tariff filings, each tariff filing containing one tariff record. Do NOT associate at the Tariff Record Content Data Level, as that will result in the target tariff record or record set becoming OBE if that record or record set is in a Pending, Tolled, Conditionally Accepted or Conditionally Effective status.	2/3/14

	Question	Answer	Date
		Method 2: Multiple tariff records with the same Tariff Identifier and multiple Tariff Record Proposed Effective Dates (a Tariff Record ID set) can be filed in a single tariff filing. All the proposed tariff records with the same Tariff Identifier must have the same Option Code. However, each tariff record must have a different Record Effective Priority Order. Do NOT associate at the Tariff Record Content Data Level, as that will result in the target tariff record or record set becoming OBE if that record is in a Pending, Tolled, Conditionally Accepted or Conditionally Effective status.	
		Example: Tariff Record ID Priority Order Option Code P. Eff. Date Ass. Tariff Record 1589 1085 A 1/8/10 Null 1589 1258 A 2/8/10 Null 1589 1565 A 3/8/10 Null 1589 1566 A 3/8/10 Null	
		Under Method 2, make sure the Record Effective Priority Order is valid for each Tariff Record Proposed Effective Date. Method 1 is the best method for those who have limited experience with eTariff and/or whose eTariff software does not validate associations at the Tariff Record Content Data Level.	
34	I made a filing following Method 2	Method 1 also will establish different statutory effective dates (in the example above, 3 different dates), while Method 2 will establish a statutory date based on earliest proposed effective date. If the tariff records in the subject tariff filing are Pending,	2/3/14

	Question	Answer	Date
	describe in Qu. 33 above, with a Tariff	Tolled, Conditionally Accepted or Conditionally Effective,	
	Record ID set containing 4 tariff	then an Amendment or Compliance filing (as appropriate)	
	records. One of those records has a	may be filed to correct the tariff record. However, the whole	
	mistake that needs to be corrected.	Tariff Record ID set of 4 tariff records must be refiled.	
	How can I correct that record?	Remember to increment the Record Effective Priority Order.	
		With at least one of the tariff records in the tariff record set,	
		associate at the Tariff Record Content Data Level. This	
		association at the Tariff Record Content Data Level will OBE	
		ALL the proposed tariff records in the set in the targeted tariff	
		filing.	
35	I made a filing following Method 2	eTariff's XML Schema Version 1 does not provide enough	
	describe in Qu. 33 above, with a Tariff	data elements to correctly target a single tariff record in a	
	Record ID set containing 4 tariff	Tariff Record ID set.	
	records. Why is it not possible to		
	correct only select records in the Tariff	For example, Filing Identifier 687 proposed and has pending:	
	Record ID set?	Tariff Record ID Priority Order Option Code P. Eff. Date 1589 1085 A 1/8/10	
		1589 1258 A 2/8/10	
		1589 1565 A 3/8/10	
		1589 1566 A 3/8/10	
		If Line 3 (Tariff Record ID 1589, Priority Order 1565, Option	
		Code A with a Tariff Record Proposed Effective Date of	
		3/8/10) is in error, the eTariff XML schema, at the associated	
		Tariff Record Content Data Level, only request data elements	
		the Tariff Record ID and the Option Code. These are not	
		enough data to select the proper tariff record in the Tariff ID	
		set that is in error.	
36	I made a Normal/Statutory or	Any Type of Filing Code or Record Change Type that requires	2/3/14
	Compliance filing following Method 2	providing associated tariff record data at the Tariff Record	
	describe in Qu. 33 above. What other	Content Data Level should be treated with extreme caution.	

	Question	Answer	Date
	limitations are there to the use Tariff Record ID sets?	Normal/Statutory filings may be revised using Amendment category Type of Filing Codes, and Compliance Statutory filings may be revised using Compliance category Type of Filing Codes. See Qu. 34 above.	
		Record Change Type Withdraw that targets any tariff record within a filing's Tariff Record ID set will withdraw the complete Tariff Record ID set.	
37	I made a tariff filing with a Tariff Record ID set that the Commission suspended. How do I move the suspended tariff records into effect or change their effective dates?	The Motion category of Type of Filing Codes is used to motion tariff records into effect and/or change their effective date, as permitted by Commission regulation. Motion filings can only be directed to tariff records that are in Suspended status.	2/3/14
		The use of a Motion filing targeting a suspended Tariff Record ID set will result in all the tariff records in the Tariff Record ID set going into effect on the same date (see Qu. 35). If multiple tariff records with different Tariff Record Proposed Effective Date in a Tariff Record ID set are provided in the Motion filing, the actual Effective date that will appear in the Commission's records is unpredictable.	
		The proper method to change the date of Suspended tariff records in a Tariff Record ID set is to file a Compliance (FPA Program) or Normal/Statutory (Oil Program) filing that contain a new Tariff Record ID set with the new Tariff Record Proposed Effective Dates. Such filings in the FPA and Oil Programs should state in the Transmittal Letter that the Commission should act before the automatic end of the	

	Question	Answer	Date
		suspension period when Suspended tariff records automatically change status to Effective.	
38	My filing was rejected because of OSEC Validation Rule 80: A tariff record's Record Effective Priority Order in the filing duplicates an effective or pending Record Effective Priority Order. Which records need to be checked to eliminate this error?	The most common reason eTariff filings are rejected by the Secretary is OSEC Validation Rule 80. The Secretary's rejection email provides the Tariff Record Identifier that caused the error to assist filers in identifying and correcting the problem. Each Tariff Record Identifier's Record Effective Priority Order in a proposed tariff filing should be checked two ways: 1. If there are multiple identical Tariff Record Identifiers in the same Option Set in the same filing, all Record Effective Priority Order numbers must be unique within the filing. 2. If the proposed tariff record in the filing has an identical Tariff Record Proposed Effective Date as another version of the tariff record filed with the Commission, the Record Effective Priority Order numbers must be unique. If the tariff record with the Commission has the status condition of Pending, Tolled, Conditionally Accepted or Conditionally Effective, check the Tariff Record Proposed Effective Date of that pending record. If the status condition is Accepted, Suspended or Superceded, then check the Commission's effective date for that record.	1/6/14
39	The Commission changed the effective date for a tariff record. Now the		
	Record Effective Priority Order		
	conflicts with another tariff record that		
	has the same effective date or the same		

	Question	Answer	Date
	Tariff Record Proposed Effective Date.		
39A	Which tariff record will appear in the Commission Public eTariff Viewer and eTariff data base as Effective and which will appear as Superceded?	Because the tariff records' Record Effective Priority Order numbers are identical for the same effective date, there is no basis that the software can determine what was the intent of the Commission or the applicant as to which tariff record should be Effective and which tariff record should be Superceded. The Commission's eTariff data base and Public eTariff Viewer will randomly select one of the tariff records as Effective and place the other tariff record into the Superceded status category.	1/6/14
39B	How should conflicting Record Effective Priority Order situations be corrected?	If the proposed tariff record is still Pending before the Commission, then the applicant should file an Amendment/Compliance filing, as appropriate, with a revised tariff record with an appropriated Record Effective Priority Order. The tariff record should be associated with the underlying Pending tariff record such that that record will become OBE. If the tariff record has been accepted, then the applicant should file a Compliance filing with a revised tariff record with an appropriated Record Effective Priority Order.	1/6/14
39C	What are the most common situations that Commission orders may change an effective date and thus increase the risk that there may be identical Record Effective Priority Order numbers?	The most common situations involve Commission orders suspending tariff records for more than the minimal suspension period and orders on Compliance filings were the Commission requires an Effective date different from the Tariff Record Proposed Effective Date.	1/6/14
40	In our supporting documents we often cite to a specific section of our tariff. However, Commission orders often use a different citation for the same section.	Commission orders do not use a uniform tariff citation style. However, most citations attempt to identify the tariff section using terms provided by the applicant and are readily available to the public if the public wishes to follow the citation's	1/6/14

	Question	Answer	Date
	How does the Commission compose tariff citations?	direction. Thus many Commission order citations follow the following style:	
		Company Name + ", " + Program ", " + Tariff Title ", " + Section Title ", at " + (additional references as appropriate for the tariff record's content)	
		Company Name = The Company Name in the Company Identifier's (CID) profile.	
		Program = As provided by the <i>OSEC Implementation Guide</i> at p. 7. This is optional if the company does not have tariffs in more than one Program.	
		Tariff Title = Tariff Title as provided by the Company in the tariff's Baseline filing's Tariff Title data element.	
		Section Title = See Qu. 41.	
		An example:	
		Texas Eastern Transmission, LP, FERC NGA Gas Tariff, Texas Eastern Database 1, <u>3.18</u> , <u>Materially Non-Conforming Agreements</u> , <u>19.0.0</u> , A	
41	Commission orders often refer to a "Section Title" when referencing a tariff record and the term also appears	A full Section Title is composed of four data elements from the eTariff filing as provided by the applicant:	1/6/14
	in the eTariff Public Viewer when viewing a tariff record. What is a Section Title?	Record Content Description + ", " + Tariff Record Title + ", " + Record Version Number + ", " + Option Code	

	Question	Answer	Date
		Option Code is often omitted, as most tariff records are Option Code "A".	
		From the example in Qu. 40, the Section Title is:	
		3.18, Materially Non-Conforming Agreements, 19.0.0, A	
42	I made a mistake whereby privileged/CEII material was included as part of the Record Binary Data. What should I do to correct this mistake?	All Record Binary Data that are part of an eTariff filing are, upon acceptance by OSEC of the tariff filing, automatically and immediately uploaded into eLibrary and the eTariff Public Viewer and made part of the public record. FERC is not responsible for detecting and correcting filer errors.	1/6/14
		Applicants cannot, though eTariff metadata, propose a non-public tariff record. When such an error occurs:	
		 The Applicant should email <u>FERCOnLineSupport@ferc.gov</u>. The email should identify the Applicant, docket number, date of filing, accession number of the specific document at issue and the complete metadata of the tariff record at issue, and request FERC staff to change the status of the document in eLibrary to either privileged or CEII, as appropriate and to remove the companion tariff record or Record Binary Data from the eTariff data base. The Applicant is responsible for correcting their filing. The Applicant should amend or modify their filing using the appropriate TOFC to ensure the proper set of documents and tariff records are before the Commission and the public consistent with 18 C.F.R. 388.112 (2014). 	

	Question	Answer	Date
		 a. A redacted pubic version of the document (for a tariff record, this would be Record Binary Data <i>and</i> the "Clean Tariff" document); b. An unredacted non-public version of the document, and c. A proposed form of protective agreement. 	
		Alternatively, instead of modifying the filing, the Applicant may Withdraw the filing and start over. Note that Withdraw of a tariff filing does not remove the filing or any of its documents or tariff records from eLibrary or eTariff, or change the security status of any document.	
		The Applicant should take great care to ensure that the Applicant's version of the tariff data base matches the Commission's version. If the two data bases do not match, the Applicant may generate incorrect eTariff filings, and OSEC may inappropriately accept or reject eTariff filings.	
43	The company proposed/the Commission Accepted and gave an effective date of 12/31/9998 to a tariff	If a Tariff Record is Accepted by the Commission with a 12/31/9998 effective date, there are two methods by which the Effective date can be changed to the real effective date.	<u>5/12/16</u>
	record. The real Effective date is now known. How can the company change the Effective date from 12/31/9998 to the real Effective date?	1. The applicant may file a Type of Filing category REPORT using the Type of Filing Code appropriate for the program informing the Commission of the real Effective date. The Commission will update the Effective date of the Tariff Record without further notice or order. The applicant should update its tariff database consistent with the date the applicant provided	
		in the Report. (NOTE: the Commission will inform all parties and individuals on the service list and the	

Question	Answer	Date
	eSubscription list that this eTariff filed Report has been	
	made with the Commission.)	
	2. The Applicant may file a Type of Filing category	
	COMPLIANCE using the Type of Filing Code	
	appropriate for the program with a revised Tariff	
	Record and including the real effective data in the	
	Tariff Record's Tariff Record Proposed Effective Date.	
	The Transmittal Letter should also request that the	
	Commission reject as moot the Tariff Record accepted	
	effective 12/31/9998. The Commission will issue	
	Notice this filing and issue an order in due course.	
	The Commission order Accepting a Tariff Record effective	
	12/31/9998 will normally instruct the applicant which method	
	to use. If the Commission order does not specify a specific	
	method to update the effective date, either option is	
	acceptable. If there have been intervening changes to the	
	Tariff Record's tariff text that must be reflected, a Type of	
	Filing category COMPLIANCE tariff filing must be made	
	regardless of the Commission's instruction.	

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. See also Tariff Record Related Codes, Qu. 35.	12/19/08 2/3/14
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: Compliance tariff filings pursuant to a Commission rule making; During the transition from paper tariff filings to 	3/6 /09 2/3/14

		eTariff filings, all compliance filings referencing	
		paper tariff filings. For the FPA and NGA	
		programs, this transition period may last many	
		years as all Order No. 714 grandfathered but	
		effective paper tariff documents do not have to be	
		placed into the eTariff format until their first tariff	
		change.	
4	I forgot to include an attachment in a	File the omitted attachment using a Report category Type of	5/25/10
	tariff filing. How do I correct this	Filing. This Type of Filing requires the Associated Filing	
	mistake?	Identifier at the filing level.	
5	I made a mistake with a tariff record in a	Use a COMPLIANCE Type of Filing to correct a tariff record.	5/25/10
	COMPLIANCE Type of Filing. How do	Including the Associated Filing Identifier at the filing level to	8/12/13
	I correct this mistake?	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 if the tariff	
		record is Pending, Tolled, Conditionally Accepted, or	
		Conditionally Effective.	
		Conditionally Effective.	
		NOTE that AMENDMENT Type of Filings ARE NOT used to	
		correct COMPLIANCE Type of Filings.	
6	I made a mistake on my COMPLIANCE	The COMPLIANCE filing will have to be withdrawn using a	5/25/10
U	category Type of Filing – it should have	WITHDRAW filing, and refiled using a	10/8/10
	been a NORMAL/STATUTORY filing.	NORMAL/STATUTORY filing code.	8/12/13
	How do I correct this mistake?	NORWAL/STATOTORT Innig code.	0/12/13
	now do i concet this inistance.	An alternative method of closing the mistaken COMPLIANCE	
		filing: If the tariff records in the COMPLIANCE filing are	
		Pending, Tolled, Conditionally Accepted, or Conditionally	
		Effective, then the NORMAL/STATUTORY tariff filing can	
		close the COMPLIANCE filing by associating and OBE'ing	
		every pending tariff record in the COMPLIANCE filing. No	

		WITHDRAW filing is necessary.	
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, 10 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, BASELINE/NEW or CANCELLATION filing. How do I do it?	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 date(s) in the AMENDMENT filing.	10/8/10
9	Must a motion to extend the date by which the Commission may act be filed through eTariff?	Yes. See Order No. 714 at P 83. 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: 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; B) To extend the Commission action date to a given date beyond the statutory date (beyond the 30 or 60 days): Refile	10/8/10 10/4/11

		,	
		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.	
		C) To extend the Commission action date indefinitely: 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.	
10	I need to motion suspended tariff records	File all the records that the company wishes to move into effect	4/18/11
	into effect. However, there have been	(both changed and unchanged) using a COMPLIANCE filing.	
	intervening changes. How do this?	The Tariff Record Proposed Effective Date for each of the	
		record should conform with the motion filing rules.	
11	Should my MOTION category filing's	No. MOTION category filings' tariff records should not	5/25/11
	tariff records contain tariff text or	contain tariff text or a revised Record Version Number, as the	
	modified Record Version Number?	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.	
12	\mathcal{E}	Companies in the FPA and Oil Programs with suspended tariff	8/12/13
	tariff records go into effect automatically	records who wish to move the effective date of their suspended	
	at the end of their suspension periods.	tariff records further into the future should file a MOTION	
	What should be filed to move the	filing that identifies, for each of the suspended tariff records	
	effective date out?	they wish to push out the effective date, the new Tariff Record	
		Proposed Effective Date. This filing must be made before the	
		end of the suspension period.	
13	I made a Normal/Statutory filing in the	The Suspension Motion data element can be populated with	8/12/13
	NGA Program and entered the incorrect	either "Y" or "N". If the incorrect information is provided, the	
	information for Suspension Motion	information is applied to the tariff filing as a whole – including	
	(suspend_motion). How do I correct that	each proposed tariff record. If the mistake is found while the	
	mistake?	filing is still pending, it may be WITHDRAWN. Alternatively,	
		while the filing is still pending, file an AMENDMENT with all	
		new records and associated at the record level such that all the	
		records in the tariff filing with the incorrect information are	
		OBE'd and the tariff filing Closed.	
		A mistake in the Suspension Motion data found after the	
		issuance of the Commission order cannot be corrected in	
		eTariff. As a result, tariff records that could have gone into	
		effect will not without a MOTION filing; or tariff records will	
		go into effect that the company may not wish to have in effect.	
		MOTION filings cannot propose a retroactive effective date.	
14	I made a Normal/Statutory filing under	The applicant with a Pending Normal/Statutory NGPA program	11/13/13
	284.123(b)(2) in the NGPA program	filing can propose to change the applicable time-line by filing	,
	under one of the two time-line options	an Amendment with the desired time-line. The Amendment's	
	(60- or 150-days) that is still Pending	time line will change the underlying Pending filing's time-line.	
	before the Commission. I now want to	For example:	
		1 - 7 - 7 - 1 - F - 7 -	

	change the time-lines. How can I do						
	that?	TOFC	Category	Time-line			
		760	Normal/Statutory	150 days			
		1270	Amendment	60 days			
		Or:					
		1300	Normal/Statutory	60 days			
		1350	Amendment	150 days			
15	I made an initial filing under	TOEC 080	actually follows the Com	pliance business process	11/13/13		
13	284.123(b)(1) (TOFC 980), which has no		TOFC 980 actually follows the Compliance business process category business. As such, Amendment business process				
	time line. I would like to change to a 60-	<i>C</i> 3	•	<u>*</u>			
	day time-line; however my Amendment	categories will not amend Compliance category TOFCs.					
	TOFC 1270 was rejected. How can I	To obongo	the time line of a TOEC 0	90 filing file a TOEC			
		_	the time-line of a TOFC 9	O 1			
	change the time-line for my filing?		•	all the records of the TOFC			
			The association of the tar				
		the records in the TOFC 980 and close the TOFC 980 tariff					
		filing. OSEC will assign the TOFC 1300 filing a new docket					
		number.					

eTariff Viewer

	Question	Answer	Date
1	In the OSEC Implementation Guide	Tariff Record Title (record_title) will definitely be used in	12/19/08
	under Tariff Record Content Data	an automated table of contents. How the Record Content	1/15/10
	Tariff Record Title (record_title) and	Description (record_content_desc) will be displayed has	10/8/10
	Record Content Description	not been determined. At the April 28, 2009 technical	10/4/11
	(record_content_desc), it states that	conference, Record Content Description, Tariff Record	
	"this field may be used in a database	Title and Record Version Number, in this arrangement,	
	generated Table of Contents." Can	were identified as the data elements to be used.	
	FERC commit that these are the	Commission orders commonly refer to this set of data	
	fields they will use in an automated	elements as the "section title."	
	table of contents?		
2	If leading spaces are placed in Tariff	Leading spaces will likely be removed for the eTariff	2/9 /09
	Record Title (record_title), Record	Viewer's display. ETariff will not modify the data	
	Content Description	submitted to the Commission, including leading spaces.	
	(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?		
3	When a tariff filing is made, how long	The new tariff records should appear within a few minutes of	10//8/10
	does it take for the new tariff records to	the Secretary accepting the tariff filing for filing before the	
	appear in the eTariff Viewer?	Commission.	
4	When the Commission acts on a tariff	There may be up to a 5-day delay between the time the	10/8/10
	filing, how long does it take for the	Commission order issues and the time the actions are reflected	
	Commission's actions to be reflected in	in the eTariff Viewer.	
	the eTariff Viewer?		
5	My RTF tariff text does not appear the	There are many reasons why the RTF representation of the	10/8/10

	Question	Answer	Date
	same as the Clean Tariff I provided as an attachment. Why are they different?	tariff text in the eTariff 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. Reasons for the lack of fidelity include one or more of the following possible explanations: 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. Using Tracked Changes and creating the RTF file before removing all tracked changes and/or before saving the file in native format.	1/6/14
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. The instructions on how to use this feature are located under Help on the eTariff Viewer home page.	4/18/11
7	I have lost access to the company's past XML and ZIPped eTariff filings. Can I	No. The Commission does not retain a copy of the XML or ZIPped tariff filings. All the material from these tariff filings,	4/18/11

	Question	Answer	Date		
	obtain a copy from the Commission?	including the meta data, are available on eLibrary.			
8	I only need access to a couple of	Most internet browsers permit the creation of shortcuts or	8/12/13		
	companies' tariffs. Do I have to go	favorites to websites. In the eTariff Viewer, bring up the tariff			
	through the eTariff Viewer's menu each	of interest, and then create a shortcut or favorite consistent with			
	time to find and bring up those tariff's?	the instructions on your browser.			
9	I cannot find a tariff record in the eTariff	There are several reason why certain tariff records do not	8/12/13		
	Viewer's Table of Contents. Why cannot I see certain tariff records?	appear in the eTariff Viewer's Table of Contents:			
	i see certain tariii records:	1. The tariff record is Rejected or Cancelled as of the Effective			
		Date the user selected for viewing the tariff, and there were no			
		Effective versions of the tariff record. To see these records,			
		select a view Effective date prior to the date the tariff record			
		was Rejected or Cancelled.			
		2. A version of the tariff record is Suspended, and there were			
		no Effective versions of the tariff record as of the Effective			
		Date the user selected for viewing the tariff. To see these			
		records, select a view Effective date after the end of the			
		suspension period.			
		3. On rare occasions, there is an eTariff updating error that			
		results in no Effective tariff record (a condition known as			
		Superceded<>Superceded). To see these records, select a view			
		Effective date prior to the date the tariff record was superceded.			
		If these errors are found, please inform			
		ferconlinesupport@ferc.gov, and provide the Company ID, Tariff Identifier and Tariff Record Identifier.			
10	I cannot find a tariff record in the eTariff	On the Tariff Browser screen, use the "List All Sections"	8/12/13		
10	Viewer's Table of Contents. How can I	button. This will list all tariff records, including those that have	5/12/16		
	find tariff records that are not in eTariff	only Rejected, Suspended, Cancelled and no Effective status.	<u> </u>		
	Viewer's Table of Contents?	only Rejected, Suspended, Cuncerted and no Effective status.			
	. 12 21 & Tubic of Commiss.	Rejected and Cancelled tariff records may appear misplaced in			

	Question	Answer	Date
		the Table of Contents. This may occur because the tariff	
		records' Tariff Record Collation Values and Parent Identifiers	
		may have no continuing relationship to their location relative to	
		other tariff records in the eTariff Viewer's Table of Contents.	
		See also Maintaining and Changing Tariff Databases, Qu. 8.	
11	Many recent Commission orders contain	For the link to the tariff, go to the eTariff Viewer and either:	8/12/13
	hyperlinks to the eTariff Viewer's	(a) go to the Tariff Browser to find the company's tariff, place	
	version of the Company's tariff or	the cursor over the hyperlink to the tariff, and copy the link	
	specific tariff records in the tariff. How	address (usually the option to copy the link address appears	
	can I find these links for use in my	with a right-click of the mouse); or	
	filings?	(b)go to the company's Tariff Browser, and copy the URL from	
		the address line at the top of your browser.	
		For the link to the tariff record in the Toriff Provisor select the	
		For the link to the tariff record, in the Tariff Browser, select the tariff record of interest from the Table of Contents. Then, in	
		the tariff section activity box on the upper right of the screen,	
		place the cursor over the hyperlink to the version of the tariff	
		record of interest, and copy the link address (usually the option	
		to copy the link address appears with a right-click of the	
		mouse).	
		If the document is to be converted to PDF and has hyperlinks,	
		remember to print-to-PDF to retain the hyperlinks. <i>All</i> PDF	
		documents filed with the Commission are <i>required</i> to be either	
		print-to-PDF or OCR'ed.	
12	The eTariff Viewer's Table of Contents	This is a known error of the eTariff Viewer.	1/6/14
	does not show the correct tariff record		
	section title for the chosen effective date.		
13	Two tariff records with the same Tariff	If two or more tariff records with the same Tariff Record	1/6/14
	Record Identifier became effective on the	Identifier became effective on the same day and have the same	

	Question	Answer	Date
	same day. However, the eTariff Viewer	Record Effective Priority Order, then the eTariff software	
	shows the wrong tariff record as	cannot determine the intent of the Commission or the applicant	
	effective. What is the problem?	as to which tariff record should be effective and which tariff	
		record(s) should be Superceded. The applicant should make a	
		tariff filing to correct the Record Effective Priority Order. See	
		Tariff Record Related Codes, Qu. 39.	
14	I looked at my company's tariff on the	Effective tariff records not in the proper order mean that the	1/6/14
	eTariff Public Viewer. The effective	records' Tariff Record Collation Values are incorrect. Tariff	
	tariff records are out of order and/or not	record order is determined by each tariff record's Tariff Record	
	in the proper hierarchical structure. What	Collation Value. Tariff records are ordered with the smallest	
	is wrong, and how can it be corrected?	Tariff Record Collation Value at the top of the Table of Contents through the highest Tariff Record Collation Value at	
		the bottom of the Table of Contents. Every effective tariff	
		record's Tariff Record Collation Value must be unique.	
		Duplicative effective Tariff Record Collation Values are	
		ordered randomly relative to each other on the eTariff Public	
		Viewer.	
		Effective tariff records that are misplace in the hierarchy may	
		mean that the either that record's or one of its parent's Tariff	
		Record Parent Identifier is incorrect.	
		A tariff record that appears in the eTariff Public Viewer to be a	
		child of the wrong parent may have the proper Tariff Record	
		Parent Identifier, but the wrong Tariff Record Collation Value.	
		A THE CORP AND A THE	
		Incorrect Tariff Record Collation Values and Tariff Record	
		Parent Identifiers should be corrected through a	
15	Different companies have your different to	Normal/Statutory or Compliance filing.	1/6/14
13	Different companies have very different tar	ini organization. Are there any guidennes?	1/0/14

Question Answer Date

The Commission provides limited guidance on how to structure tariffs at Parts 35, 154, 284 and 341.

Business practice and staff experience suggest the following guidelines:

1. Do not have too many Tariff IDs. Rather, group classes of tariff documents into a single Tariff Identifier:

i. Example of excess Tariff IDs:

=					
Portland General Electric Company	C001132		PGE First Revised Volume 12		
Portland General Electric Company	C001132	9	PGE Original Volume 13 Ancillary Services		
Portland General Electric Company	C001132	10	PGE-2 Cost Based Rate Tariff		
Portland General Electric Company	C001132	3	PGE SEVENTH REVISED VOLUME NO. 11 MBR		
Portland General Electric Company	C001132	11	PGE 14 Reserve Energy Service		
Portland General Electric Company	C001132	8	Portland General Electric OATT Volume No. 8		
Portland General Electric Company	C001132	12	Other Rate Schedules		

Puget Sound Energy, Inc.	C000171	37	Residential Purchase and Sale Agreement
			-
Puget Sound Energy, Inc.	C000171	41	Market-Based Rates Tariff
Puget Sound Energy, Inc.	C000171	39	Electric Transmission Reassignment
Puget Sound Energy, Inc.	C000171	43	Jackson Prairie Gas Storage Project Agreement
Puget Sound Energy, Inc.	C000171	54	OATT - Open Access Transmission Tariff
Puget Sound Energy, Inc.	C000171	99	Montana Intertie Agreement
Puget Sound Energy, Inc.	C000171	103	Misc Tariffs and Agreements
Puget Sound Energy, Inc.	C000171	113	Open Access Transmission Tariff
Puget Sound Energy, Inc.	C000171	73	Vantage Transmission Service Agreement #476
Puget Sound Energy, Inc.	C000171	80	PSE Original Service Agreement No. 506
Puget Sound Energy, Inc.	C000171	82	PSE Original Service Agreement #507
Puget Sound Energy, Inc.	C000171	84	PSE Original Service Agreement No. 508

2. Don't include the Company Name as part of the Tariff Title – it unnecessarily adds character space that is better used to describe the tariff, and creates duplicative text in properly formatted tariff citations:

			_		
UGI Utilities Inc.	C002089	18		UGI Utilities Inc.	
Union Electric Company	C000744	11		Union Electric Compar	y Tariffs of General Applicability
			•		

Ouestion Answer Date

- 3. Some companies use tariff structures that lack organization.
 - i. Some common mistakes or practices that produce poor tariff structure:
 - 1. Mixing up correlation values
 - 2. Placing different types of agreements together
 - 3. Not using parent/child relationships to facilitate viewing and researching

ii. Example of disorganized tariff structure:

Distribution Service Agmt, Service Agreement No. 357. 2.0.0 SGIA, Service Agreement No. 358, 2.0.0 Distribution Service Agmt, Service Agreement No. 359, 1.0.0 LGIA, Service Agreement No. 362, 1.0.0 Distribution Service Agmt, Service Agreement No. 363, 1.0.0 WDAT Service Agreement, First Revised Service Agreement No. 130, 0.0.0 IFA, First Revised Service Agreement No. 181, 1.0.0 LGIA, First Revised Service Agreement No. 184, 1.0.0 SA for WDS, First Revised Service Agreement No. 185, 1.0.0 SGIA, First Revised Service Agreement No. 198, 1.0.0 Amended SGIA Cancel, First Revised Service Agreement No. 215 Cancelled, 3.0.0 Dist Serv Agmt Cancel, First Revised Service Agreement No. 216 Cancelled, 1.0.0 Amended SGIA, First Revised Service Agreement No. 200, 1.0.0 Distribution Service Agmt, First Revised Service Agreement No. 201, 0.0.0 SGIA, First Revised Service Agreement No. 221, 1.0.0 LGIA, First Revised Service Agreement No. 226, 1.0.0 LGIA, First Revised Service Agreement No. 233, 1.0.0 Distribution Service Agmt, First Revised Service Agreement No. 234, 1.0.0 Distribution Service Agmt, Service Agreement No. 230, 1.0.0 IFA, Service Agreement No. 140, 1.0.0 Distribution Service Agmt, Service Agreement No. 141, 2.0.0 IFA, Service Agreement No. 231, 1.0.0 SGIA, Service Agreement No. 238, 2.0.0 Distribution Service Agmt, Service Agreement No. 239, 2.0.0 SGIA, Service Agreement No. 289, 1.0.0 Distribution Service Aamt. Service Agreement No. 290, 1.0.0

Question Answer Date Example of disorganized tariff structure: Mixing sections, sheets and pages in a single tariff:

Pq 5 - Sections 6.2 - 10, LGS-1 Storage Svc, 2.0.0 Sheet Nos. 50 - 54, Future Use, 2.0.0 □ Pq 1 - Sections 1 - 2.1, LGS-2 Storage Svc, 2.0.0 Sections 2.3 - 2.4, LGS-2 Storage Svc, 2.0.0 Sections 3 - 5, LGS-2 Storage Svc, 2.0.0 Pg 5 - Sections 6 - 8, LGS-2 Storage Svc, 2.0.0 Pq 6 - Sections 9 - 10, LGS-2 Storage Svc, 2.0.0 Sheet Nos. 61 - 69, Future Use, 2.0.0 Definitions 1.9 - 1.15, GTC - Definitions, 2.0.0 Sheet Nos. 76 - 84, Future Use, 2.0.0 4. Example of good tariff structure: i. Has standardized Section Titles ii. Has informative Section Titles iii. Maximizes use of sectionalized outline formatting, at least 3 Levels deep a. Consistent use of Record Content Description for outline format b. Consistent use of Tariff Record Title for the description

Question	Answer		Date			
9.2, System Reinforcements, 0.0.0						
10, OPERATING PROVISIONS, 0.0.0						
10.1, Good Utility Practice and Applicable Requ	rements Oblic					
10.2, Power Delivery and Quality Standard, 0.0	<u>0</u>					
10.3, Coordination Of Operations, 0.0.0						
10.4, Relationship To Balancing Authority Area	Operations, 0.					
10.5, Separate Balancing Authority Area, 0.0.0						
10.6, Reporting Significant Events, 0.0.0						
10.7, Operation Pursuant To Good Utility Pract	ce, 0.0.0					
10.8, Settlement of Disputes and Arbitration, 0.	.0					
10.9, Protective Devices, 0.0.0						
■ 10.10, Continuity Of Service, 0.0.0						
10.10.1, Operation Actions To Maintain Co	tinuity, 0.0.0					
10.10.2, Unscheduled Interruptions, 0.0.0						
10.10.3, Scheduled Interruptions, 0.0.0						
10.10.4, Interruption By Protective Devices	0.0.0					
10.10.5, Jeopardy, 0.0.0						
10.11, Operating Records, 0.0.0						
10.12, Mutual Obligation Communications Prote	col, 0.0.0					
10.13, Confidentiality, 0.0.0						

Company Registration

	Question	Answer	Date
1	I manage several company registrations	Yes. Create a Delegated Filer DID at the Commission's	8/12/13
	(CIDs). The same agents make filings	Company Registration site. Assign agents to each of the forms.	
	on behalf of these companies. Is there	Then, edit each of the CIDs by designating the DID for each	
	some way that I can manage just one	form. Thereafter, if you need to make any changes to your	
	company profile's agents and have those	agents, make the change in the DID profile, and those changes	
	changes carry over to the other company	will automatically carry over to every CID form that has that	
	profiles?	DID designated as an agent.	
2	I would like to create several DIDs for	Yes. However, the Commission provides no service to find lost	8/12/13
	my business purposes. Will Company	DIDs or correct information in the DID profile other than	
	Registration permit that?	through Company Registration.	
3	I am a person eRegistered with the	You should contact the company's CID Account Manager. If	2/3/14
	Commission. How do I find out whether	the Account Manager does not find your name as an agent, the	
	I am an agent for a company for the	Account Manager may add your name. If the Account Manager	
	purpose of filing a form with the	does not find your name but finds that a DID listed as an agent	
	Commission?	for the form, you should contact DID's Account Manager.	
		Staff does not review, approve or have access to a CID profile's	
		list of agents.	
4	The company retroactively changed its	<u>No.</u>	<u>5/12/16</u>
	name and/or other information. Can I		
	request that the CID profile information		
	be changed with a retroactive effective		
	date?		

Maintaining and Changing Tariff Data Bases

	Question	Answer	Date
1	My company is changing its name/was acquired by another entity, but will otherwise continue to operate as it did in the past. Does the old company's tariff database need to be Cancelled and a new Baseline tariff data base filed?	If the company is simply changing its name, was acquired by another entity, or both, then there is no need to Cancel the existing tariff data base and file a new Baseline tariff. Simply update Company Registration and, as of the effective date of the change, revise any Tariff Records as necessary through an eTariff filing.	5/12/16
2	The company wishes to change tariff data bases. However, there are many tariff records that are in different status conditions. How should the tariff records with different status conditions be filed?	Tariff records may have many different status conditions (see Tariff Record Related Codes, Qus. 12-17, above). In general, refiled tariff data bases should reflect only Effective or Conditionally Effective tariff records. Tariff records that are Pending, Pending (Tolled), Accepted, Conditionally Accepted, and Suspended should be filed at a later date in a COMPLIANCE filing as action dates approach or Commission findings require. An accepted set of procedures for managing tariff records with statuses other than Effective or Conditionally Effective are listed at Transmittal Letter, Docket No. ER15-2244.	5/12/16
3	The company Cancelled a tariff data base effective a certain date. The Commission accepted a Pending tariff record with an effective date that predates the date the tariff database was Canceled. Can the cancelled tariff data base tariff records' metadata be modified to reflect the change in status, effective date and Commission action?	Cancelled tariff databases may be revised for changes that occur prior to the date of cancellation. For example, tariff records Pending as of the date of cancellation may become Accepted and Effective with effective dates prior to the date of cancellation. The Commission will revise its "cancelled" tariff data base to reflect changes to Pending tariff records' statuses and effective dates. It remains the responsibility of the company to reflect these changes in its proprietary tariff database. An accepted set of procedures for managing tariff records with statuses other than Effective or Conditionally	5/12/16

		Effective are listed at Transmittal Letter, Docket No. ER15-	
		<u>2244.</u>	
4	The company Cancelled a tariff data base effective a certain date. The Commission required a change to a tariff record with an effective date that predates the date the tariff database was Canceled. Can the company make an eTariff filing that revises a cancelled tariff data base tariff records' metadata and Record Binary Data with an effective date prior to the date the tariff data base was cancelled?	Yes. Cancelled tariff databases may be revised through an eTariff filing for changes that occur prior to the date of cancellation. An accepted set of procedures for managing tariff records with statuses other than Effective or Conditionally Effective are listed at Transmittal Letter, Docket No. ER15-2244.	5/12/16
<u>5</u>	What Type of Filing Code should be used to file a new tariff data base?	Tariff data base filings are generally at the initiative of the company. As such, a statutory type of filing code as appropriate for the Program should be used: Baseline-New. If the Commission required a company to refile its tariff data base or the tariff database must be refiled in compliance with some other directive, such as a Commission approved settlement, a compliance type of filing code as appropriate for the Program should be used: Baseline-Refile.	5/12/16
<u>6</u>	The company proposed a name change in Company Registration with a prospective effective date. Various tariff records must be revised to reflect this and related changes. What name will be reflected as the "applicant" in eLibrary and the Commission's Notice if the company makes this eTariff filing prior to the proposed effective date of the CID	eLibrary and the Commission's Notice will reflect the name of the applicant that has the status of Effective as reflected in the Company Registration data base as of the date the eTariff filing was made. The Filing Title and Transmittal Letter should indicate the purpose of the tariff filing.	5/12/16

	profile change?		
<u>7</u>	The company opts to retain the same	Yes. However, great care should be taken to ensure that each	<u>5/12/16</u>
	Tariff ID. However, the new eTariff	Tariff Record retains its original position relative to the	
	database vendor requires the existing	preceding and following Tariff Records. A common mistake	
	Tariff Record Collation Values be	with such re-collation filings is assigning an incorrect Tariff	
	changed to their system. Can Tariff	Record Collation Values for a child Tariff Record. The results	
	Record Collation Values be changed	are "lost" Tariff Records – both single Tariff Records and	
	while retaining the existing Tariff ID?	whole branches.	
8	The company refiled all Tariff Records	eTariff has proven to be extremely reliable in retrieving Tariff	<u>5/12/16</u>
	with new Tariff Record Collation Values	Record data from the eTariff XML. As determining the cause	
	and/or Tariff Record Parent Identifiers.	of missing/misplaced Tariff Records becomes increasingly	
	However, not all Tariff Records appear	time-consuming and complex as new versions of Tariff Records	
	in the Commission's Public Viewer.	are filed, these problems are best identified and resolved as	
	Did eTariff lose those missing Tariff	soon as possible after a filing is made.	
	Records?		
		If the applicant believes that eTariff may have lost Tariff	
		Records, check the following sources:	
		1. In the eTariff Viewer at ferc.gov, bring up the tariff data	
		base in question. Ensure that effective date is within the	
		range of the proposed or actual effective date for the	
		proposed revisions of the tariff data base. Select the	
		"List All Sections" button. That option will reveal Tariff	
		Records that may be Effective and/or Pending, but with	
		Tariff Record Collation Values and/or Tariff Record	
		Parent Identifiers that mis-place those Tariff Records.	
		2. In eLibrary, bring up the tariff filing that should contain	
		the missing Tariff Records. Open the "FERC	
		GENERATED TARIFF FILING.RTF" document. Search for the missing Tariff Record Identifier(s).	
		Search for the missing Tarm Record Identifier(s).	
<u> </u>			

		If the missing Tariff Records appear in either the List All Sections view of the tariff database or in FERC GENERATED TARIFF FILING.RTF, then the problem is most likely incorrect Tariff Record Collation Values and/or Tariff Record Parent Identifiers provided by the applicant. If the missing Tariff Records do not appear in either of these locations, then: 3. Open the company-retained eTariff XML filing filed with the Commission with an XML editor or a variety of text editor software. Search for the missing Tariff Record Identifier(s). [NOTE: the Commission does not retain eTariff XML files – the Commission only retains the data contained within the files. See Business Rules	
		the data contained within the files. See Business Rules, Qu. 35 above.] If the missing Tariff Records cannot be found in either the Public Viewer or eLibrary's FERC GENERATED TARIFF FILING.RTF, and they are in the company's eTariff XML, please contact ferconlinesupport@ferc.gov and provide a Docket No., Submission ID, example missing Tariff Record Identifiers and brief description of the problem.	
		Commission staff provides only minimal technical support in diagnosing missing Tariff Record problems not of eTariff's making.	
9	The company's existing Section Titles are on a sheet basis. Can the company move to a sectionalized basis as part of a refiled tariff database?	Yes. Companies should use such tariff database refilings as an opportunity to adopt best tariff formatting practices. <i>See also</i> eTariff Viewer, Qu. 15 above.	5/12/16
<u>10</u>	Is a redline/strike-out required for refiled tariff databases?	Certain Program's tariff filing requirements require tariff filings to provide a redline/strike-out document that identifies all	5/12/16

		proposed tariff changes. Redline/strike-out is only required for identifying changes in tariff text. [NOTE: headers and footers are not normally considered tariff text.] Redline/strike-out is not required for tariff database cancellations. Redline/strike-out is not required for refiled tariff databases if there are no changes other than tariff structure and format. The Transmittal Letter should clearly state that no redline/strike-out is being provide as no changes in tariff text is proposed. If there are minor clean-up changes or changes due to tariff structure or format, either provide redline/strike-out of only	
		those Tariff Records with changes, or provide a table that identifies the Section Title and the change.	
11	May the company propose additional changes to its tariff in a refiling of its tariff database?	Yes. However, proposed changes other than those required to refile a tariff database may result in unforeseen protests and Commission findings, such as suspension, change in effective date, or rejection. Such events could seriously complicate a company's ability to make eTariff filings with the Commission and maintain its tariff database.	5/12/16