

Gas Distribution Access Rule Electronic Business Transaction Working Group Interpretive Document

LEGEND
The grayed area specifies the GDAR reference number and text, and includes the date added to this document. For easier reference, a yellowed background for a reference indicates an item that has changed since last meeting. Reference text that is bolded – denotes the relevant part of the reference that is pertinent to the discussion Reference text that is [square-bracketed] – denotes authors additional text to aid in clarification
Orange text – denotes business rules, processes, or interpretations to the Rule, which the Group has agreed to
Red text – denotes recommended changes to the GDAR
Green text – denotes an action item which <i>may</i> become an issue to be added to the Global Issues List
Blue text – denotes a link, press <Ctrl> key and click on text to jump to the link
GI # 123 – denotes the reference G.I. number for an item that has a relevant Global Issues item

EXAMPLE:

Ref: 4.5.1 Aug 8, 2004	The gas distributor shall notify the requesting party of the gas distributor’s proposed STR implementation date as soon as practicable . [This affects other clauses as well.]
Literal Interpretation	•
Interpretive Conflicts	• The vendors interpret “requesting party” as the consumer. The distributors interpret it to mean only the vendors.
Practical Application Problems	•
Discussion / Outcome GI #124	• Agreed that “as soon as practicable” will be less than 7 days. We need to determine whether notification is required for when the proposed implementation date changes.
Recommended Changes to GDAR GI #123	• Change clause 4.5.1 to read: “The gas distributor shall notify the vendor of the gas distributor’s proposed STR implementation date as soon as practicable.”

TEMPLATE (use to copy and paste):

Ref:	
Literal Interpretation	•
Interpretive Conflicts	•
Practical Application Problems	•
Discussion / Outcome	•
Recommended Changes to GDAR	•

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Section 4

Ref: 4. Feb 12, 2004	[Concept of "vendor of record"]
Literal Interpretation	•
Interpretive Conflicts	•
Practical Application Problems	•
Discussion / Outcome	<ul style="list-style-type: none"> • For the purposes of delineating the specific business flows that can or cannot occur at various times, "vendor of record" is an appropriate concept to define. • It is agreed that "vendor of record" will be that vendor that the consumer is considered to be attached to on a go-forward basis (i.e. the vendor that the customer will be flowing with) based on the completion of STR processing (including the expiry of the 30-day window in contest periods during vendor-to-vendor switches).
Recommended Changes to GDAR	•
Ref: 4. Jan 29, 2004	[Issue that GDAR does not specify the format of STR's between vendors and distributors.]
Literal Interpretation	•
Interpretive Conflicts	•
Practical Application Problems	<ul style="list-style-type: none"> • Non-conformance to a standard can lead to inefficiencies and documentation problems. Due to legacy systems, standardizing on the xml-based transactions will involve costs to modify the systems, and there is an issue of balancing those costs against the gains, from a consumer perspective.
Discussion / Outcome	<ul style="list-style-type: none"> • GDAR does not require xml-based STR's, so vendors could submit through other means (e.g. phone call). Agreement amongst all that xml-based transactions are what vendors and distributors will use. • We may need to establish a standard for xml-based transactions (to be approved by the Board).
Recommended Changes to GDAR	<ul style="list-style-type: none"> • Clause be added to subsection 4.1 requiring all STR's between vendors and distributors be XML-based and structured in a format approved by the Board.

<p>Ref: 4. Feb 5, 2004</p>	<p>[Concept of functional acknowledgments]</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • If a market participant sends a transaction to another market participant (e.g. vendor to distributor), there is a need for the recipient to acknowledge the receipt of the transaction at a very basic level, back to the sender. If the distributors and vendors use xml-based transactions (link xml format requirement), then this "functional acknowledgement" would be sent once the recipient has analyzed the structure/format of the xml-document and determined the validity of the sender. The functional acknowledgement would then advise the sender whether the document was accepted or rejected, or possibly partially accepted/rejected (this might be due to multiple transaction requests bundled in one document).
<p>Discussion / Outcome GI #110</p>	<ul style="list-style-type: none"> • All vendors, as well as Kingston and Kitchener, are in favour of some form of notification going out to the vendor at the point of acceptance (as defined by link Accepted definition in reference to 4.3.2) of an STR. Union and Enbridge are not in favour of this on the basis that they will be performing validation within a day anyway. While Union concedes that the use of functional acknowledgments may be a standard practice in EBT's, they prefer that this requirement be postponed to a second phase of GDAR. • Vendors have been asked to advise the group if they could accommodate handling both scenarios of receiving a functional acknowledgement, and not receiving one. Feb 5, 2004 Update: All vendors responded with a strong preference to utilizing functional acknowledgements; accommodating both scenarios would entail costs to make changes to their systems.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> •

Ref: 4. Feb 12, 2004	[Notification to vendor when STR's are "Processed", (as opposed to "Reject" and "Suspended")]
Literal Interpretation	•
Interpretive Conflicts	•
Practical Application Problems	<ul style="list-style-type: none"> Although GDAR requires notification to the vendor for certain scenarios when the distributor has rejected or suspended an STR, there isn't a similar requirement to notify the vendor when STR processing has completed successfully to the direction set by the STR. This would be the point when the distributor has completed all the processing for the STR, and it is just waiting to be implemented (see Implemented definition). Both distributors and vendors are of the opinion that this notification is important. Similar to the other acknowledgements (see Functional Acknowledgement), notification of a successful STR is useful, particularly since there are processes that have set timeframes for completion by the participants, and they need to know when the 'clock starts' and when it ends. Most notable is the 14-day timeframe for distributors to complete the screening process, a process initiated after the STR has been "accepted" by the distributor pursuant to 4.3.2 (see 14-day initial screening timeframe). Because all 4 distributors have assured the vendors that STR processing would be completed no later than one day after completing the initial screening of the STR, it was agreed that sending the notification upon completion of the processed STR would serve to meet, in principle, the 14-day requirement.
Discussion / Outcome	•
Recommended Changes to GDAR	<ul style="list-style-type: none"> Add new clause to subsection 4.4 to read: 4.4.2 Once a gas distributor has successfully completed the processing of a vendor-initiated STR, and prior to implementation of the direction set by the STR, the gas distributor shall notify the vendor.

Subsection 4.1

Subsection 4.2

Subsection 4.3.1

Subsection 4.3.2


<p>Ref: 4.3.2.1c) Feb 5, 2004</p>	<p>A gas distributor shall accept an STR from: (c) a consumer's new gas vendor:</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • Under clause 4.3.3.1, (Initial Screening) the Rule requires the vendor to have an account number with the distributor (see link vendor account number with distributor), but 4.3.2.1 c) essentially also requires it from a logical perspective based on the assumption that a distributor-assigned vendor account number is predicated by the establishment of a relationship between the distributor and vendor as set through their Service Agreement. This means that the requirement for the vendor account number check should really be required <i>before</i> the initial screening stage; most logically at the accepted stage (link Accepted definition).
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • If the check is done at the acceptance stage, then checking it again at the initial screening stage becomes superfluous.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> • Change clause 4.3.2.1c) to: (c) a consumer's new gas vendor: <ul style="list-style-type: none"> • for a change of gas supply for a consumer from system gas to a gas vendor; or • for a change of gas supply for a consumer from one gas vendor to another, including a change in billing option;. • provided the vendor and distributor have established a Service Agreement
<p>Ref: 4.3.2.2 Jan 29, 2004</p>	<p>If an STR is submitted by any other person, the gas distributor may reject the STR, and shall notify the requesting party.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> •
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • What is meant by "any other person"? Consumer isn't defined very clearly. • If a son, who pays his mother's bill, calls in, would he be allowed to discuss his mother's bill? (No, unless mother has provided authorization.) • What if son signs up with vendor and mother calls in and says he didn't have signing authority? (Based on the 2 out of 3 validation rule, and assuming that the account # and postal code validators are correct, account would be enrolled with the vendor. Vendor would then have to drop the customer.) • "Any other person" is just that – anyone else, other than the consumer or the consumer's current vendor or consumer's new vendor. Agreement that the distributors will use – as a basis for determining whether or not the STR is rejected – information confirming that the person submitting the STR has authorization to act on behalf of the consumer. Examples of authorized persons might be lawyers or energy management agents that are all acting on behalf of a client, and the scenario noted above regarding the mother/son.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> •

Subsection 4.3.3

<p>Ref: 4.3.3.1(a) Jan 29, 2004</p>	<p>If a gas distributor has accepted an STR, pursuant to subsection 4.3.2.1 of this Rule, the gas distributor shall determine if the STR has valid entries for the following terms (collectively, the "validation terms"):</p> <p>(a) If the consumer has an account number with the gas distributor,</p> <ul style="list-style-type: none"> • the gas vendor's account number with the gas distributor • the consumer's account number with the gas distributor; and • at least one of: <ol style="list-style-type: none"> (1) the consumer's name, and (2) the consumer's postal code.
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> • That the gas vendor must have an account number with the distributor (presumably within the distributor's CIS).
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • Not all distributors assign an account number to a vendor.
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • "Gas vendor's account number with the distributor" – what does this mean? Believed by the group that the intent of this was to ensure that the vendor and the distributor have a "relationship" (i.e. service agreement between them). Discussion on whether we should use a standard identifier (e.g. OEB-issued license) for this. Agreement that each distributor would provide the vendor with an assigned alpha-numeric identifier that would be considered, for the intents of GDAR, to be their account number.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> •

<p>Ref: 4.3.3.1(a) Jan 29, 2004</p>	<p>If a gas distributor has accepted an STR, pursuant to subsection 4.3.2.1 of this Rule, the gas distributor shall determine if the STR has valid entries for the following terms (collectively, the "validation terms"): (a) If the consumer has an account number with the gas distributor,</p> <ul style="list-style-type: none"> • the gas vendor's account number with the gas distributor • the consumer's account number with the gas distributor; and • at least one of: <ul style="list-style-type: none"> (1) the consumer's name, and (2) the consumer's postal code.
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • Vendors need to get an acknowledgement from the distributor that the STR has been accepted as well, since this is when the 14-day clock starts for screening to be completed (refer to 4.3.3.7).
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • Agreed that "accepted" in this context will mean: <ol style="list-style-type: none"> 1. structure/format is acceptable (i.e. if xml-based, meets specifications) 2. it is received from a valid party; valid party being defined by 4.3.2.1 and 4.3.2.2 (which permits the distributor to permit or reject any other person) • Agreed that it is at this point that the 14 (calendar) days clock (4.3.3.7) starts for initial screening. • Agreed that if the distributor does not accept the STR at this point, they would notify the vendor of the failure of the STR.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> •

<p>Ref: 4.3.3.2 Jan 29, 2004</p>	<p><i>(Initial Screening)</i> A valid entry is an entry that matches the information contained in the gas distributor's information system.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> For validation, all validation terms must be an identical match to what the distributor has in their CIS.
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> None
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> It was agreed that this may be too strict for consumer's account number, name, and postal code. An exact match on customer name is impractical as it relies on too many variables. Account numbers and postal codes is also problematic as different systems may or may not include special characters, such as spaces or dashes.
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> Refer to GI #072. Suggested that a Name Validator, similar to electricity, be used. Agreement that the validators will be, for: Account Number = CIS account number stripped of any spaces or special characters; Postal Code = Billing Address Postal Code stripped of any spaces; Name = first four characters of the Last Name or Company Name as appropriate, populated in the Last Name Field. Company Name(if applicable) will be populated in the Last Name field. Retailers should provide all 3 fields even though a 2/3 match is only required for validation criteria.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none">
<p>Ref: 4.3.3.4 Jan 29, 2004</p>	<p>If the STR contains valid entries for the validation terms, and there is not a pending STR with respect to the consumer, the gas distributor shall tag the STR as "pending."</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> Pending occurs when the STR passes validation, and there is a subsequent check to ensure that there aren't any other STR's pending for this customer.
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none">
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> Tagging the STR as "pending" doesn't mean notifying the vendor of this.
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> Agreement that there isn't a wait state for 14 days for further STR's (i.e. 4.3.3.7 does not imply that you must wait for 14 days).
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none">

Ref: 4.3.3.5 Feb 12, 2004	If the STR is for a change in gas supply and there is a pending STR for a change in gas supply , the gas distributor shall reject the STR and notify the requesting party.
Literal Interpretation	<ul style="list-style-type: none"> That the second incoming STR for any change of gas supply is to be rejected.
Interpretive Conflicts	<ul style="list-style-type: none">
Practical Application Problems	<ul style="list-style-type: none"> There is not consensus that this clause is adequate for the market dynamics, and the group believes it best to analyze the specific and various business workflows resulting from STR processing before determining whether changes are required to this clause.
Discussion / Outcome	<ul style="list-style-type: none"> For the purposes of this discussion, "pending" is as defined by 4.3.3.4; that the STR contains valid entries for the validation terms, and there is not a pending STR with respect to the consumer. It is up to the point of flow. Group to work through the various workflows for change of supply STR collisions.
Recommended Changes to GDAR	<ul style="list-style-type: none">
Ref: 4.3.3.6 Jan 29, 2004	If the gas distributor determines that any information, in addition to the validation terms, necessary to implement the pending STR is inaccurate or incomplete, the gas distributor shall suspend processing the STR and shall notify the requesting party.
Literal Interpretation	<ul style="list-style-type: none">
Interpretive Conflicts	<ul style="list-style-type: none">
Practical Application Problems	<ul style="list-style-type: none">
Discussion / Outcome	<ul style="list-style-type: none"> What is meant by "implement"? Does it mean "process" or does it mean "to have effected"? Is it the date when we have "processed" the STR or is it the "flow date"? Agreement that for the purposes of GDAR, "implement" is reference to the "effective date" of the STR, meaning the date at which point the directive of the STR actually occurs. So, it is not the date at which the STR is "processed". For change of gas supply STR's, this would be the date at which flow starts or ends. For change of address or billing option STR's it would be the date the change of address or billing option change is to be effective from.
Recommended Changes to GDAR	<ul style="list-style-type: none"> 

<p>Ref: 4.3.3.7 Jan 29, 2004</p>	<p>A gas distributor shall complete the initial screening process within 14 days of receipt of the STR.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> •
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • Agreement that the 14 days are 14 <i>calendar days</i>. • Agreement that the clock for the 14 days starts after the STR has been checked to ensure that it has the proper structure/format, and is from a valid sender (this is "accepted" as referred to by 4.3.3.1). The distributor has 14 days from then to complete the validation (2 out of 3 rule), check for any other pending STR's, and determine if any info required to implement the STR, is inaccurate or incomplete.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> •

Subsection 4.3.4

<p>Ref: 4.3.4.1 Jan 29, 2004</p>	<p>If the requesting party has not provided the necessary information required pursuant to notification in subsection 4.3.3.6 of this Rule, within 30 days from receipt of the STR, the gas distributor shall reject the STR and shall notify the requesting party.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> • "Receipt" means when the original STR was received by the distributor.
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • If the distributor takes the full 14 days to complete screening, then this leaves the vendor only 16 days to provide all the information, which the vendors do not believe is sufficient time.
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • When is "receipt"? GDAR does not define this. We agreed that we will consider that the 30-day rule starts at the point when the distributor sends the "Suspend" notification to the vendor. Any STR's coming in during this time would be rejected. • Agreement that the 30 days should commence when the distributor sends the suspend notification in 4.3.3.6.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> • Change clause 4.3.4.1 to: "If the requesting party has not provided the necessary information required pursuant to notification in subsection 4.3.3.6 of this Rule, within 30 days from sending notification to the requesting party of the suspended STR, the gas distributor shall reject the STR and shall notify the requesting party."

Subsection 4.3.5

Subsection 4.3.6

<p>Ref: 4.3.6.5 Feb 12, 2004</p>	<p>If a gas distributor receives an STR to transfer a consumer from the consumer's current gas vendor to a new gas vendor, and the gas distributor has determined that the new gas vendor has sufficient security, the gas distributor shall notify the current gas vendor of the pending STR.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • Both vendors need to be notified of a vendor-to-vendor switch to allow for both parties to resolve the conflict with the customer. As it stands, the Rule gives preferential treatment to the current gas vendor since that vendor would know that they are in a contest with another vendor, while that new vendor would not realize it. There is a need to send a notice of pending switch to both vendors to give opportunity for them to work with the customer.
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> •
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> • <i>Change heading between 4.4.6.4 and 4.3.6.5 that reads "Notification to Current Gas Vendor" to: Notification to Gas Vendors</i> • <i>Change 4.3.6.5 to: If a gas distributor receives an STR to transfer a consumer from the consumer's current gas vendor to a new gas vendor, and the gas distributor has determined that the new gas vendor has sufficient security, the gas distributor shall notify both gas vendors of the pending STR.</i>

Subsection 4.3.7

<p>Ref: 4.3.7.4 Jan 29, 2004</p>	<p>A gas distributor shall not process an STR from a consumer's gas vendor unless the consumer's contract with the gas vendor has been terminated due to the consumer's default, or has expired or will expire on or before the proposed transfer date.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • The distributor does not have the ability to ascertain whether the vendor is in compliance with this or not, as they are not privy to the vendor-consumer contracts. This GDAR clause seems to place a burden on the distributor to police the vendors. • If however, the GDAR is suggesting through this clause that the distributors do require the vendor-consumer contract information, there is a question whether the Board has authority to direct the vendors to provide contractual information to the distributor.
<p>Discussion / Outcome</p>	<ul style="list-style-type: none"> • Agreement that this clause should not be in the GDAR, as this is a vendor issue, and the distributor does not have the ability to monitor vendor compliance with this.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> • Either remove this clause entirely, or change it to: "A gas vendor shall not submit an STR unless the consumer's contract with the gas vendor has been terminated due to the consumer's default, or has expired or will expire on or before the proposed transfer date."

Subsection 4.3.8

Subsection 4.3.9

Subsection 4.4

<p>Ref: 4.4.1 Feb 5, 2004</p>	<p>Any time a gas distributor rejects, stops or suspends processing an STR, the gas distributor shall include in any notification the specific reasons for the gas distributor taking this action.</p>
<p>Literal Interpretation</p>	<ul style="list-style-type: none"> •
<p>Interpretive Conflicts</p>	<ul style="list-style-type: none"> •
<p>Practical Application Problems</p>	<ul style="list-style-type: none"> • "Specific" isn't detailed or defined in GDAR. Also issue of multiple reasons. For example, on a change of gas supply STR that is suspended, there could be 3 scenarios: <ol style="list-style-type: none"> 1. Send "Suspend" with reason "missing info" 2. Send "Suspend" with reason "missing price point" 3. Send "Suspend" with reasons "missing price point", "invalid billing option"
<p>Discussion / Outcome GI #27, GI #90, GI #107</p>	<ul style="list-style-type: none"> • We need to develop/document a standard list of specific reasons. • Also need to determine if multiple reasons would be sent back.
<p>Recommended Changes to GDAR</p>	<ul style="list-style-type: none"> •

Subsection 4.5

Subsection 4.6

Ref: 4.6.1	A gas distributor shall implement the direction contained in an STR in a timely manner, but in any event, no later than 60 days from the date that the gas distributor receives a valid and complete STR, provided that this time limit shall not include the time which elapses while the gas distributor has suspended processing the STR.
Literal Interpretation	•
Interpretive Conflicts	•
Practical Application Problems	•
Discussion / Outcome	• Refer to GI #80 and GI #92
Recommended Changes to GDAR	•

Subsection 4.7

Action Items

- We may need to establish a standard for xml-based transactions (to be approved by the Board) 3
- Group to work through the various workflows for change of supply STR collisions. 13
- We need to develop/document a standard list of specific reasons..... 21
- Also need to determine if multiple reasons would be sent back..... 21

Agreed To Items

- It is agreed that “vendor of record” will be that vendor that the consumer is considered to be attached to on a go-forward basis (i.e. the vendor that the customer will be flowing with) based on the completion of STR processing (including the expiry of the 30-day window in contest periods during vendor-to-vendor switches)..... 3
- Because all 4 distributors have assured the vendors that STR processing would be completed no later than one day after completing the initial screening of the STR, it was agreed that sending the notification upon completion of the processed STR would serve to meet, in principle, the 14-day requirement. 5
- Agreed that “accepted” in this context will mean: 1. structure/format is acceptable (i.e. if xml-based, meets specifications) 2. it is received from a valid party; valid party being defined by 4.3.2.1 and 4.3.2.2 (which permits the distributor to permit or reject any other person)..... 11
- Agreed that it is at this point that the 14 (calendar) days clock (4.3.3.7) starts for initial screening. 11
- Agreed that if the distributor does not accept the STR at this point, they would notify the vendor of the failure of the STR. 11
- Agreement that the validators will be, for: Account Number = CIS account number stripped of any spaces or special characters; Postal Code = Billing Address Postal Code stripped of any spaces; Name = first four characters of the Last Name or Company Name as appropriate, populated in the Last Name Field. Company Name(if applicable) will be populated in the Last Name field. 12
- Agreement that there isn't a wait state for 14 days for further STR's (i.e. 4.3.3.7 does not imply that you must wait for 14 days). 12
- Agreement that the 14 days are 14 *calendar* days. 14
- Agreement that the clock for the 14 days starts after the STR has been checked to ensure that it has the proper structure/format, and is from a valid sender (this is “accepted” as referred to by 4.3.3.1). The distributor has 14 days from then to complete the validation (2 out of 3 rule), check for any other pending STR's, and determine if any info required to implement the STR, is inaccurate or incomplete..... 14
- Agreement that this clause should not be in the GDAR, as this is a vendor issue, and the distributor does not have the ability to monitor vendor compliance with this. 18

Recommended Changes To The GDAR

- Clause be added to subsection 4.1 requiring all STR's between vendors and distributors be XML-based and structured in a format approved by the Board. 3
- Add new clause to subsection 4.4 to read: 4.4.2 Once a gas distributor has successfully completed the processing of a vendor-initiated STR, and prior to implementation of the direction set by the STR, the gas distributor shall notify the vendor. 5

- Change clause 4.3.2.1c) to: (c) a consumer's new gas vendor: • for a change of gas supply for a consumer from system gas to a gas vendor; or • for a change of gas supply for a consumer from one gas vendor to another, including a change in billing option;. • provided the vendor and distributor have established a Service Agreement 9
- Change clause 4.3.4.1 to: "If the requesting party has not provided the necessary information required pursuant to notification in subsection 4.3.3.6 of this Rule, within 30 days from sending notification to the requesting party of the suspended STR, the gas distributor shall reject the STR and shall notify the requesting party." 15
- Either remove this clause entirely, or change it to: "A gas vendor shall not submit an STR unless the consumer's contract with the gas vendor has been terminated due to the consumer's default, or has expired or will expire on or before the proposed transfer date." 18