UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Coordination Between Natural Gas and Electricity Markets	))	Docket No. AD12-12-000

COMMENTS OF
THE INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA

The Interstate Natural Gas Association of America (INGAA)[1] submits these comments pursuant to the "Notice of Request for Comments and Technical Conference" (Notice) the Commission issued in this docket on December 7, 2012.

EXECUTIVE SUMMARY

INGAA appreciates the Commission's initiative to foster coordination between generation "dispatching entities" (ISOs, RTOs and, in bilateral markets, individual electric utilities) and interstate natural gas pipelines. INGAA supports improving electric reliability through enhanced coordination, including enhanced information sharing, where useful and legally permissible.

The Notice poses three sets of questions soliciting suggestions for enhancing information sharing between the natural gas and electric power industries. INGAA looks forward to hearing the dispatching entities' thoughts on what additional pipeline information, beyond the data INGAA members already make publicly available, would advance electric reliability if it was shared with dispatching entities. At the same time, INGAA is not in a position to make specific proposals or presume what dispatching entities might propose. Rather, INGAA suggests that the

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1 INGAA is comprised of 27 members, representing the vast majority of the interstate natural gas transmission pipeline companies in the United States and comparable companies in Canada. INGAA's members, which operate approximately 200,000 miles of pipelines, provide an indispensable link between natural gas producers and natural gas consumers in the residential, commercial, industrial and electric power sectors. INGAA members are committed to providing reliable transportation services to their diverse customers, without undue discrimination, and to maintaining a high level of customer service.

Commission, and others, consider three questions when reviewing suggested enhancements to gas-electric communications or best practices.

First, does the suggested enhancement to gas-electric information sharing seek information that pipelines already provide? INGAA's comments describe the substantial body of information that interstate natural gas pipelines already provide publicly through electronic posting. INGAA hopes this will serve as a baseline that will better allow all stakeholders to consider what types of additional information should be shared between pipelines and dispatching entities.

Second, will the suggested enhancement to gas-electric information sharing contribute to improving electric reliability? The sole purpose of an enhancement to information sharing should be to foster improved electric reliability. Thus, any enhancement should:

- Contribute to better scheduling and dispatching of generation, by a dispatching entity, in a given electric market;
- Reflect only operating information on capacity available to be nominated and utilized on the transporting pipeline; and
- Relate to the specific contracted-for capacity of a particular generator or natural gas supplier to the generator that might address a particular real-time concern.

Information that is not necessary to promote electric reliability should not be shared.

Third, can the suggested enhancement to gas-electric information sharing be accommodated within existing legal requirements? The Natural Gas Act and the Commission's jurisprudence governing open access and undue discrimination prohibit pipelines from unduly discriminating between similarly situated shippers or granting an undue preference to "any person" whether a shipper or a non-shipper (which conceivably could be construed to cover a dispatching entity). The Commission's regulations also prohibit a pipeline from using a third party as a conduit of non-public transmission function information to the marketing function employees of the pipeline or its affiliates. Finally, some have suggested that information sharing conceivably could exposure a pipeline to civil damages to the extent unauthorized disclosure causes a generator economic harm.

In authorizing the sharing of any additional data, the Commission must affirm that such sharing will not constitute undue discrimination given the Commission's overriding public policy interest in ensuring reliable electric generation. Even if a change to the timing or substance of pipeline information sharing enhances gas-electric coordination, the Commission must provide pipelines the assurance that the communications the Commission intends for pipelines to engage in with dispatching entities are permissible under section 4(b) of the Natural Gas Act and its regulations. INGAA further requests the Commission clarify that pipelines participating in enhanced information sharing with dispatching entities to promote electric reliability should not be subject to civil liability to generators as a result of that participation. These clarifications are necessary to reduce the regulatory risk to pipelines associated with enhanced information sharing, and to allow pipelines to cooperate more fully with dispatching entities to foster electric reliability.

GENERAL COMMENTS

As INGAA detailed in the comments it filed in this docket last March,[2] pipelines[3] see the electric power market as a growing and valuable business opportunity.[4] INGAA's members thus have a strong business interest in meeting the needs of the electric power market. Consistent with this interest, INGAA and its members actively participated in last summer's regional technical conferences and have discussed electric generation service issues with the Independent System Operators (ISOs), Regional Transmission Organizations (RTOs) and pipeline customers on numerous occasions, including semi-annual meetings with the Inter-RTO Council.

The Notice poses three sets of questions that solicit stakeholder suggestions for improving gas-electric information sharing. INGAA looks forward to hearing these suggestions rather than attempting to presume what others might offer. Once INGAA has had the opportunity to review the stakeholders' suggestions for enhanced information sharing, INGAA may be in a better position to comment specifically on the questions posed in the Notice. For

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[2] "Comments of the Interstate Natural Gas Association of America," Docket No. AD12-12-000 (filed Mar. 30, 2012)("INGAA March Comments").

[3] Throughout these comments "pipeline(s)" refers to interstate natural gas pipeline(s) unless the context clearly indicates otherwise.

[4] INGAA March Comments at 3-4:

> Increasing natural gas consumption in the electric power sector is not a new phenomenon and the pipeline industry has served this market reliably over the years. Consumption of natural gas in the electric sector was 7.4 Trillion cubic feet (Tcf) per year as of 2010, up from 5 Tcf just 10 years earlier, which was up from 3.2 Tcf per year in 1990. * * * Given the widespread sources of supply throughout the United States and natural gas' cleaner-burning characteristics, natural gas is projected to experience strong demand growth during the coming decades. While the increased demand for natural gas will come from various sectors, such as the vehicle, industrial, and power sectors, the electric power sector consistently has been identified as the sector that will most significantly increase its use of natural gas.

(citing North American Electric Reliability, *2011 Special Reliability Assessment: A Primer on the Natural Gas and Electric Power Industries Interdependencies in the United States*, December 2011 at 36 for consumption figures).

now, INGAA requests the Commission consider the following three questions when evaluating information sharing suggestions.

I. DOES THE SUGGESTED ENHANCEMENT TO GAS-ELECTRIC INFORMATION SHARING SEEK INFORMATION PIPELINES ALREADY PROVIDE?

As part of an effort to consider additional gas-electric information exchanges, the gas and electric industries should identify and reach a common understanding of what information is available already. Pipelines publicly post an enormous amount of information for shippers, potential shippers and others to view. Sections 284.12(b)(3)(vi)[5] and 284.13[6] of the Commission's regulations detail the data that interstate pipelines must provide. Pipelines, at a minimum, post the following information on their websites:

- Transactional Reporting
    - Firm
    - Interruptible
    - Capacity Release
- Index of Customers (detailed information regarding the rate, duration and terms of each transportation and storage contract)
- Capacity and Flow Information
    - Operationally Available (scheduled and remaining capacity at each cycle)
    - Unsubscribed (available to sell)
    - No Notice Activity (if applicable)
- Notices
    - Critical
    - Non-Critical
    - Planned Service Outage

[5] 18 C.F.R. § 284.13(b)(3)(vi) provides that a pipeline must post notices of operational flow orders, critical periods, and other critical notices on its web site, and must notify affected parties of such notices.

[6] *E.g.*, 18 C.F.R. § 284.13(b)(reports on firm and interruptible services), *id*., § 284.13(c)(index of customers); *id.*, § 284.13(d)(capacity and flow information).

For a fuller description, Appendix A lists the information pipelines must post electronically under section 18 C.F.R § 284.13 (excluding § 284.13(e)). The data is downloadable and it is archived and available for a period of three years. Pipelines also electronically post their tariffs, as well as gas quality information, transactional reports, imbalance data, and standards of conduct information. A discussion of information exchange should start with a review of the information that is available now.

While it is not clear what additional information is needed to ensure electric reliability, beyond what is publicly available (or, for that matter, what dispatching entities can get directly from the generators within their boundaries),[7] INGAA supports having a dialogue on this issue. INGAA appreciates that the electric and gas industries use different terminology and the information conveyed by various pipeline postings may not be self-evident to a dispatching entity. INGAA and its member pipeline companies already have undertaken substantial informal outreach with dispatching entities to explore issues of mutual interest in connection with the greater use of natural gas for electric generation. Consistent with this outreach, INGAA and its members commit to continue to meet with dispatching entities, just as we would with any other customer group, to explain pipeline operational informational postings.[8] INGAA's members also will work with parties as part of the Commission's process to determine if other information would have a direct impact on electric transmission reliability.

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7 For example, the Commission's *Staff Report on Gas-Electric Coordination Technical Conferences* in this docket (Report) advises ISOs, RTOs and generators to sign up to receive pipeline notifications of operational flow orders and other critical notices, as required by NAESB Wholesale Electric Quadrant (WEQ) Version 002.1 Business Practice Standard 11.1.4. As the Commission notes, "These communications can help electric transmission operators better manage their systems by reallocating resources in response to changing conditions on natural gas pipelines." Report at 28.

8 While this docket reflects the Commission's initiative to foster coordination between dispatching entities and pipelines, an examination of information exchange should not be limited to these parties. The Commission also should examine enhancements to information exchanges between dispatching entities and their generators.

In addition to the information postings and other publicly available items identified above, pipelines typically post annual pipeline maintenance schedules on their websites well in advance of the work being done. Some stakeholders have suggested that pipelines should develop their maintenance schedules in closer cooperation with dispatching entities. In preparing their schedules, pipelines always are willing to listen to concerns about preferred maintenance times (including concerns expressed by dispatching entities). Pipelines are open to suggestions from dispatching entities, as pipelines are for all of their customers. Pipelines will endeavor to accommodate these suggestions as much as possible consistent with following their tariffs, complying with Commission regulations, and preserving their ability to honor their obligations to firm shippers.

II. WILL THE SUGGESTED ENHANCEMENT TO GAS-ELECTRIC INFORMATION CONTRIBUTE TO IMPROVING ELECTRIC RELIABILITY?

To the extent generators identify additional, non-public information that potentially may be shared by pipelines[9] and *vice versa*, it must be demonstrated that such information contributes to better scheduling and dispatching of generation, by a dispatching entity, in a given electric market. Moreover, any enhancement in available information should reflect only operating information on capacity available to be nominated and utilized on the transporting pipeline and relate to the specific contracted for capacity — primary, secondary or interruptible — of a particular generator or natural gas supplier to the generator that might address a particular real-

[9] Generators and customers already have expressed concern about the substance and frequency of the information pipelines would exchange with dispatching entities, as well as the circumstances when such exchanges would occur. *See, e.g.*, "Protest of the Electric Power Supply Association," Docket No. ER13-356-000 (filed Nov. 23, 2012); "Motion to Intervene and Protest of New England Power Generators Association, Inc.," Docket No. ER13-356-000 (filed Nov. 23, 2012)("NEPGA Motion"). Pipelines face potentially significant exposure if they get in the middle of communications that should already be occurring between the RTO or ISO and the generator, and INGAA believes that absent a Commission clarification assuring pipelines against legal liability it would be inappropriate for a pipeline to communicate information to a dispatching entity before it communicates this information to its shippers.

time concern.[10] This will ensure that any additional information sharing contributes to improving electric reliability consistent with Commission goals.

Communication and information sharing may contribute to emergency management. However, even in an emergency, communication alone cannot create pipeline capacity, for generators or anyone else, where none is available. Nor can communication alone provide a shipper with contractual rights it does not otherwise have. Moreover, gas-electric information sharing, no matter how enhanced, will not allow fully utilized capacity to be allocated in a manner other than pursuant to the pipeline's tariff and service priorities.

For example, consider an electric generator that is relying wholly or partly on interruptible transportation to supply its plant. Even in an emergency, the pipeline cannot provide that generator with capacity for the generator's interruptible service if the pipeline's full capacity is being used by firm shippers. Similarly, the pipeline cannot accord the generator with a higher priority of service. In other words, pipelines must follow their Commission-approved tariff provisions for allocating capacity. These just and reasonable provisions have been in place and work well in the current market.

Nevertheless, INGAA is supportive of the Commission's objectives of promoting improved electric reliability and INGAA's member pipelines are willing to consider suggestions for enhanced information sharing, particularly if such information may be useful to avoid electric outages in an emergency situation. For example, the Commission recently implemented changes allowing flow day redirects without losing capacity through constraints. Shippers could explore the potential for this change to allow them to work better among themselves during emergencies

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[10] Indeed, generators are often in the best position to be able to assess whether or not they will be able to run in a given situation.

to divert capacity from one location to another. Thus, while enhanced information sharing, by itself, is not sufficient to alleviate all potential electric reliability concerns, INGAA is willing to work with dispatching entities to determine whether and how additional information may be better shared to promote electric reliability.

III. CAN THE SUGGESTED ENHANCEMENT TO GAS-ELECTRIC INFORMATION SHARING BE ACCOMMODATED WITHIN EXISTING LEGAL REQUIREMENTS?

INGAA recognizes the importance of natural gas/electric power market coordination in ensuring the continued reliability of the bulk power system and realizing the environmental, economic, national security and commercial benefits of expanding gas-fired generation. That said, INGAA members provide service within a set of legal constraints imposed by the Natural Gas Act (NGA) and the open access, transparency and anti-discrimination regulations the Commission issued pursuant to that statute. Each of the legal constraints described below must be taken into account when evaluating a suggested enhancement to gas-electric information sharing. Should the electric industry stakeholders identify information that they believe would enhance electric reliability, the Commission must provide pipelines with the assurance that such communications legally are permissible and, specifically, that such information sharing will not constitute undue discrimination given the Commission's overriding public policy interest in ensuring reliable electric generation. A Commission clarification providing this assurance will allow pipelines to engage more fully in discussions related to enhanced information sharing.

1. Undue Discrimination

NGA section 4(b) requires pipelines to treat all "similarly situated" shippers and potential the same:

> No natural gas company shall, with respect to any transportation … of natural gas subject to the jurisdiction of the Commission, (1) make or grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage, or (2) maintain any unreasonable difference in rates, charges, service, facilities, or in any respect, either as between localities or as between classes of service.[11]

In similar fashion, the Commission's regulations provide that a pipeline must apply all tariff provisions relating to the sale or purchase of transportation capacity in a fair and impartial manner and that the pipeline may not give undue preference to any person in matters relating to the sale or purchase of transportation service.[12]

Section 4(b) is not limited to a pipeline's actions *vis-à-vis* its shippers. Section 4(b) also provides that a pipeline may not unduly discriminate in favor of "any person" with respect to any transportation. Unless clarified to the contrary, section 4(b)'s reference to "any person" conceivably could be construed to cover dispatching entities. There are significant arguments that dispatching entities, who are not shippers, are not "similarly situated" to any shipper on a pipeline. In fact, the Commission has recognized that "significant amount of information already is shared across industries pursuant to existing market practices, including those implemented pursuant to Order No. 698," and that "[b]y clearly defining the information to be shared and placing appropriate restrictions on its use, regions can address coordination needs *consistent with the statutory prohibitions against undue discrimination or preference*."[13] Nonetheless, there is

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[11] 15 U.S.C. § 717c(b).

[12] See 18 C.F.R. § 358.4(a)-(d).

[13] *Coordination Between Natural Gas and Electricity Markets,* 141 FERC ¶ 61,125 at P 8 (2012) (emphasis added).

some risk that a pipeline potentially could be subject to an allegation of "undue discrimination" if it provides a dispatching entity with non-public transmission information with respect to any transportation or sale of natural gas subject to the jurisdiction of the Commission without telling all other shippers or potential shippers contemporaneously.[14]

Since the Commission's definition of "undue discrimination" under the NGA is imprecise, pipelines are cautious when it comes to such communications in order to protect themselves from any allegations of "undue discrimination." Therefore, to ensure that pipelines are able to freely participate in any enhanced information-sharing protocols without subjecting themselves to undue regulatory risk, the Commission should clearly define the type of enhanced information that may be shared between pipelines and dispatching entities and clarify that the sharing of such information is not unduly discriminatory or preferential conduct under NGA section 4(b).

2. Standards of Conduct

The Commission's Standards of Conduct govern a pipeline's interactions with the marketing function employees of both the pipeline and its affiliates. The Standards of Conduct, however, also provide general principles that apply to a pipeline's interactions with affiliates and non-affiliates if the pipeline engages in transportation transactions with an affiliate that employs marketing function employees.[15]

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[14] A pipeline could face undue discrimination exposure if a dispatching entity treats one electric generation shipper in a way that is arguably "favorable" to a competitor due to information provided by the pipeline. A pipeline might also face undue discrimination exposure from a shipper (perhaps even a shipper that is not an electric generator) claiming it was somehow harmed by not receiving the information the pipeline disclosed to the dispatching entity.

[15] 18 C.F.R. § 358.2.

Since ISOs and RTOs are not pipeline affiliates, the Standards of Conduct rules are inapplicable but for the "No Conduit" rule,[16] which bars a pipeline from using third parties to communicate information to the marketing function employees of a pipeline affiliate of the pipeline that the pipeline could not communicate directly. The No Conduit rule would be relevant to pipeline communications to ISOs and RTOs if, for example, the ISO or RTO inadvertently discussed non-public transmission function information it received from the pipeline with marketing function employees of the pipeline's affiliated electric generation company (if applicable). The Commission thus should clarify that if a pipeline shares non-public information with a dispatching entity in order to promote electric reliability, the pipeline does not run afoul of the No Conduit rule if the dispatching entity, unbeknownst to the pipeline, shares that information with the marketing function employees of an affiliate of the pipeline.

3. Civil Liability

To the extent that pipelines engage in enhanced information sharing with dispatching entities to promote electric reliability, this should not subject the pipelines to additional open-ended civil liability to generators. Thus, the Commission must clarify that pipelines are not subject to civil liability to generators to the extent that shared information is inadvertently disclosed and misused. For example, in the ongoing *ISO-NE* proceeding,[17] generators have argued they should be afforded third-party beneficiary status to the non-disclosure agreement that would be executed between the pipelines and ISO-NE to allow enhanced information sharing.[18] The purpose of such third-party beneficiary status is to provide generators with a vehicle to pursue civil damages, presumably outside of FERC, for alleged disclosure of

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16 See 18 C.F.R. § 358.6.

17 *ISO New England Inc.* (Docket No. ER13-356-000).

18 *See*, *e.g.*, NEPGA Motion, *supra*, n. 9.

information, in violation of the terms of the non-disclosure agreement, that causes the generator economic harm.[19]

According generators the status of third-party beneficiaries exposes pipelines to substantial risk given that generators conceivably could seek damages related to losses in the electric and natural gas commodity markets. Such exposure is unwarranted, especially given that pipelines would be engaged in voluntary information sharing to improve the reliability of the electric market, and would be obtaining no additional financial incentive for doing so. This risk exposure thus could have a chilling effect on the willingness of pipelines to participate in enhanced information sharing programs such as the one contemplated by ISO-NE.

Therefore, to the extent the Commission seeks to encourage pipelines to engage in enhanced information sharing with dispatching entities, the Commission must clarify that pipelines are not subject to unwarranted civil liability to generators.

4. The Need for Commission Guidance

The interplay between enhancements to gas-electric information sharing and the legal constraints posed by NGA section 4(b), the Commission's implementing regulations, the Standards of Conduct No Conduit rule and the potential threat of civil liability is illustrated in the ongoing *ISO-NE* case,[20] where INGAA and pipelines serving New England asked the Commission to clarify that the pipelines would not violate section 4(b) or the No Conduit rule if they shared certain operational information with ISO New England without contemporaneously posting it for all customers.[21] To date, the Commission has not provided the requested clarification and the underlying legal concerns persist.

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19 *Id.*

20 *ISO New England Inc.*, *supra*, n. 17.

21 "Joint Comments and Request for Approval, Subject to Clarification, of the New England Pipelines and the

In addition to the Commission clarifying what non-public transmission information pipelines may share with dispatching entities, the Commission must address potential pipeline liability from allegations by generators of misuse of information received by a dispatching entity. In *ISO-NE*, generators have argued they should be granted the status of third-party beneficiaries to the non-disclosure agreements (NDAs) between the New England pipelines and ISO New England. As noted above, the generators seek third-party beneficiary status as a vehicle to pursue civil damages against a pipeline, presumably outside the Commission, for an information disclosure that allegedly violates the NDA and causes a generator economic harm.[22] To the extent the Commission wants to ensure pipelines will engage in sharing commercially sensitive non-public operational information with and receiving such information from dispatching entities, the Commission also must address these liability concerns.

CONCLUSION

Interstate natural gas pipelines support sharing operator-to-operator information with electricity dispatching entities to ensure electric reliability. To advance the discussion, the electricity dispatching entities need to identify what pipeline information, beyond what is already publicly available, would advance electric reliability further if it was shared with dispatching entities. Given the different terminology, pipelines are willing to engage in discussions to aid dispatchers in understanding the various pipeline postings and publicly available information. To remove potential barriers to communication and advance the Commission's goal of ensuring reliable electric generation, the Commission must take two steps: (1) clarify what non-public information a pipeline may share with dispatching entities, without a contemporaneous posting,

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Interstate Natural Gas Association of America" p. 6, Docket No. ER13-356-000 (filed Nov. 28, 2012).

[22] NEPGA Motion, *supra*, n. 9.

and (2) provide pipelines simultaneously with the necessary assurances that such information sharing does not constitute undue discrimination, violate Commission's transparency, open access, and Standards of Conduct "No Conduit" regulations, or expose pipelines to civil liability *vis-à-vis* generators.

INGAA looks forward to the February 13, 2013, technical conference and encourages the Commission and other interested parties to consider the three questions identified above when evaluating suggested enhancements to gas-electric information sharing.

Respectfully submitted,

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APPENDIX A

18 CFR § 284.13 Reporting requirements for interstate pipelines

An interstate pipeline must comply with the following transportation reporting requirements:

Firm and IT Service Posting

An interstate pipeline must post firm and interruptive transportation service information on its Internet web site for at least 90 days.

<u>For pipeline firm service and for capacity release</u> (under §284.8), for each contract, the pipeline must post the following information no later than the first nomination under a transaction:

(1) The shipper or releasing shipper's legal name, identification number and contract number; and
(2) Specific contract information including:
   a. contract number;
   b. rate charged;
   c. max rate;
   d. duration of contract;
   e. contract receipt and delivery points and zones or segments, and respective codes;
   f. quantities or volumes;
   g. special terms and conditions including negotiated rates, discounts, and other deviations from the pipeline's tariff;
   h. any affiliate relationships between the pipeline and the shipper or between the releasing and replacement shipper;
   i. whether a capacity release is a release to an asset manager; and
   j. whether a capacity release is a release to a marketer participating in a state-regulated retail access program.

<u>For pipeline interruptible service</u>, the pipeline must post the following information on a daily basis no later than the first nomination for service under an interruptible agreement:

(1) The shipper's legal name, identification number and contract number; and
(2) Specific contract information including:
   a. rate charged;
   b. max rate;
   c. shipper receipt and delivery points and point codes;
   d. quantity of gas the shipper is entitled to transport;
   e. special details pertaining to the agreement, including discounted rates or deviations from the pipeline's tariff; and
   f. whether the shipper is affiliated with the pipeline.

Index of Customers

An interstate pipeline must file with the Commission an index of all its firm transportation and storage customers under contract on the first business day of each calendar quarter. Pipeline must post this index of customers on its Internet web site until the next quarterly index is posted.

Pipelines are not required to include capacity release contracts, unless the release is permanent.

For each shipper receiving firm transportation or storage service, the index must include the following information:

(1) Shipper’s legal name, identification number and contract number;
(2) Applicable rate schedule;
(3) Contract number;
(4) Contract effective and expiration dates;
(5) Transportation service maximum daily contract quantity and storage service maximum storage quantity;
(6) Contract receipt and delivery points and zones or segments, and respective codes;
(7) Whether the contract includes negotiated rates;
(8) Name of a shipper’s agent or asset manager, if any; and
(9) Any affiliate relationship between the pipeline and a shipper or between the pipeline and a shipper's asset manager or agent.

Capacity and Flow Information

An interstate pipeline must provide on its Internet web site equal and timely access to information relevant to the availability of all transportation services whenever capacity is scheduled, including, but not limited to:

(1) The availability of capacity at receipt points, on the mainline, at delivery points, and in storage fields;
(2) Whether the capacity is available directly from the pipeline or through capacity release;
(3) The total design capacity of each point or segment on the system;
(4) The amount scheduled at each point or segment whenever capacity is scheduled; and
(5) All planned and actual service outages or reductions in service capacity.

An interstate pipeline must also provide information about the volumes of no-notice transportation. §284.7(a)(4). This information must be posted at each receipt and delivery point three days after the day of gas flow and must reflect the pipeline's best estimate.

An interstate pipeline must file annually (by March 1) its estimated peak day system capacity and the estimated storage capacity and maximum daily delivery capability of storage facilities under reasonably representative operating assumptions and the respective assignments of that capacity to the various firm services provided by the pipeline.