

Industry Tip

Title

Date	Module/Application/Functionality	Notes
October 5, 2022.	Reporting Facility Obligation when BAs Amalgamate	The introductions of Reporting Facility obligation “Operationally Responsible” and “Financially Responsible” BAs.

Background

Reporting Facility Obligations (RF Obligations) are based on the Business Associate (BA) responsible for submitting Volumetric and Valuation data in Petrinex (The Responsible BA) in the production month and year specified. IRIS only allows RF Obligations to be created under the Responsible BA ID and has existing edits to ensure this. Currently when BAs amalgamate, the surviving BA does not have access to fulfill RF Obligations on behalf of the amalgamated BAs they now represent. This inability to fulfill a RF Obligation results in penalties being generated that the BAs are unable to rectify to avoid the non-compliance penalties.

Process

To address this, ER is implementing a change in IRIS, so that the Surviving BA is considered to be the “Responsible BA” for any RF Obligation assigned to the Non-surviving BA (inactivated BA ID) and will have the ability to fulfill any unfulfilled RF obligations for that inactive BA. This new functionality will be based on the entire lineage of a BA and the amalgamation path, i.e. if BA 1 has an RF obligation, and subsequently became amalgamated into BA 2, then BA3, and finally BA4 over a period of many years, as each amalgamation occurs the responsibility for the obligation will be forwarded to the surviving BA each time, until it finally rests with BA4.

ER is also introducing the concept of “Operationally Responsible” and “Financially Responsible” BAs for Reporting Facility Obligations.

Non-Amalgamated BA Reporting Facility Obligations

In the absence of an amalgamation, the “Responsible BA” is both operationally and financially responsible for a RF Obligation – they have access to fulfill the obligation, see it on an unfulfilled obligation report, get invoiced for any non-compliance related to the RF obligation, exactly as it currently works in IRIS. However, the RF Obligation template will now appear with two newly labeled fields “Financially Responsible BA” and “Operationally Responsible BA” which will reflect the same BAID.

Amalgamated Reporting BA Reporting Facility Obligations

If the “Responsible BA” BA1 has been amalgamated into the surviving BA, “BA2,” and BA1 has been made inactive, then BA1 will now be considered the Financially Responsible BA, meaning:

- BA1 will appear as the “Financially Responsible BA” on the RF Obligation screen (but is not considered by IRIS to be the “Operationally Responsible” BA” in terms of access to attach documentation or fulfill a RF Obligation).
- The BAID in the Financially Responsible field will be used for the purpose of validating the data reported in Petrinex during a specified period, as well as the following billing purposes:
 - The Financially Responsible BAID BA1 is invoiced for any noncompliance related to the obligation
 - The Financially Responsible BAID BA1 is the BAID under which the obligation will appear in the Non-Compliance Billing History report

BA2 is now considered the “Operationally Responsible BA” for the RF Obligation, meaning:

- BA2 appears as the “Operationally Responsible BA” on the Reporting Facility Obligation screen and is considered, by IRIS, to have authority to attach documentation and fulfill RF Obligations previously assigned to the Financially Responsible BAID, BA1.
- BA2 sees the RF Obligation for the Financially Responsible BA, BA1, on their Unfulfilled Obligations and IRIS Non-Compliance Detail reports when running the report using their BAID.
- When BA2 is searching for obligations under their BAID, the Financially Responsible BA, BA1, will appear on BA2’s obligation list and will be displayed using BA1’s name and BAID.
- BA2 has access to view, edit, attach, and fulfill the RF Obligation(s).
- BA2 appears in the “Operationally Responsible” field on the RF Obligation screen which demonstrates that they are “Operationally Responsible” for the RF Obligation, separate from the “Financially Responsible BA,” BA1.
- “Obligations Added/Changed” notifications for Reporting Facilities will be sent to the “Operationally Responsible BA,” BA2.
- BA2 receives the Reporting Facility>Reporting Facility Obligation Accepted and Reporting Facility Obligation Insufficient notifications related to the completion of the obligation fulfillment work items.
- BA2 is now responsible to monitor and manage any non-compliance invoicing generated for the inactivated BA, BA1.

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