



REQUEST FOR CLARIFICATION OR INTERPRETATION

C02002

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GISB Standard Number: 1.3.65

Clarification or interpretation request:

Standard 1.3.65 states:

The Title Transfer Tracking services should be supported by means of the nominations, quick responses and scheduled quantities processes. At the Transportation Service Provider's election, the confirmation process may also be utilized with Title Transfer Tracking Service Providers within the TSP's system.

Standard 1.2.19 states:

A title transfer Nomination is a nomination line item requesting the service of Title Transfer Tracking and is sent by an Account Holder to a Title Transfer Tracking Service Provider.

Standard 1.2.15 states:

Title Transfer Tracking is the process of accounting for the progression of title changes from party to party that does not effect a physical transfer of the gas.

And Standard 1.2.16 states:

A Title Transfer Tracking Service Provider is a party conducting the title transfer tracking activity.

*National Fuel questions how the "transportation nomination" concept can be reconciled with Definition 1.2.19, which provides that "[a] title transfer Nomination is a nomination line item requesting the service of Title Transfer Tracking and is sent by an Account Holder to a Title Transfer Tracking Service Provider." A "Title Transfer Tracking Service Provider" is in turn defined by definition 1.2.16 as a "party conducting the title transfer tracking activity."*

This form is to be submitted to the GISB office, both in electronic and written form.



Possible interpretations or clarifications, if known:

*Please clarify that the standards contemplate that title transfer tracking nominations will be made to the TTTSP, not the TSP, unless the TSP voluntarily assumes the role of a TTTSP. Furthermore, please clarify that while a TSP utilizes nominations, quick responses and scheduled quantities processes to schedule transportation transactions, that Standard 1.3.65 in conjunction with Standards 1.2.15, 1.2.16 and 1.2.19 do not require TSPs to assume the role of a TTTSP.*