

## **Columbia Gas Transmission/Columbia Gulf Transmission Comments on Proposed Title Transfer Tracking Standards**

Columbia Gas/Columbia Gulf is supportive of GISB's attempts to develop standards for title transfer tracking (TTT) and appreciative of the time and effort the task force put forth in developing the proposed standards. However, we do have concerns with several of the standards as they are currently defined. The following highlights our concerns:

**Standard 5:** Concerned with the last sentence of this standard, "In any event TTT activity is always performed at a location." The use of the word location may be confusing and ambiguous. TTT activity performed at a pooling point may not necessarily be considered at a physical location. We suggest that this sentence be deleted.

**Standard 10:** This appears to be a principle, not a standard and we suggest it be reclassified as such.

**Standard 15:** This standard appears to require TSPs to establish pooling points and offer TTT services at any location where an OBA is in effect. Columbia believes that this standard goes beyond the Commission's direction to GISB in Order 587-F. The Commission's did not require pipelines to offer TTT service, but directed GISB to develop TTT standards so that parties that offer that service would do so through a standardized format. This standard goes well beyond that requirement and, in essence mandates pipelines to provide TTT services at any point with an OBA. We believe this standard should be rejected.