

First draft of response to Request for Interpretation C02002

Text of Request:

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.

Restated Request:

Part 1: Please clarify that the TTT related standards contemplate that title transfer tracking nominations will be made to the TTTSP, not the TSP, except where the TSP has voluntarily assumed the role of a TTTSP with respect to location(s) on its system.

Part 2: Furthermore, is it correct that while a TSP utilizes nominations, quick responses and scheduled quantities processes to schedule transportation transactions, and may use these same processes and transaction communication methods to communicate with a 3PAD concerning the initiating transaction(s) (i.e., transaction(s) identifying the party(ies) whose gas is to be transferred within and tracked by the 3PAD) and resulting transaction(s) (i.e., transaction(s) identifying the party(ies) which received such gas and are transporting such gas on the TSP), 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.

Related Standards

1.3.65, 1.2.15, 1.2.16 and 1.2.19

Text of Interpretation:

Part 1: Yes.

Part 2: Yes, a TSP is not required to, itself, take on the role of a TTTSP and offer TTT services. The TSP is required to support 3PAD(s) requesting the TSP to enable the 3PAD(s) to provide TTT services with respect to transactions arising from and terminating in activity on the TSP's system consistent with Standards 1.2.15, 1.2.16, 1.2.19, 1.3.64, 1.3.65, and 1.3.66.

The TSP may employ the nominations, quick response and scheduled quantities processes and information communications mechanisms (i.e., Service Requester to TSP and TSP to Service Requester protocols), or it may employ the confirmation and scheduled quantities processes and related information communications mechanisms (i.e., Operator to TSP and TSP to Operator protocols) for information transfer between the TSP and the 3PAD.