

**KN Energy Gas Pipeline Group**  
**Comments re Proposed Title Transfer Tracking Standards**

The KN Energy pipeline group submits the following comments for consideration by the Executive Committee relative to the title transfer tracking standards proposed in response to requests R97019, R97043, and R97049.

- (1) The Title Transfer Tracking Task Force in its efforts to deal with a difficult process on which there is a wide diversity of opinion has developed proposed standards which attempt to promote competition, identify responsibilities of all parties and define all required communications. In KN's opinion, these standards fall short of the objective of title tracking as expressed in principle 1.1.10 which states "Title transfer tracking improves quantity certainty." (a) We believe that the increased communications required by these standards during an already tight confirmation and scheduling time frame will result in an increase of mismatches and unscheduled volumes. This is especially likely at points with multiple 3PADS. (b) Additionally, we are concerned about the scheduling and allocation of volumes upstream and downstream of the 3PAD when nominated and confirmable volumes into and out of the 3PAD do not equal. This will potentially result in an increase in disputed volumes and prior period reallocations.
- (2) We believe the alternative proposal as presented at the September 9,10,11<sup>th</sup> Title Transfer Tracking Meeting whereby pipelines would track title at existing pooling points makes more sense. In this model, the incremental increases in required communication serves to perform title transfer tracking in the most efficient manner and simplifies the scheduling/confirmation process for title transfer tracking.