

**Title Transfer Tracking Pilot Test Task Force
Project Plan
Business Case - Operator Model**

Working Group Members (active):

<u>Name</u>	<u>Company</u>	<u>Phone/Fax</u>	<u>E-mail</u>
Jim Buccigross	National Registry	(508) 535-5868/7744	legaljb@tcapserv.com
Greg Lander	TransCapacity	(508) 535-7500/7744	exec@tcapserv.com

1. Base Business Case

See attached Base Case Diagram and Base Case "Transactions for all Scenarios" document.

2. Model Description:

Both the TSP and multiple TTTSP's provide the TTT service (a) on one side of the nominatable point; (b) on both sides of the nominatable point; and, (c) at the point.

3. Transactional Flow Chart

Attached as TTT and transportation nominations and confirmations. (coptrans.xls and copconfs.xls respectively)

4. Energy Balance by Point

See attached TTTMASS.XLS spreadsheet.

5. Documents needed, Roles and Responsibilities

See attached Section 5 Table - Documents Needed, Roles and Responsibilities

6. Preliminary Evaluation - Strengths and Weaknesses

See attached Assumptions, Strengths & Weaknesses

7. Data Elements

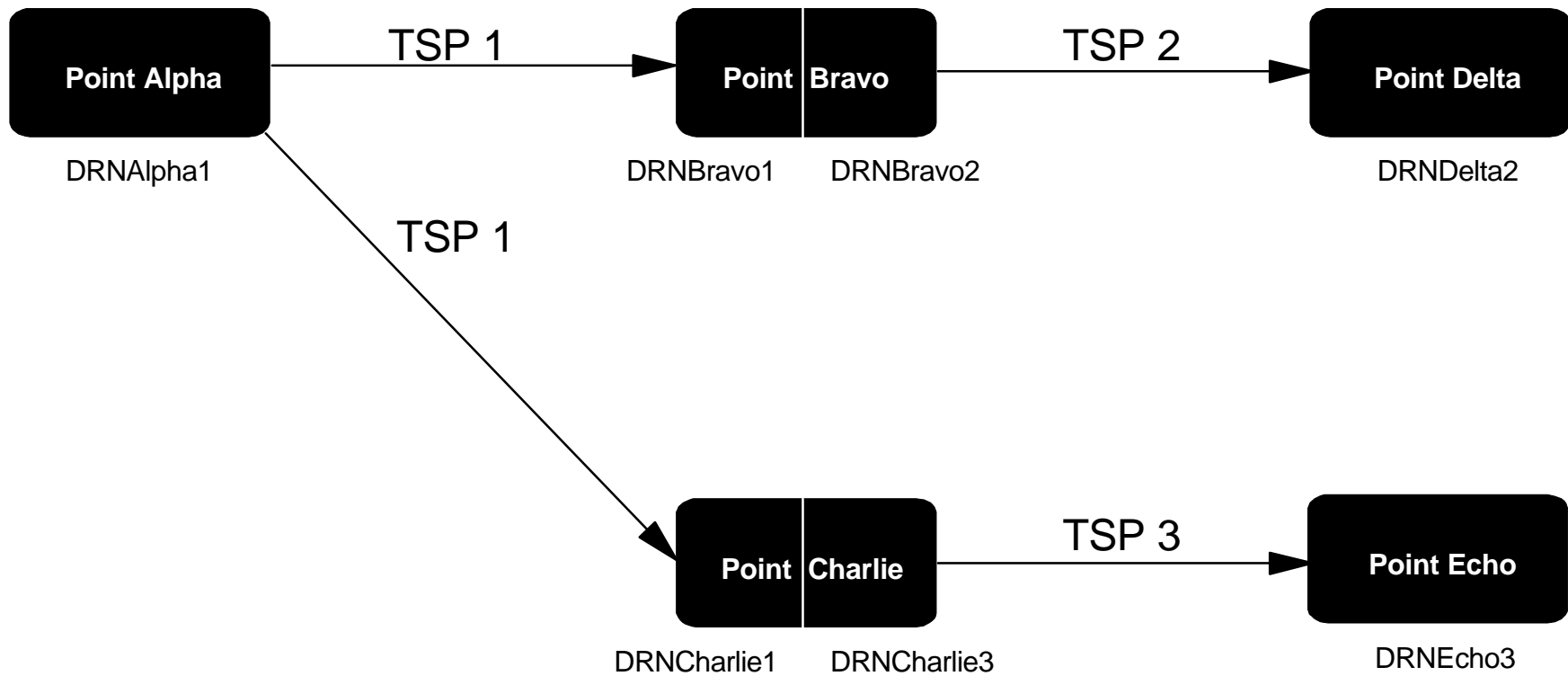
8. Define Error Tests

9. Standards Changes

See attached Section 9 - Proposed Changes to Existing Standards or New Standards

TTT PT TF

Title Transfer Tracking Base Case Diagram



TTT PT TF
TITLE TRANSFER TRACKING BASE CASE
Transactions for all Scenarios
Page 1 of 4

TSP1

Ownership into Point Alpha
 DRNAlpha 1

Co. A 30 units
 Co. B 10 units
 Co. C 10 units
 Co. D 50 units

Total Units Into
 Point Alpha = 100

Sales @ Point Alpha

Co. A to Co. E 5 units
 Co. A to Co. F 5 units
 Co. B to Co. G 10 units
 Co. C to Co. H 10 units
 Co. D to Co. F 10 units
 Co. D to Co. Z 20 units
 Co. D' to Co. Z 10 units
 Co. E to Co. G 5 units
 Co. F to Co. Z 5 units
 Co. H to Co. G 10 units
 Co. F to Co. Z 10 units
 Co. Z to Co. A 5 units
 Co. A to Co. J 5 units
 Co. Z to Co. J 10 units
 Co. J to Co. K 5 units
 Co. K to Co. G 5 units

Ownership Out of Point Alpha

Co. A 20 units
 Co. D 10 units
 Co. Z 30 units
 Co. G 30 units
 Co. J 10 units

Total Units Out Of
 Point Alpha = 100

**Nominations to TSP 1 From
 Point Alpha to Point Bravo**
 DRNAlpha1 to DRNBravo1

Co. A 20 units
 Co. D 10 units
 Co. Z 20 units
 Co. G 30 units
 Co. J 5 units

Total Units From Point Alpha
 To Point Bravo = 85

**Nominations to TSP 1 From
 Point Alpha to Point Charlie**
 DRNAlpha1 to DRNCharlie1

Co. Z 10 units
 Co. J 5 units

Total Units From Point Alpha
 To Point Charlie = 15

TTT PT TF
TITLE TRANSFER TRACKING BASE CASE
Transactions for all Scenarios
Page 2 of 4

TSP2

Ownership into Point Bravo

DRNBravo1

Co. A	20 units
Co. D	10 units
Co. Z	20 units
Co. G	30 units
Co. J	5 units

Point Bravo = 85

Sales @ Point Bravo

Co. G to Co. Z	30 units
Co. D to Co. I	10 units
Co. Z to Co. I	10 units
Co. Z to Co. D	10 units

Ownership Out of Point Bravo

Co. A	20 units
Co. D	10 units
Co. Z	30 units
Co. I	20 units
Co. J	5 units

Total Units Out Of
Point Bravo = 85

**Nominations to TSP 2 From
Point Bravo to Point Delta**

DRNBravo2 to DRNDelta2

Co. A	20 units
Co. D	10 units
Co. Z	30 units
Co. I	20 units
Co. J	5 units

Total Units From Point Bravo
To Point Charlie = 85

TTT PT TF
TITLE TRANSFER TRACKING BASE CASE
Transactions for all Scenarios
Page 3 of 4

TSP3

Ownership into Point Charlie
 DRNCharlie1

Co. Z 10 units
 Co. J 5 units

Total Units Into
 Point Charlie = 15

Sales @ Point Charlie

Co. Z to Co. J 5 units

Ownership Out of Point Charlie

Co. Z 5 units
 Co. J 10 units

Total Units Out Of
 Point Charlie = 15

**Nominations to TSP 3 From
 Point Charlie to Point Echo**
 DRNCharlie3 to DRNEcho3

Co. Z 5 units
 Co. J 10 units

Total Units From Point Charlie
 To Point Echo = 15

TTT PT TF
TITLE TRANSFER TRACKING BASE CASE
Transactions for all Scenarios
Page 4 of 4

TSP2

Ownership into Point Delta
 DRNDelta2

Co. A	20 units
Co. J	5 units
Co. Z	30 units
Co. I	20 units
Co. D	10 units

Sales @ Point Delta

Co. A to Co. L	15 units
Co. L to Co. N	5 units
Co. J to Co. L	5 units
Co. Z to Co. M	10 units
Co. I to Co. M	20 units
Co. M to Co. D	30 units

Ownership Out of Point Delta

Co. A	5 units
Co. Z	20 units
Co. D	40 units
Co. L	15 units
Co. N	5 units

Total Units Into
 Point Delta = 85

Total Units Out Of
 Point Delta = 85

Title Transfer Transaction Nominations at Point Alpha

Serial Number	Nomination Form	Service Provider	Service Requester	Upstream Entity	Downstream Entity	Quantity:	Receipt Point	Delivery Point
1	TTT Nomination	TTTSP	A	supplier	A	10	Alpha	
2	TTT Nomination	TSP1	A	supplier	A	20	Alpha	
3	TTT Nomination	TTTSP	B	supplier	B	10	Alpha	
4	TTT Nomination	TTTSP	C	supplier	C	10	Alpha	
5	TTT Nomination	TTTSP	D	supplier	D	40	Alpha	
6	TTT Nomination	TSP1	D	supplier	D	10	Alpha	
7	TTT Nomination	TTTSP	E	A	E	5	Alpha	
8	TTT Nomination	TTTSP	F	A	F	5	Alpha	
9	TTT Nomination	TTTSP	G	B	G	10	Alpha	
10	TTT Nomination	TTTSP	H	C	H	10	Alpha	
11	TTT Nomination	TTTSP	F	D	F	10	Alpha	
12	TTT Nomination	TTTSP	Z	D	Z	20	Alpha	
13	TTT Nomination	TTTSP	Z	D	Z	10	Alpha	
14	TTT Nomination	TTTSP	G	E	G	5	Alpha	
15	TTT Nomination	TTTSP	Z	F	Z	5	Alpha	
16	TTT Nomination	TTTSP	G	H	G	10	Alpha	
17	TTT Nomination	TTTSP	Z	F	Z	10	Alpha	
18	TTT Nomination	TTTSP	A	Z	A	5	Alpha	
19	TTT Nomination	TTTSP	J	A	J	5	Alpha	
20	TTT Nomination	TTTSP	J	Z	J	10	Alpha	
21	TTT Nomination	TTTSP	K	J	K	5	Alpha	
22	TTT Nomination	TTTSP	G	K	G	5	Alpha	
23	TTT Nomination	TSP1	Z	TTTSP	Z	30	Alpha	
24	TTT Nomination	TSP1	G	TTTSP	G	30	Alpha	
25	TTT Nomination	TSP1	J	TTTSP	J	10	Alpha	
26	TTT Nomination	TTTSP1	supplier	supplier	A	10	Alpha	
27	TTT Nomination	TSP1	supplier	supplier	A	20	Alpha	
28	TTT Nomination	TTTSP	supplier	supplier	B	10	Alpha	
29	TTT Nomination	TTTSP	supplier	supplier	C	10	Alpha	
30	TTT Nomination	TTTSP	supplier	supplier	D	40	Alpha	
31	TTT Nomination	TSP1	supplier	supplier	D	10	Alpha	
32	TTT Nomination	TTTSP	A	A	E	5	Alpha	
33	TTT Nomination	TTTSP	A	A	F	5	Alpha	
34	TTT Nomination	TTTSP	B	B	G	10	Alpha	
35	TTT Nomination	TTTSP	C	C	H	10	Alpha	
36	TTT Nomination	TTTSP	D	D	F	10	Alpha	
37	TTT Nomination	TTTSP	D	D	Z	20	Alpha	
38	TTT Nomination	TTTSP	D	D	Z	10	Alpha	
39	TTT Nomination	TTTSP	E	E	G	5	Alpha	
40	TTT Nomination	TTTSP	F	F	Z	5	Alpha	
41	TTT Nomination	TTTSP	H	H	G	10	Alpha	
42	TTT Nomination	TTTSP	F	F	Z	10	Alpha	
43	TTT Nomination	TTTSP	Z	Z	A	5	Alpha	
44	TTT Nomination	TTTSP	A	A	J	5	Alpha	
45	TTT Nomination	TTTSP	Z	Z	J	10	Alpha	
46	TTT Nomination	TTTSP	J	J	K	5	Alpha	
47	TTT Nomination	TTTSP	K	K	G	5	Alpha	
48	TTT Nomination	TSP1	TTTSP	TTTSP	Z	30	Alpha	
49	TTT Nomination	TSP1	TTTSP	TTTSP	G	30	Alpha	
50	TTT Nomination	TSP1	TTTSP	TTTSP	J	10	Alpha	

Title Transfer Transaction Confirmations at Point Alpha

Serial Number	Confirmation Form	Service Requester	Receiver	Sender	Quantity:
1	Receipt	A	TSP1	TTTSP	10
2	Receipt	A	supplier	TSP1	20
3	Receipt	B	TSP1	TTTSP	10
4	Receipt	C	TSP1	TTTSP	10
5	Receipt	D	TSP1	TTTSP	40
6	Receipt	D	supplier	TSP1	10
48	Delivery	Z	TSP1	TTTSP	30
49	Delivery	G	TSP1	TTTSP	30
50	Delivery	J	TSP1	TTTSP	10
51	Delivery	A	TSP2	TSP1	20
52	Delivery	D	TSP2	TSP1	10
53	Delivery	Z	TSP2	TSP1	20
54	Delivery	G	TSP2	TSP1	30
55	Delivery	J	TSP2	TSP1	5
56	Delivery	Z	TSP3	TSP1	10
57	Delivery	J	TSP3	TSP1	5

																			666667	
Point Alpha Activity																				
Company	Owns	Co. A Buys	Co. A Sells	Co. A Net	Co. B Buys	Co. B Sells	Co. B Net	Co. C Buys	Co. C Sells	Co. C Net	Co. D Buys	Co. D Sells	Co. D Net	Co. Z Buys	Co. Z Sells	Co. Z Net	Co. E Buys	Co. E Sells	Co. E Net	Co. F Buys
A	30	5	-5		0	-10		0	-10		0	-10		30	-5		5	-5		5
B	10		-5									-30		5	-10					10
C	10		-5											10						
D	50													0						
Total Buys/Sells		5	-15		0	-10		0	-10		0	-40		45	-15		5	-5		15
Net after TT				-10			-10			-10			-40			30				0
Production Ownership		30			10			10			50									
Net after Production and TTT				20			0			0			10			30				0
Transport to Bravo			-20			0			0			-10			-20					
Transport to Charlie			0			0			0			0			-10					
Net after Transport				0		0			0			0			0					0
Point Bravo Activity																				
Company	Owns	Co. A Buys	Co. A Sells	Co. A Net	Co. B Buys	Co. B Sells	Co. B Net	Co. C Buys	Co. C Sells	Co. C Net	Co. D Buys	Co. D Sells	Co. D Net	Co. Z Buys	Co. Z Sells	Co. Z Net	Co. E Buys	Co. E Sells	Co. E Net	Co. F Buys
A	20										10	-10		30	-10					
D	10														-10					
Z	20																			
G	30																			
J	5																			
Total Buys/Sells		0	0		0	0		0	0		10	-10		30	-20		0	0		0
Net after TT				0			0		0				0			10				0
Production Ownership		20									10			20						
Net after Production and TTT				20			0		0				10			30				0
Transport to Delta			-20									-10			-30					
Net after Transport				0			0		0				0			0				0
Point Charlie Activity																				
Company	Owns	Co. A Buys	Co. A Sells	Co. A Net	Co. B Buys	Co. B Sells	Co. B Net	Co. C Buys	Co. C Sells	Co. C Net	Co. D Buys	Co. D Sells	Co. D Net	Co. Z Buys	Co. Z Sells	Co. Z Net	Co. E Buys	Co. E Sells	Co. E Net	Co. F Buys
Z	10	0	0		0	0		0	0		0	0		0	0		0	0		0
J	5														-5					
Total Buys/Sells		0	0		0	0		0	0		0	0		0	-5		0	0		0
Net after TT				0			0		0				0		-5		0	0		0
Production Ownership		0			0			0			0			10			0			0
Net after Production and TTT				0			0		0				0	10		5				0
Transport to Echo			0			0			0			0			-5			0		
Net after Transport				0		0			0				0			0				0

Point Alpha Activity																		
Company	Owns	Co. F Sells	Co. F Net	Co. G Buys	Co. G Sells	Co. G Net	Co. H Buys	Co. H Sells	Co. H Net	Co. I Buys	Co. I Sells	Co. I Net	Co. J Buys	Co. J Sells	Co. J Net	Co. K Buys	Co. K Sells	Co. K Net
A	30	-5		10	0		10	-10					5	-5		5	-5	
B	10	-10		5									10					
C	10			5														
D	50			10														
Total Buys/Sells		-15		30	0		10	-10		0	0		15	-5		5	-5	
Net after TT			0			30						0			10			0
Production Ownership																		
Net after Production and TTT			0			30						0			10			0
Transport to Bravo						-30									-5			-85
Transport to Charlie						0									-5			-15
Net after Transport			0			0						0			0			0
Point Bravo Activity																		
Company	Owns	Co. F Sells	Co. F Net	Co. G Buys	Co. G Sells	Co. G Net	Co. H Buys	Co. H Sells	Co. H Net	Co. I Buys	Co. I Sells	Co. I Net	Co. J Buys	Co. J Sells	Co. J Net	Co. K Buys	Co. K Sells	Co. K Net
A	20					-30				10						0		
D	10									10								
Z	20																	
G	30																	
J	5																	
Total Buys/Sells		0		0	-30		0	0		20	0		0	0		0	0	
Net after TT			0			-30						20			0			0
Production Ownership				30									5					
Net after Production and TTT			0			0						20			5			0
Transport to Delta											-20				-5		0	-85
Net after Transport			0			0						0			0			0
Point Charlie Activity																		
Company	Owns	Co. F Sells	Co. F Net	Co. G Buys	Co. G Sells	Co. G Net	Co. H Buys	Co. H Sells	Co. H Net	Co. I Buys	Co. I Sells	Co. I Net	Co. J Buys	Co. J Sells	Co. J Net	Co. K Buys	Co. K Sells	Co. K Net
Z	10	0		0	0		0	0		0	0		5	0		0	0	
J	5																	
Total Buys/Sells		0		0	0		0	0		0	0		5	0		0	0	
Net after TT			0			0						0	5	0	5			0
Production Ownership				0			0			0			5			0		
Net after Production and TTT			0			0						0	5		10			0
Transport to Echo		0			0			0			0				-10		0	-15
Net after Transport			0		0			0			0				0			0

5. Documents Needed, Roles and Responsibilities

Title Transfer Tracking Pilot Test Task Force
 Business Case # Operator Model - Section 5

Step	Document & Description	Sender	Receiver	Comments/Notes
1	Title Transfer Tracking (TTT) Nomination (TTTNOM)	Title Transfer Tracking Service Requester (TTTSR) or agent	Title Transfer Tracking Service Provider (TTTSP)	
2	TTTNOM Functional Acknowledgment (FA)	TTTSP's server	TTTSR	
3	TTT Pre-determined Allocation (PDA) Statement (TTTPDA)	TTTSR	TTTSP	
4	TTTPDA FA	TTTSP's server	TTTSR	
5	TTT Quick Response (TTTQR)	TTTSP	TTTSR	
6	TTTQR FA	TTTSR	TTTSP	
7	TTTPDA QR	TTTSP	TTTSR	
8	TTTPDA QR FA	TTTSR	TTTSP	
9	TTT Confirmation (TTTCONF) to Transportation Service Provider (TSP)	TTTSP	TSP	
10	TTTCONF FA	TSP	TTTSP	Receiver validates the TTTCONF structure here

				for FA first then translates
11	TTT Request To Confirm (TTTRTC)	TSP	TTTSP	Receiver validates the TTTCNF structure here for FA first then translates. If QTY is the same then end of change wrap, else, repeat error wrap
12	TTTRTC FA	TTTSP	TSP	
13	TTT Confirmation (TTTCNF) to Transportation Service Provider (TSP)	TTTSP	TSP	If the RTC QTY received from TSP is less than that QTY sent to TSP by TTTSP, then change respective in and out QTY's using TTTSR's rankings.
14	TTTCNF FA	TSP	TTTSP	Receiver validates the TTTCNF structure here for FA first then translates
15	TTTCNF to Title Tracking Service Requester	TTTSP	TTTSR	Contains lower QTY if applicable
16	TTTCNF FA	TTTSR	TTTSP	
17	TTTNOM	TTTSR	TTTSP	Where this is a change wrap to correct or override lower QTY's
18	TTTNOM FA	TTTSP	TTTSR	

19	TTTCONF	TTTSP	TSP	Sent by TTTSP to TSP where earlier change wrap results in change to entity or quantity and immediately preceding TTTCONF from TTTSP to TSP
20	TTTCONF FA	TSP	TTTSP	
21	Operator's Scheduled Quantity (OSQ)	TSP	TTTSP	This SQ is sent by TSP to TTTSP as means of signifying no further changes and providing unambiguous QTY's into and out of TTTSP's location and/or agreement.
22	OSQ FA	TTTSP	TSP	
23	TTT Scheduled Quantify (TTTSQ)	TTTSP	TTTSR	Where no error or RTC of lesser QTY by deadline
24	TTTSQ FA	TTTSR	TTTSP	
25	TTT Allocated Quantity (TTTAQ)	TSP	TTTSP	Where no change to scheduled quantity this is sent for both of TTTSP's quantities, i.e., those received and delivered. Where there is a change, (i.e., AQ is not equal to SQ) only the receipt quantity or the delivery

				quantity is sent to TTTSP by TSP.
26	TTTAQ FA	TTTSP	TSP	
27	Out of TTT Allocated Quantity (OUTTTAQ)	TTTSP		Where only the received or delivered AQ was transmitted by the TSP to the TTTSP, this AQ is the product of applying the transmitted AQ to the TTTSR's PDA to generate the applicable opposite AQ.
28	OUTTTAQ FA	TSP	TTTSP	
29	TTT Allocated Quantity (TTTAQ)	TTTSP	TTTSR	
30	TTTAQ FA	TTTSR	TTTSP	
31	TTTSP's Invoice (TTTINV)	TTTSP	TTTSR	
32	TTTINV FA	TTTSR	TTTSP	

**Title Transfer Tracking Pilot Test Task Force
Business Case - Operator Model
Preliminary Assumptions, Strengths & Weaknesses**

Assumptions:

1. With separate DRN's for each TTTSP, TSP will be able to balance with each TTTSP where multiple TTTSP's exist.
2. Shippers nominate title transfer nominations to the TTTSP.
3. TTTSP will confirm with the upstream pipeline.
4. Downstream pipeline will confirm with the TTTSP.
5. Receipts into, and deliveries from TTTSP's will be nominated on the TSP.
6. Transfer's between TTTSP's will confirm with the TSP.
7. Each TTTSP on a TSP will have its own point (DRN No.)
8. TTTSP's have all of the rights and responsibilities of point operators at their points.

Strengths:

1. With separate DRN's for each TTTSP, TSP will be able to balance with each TTTSP where multiple TTTSP's exist.
2. With separate DRN's for each TTTSP, multiple TTTSP's are able to operate without confusion.
3. Model promotes competition, allows TSP to participate as a TTTSP if desired.
4. Given the nomination and separate DRN model, any problems with the confirmation process can be resolved in the same manner and time frame as exists for current transportation nominations.

Weaknesses:

1. Increased number of transportation nominations, related confirmation and scheduled quantity documents.
2. Increased number of DRN's for TTTSP's.

Std No.	Proposed Standard Text	Standard Source	Operator Model	Account Model		TSP Req'd Model
6	Title Transfers are transactions where a change in ownership in gas occurs without physical movement of gas.	BPS	Yes			Yes
7	Title Transfer Tracking is the administrative tracking of title transfer transactions.	BPS	Yes			Yes
8	Title Transfer Tracking occurs at any point nominatable under a transportation service agreement, except where tariff restrictions exist with respect to storage transfers.	BPS	Prefer 8A			
8A	Title Transfer Tracking occurs at any point nominatable under a transportation service agreement.	TCap	Yes			
8B	Title Transfer Tracking occurs at any receipt point nominatable under a transportation service agreement, except where tariff restrictions exist with respect to storage transfers.	Model 2 Group	No			Yes
9	Regarding service class for title transfer transactions, no standard is needed.	BPS	No. Prefer 8A			Yes
9A	Title Transfer Tracking should not be restricted to particular service classes nor should there be restrictions with respect to title transfers between or among services; except where tariff restrictions exist with respect to storage transfers.	TCap	Offered if 8A not adopted			
10	Title transfer tracking services should be open to be provided by any party.	BPS	Yes			No
10A	If ____ may be provided by anyone, then it should be open to be provided by any party.	Model 2 Group	No			Yes
11	Any party may, but shall not be required to, provide title transfer tracking service.	BPS	Yes			No
11A	TSP should have primary responsibility to provide title transfer tracking service..	Model 2 Group	No			Yes
12	Title transfer tracking service shall be accomplished by using the nomination-related, flowing gas-related, and invoice-related GISB standards appropriate to title transfer tracking services. The Market Initiation, Execution and Settlement Task Forces should review the existing transactions sets for appropriateness to the title transfer tracking service.	BPS	Prefer to have 12 A remove reference to Mkt * Cmmtees			?

12A	Title transfer tracking service shall be accomplished by using the nomination-related, flowing gas-related, and invoice-related GISB standards appropriate to title transfer tracking services.	TCap	Yes			
13	All title transfer tracking services should be performed under a contract.	BPS	Prefer to have 13A and 13B because they make it clear			No
13A	All title transfer tracking services should be performed under a contract between the Title Transfer Tracking Service Provider and the Title Transfer Tracking Service Requester.	TCap	Yes			
13B	All Title Transfer Tracking service activities between Title Transfer Tracking Service Providers and Transportation Service Providers should take place pursuant to contracts between these parties.	TCap	Yes			
14	Upon reasonable request, Transportation Service Providers should provide the Title Transfer Tracking Service Provider with a point and/or an agreement to conduct title transfer tracking.	BPS	Yes			No
15	No Standard regarding the financial responsibilities if Title Transfer Tracking Service Providers is required.	BPS	Prefer 15A			
15A	Financial responsibilities of Title Transfer Tracking Service Providers is a matter determined between the Title Transfer Tracking Service Provider and the Title Transfer Tracking Service Requester.	TCap	Yes			
15B	Title Transfer Tracking Service Providers should perform all the same duties, be provided all the same rights and opportunities, and should accept the same obligations as required by Transportation Service Providers of Point Operators.	TCap	Yes			
26	All title transfer transactions should be nominated according to existing GISB standards.	BPS	Yes			Yes

26A	Transportation Service Providers may choose to support the Account Model and should support the Operator Model of Title Transfer Tracking.	TCap	Yes			
30	Transportation Service Providers should accept nominations, confirmations and PDAs from any title transfer tracking service provider with respect to services or activities on the transportation service provider and Transportation Service Providers should provide requests to confirm and allocations as applicable to title transfer tracking service providers. A Transportation Service Provider is only required to conduct business with Title Transfer Tracking Service Providers that perform in accordance with GISB standards and any applicable contract.	BPS	Prefer 91A, 91B and 91C which are specific to the Account and Operator Models and much clearer			No
31	Both the buyer and the seller in a title transfer transaction should nominate or confirm their title transfer transaction to the appropriate party(ies).	BPS	Prefer to have 31 A and 31 B as they are clearer.			Yes
31A	Under the Account Model, both the buyer and the seller in a title transfer transaction should nominate their title transfer transaction to the Transportation Service Provider.	TCap	Yes			
31B	Under the Operator Model, both the buyer and the seller in a title transfer transaction should nominate their title transfer transaction to the Title Transfer Tracking Service Provider and the Title Transfer Tracking Service Provider should conduct the confirmation process with the Transportation Service Provider with respect to: a) the quantities and identities of those entities delivering gas to Title Transfer Tracking Service Requesters of the Title Transfer Tracking Service Provider; and, b) the quantities and identities of those entities receiving gas from Title Transfer Tracking Service Requesters of the Title Transfer Tracking Service Provider.	TCap	Yes			

31C	Both the buyer and the seller in a title transfer transaction should nominate their title transfer transaction to the appropriate party(s).	Model 2 Group	No, prefer the clarity of 31A and 31B			
32	All title transfer tracking services and all transactions between title tracking service providers and transportation service providers should be performed under contracts.	BPS	Yes			No
33	The standard nominations timeline (GISB Std. 1.3.2) should apply for title transfer transaction nominations.	BPS	Prefer to have 33A			Yes
33A	<p>Without regard to the Operator or Account Model, <u>Title Transfer Tracking Service Requesters should nominate their title transfer transactions to Title Transfer Tracking Service Providers pursuant to the GISB nominations related standards. Transportation Service Requesters seeking to have gas delivered into or received from a Title Transfer Tracking Service Provider's location and/or agreement by a Transportation Service Provider should nominate this activity pursuant to the GISB nominations related standards.</u> Under the Operator Model of Title Transfer Tracking, <u>Title Transfer Tracking Service Providers should send initial Requests for Confirmation with respect to transactions into and out of their location(s) and/or agreements to the associated Transportation Service Provider by no later than 12:30 PM for nominations at the standard deadline, should initiate a Request for Confirmation within one hour of learning of any change to transactions into or out of their location(s) and/or agreement(s), and should respond (with a Request for Confirmation) to any unsolicited Confirmation Response sent by a Transportation Service Provider within thirty minutes of its receipt at the Title Transfer Tracking Service Provider's designated site.</u></p>	TCap	Yes			

34	Transfers between Title Transfer Tracking Service Providers constitute an activity that needs to be nominated to the Transportation Service Provider.	BPS	Prefer 34A as this standard is not needed for the Account Model			N/A
34A	Under the Operator Model, transfers between Title Transfer Tracking Service Providers constitute an activity that needs to be confirmed to the Transportation Service Provider by the Title Transfer Tracking Service Provider.	TCap	Yes			
35	No standards should be supported on the following: for confirmation purposes, the interconnected operators should be provided quantity information that is delineated by the entity and/or contract as appropriate.	BPS	Prefer 35A			
35A	For confirmation purposes under the Operator Model of Title Transfer Tracking, the Title Transfer Tracking Service Providers and Transportation Service Providers should provide each other quantity information that is at a minimum delineated by the receiving and delivering entities owning the gas and where the Transportation Service Provider confirms by Transportation Service Agreement, the Title Transfer Tracking Service Providers and Transportation Service Providers should provide each other quantity information that is delineated by the receiving and delivering entities owning the gas and the applicable Transportation Service Requesters' Transportation Service Agreements with the Transportation Service Provider.	TCap	Yes			
36	Title Transfer Tracking Service Providers are considered operators for confirmation purposes.	BPS	Prefer 36A			
36A	Under the Operator Model of Title Transfer Tracking, Title Transfer Tracking Service Providers are considered operators for the purpose of conducting the confirmation process.		Yes			

37	Data sets, roles, responsibilities and timing with respect to title transfer transactions must be defined before September 30, to be added on August 6 and August 7.	BPS	N/A			
89	By August 26, determine what additional standards need to be proposed for title transfer tracking and a laundry list of ways to do business, answer the questions about reliability and timing, develop a business model, and a pilot test group can work out fine tuning after that date.	BPS	N/A			
90	All Title Transfer Tracking Service Providers should offer their title transfer tracking services to any party on a not unduly discriminatory basis.	BPS	Yes			
91	For roles within the context of title tracking: the title transfer tracking provider should: <ol style="list-style-type: none"> 1. receive nominations and confirmations from Service Requesters 2. provide nominations, requests for confirmations and/or confirmation responses to Service Provider(s) 3. receive PDAs from Service Requesters 4. provide scheduled quantities and allocations to service requesters 5. receive allocations from the SP 6. provide PDAs to the SP and/or Title Transfer Tracking Service Providers as appropriate 	BPS	Prefer 91A, 91B, and 91C as they better reflect the Operator and Account Models			
91A	For roles within the context of the Account Model of Title Transfer Tracking: the Title Transfer Tracking Service Provider should: <ol style="list-style-type: none"> 1. receive nominations from Title Transfer Tracking Service Requesters, 2. provide quick responses to Title Transfer Tracking Service Requesters 3. receive PDAs from Title Transfer Tracking Service Requesters 4. provide scheduled quantities and allocations to Title Transfer Tracking Service Requesters 	TCap	Yes			

<p>91B</p>	<p>For roles within the context of the Operator Model of Title Transfer Tracking: the Title Transfer Tracking Service Provider should:</p> <ol style="list-style-type: none"> 1. receive nominations from Title Transfer Tracking Service Requesters 2. provide Request for Confirmation and/or Confirmation Response to applicable Title Transfer Tracking Service Providers with respect to transfers between these parties 3. provide Requests for Confirmation to Transportation Service Providers with respect to transfers into and out of the Title Transfer Tracking Service Provider 4. receive Request for Confirmation and/or Confirmation Responses from applicable Title Transfer Tracking Service Providers with respect to transfers between these parties 5. receive Confirmation Responses from Transportation Service Providers with respect to transfers into and out of the Title Transfer Tracking Service Provider 6. receive PDAs from Title Transfer Tracking Service Requesters 7. provide PDAs to applicable Title Transfer Tracking Service Providers with respect to transfers out of the PDA providing Title Transfer Tracking Service Provider to the PDA receiving Title Transfer Tracking Service Provider 8. provide PDAs to Transportation Service Providers with respect to transfers out of the PDA providing Title Transfer Tracking Service Provider 9. receive PDAs from applicable Title Transfer Tracking Service Providers with respect to transfers out of the PDA providing Title Transfer Tracking Service Provider into the PDA receiving Title Transfer Tracking Service Provider 10. receive PDAs from Transportation Service Providers with respect to transfers out of the PDA providing Transportation Service Provider into the PDA receiving Title Transfer Tracking Service Provider 11. provide Scheduled Quantities and Allocation Statements to Title Transfer Tracking Service Requesters 12. provide Operator Scheduled Quantities and Allocation Statement information to applicable Title Transfer Tracking Service Providers and Transportation Service Providers with respect to transfers between the information providing Title Transfer Tracking Service Provider and these parties 13. receive Operator Scheduled Quantities and Allocation Statement information from applicable Title Transfer Tracking Service Providers and Transportation Service Providers with respect to transfers between the information receiving Title Transfer Tracking Service Provider and these parties 	<p>TCap</p>	<p>Yes</p>			
------------	--	-------------	------------	--	--	--

91C	<p>For roles within the context of the Operator Model of Title Transfer Tracking: the Transportation Service Provider should:</p> <ol style="list-style-type: none"> 1. receive Requests for Confirmation from Title Transfer Tracking Service Providers with respect to transfers into and out of the Title Transfer Tracking Service Provider 2. provide Confirmation Responses to the Requests for Confirmation sent by the Title Transfer Tracking Service Provider to the Transportation Service Provider 4. receive PDAs from Title Transfer Tracking Service Providers conducting confirmations of deliveries to Service Requesters of the Transportation Service Provider 5. provide PDAs to Title Transfer Tracking Service Providers with respect to deliveries to such Title Transfer Tracking Service Provider from the Transportation Service Provider 7. provide Operator Scheduled Quantities to Title Transfer Tracking Service Providers 8. may agree to receive Operator Scheduled Quantities from Title Transfer Tracking Service Providers 9. provide Allocation Statements to Title Transfer Tracking Service Providers with respect to transfers out of the Title Transfer Tracking Service Provider 10. receive Allocation Statements from Title Transfer Tracking Service Providers with respect to transfers into the Title Transfer Tracking Service Provider 	TCap	Yes			
92	<p>For roles within the context of title transfer tracking, the role of operator vs Pooler confirmation is defined by a previously proposed standard: Title Transfer Tracking Service Providers are considered operators for confirmation purposes.</p>	BPS	No			