

TTT Framework Questions:

- A. Does the TTT-PT-TF believe that the "Operator Model" and the "Account Model" title transfer tracking scenarios can coexist and effectively enable title transfer tracking?
- B. Should sub-groups be set up to develop draft Principles, Definitions and Standards to effectively enable both the "Operator Model" and the "Account Model" title transfer tracking scenarios to operate?
- C. Should these "sub-groups" then report their findings to the TTT-PT-TF for modification, improvement, and ultimate recommendation for approval to the GISB Executive Committee?
1. Is it clear that the Commission is proposing that pipelines would not be compelled to provide TTT?
 2. Is it self-evident that if pipelines do offer TTT, that they could either charge for it or do it for free?
 3. Is it self-evident that third-parties would not enter the marketplace if pipelines offer TTT for no charge?
 4. Is it self-evident that third-parties would enter the marketplace if pipelines offer TTT and do charge for it?
 5. If pipelines and third-parties are offering TTT service, should these services be offered on a comparable basis? Or, in other words, do people believe that the pipeline functioning as a TTTSP should communicate with the TSP in a manner that is not comparable with that used by third-party TTTSPs?
 6. Given the above, does anyone see another way to achieve comparability other than that proposed in the NOPR (i.e., the "Operator" Model)?
 7. Is TTT part of the scheduling "critical" timeframe of GISB Standard 1.3.2? Or, is TTT accomplished either before or after the critical transportation transactions have been completed?
 8. When TTT results in no transportation (loops) is there a requirement to "track" them? If so, can these be accomplished before and after the critical scheduling processing?
 9. Do TTT users receive reports reflecting the results of their trades on a monthly, daily or more often basis?

10. Are TTT users required to have proven title to gas before they are allowed to transfer title to another user? Put another way, can a TTT user sell supply they do not have? i.e. are TTT users required to have a deal put together before they can enter the transactions?
11. May a TTT user change their mind between processing cycles within one flow day as to the market and/or supply?
12. Is the TTT transaction the actual buy/sell "contract" that both the buyer and the seller guarantee through another agent, a financial broker-like entity like the New York Stock Exchange? If there is another contract, then what is the purpose of the TTT transaction?

Additional Framework Questions from the April 17, 1998 TTT-PT-TF Meeting:

13. Who has the responsibility for ensuring that the wellhead operator has sufficient authority to confirm the gas flowing through the wellhead orifice meter?"
- 14(a). Is the wellhead operator's responsibility volumetric only?
Or, 14(b). Do wellhead operators have a contract responsibility (confirmation at the contract – pool, transportation service, etc.) as well?
15. What is the motivation for the title transferor of the gas to nominate.
16. Will the point operator will have additional responsibilities?
17. [Will] "degradation of service" be addressed as a threshold question?
18. [Will TT-PT-TF] ensure we address the potential increase in the number of people who would be involved in scheduling if 3rd parties are allowed to participate in TTT?
19. Should the party that provided the TT nomination service also be required to handle the transportation nomination?
20. [Will TT-PT-TF] ensure that people recognize that unbundling of the sales of natural gas resulted in an increase in the number people who are involved in the daily scheduling process and that opening up a segment of the business for 3rd parties was consistent with other action by the Commission and therefore we should expect more people to be involved, but we should also expect and demand a higher degree of automation to improve efficiency?
21. Can we really achieve our goal of providing 3rd party service providers entry into the market place without actually increasing the amount of work and the number of people who have to be involved?

22. Based on the statement ‘It should be the shipper’s responsibility to furnish the transporter with sufficient information to establish its title to gas and its right to nominate that gas on the pipeline.’ is it possible to resolve the TTT dilemma by altering the information provided in the nomination?
23. Is it reasonable to establish standards that result in transactions not occurring if parties do not provide appropriate information?”
24. Is it necessary to have TTT at all points?”
25. What are the nomination requirements for people requesting TTT service? What do we mean by TTT confirmations?”
26. The group then constructed a matrix with the following questions for the sponsors of the Operator and the Account Model.

Does the model support the following?

Concept	Operator	Account
Nominations required from all parties transacting business?	Yes	Yes
TSP as Title Transfer Tracker?	Yes	Yes
3 rd party as TTT?	Yes	Yes
TSP required to be TTTSP? [The Account answer was not universally agreed to.]	No	Yes
TTT may occur at all nominatable points	Yes	Yes
Separate DRNs required for each TTTSP?	No	No
Separate DRNs possible for each TTTSP	Yes	No
TTT service is under a contract, between TTTSP and the TTTSR	Yes	Yes
TTT service is under a contract between TTTSP and the TSP	Yes	Yes
If one party plays two roles, is a contract required?	Yes	?
Is a contract between the TTTSP and parties other than the TSP or the TTTSR required? SAME QUESTION RESTATED Is the TTTSP on one side of the flange required to have a contract with the point operator on the other side of the flange?	No	No

27. ALL transfers of title at a meter must be nominated to the transportation service provider?
28. Title Transfers between two different TTT+s at the same meter must be nominated to the transportation service provider?

29. If a 3rd party TTT is the only person currently authorized to track TTT transactions at a TSP's receipt meter, then the transportation service requester nominating from that meter should denote the TTT as the upstream party whenever the supplier is a party who is not transporting on the interconnected pipeline?

30. Per page 96 [slip copy?] of the Final Order 587-G, it appears that the Commission feels transportation into a pool should be given the same transportation priority out of the pool. If a third party TTT is involved in Title Tracking at a pipeline pooling meter, how will the priority of the nominations going into the pool be determined by the pipeline?

31. What happens when the Operator confirms true physical flow at a meter but the TTT is unable to confirm/verify the entire daisy chain? What is the time frame for clearing up any title transfer discrepancies?