

Work Paper for Title Transfer Tracking Standards Proposed Standards Regarding Title Transfer Tracking Standards Already Addressed

P1

Title Transfer Tracking (TTT) by Third Party Account Administrators (3PADs) should not include transfers of gas between storage service accounts or transfers between Transportation Service Agreement contracts on the same Transportation Service Provider (TSP) with no physical receipts or deliveries required to effectuate the contract-to-contract transfer.

Additionally, where TSPs do not provide pool-to-pool transfers, TTT by 3PADs at pool locations should be allowed. Where TSPs do provide pool-to-pool transfers, TTT by 3PADs at these pooling locations can be excluded by the TSP [unless the 3PAD can conform to nomination deadlines].

Pool-to-pool transfers or contract-to-contract transfers on the same TSP are nominated to the TSP at nomination deadlines.

[Bracketed section is book marked until End Users can discuss](#)

D1

Title is the term used to identify the ownership of gas

D2

Title Transfer is the change of ownership of gas between parties at a location

D3

Title Transfer Tracking is the process of accounting for the progression of ownership changes at a location from party to party not associated with transportation services.

Original #1

D4

A Title Transfer Tracking Service Provider is a party conducting the title transfer tracking activity

D5

A Third Party Account Administrator is a Title Transfer Tracking Service Provider other than the Transportation Service Provider.

Original #2

D6

An Account Holder is the party using the services of a Title Transfer Tracking Service Provider (TTTSP) under a contract with that TTTSP.

Original #3

D7

A Title Transfer Nomination is a nomination line item requesting the service of Title Transfer Tracking and is sent by an Account Holder to a Title Transfer Tracking Service Provider.

Diagram relationship Lines A and C

D8

A Title Transfer Nomination Quick Response is a quick response providing data validation of a Title Transfer Nomination(s), for a service request received by a Title Transfer Tracking Service Provider (TTTSP). The Title Transfer Nomination Quick Response is sent by the TTTSP to the Account Holder which requested the service.

Diagram relationship Lines S and T

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D9

A Title Transfer Request for Validation is a request for validation of a Title Transfer Nomination(s) received by a Third Party Account Administrator (3PAD). The Title Transfer Request for Validation is sent by the 3PAD to the Transportation Service Provider (TSP) and reflects only those nomination(s) received by the 3PAD which pertain to activities entering or leaving the TSP at a location(s).

Diagram relationship Line D

D10

A Title Transfer Request for Validation Quick Response is a quick response providing data validation of a Title Transfer Tracking Request For Validation received by a Transportation Service Provider (TSP). The Request for Validation Quick Response is sent by the TSP to the Third Party Account Administrator.

Diagram relationship Line U

D11

A Title Transfer Validation Response is a validation response concerning the Title Transfer Tracking (TTT) transactions for quantities entering and leaving the Third Party Account Administrator (3PAD) from and to the Transportation Service Provider(TSP) at a location(s). The Title Transfer Validation Response may be sent in response to a title transfer request for validation or may be sent as an unsolicited transaction. The Title Transfer Validation Response is sent by the TSP to the 3PAD and includes all TSP transactions regarding TTT by the 3PAD at a location(s).

Diagram relationship Line V

D12

A Title Transfer Validation Response Quick Response is a quick response providing data validation for a Title Transfer Tracking Validation Response. The Title Transfer Validation Response Quick Response is sent by the Third Party Account Administrator to the Transportation Service Provider.

Diagram relationship Line W

S2

Prior to a Third Party Account Administrator (3PAD) providing Title Transfer Tracking services, the 3PAD should identify itself in writing to the Transportation Service Provider.

Original #6

S3

All coordination between Title Transfer Tracking Service Providers (TTTSPs) and Transportation service Provider (TSPs) should be performed under a contract between the these parties. Where the TSP is also a TTTSP on it's system, tariff provisions (terms, conditions and rates) or general terms and conditions of the TSP, may take the place of a contract.

(answers open issue F) Original #10

S4

Upon reasonable request of the Third Party Account Administrator (3PAD), Transportation Service Providers (TSPs) should provide the 3PAD with one of the following for conducting title transfer tracking (TTT) activity:

- 1) location code(s)
- 2) contract identifier(s) used in the exchange of transactional data; or
- 3) both one and two above.

In any event TTT activity is always performed at a location.

(answers open issue F) Original #11

S5

All Title Transfer Tracking (TTT) services should be performed under a contract between the Account Holder and their Title Transfer Tracking Service Provider (TTTSP). All TTTSPs should offer their TTT services on a not unduly discriminatory basis."

(answers open issue E/F) Original #12 & #26

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S6

Any party participating in the Title Transfer Tracking service, whether they be an Account Holder, Title Transfer Tracking Service Provider (TTTSP) or a Transportation Service Provider exchanging information with a TTTSP, should do so by means of applicable GISB 1.4.X standards.

Original #7

S7

A Transportation Service Provider (TSP) should only be required to conduct business with Title Transfer Tracking Service Providers (TTTSPs) that perform in accordance with those GISB standards applicable to TTT and the applicable contract between the TTTSP and the TSP."

(answers open issue E) Original #15

S8

No longer necessary. Resolved with modifications to S1 (answers open issue G) Original #8

S10

Resolved with modifications made to S12. Original #13

S11

Resolved with modifications made to S13. Original #14

S12

Within the context of Title Transfer Tracking service, when the Title Transfer Tracking Service Provider is a Third Party Account Administrator (3PAD), the 3PAD should:

- a) receive and process nomination information from their Account Holders (AHs);
- b) provide to the Transportation Service Provider (TSP) nominations with respect to transfers into and out of the 3PAD on behalf of the 3PADs AHs, where the TSP requires such nominations (by means of applicable GISB 1.4.X standards);
- c) provide to the TSP a Request(s) for Validation (by means of applicable GISB 1.4.X standards);
- d) receive and process information contained within Validation Response(s) and/or unsolicited Validation Response(s) from the TSP (by means of applicable GISB 1.4.X standards);
- e) receive from and process information contained within, or provide Scheduled Quantities for Operators to the TSP, (by means of applicable GISB 1.4.X standards); and
- f) provide scheduled quantity information to their AHs.

(answers open issue E/F) Original #16

S12.1

Within the context of Title Transfer Tracking service, when the Title Transfer Tracking Service Provider is a Third Party Account Administrator (3PAD), the 3PAD should:

- a) receive and process predetermined allocation statements from their Account Holders (AHs);
- b) receive and process information contained within Allocation Statement(s) from the Transportation Service Provider (TSP) with respect to transactions into the 3PAD for the 3PAD's AHs (by means of applicable GISB 2.4.X standards);
- c) provide Allocation Statement(s) to the TSP with respect to transactions out of the 3PAD for the TSP's AHs/Service Requesters and/or another 3PAD's AHs (by means of applicable GISB 2.4.X standards); and,
- d) provide allocation information to their AHs.

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S13

Within the context of Title Transfer Tracking service, when the Transportation Service Provider (TSP) is interacting with a Third Party Account Administrator (3PAD), the TSP should:

- a) receive and process information contained within Request(s) for Validation from the 3PAD (by means of applicable GISB 1.4.X standards);
- b) provide to the 3PAD Validation Response(s) and/or unsolicited Validation Responses(s) (by means of applicable GISB 1.4.X standards);
- c) determine whether information contained within Scheduled Quantities for Operators should be received from and processed or provided to the 3PAD (by means of applicable GISB 1.4.X standards),
- d) provide to the 3PAD Allocation Statement(s) (by means of applicable GISB 2.4.X standards); and
- e) receive and process information contained within Allocation Statement(s) from the 3PAD (by means of applicable GISB 2.4.X standards).

(answers open issue E/F) Original #17

S18

No longer necessary. Resolved with modifications to D3

S19

Once a party has chosen to provide Title Transfer Tracking (TTT) services they may choose to do so at one or more locations with respect to a Transportation Service Provider but should not be required to provide the service at all locations nor should they be required to provide the services at any particular location(s). Except where restricted by other GISB standards, TTT, when supported by a Title Transfer Tracking Service Provider, can occur at any Receipt or Delivery Location nominatable under a transportation service agreement.

Original #23

S20 (P2)

Title transfers can occur regardless of the service class of any related transportation.

Original #24 Should be a principle. Will be re-numbered at a future date.

S21 (P3)

Title Transfer Tracking services should be open to be provided by any party.

Original #25 Should be a principle. Will be re-numbered at a future date.

S22

Resolved with modifications made to P1

S23, S24.1

Re-numbered to S24

S24

The Title Transfer Tracking Timing and Information Flow Diagram (the TTT TIF Diagram) represents the movement of information between parties with respect to processing (from nomination through scheduled quantity) a given Title Transfer Tracking transaction.

Some of the lines are transmittals of information between parties. Some of the lines identified represent the TSPs internal processes. Processes where information is compared with other information or otherwise processed in order to generate a transmittal are identified by boxes labeled with numbers.

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[Diagram Here]

In the TTT TIF Diagram, each box represents processes performed by the entity listed below:

- Box 1: Third Party Account Administrator
- Box 2: Transportation Service Provider performing TTT services as well as transportation
- Box 3: Transportation Service Provider
- Box 4: Transportation Service Provider
- Box 5: Welded Operator or TSP₂
- Box 6: Transportation Service Provider
- Box 7: Transportation Service Provider

In the TTT TIF Diagram, each line represents transmittal of the transaction listed below:

- Line A: Title Transfer Nomination (to TTSP)
- Line B: Transportation Nomination (to TSP)
- Line D: Title Transfer Request for Validation (from 3PAD to TSP and 3PAD to 3PAD)
- Line M: Operator Scheduled Quantity (from TSP to 3PAD)
- Line N: Scheduled Quantity Information (from TSP/WOPR to SR)
- Line O: Operator Scheduled Quantity (from TSP to WOPR)
- Line P: Scheduled Quantity Information (from TTSP to AH)
- Line Q: Title Transfer Nomination on behalf of AH (from 3PAD to TSP)
- Line R: Nomination Quick Response to nomination(s) on behalf of AHs (from TSP to 3PAD)
- Line S: Title Transfer Nomination Quick Response Information (from TTTSP to AH)
- Line T: Nomination Quick Response (from TSP to SR)

- Line V: Title Transfer Validation Response (from TSP to 3PAD and 3PAD to 3PAD)
- Line W: Title Transfer Validation Response Quick Response (from 3PAD to TSP and 3PAD to 3PAD)
- Line X: Request for Confirmation (between TSP and TSP/WOPR)
- Line Y: Confirmation Response or unsolicited Confirmation Response (between TSP/WOPR and TSP)
- Line Z: Confirmation Response Quick Response (between TSP and TSP/WOPR)

In the TTT TIF Diagram, the lines E, F, G, H, I, J, K, L represent the TSPs internal processes.

In the TTT TIF Diagram, the lines C and U represent the 3PADs internal processes.

- a) Where a TSP requires the receipt of a line “Q” transmittal from the 3PAD, the line “Q” transmittal from Box 1 to Box 3 should be received at the TSP’s designated site within fifteen (15) minutes of the nomination deadline.

- b) Where a line “Q” transmittal has been required by a TSP, the line “R” transmittal from Box 3 to Box 1 should be received at the 3PAD’S designated site within fifteen (15) minutes of the deadline for nominations being received at the TSP’s designated site (consistent with GISB Standard 1.3.37).

- c) The line “F” between Box 3 and Box 4 represents the case where a mismatch has been identified by the TSP with respect to those transactions nominated to the TSP by its SRs (and/or AHs) as entering or leaving the 3PAD from or to (respectively) the TSP, and, those transactions sent by the 3PAD to the TSP in line “Q”, and whereupon, the TSP should promptly begin another exchange of information with the 3PAD. This exchange of information is identified as being between Box 4 and Box 1 and should be comprised of (in order) the information to be exchanged in lines V, W, D, V, and W.

- d) The line “U” between Box 1 (Process Nominations) and Box 1 (Resolve Mismatches) represents the case where a 3PAD initially, or upon detecting a difference between information last communicated to the TSP and the information that is currently effective, initiates an exchange of information with the TSP. This exchange of information is identified as being between Box 1 and Box 4 and should be comprised of (in order) the information to be exchanged in lines D, V and W.

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e) For any nomination deadline, an initial line “D” transmittal between Box 1 and Box 4 should be received at the TSP’s designated site within one half hour (30 minutes) of the line “Q” transmittal. In addition, a line “D” transmittal between Box 1 and Box 4 should be received at the TSP’s designated site within one half hour of the receipt of the first line “V” transmittal between Box 4 and Box 1. This first line “V” transmittal should identify that it is the result of a mismatch and should identify the mismatched line item(s). Subsequent line “V” transmittals within the same nominations processing cycle should be received at the 3PAD’s designated site within one half hour (30 minutes) of the receipt of the line “D” transmittal. In addition, the line “W” transmittals between Boxes 1 and 4 should be received at the TSP’s designated site within fifteen (15) minutes of receipt at the 3PAD’s designated site of the transmittal to which the line “W” transmittal responds.

f) Where a line “D” transmittal is the next communication between the 3PAD and the TSP after a line “Q” or line “R” transmittal (i.e., there has been no line “V” transmittal), the line “D” transmittal may not increase quantities for any AH nor may an AH not previously identified in the line “Q” transmittal be identified in the subject line “D” transmittal.

g) Where a line “D” transmittal is the next communication between the 3PAD and the TSP after a line “V” or line “W” transmittal, the line “D” transmittal may not increase quantities for any AH nor may an AH not previously identified in the line “V” transmittal be identified in the subject line “D” transmittal.

h) The line “I” between Box 6 (Compare Flow Data for Mismatches) and Box 6 (Resolve Flow Data for Mismatches) represents the case where a mis-match has been identified with respect to those transactions nominated to the TSP by its SRs (and/or AHs) as entering or leaving the TSP/WOPR from or to (respectively) the TSP, and, those transactions identified by the TSP/WOPR to the TSP in a line “Y” transmittal (or line “X” transmittal, as applicable); and whereupon, in cases where the TSP determines there is sufficient time to conduct another exchange of information, the TSP should promptly begin another exchange of information with the TSP/WOPR. This exchange of information is identified as being between Box 6 and Box 5 and should be comprised respectively of the information to be exchanged in lines X, Y, and Z.

i) Where the results of the comparison of information presented as the transmittals between Box 6 and Box 5 cause a reduction to a quantity identified by the TSP to a 3PAD in the TSP’s most recent corresponding line “V” transmittal (line “J” exemplifies this occurrence), the TSP should promptly begin another exchange of information with the 3PAD. This exchange of information is identified as being between Box 4 and Box 1 and should be comprised of (in order) the information to be exchanged in lines V, W, D, V, and W.

j) The line “X” transmittal between Box 6 (Compare Flow Data for Mismatches) and Box 5 (Initiate Confirmation) should be received at the applicable party’s designated site no less than two hours prior to the end of the confirmation process (the time for receipt of completed confirmations), except where the TSP performs capacity allocations before initiating confirmations; in which case, the line “X” transmittal should be received at the applicable party’s designated site within two hours of the nomination deadline. The line “Y” transmittal between Box 6 and Box 5 should be received at the applicable party’s designated site within one half hour (30 minutes) of the receipt of the line “X” transmittal. The line “Z” transmittal should be received at the applicable party’s designated site within fifteen (15) minutes of receipt at the sender’s designated site of the transmittal to which line “Z” transmittal responds.

k) At the time of any line “D” transmittal between Box 1 and Box 4 the information in the transmittal as to the total quantities into and total quantities out of the 3PAD from and to the TSP respectively should be equal to one another.

l) At the time of any line “X” transmittal exchanged between a TSP and a TSP/WOPR, the information in the transmittal as to the total quantities into and total quantities out of the TSP/WOPR from and to the TSP, respectively, should reflect the processing of 3PAD provided information as to activity on the TSP

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side of the interconnect, including the transactions between 3PADs across the interconnect (where applicable).

m) At the time of any line "Y" transmittal exchanged between a TSP and a TSP/WOPR, the information in the transmittal as to the total quantities into and total quantities out of the TSP/WOPR from and to the TSP, respectively, should reflect the processing of 3PAD provided information as to activity on the TSP side of the interconnect, including the transactions between 3PADs across the interconnect (where applicable).

n) At the time of any line "V" transmittal sent by a TSP to a 3PAD, the information in the transmittal should identify all transactions into and out of the 3PAD, as known to the TSP, inclusive of changes to reflect the TSP's application of the lesser of rule.

o) In cases where the 3PAD and the TSP communicate (i.e., between Box 1 and Box 3 or between Box 1 and Box 4) transactions, where a comparison is made between received transactions and currently effective transactions, and where a missing transaction is identified (i.e., the receiver does not have a corresponding nomination), then the missing transaction is considered a mismatch and should be communicated back to the sender as a zero (0) quantity line item.

S25

Where a transaction involves the transfer between an Account Holder (AH) in one Third Party Account Administrator (3PAD) and an AH in another 3PAD, each 3PAD should send a nomination to its respective Transportation Service Provider (TSP) or Welded Operator (WOPR), with whom the 3PAD has a contract, on behalf of the 3PAD(s)' respective AHs, identifying the AH's transaction(s) and delineating it/them at the 3PAD₁ - AH₁ to 3PAD₂ - AH₂ level.

Where a transaction involves the transfer between an AH in a 3PAD and an AH or Service Requester (SR) in that TSP/WOPR or on a TSP/WOPR other than the TSP/WOPR at the location, with which the 3PAD has a contract, the 3PAD should send a nomination to both the TSPs/WOPRs on behalf of their AHs identifying the AH's transaction(s) and delineating it/them at the 3PAD - AH to TSP/WOPR - AH/SR level.

S26

Where a transaction involves the transfer between an Account Holder (AH) in one Third Party Account Administrator (3PAD) and an AH in another 3PAD, each 3PAD should communicate with the other with regards to its respective AHs. Such communications should employ the confirmation related data sets suitable to Title Transfer Tracking and should delineate the transactions at the 3PAD₁ - AH₁ to 3PAD₂ - AH₂ level.

S27

Absent mutual agreement to the contrary, where transactions related to Third Party Account Administrator (3PAD) activities are not balanced at the end of any confirmation cycle, transactions entering the 3PAD (receipt) or leaving the 3PAD (delivery), whichever is higher, should be reduced prorata to match the total of the transactions on the other side of the 3PAD.

S28

a) The line "V" transmittal between Box 0 and Box 1 (Resolve Mismatches) should cause the receiving 3PAD to initiate communications with all other 3PADS with which it communicated (sent or received) a line "D" transmittal with respect to a location during the subject nomination cycle. This exchange of information with other 3PADS is identified as being between Box 1 (Resolve Mismatches) and Box 11, Box 1 (Resolve Mismatches) and Box 12, and Box 1 (Resolve Mismatches) and Box 8 and should be comprised of (in order) the information to be exchanged in lines D, V, and W. These 3PAD to 3PAD exchanges should be initiated promptly upon the receipt of a line "V" transmittal and should be completed and processed (i.e., receipt of a line "V" transmittal in response to a line "D" transmittal within twenty (20)

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minutes of the line “D” transmittal. Any 3PAD receiving a line “V” transmittal from a TSP should respond to that TSP with a line “D” transmittal within one half hour (30 minutes)

b) The line “D” transmittal between Box 0 and Box 1 (Resolve Mismatches) should cause the receiving 3PAD to initiate communications with all other 3PADS with which it communicated (sent or received) a line “D” transmittal with respect to a location during the subject nomination cycle. This exchange of information with other 3PADS is identified as being between Box 1 (Resolve Mismatches) and Box 11, Box 1 (Resolve Mismatches) and Box 12, and Box 1 (Resolve Mismatches) and Box 8 and should be comprised of (in order) the information to be exchanged in lines D, V, and W. These 3PAD to 3PAD exchanges should be initiated promptly upon the receipt of a line “D” transmittal and should be completed and processed (i.e., receipt of a line “V” transmittal in response to a line “D” transmittal) within twenty (20) minutes of receipt of the line “D” transmittal. Any 3PAD receiving and processing such line “D” transmittal and detecting a difference between information last communicated to a TSP and that information currently effective should within ten (10) minutes initiate an exchange of information with that TSP. This exchange of information with the TSP is identified as being between Box 1 and Box 10 and Box 8 and Box 9 and should be comprised of the information to be exchanged in line D. In the cases where there is sufficient time, a subsequent line “V” transmittal from the TSP and line “W” transmittal from the 3PAD should occur.

S29

a) The line “C” between Box 1 (Process Incoming Nominations) and Box 1 (Compare TTT Data for Mismatches) represents the case where a 3PAD has received nominations from their AHs and should cause them to initiate communications with all other 3PADs to or from whom their AHs are receiving/delivering transfers via a line “D” transmittal. This line “D” transmittal should be received at the applicable 3PAD’s designated site within one half hour (30 minutes) of the nomination deadline. This exchange of information with other 3PADs is identified as being between Box 1 (Compare TTT Data for Mismatches) and Box 8, Box 1 (Compare TTT Data for Mismatches) and Box 12, and Box 1 (Compare TTT Data for Mismatches) and Box 11 and should be comprised of (in order) the information to be exchanged in lines D, V, and W. Likewise, those 3PADs receiving nominations from their AHs should initiate communications with the TSP at the location with which they are associated and all TSPs to or from whom their AHs are receiving/delivering transfers via a line “D” transmittal. This line “D” transmittal should be received at the applicable TSP’s designated site within one half hour (30 minutes) of the nomination deadline. This exchange of information with the TSPs is identified as being between Box 1 (Process Nominations) and Box 3 (Compare TT Data for Mismatches).

S30

In the event a TSP has either a) received no communication from the 3PAD in response to a line “V” transmittal or b) determined there was not sufficient time prior to the completion of the confirmation process to conduct another exchange of information to resolve mismatches with respect to transactions in or out of that 3PAD, then with respect to generating scheduled quantities to be sent to that 3PAD, the TSP may, absent mutual agreement between the TSP and that 3PAD to the contrary, cause the transactions for which information is not available from the 3PAD to be appropriately reduced and then should apply GISB Standard [S27] and the resulting information should be communicated to the affected parties, including the 3PAD, via line “M”, “N”, “O”, and “P” transmittals, as applicable.

S31

Upon requests, TSPs should identify the 3PAD(s) at a location who have established active TTT arrangements with the TSP. The relevant information to be provided should include the name of the 3PAD, the ID for the 3PAD used by the TSP, the contract number for the 3PAD assigned by the TSP (where applicable), the location code(s) for the 3PAD assigned by the TSP (where applicable), and the location code(s) nominatable to the TSP where transportation service to or from and associated with the 3PAD.

Bookmarked for later discussion.