



REQUEST FOR CLARIFICATION OR INTERPRETATION

C02003

Date: June 7, 2002

Requester Name: David Reitz

Company: National Fuel Gas Supply Corporation

Phone, Fax, E-mail: (716) 857-7949, (716) 857-7688, reitzd@natfuel.com

GISB Standard Number: 1.3.66

Clarification or interpretation request:

Standard 1.3.66 states:

All Third Party Account Administrators (3PADS) wishing to provide title transfer tracking services shall so notify the Transportation Service Provider (TSP). All coordination between 3PADS and a TSP should be performed under a contract between the parties. Where the TSP is a Title Transfer Tracking Service Provider on its system, tariff provisions (terms, conditions and rates) or general terms and conditions of the TSP, may take the place of a contract.

*The processing of "title transfer tracking" transportation nominations for parties other than shippers or shipper's agents would seem to run counter to the Commission's "shipper-must-have-title" policy. A TSP could file a tariff service that among other things, would ensure that a 3PAD in its role as TTTSP would conduct its operations in a manner consistent with the "shipper-must-have-title" policy.*

Possible interpretations or clarifications, if known:

*Please clarify that language in Standard 1.3.66 is not intended to prohibit a TSP from defining its relationship with a 3PAD under its tariff. Additionally, please clarify that where the TSP is the TTTSP, Standard 1.3.66 does not obligate the TSP to process transportation nominations from a party that is not a shipper under an effective service agreement or a party authorized by the shipper to act as its agent for purposes of making nominations.*