



November 10, 2021

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: Order No. 587-Z Compliance Filing;
Cheyenne Plains Gas Pipeline Company, L.L.C.;
Docket No. RP22-

Commissioners:

In compliance with the Federal Energy Regulatory Commission's ("Commission") Final Rule in Docket No. RM96-1-042, ("Order No. 587-Z" or "Final Rule"),¹ Cheyenne Plains Gas Pipeline Company, L.L.C. ("CPG") submits for filing the following tariff record for inclusion in its FERC Gas Tariff, First Revised Volume No. 1 ("Tariff"):

Part IV Section 23 Compliance with 18 CFR, Section 284.12 Version 6.0.0

Proposed to become effective June 1, 2022 to comply with Order No. 587-Z, this tariff record reflects the latest version, Version 3.2, of the business practice standards adopted by the Wholesale Gas Quadrant ("WGQ") of the North American Energy Standards Board ("NAESB").

Reason for Filing

On July 15, 2021, the Commission issued Order No. 587-Z amending its regulations to incorporate by reference, with certain exceptions, Version 3.2.² The revisions made by NAESB in Version 3.2 and adopted by the Commission enhance the natural gas industries system and software security measures and clarify the processing of certain business transactions. Among other things, the enhanced security measures include: 1) the implementation of fixes or patches for known vulnerabilities as soon as reasonably practicable with other trading partners; 2) specification of notification timelines to provide notice to trading partners of any systems or software that have been updated and the potential impact of using the vulnerable system; and 3) inclusion of both specific and broad

¹ *Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Order No. 587-Z, 86 Fed. Reg. 43590 (Aug. 10, 2021), FERC Stats. & Regs., Regs. Preambles ¶ 31,446 (2021), 176 FERC ¶ 61,015 (2021) (Final Rule issued in Docket No. RM96-1-042) (hereinafter "Order No. 587-Z").

² Id.

adoptions of system security measures, specific notification, and coordination during outages with affected partners. The clarifications to the business processes include updating: 1) the nominations-related standards to allow a service requester to determine which rights of the contract are used by its segmentation nomination; and 2) the Quadrant Electronic Delivery Mechanism-related standards to define a NAESB standard time frame for information to be retained on a pipeline informational postings website.

For each standard, Order No. 587-Z requires the pipeline to specify in the tariff section or tariff sheet(s) listing all the NAESB standards: a) whether the standard is incorporated by reference; b) for those standards not incorporated by reference, the tariff provision that complies with the standard; or c) for those standards with which the pipeline does not comply, an explanatory statement, including an indication of whether the pipeline has been granted a waiver, extension of time, or other variance with respect to compliance with the standard.³

In Order No. 587-Z, the Commission stated it would continue to apply the same requirements for waivers or extensions of time first established in Order No. 587-V.⁴ The Commission also mandated that pipelines request to continue any existing waivers or extensions.⁵ The Final Rule requires each interstate natural gas pipeline to submit a compliance filing reflecting the changed standards by November 12, 2021, to take effect on June 1, 2022.⁶

Description of Filing

CPG is hereby filing an updated tariff record in compliance with the Commission's Order No. 587-Z. Specifically, CPG is revising Section 23 of its General Terms and Conditions to incorporate the NAESB WGQ standards adopted by reference in the Final Rule and to reflect the waiver, extension and variance requested below.

Incorporation of NAESB Version 3.2

Part IV, Section 23 is updated to reflect the addition of and the deletion of certain NAESB WGQ standards as required by Version 3.2, the applicable copyright years, and the inclusion of a citation to the relevant Commission order on a previously accepted variance. Additionally the tariff record includes a proposed waiver of NAESB WGQ Standard 4.3.60 as well as a request for extensions of time related to the creation of certain EDI data sets as discussed below.

³ Order No. 587-Z, at P 27.

⁴ Order No. 587-Z at P 26, *citing Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Notice of Proposed Rulemaking, 86 Fed. Reg. 12879 (Mar. 5, 2021), 174 FERC ¶ 61,103 at PP 20-24 (2021); *Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Order No. 587-V, 77 FR 43711 (July 26, 2012), FERC Stats. and Regs., Regs. Preambles 2008-2013 ¶ 31,332 at PP 38-39 (2012) ("Order No. 587-V").

⁵ Order No. 587-Z at P 27.

⁶ See Order No. 587-Z at PP 1, 25.

Continuance of Variance

In Part IV, Section 6.1, CPG’s Tariff includes a variance to NAESB WGQ Standard 1.3.2, which extends the nomination periods for an additional fifteen minutes.⁷ The additional fifteen minutes conforms to Commission policy that pipelines may modify NAESB standards to provide better service to its customers.⁸ This variance was accepted by the Commission in previous orders.⁹

Table for Request to Continue Waivers, Variances or Extensions

As required by Order No. 587-Z for requests for a continuation of a waiver, variance or extension,¹⁰ CPG is providing the table below identifying the standard for which a variance, waiver, or extension of time was granted, and the docket number or order citation to the proceeding wherein the waiver or variance was granted.

<u>NAESB WGQ Standard</u>	<u>Waiver or Variance</u>	<u>Prior Commission Approval</u>
1.3.2	Variance	168 FERC ¶ 61,061 at P30 (2019); 154 FERC ¶ 61,250 at P45 (2016); letter order issued on November 16, 2005 in Docket No. RP06-37-000 and December 21, 2007 in Docket No. RP08-102-000.

Request for Waiver

The NAESB Standard 4.3.60 contained in Version 3.2 includes the following statement: “A Customer Activities Web site should require a single logon/password pair for each user session.” CPG is in the process of implementing a multi-factor logon authentication process that customers will use to access CPG’s web site. This new feature provides a more secure logon process benefiting the shipper and CPG and is anticipated to be in place before Version 3.2 becomes effective on June 1, 2022. Once this new multi-factor authentication feature is in place, CPG’s logon requirements will exceed Standard 4.3.60. Therefore, CPG requests a waiver of Standard 4.3.60, which requires a single logon/password.

⁷ Section 6.1 of the General Terms and Conditions of the Tariff has been modified to provide certain exceptions to the nomination deadlines. See *Cheyenne Gas Pipeline Co.*, Docket No. RP08-102-000 (Dec. 16, 2007).

⁸ See *Reliant Energy Gas Transmission Co.*, 93 FERC ¶ 61,141 (2000).

⁹ *Rager Mountain Storage Co.*, 168 FERC ¶ 61,061 at P 30 (2019) (“*Rager Mountain*”) (Order on filings in compliance with Order No. 587-Y including CPG’s filing); *Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250 at P 45 (2016) (“*Eastern Shore*”) (Order on filings in compliance with Order No. 587-W including CPG’s filing); *Cheyenne Gas Pipeline Co.*, Docket No. RP06-37-000 (Nov. 16, 2005) (letter order accepting tariff records implementing fifteen minute extension of shipper nomination deadlines in variance of NAESB Standard 1.3.2).

¹⁰ See Order No. 587-Z at P 27.

Request for Extension of Time

The NAESB WGQ Standards include a number of data sets for Electronic Data Interchange (“EDI”) related requirements. Though CPG supports some of these data sets, there are several that have never been requested by any party to receive information by EDI pursuant to the data sets found in NAESB Standards: 0.4.1, 2.4.1 through 2.4.4, 2.4.6 and 3.4.1 through 3.4.4. Therefore, CPG respectfully requests a limited extension of time until 60 days after the receipt of a request by a Part 284 shipper to use such a standard and dataset for CPG to comply with these EDI data set standards. This 60-day period will allow time for CPG to test and implement any of the above listed EDI data sets if and when a shipper requests to use such an EDI data set. The Commission has previously recognized the benefits of such an extension.¹¹ Thus, good cause exists to grant CPG’s request for a limited extension of time pursuant to the guidelines presented in Order No. 587-V.¹²

Procedural Matters

CPG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter; and
- b) clean and marked versions of the tariff records in PDF format.

CPG respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective June 1, 2022, consistent with the Commission’s directive in Order No. 587-Z. With respect to any tariff provision the Commission allows to go into effect without change, CPG hereby moves to place the tendered tariff provisions in to effect at the end of a minimal suspension period, if any, specified by the Commission.

Correspondence and communications concerning this filing should be directed to:

Mr. Francisco Tarin
Director, Regulatory
Cheyenne Plains Gas Pipeline Company, L.L.C.
Post Office Box 1087
Colorado Springs, CO 80944
Telephone: (719) 667-7517
CPGRegulatoryAffairs@kindermorgan.com

Mr. David R. Cain
Assistant General Counsel
Cheyenne Plains Gas Pipeline Company, L.L.C.
Post Office Box 1087
Colorado Springs, CO 80944
Telephone: (719) 520-4534
David_Cain@kindermorgan.com

¹¹ See, e.g., *Rager Mountain* 168 FERC ¶ 61,061 at P 40 (2019) (Commission found good cause existed to grant extensions of time for 64 pipelines that were very similar to CPG’s request); *Eastern Shore*, 154 FERC ¶ 61,250 at P 57 (2016) (Commission found good cause existed to grant extensions of time for 61 pipelines that were very similar to CPG’s request).

¹² Order No. 587-V, 77 FR 43711, 43716-17 (Jul. 26, 2012), FERC Stats. and Regs., Regs. Preambles 2008-2013 ¶ 31,332 at P 38 (2012).

These persons have been designated for service in accordance with Rule 203 of the Commission's Rules of Practice and Procedure.

The undersigned hereby certifies that he has read this filing and knows (i) the contents of such filing and the attachments; (ii) that the contents as stated in the filing and in the attachments are true to the best of his knowledge and belief; and (iii) that he possesses full power and authority to sign this filing.

Respectfully submitted,

CHEYENNE PLAINS GAS PIPELINE COMPANY, L.L.C.

By _____ /s/ _____
Francisco Tarin
Director, Regulatory

Enclosures

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing document to be served upon all shippers on CPG's pipeline system and interested state regulatory commissions, in accordance with the requirements of Sections 154.208 and 385.2010 of the Commission's Rules of Practice and Procedures.

Dated at Colorado Springs, Colorado as of this 10th day of November 2021.

/s/

Francisco Tarin

Post Office Box 1087
Colorado Springs, CO 80944
(719) 667-7517

23. Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.24, which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identification or notations are incorporated by reference. Standards that are not incorporated by reference are identified along with the tariff record in which they are located. Standards for which waivers or extensions of time have been granted are also identified.

Standards not Incorporated by Reference and their Location in Tariff:

Pursuant to NAESB's Copyright Procedure Regarding Member and Purchaser Self-Executing Waiver as adopted by the NAESB Board of Directors on April 4, 2013, Transporter may publish in its tariff, compliance filings, in communications with customers or stakeholders in conducting day to day business or in communications with regulatory agencies some or all of the language contained in NAESB standards protected by copyright, provided that Transporter includes appropriate citations in the submission.

Transporter has elected to reproduce only the following Business Practices and Electronic Communications standards, NAESB WGQ Version 3.24, that are protected by NAESB's copyright. With respect to each reproduced standard (including any minor corrections), Transporter incorporates the following: © 1996 - 202017 North American Energy Standards Board, Inc., all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>
1.2.1	Part IV: General Terms and Conditions ("GT&C") Section 6.2(c)(i)
1.2.12	GT&C Sections 1.4(c) and 6.2(c)(vii)
1.3.2(i)-(vi)	GT&C Sections 6.1(a) - (f)
1.3.5	GT&C Section 6.2(b)
1.3.7	GT&C Section 6.2(a)
1.3.11	GT&C Section 6.2(c)(viii)
1.3.15	GT&C Section 13.6(a)
1.3.16	GT&C Section 13.6(b)
1.3.17	GT&C Section 6.6
1.3.19	GT&C Section 6.2(e)
1.3.28	GT&C Section 13.5(e)
1.3.29	GT&C Section 13.5(c)
1.3.31	GT&C Section 13.5(d)
1.3.32	GT&C Section 6.2(c)(i)
1.3.33	GT&C Section 6.2(c)(viii)
1.3.39	GT&C Section 1.4(c)
1.3.51	GT&C Section 6.2(c)(vi)
1.3.64	GT&C Section 6.6(b)
1.3.65	GT&C Section 6.6(c)

Standards not Incorporated by Reference and their Location in Tariff:

(continued)

2.2.1	GT&C Section 10.6
2.3.7	GT&C Section 2.1
2.3.8	GT&C Section 2.3
2.3.11	GT&C Section 2.1
2.3.12	GT&C Section 2.1
2.3.13	GT&C Section 2.1
2.3.14	GT&C Section 2.2
3.2.1	GT&C Section 1.5
3.3.25	GT&C Section 12.2(a)
5.2.1	GT&C Section 1.8
5.2.2	GT&C Section 6.2(c)(v)
5.3.1	GT&C Section 9.5(b)
5.3.2	GT&C Section 9.5(b)
5.3.4	GT&C Section 9.11(h)
5.3.13	GT&C Section 9.10(g)
5.3.14	GT&C Section 9.11(b)
5.3.16	GT&C Section 9.11(b)
5.3.21	Part II: Statement of Rates ("Statement of Rates") Section 1, Footnote 1
5.3.22	Statement of Rates Section 1, Footnote 1
5.3.23	Statement of Rates Section 1, Footnote 1
5.3.26	GT&C Sections 9.7(g) and 9.8(d)
5.3.34	GT&C Section 6.2(c)(v)
5.3.44	GT&C Sections 9.12(a) and (b)
5.3.45	GT&C Section 9.12(b)
5.3.51	GT&C Section 9.7(d)
5.3.53	GT&C Section 9.12(g)
5.3.54	GT&C Section 9.12(f)
5.3.56	GT&C Section 9.12(e)

Standards Incorporated by Reference:

Additional Standards:

General:

Definitions:

0.2.5

Standards:

0.3.1, 0.3.2, 0.3.16, 0.3.17

Creditworthiness:

Standards:
0.3.3, 0.3.4, 0.3.5, 0.3.6, 0.3.7, 0.3.8, 0.3.9, 0.3.10

Gas/Electric Operational Communications:

Definitions:
0.2.1, 0.2.2, 0.2.3, 0.2.4

Standards:
0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15

Operating Capacity and Unsubscribed:

Standards:
0.3.18, 0.3.20, 0.3.21, 0.3.22

Data Sets:
0.4.2, 0.4.3

Location Data Download

Standards:
0.3.23, 0.3.24, 0.3.25, 0.3.26, 0.3.27, 0.3.28, 0.3.29

Dataset:
0.4.4

Storage Information:

Data Sets:
0.4.1

Nominations Related Standards:

Definitions:

1.2.2, 1.2.3, 1.2.4, 1.2.5, 1.2.6, 1.2.8, 1.2.9, 1.2.10, 1.2.11, 1.2.13, 1.2.14, 1.2.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19

Standards:

1.3.1, 1.3.3, 1.3.4, 1.3.6, 1.3.8, 1.3.9, 1.3.13, 1.3.14, 1.3.18, 1.3.20, 1.3.21, 1.3.22, 1.3.23, 1.3.24, 1.3.25, 1.3.26, 1.3.27, 1.3.30, 1.3.34, 1.3.35, 1.3.36, 1.3.37, 1.3.38, 1.3.40, 1.3.41, 1.3.42, 1.3.43, 1.3.44, 1.3.45, 1.3.46, 1.3.48, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.66, 1.3.67, 1.3.68, 1.3.69, 1.3.70, 1.3.71, 1.3.72, 1.3.73, 1.3.74, 1.3.75, 1.3.76, 1.3.77, 1.3.79, 1.3.80, 1.3.81, 1.3.82

Data Sets:

1.4.1, 1.4.2, 1.4.3, 1.4.4, 1.4.5, 1.4.6, 1.4.7

Flowing Gas Related Standards:

Definitions:

2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.3, 2.3.4, 2.3.5, 2.3.6, 2.3.9, 2.3.10, 2.3.15, 2.3.16, 2.3.17, 2.3.18, 2.3.19, 2.3.20, 2.3.21, 2.3.22, 2.3.23, 2.3.25, 2.3.26, 2.3.27, 2.3.28, 2.3.29, 2.3.30, 2.3.31, 2.3.32, 2.3.40, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 2.3.47, 2.3.48, 2.3.50, 2.3.51, 2.3.52, 2.3.53, 2.3.54, 2.3.55, 2.3.56, 2.3.57, 2.3.58, 2.3.59, 2.3.60, 2.3.61, 2.3.62, 2.3.63, 2.3.64, 2.3.65, 2.3.66

Datasets:

2.4.1, 2.4.2, 2.4.3, 2.4.4, 2.4.5, 2.4.6, 2.4.7, 2.4.8, 2.4.9, 2.4.10, 2.4.11, 2.4.17, 2.4.18

Invoicing Related Standards:

Standards:

3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.17, 3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.26, [3.3.27](#)

Datasets:

3.4.1, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards:

Definitions:

4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 4.2.10, 4.2.11, 4.2.12, 4.2.13, 4.2.14, 4.2.15, 4.2.16, 4.2.17, 4.2.18, 4.2.19, 4.2.20

Standards:

4.3.1, 4.3.2, 4.3.3, 4.3.16, 4.3.17, 4.3.18, 4.3.20, 4.3.22, 4.3.23, 4.3.24, 4.3.25, 4.3.26, 4.3.27, 4.3.28, 4.3.30, 4.3.31, 4.3.32, 4.3.33, 4.3.34, 4.3.35, 4.3.36, 4.3.38, 4.3.40, 4.3.41, 4.3.42, 4.3.43, 4.3.44, 4.3.45, 4.3.46, 4.3.47, 4.3.48, 4.3.49, 4.3.50, 4.3.52, 4.3.53, 4.3.54, 4.3.55, 4.3.57, 4.3.58, 4.3.60, ~~4.3.61~~, 4.3.62, 4.3.66, 4.3.67, 4.3.68, 4.3.69, 4.3.72, 4.3.75, 4.3.78, 4.3.79, 4.3.80, 4.3.81, 4.3.82, ~~4.3.83~~, 4.3.84, 4.3.85, 4.3.86, 4.3.87, 4.3.89, 4.3.90, 4.3.91, 4.3.92, 4.3.93, 4.3.94, 4.3.95, 4.3.96, 4.3.97, 4.3.98, 4.3.99, 4.3.100, 4.3.101, 4.3.102, 4.3.103, 4.3.104, 4.3.105, 4.3.106, 4.3.107, 4.3.108, 4.3.109, 4.3.110

Capacity Release Related Standards:

Definitions:

5.2.3, 5.2.4, 5.2.5

Standards:

5.3.3, 5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.15, 5.3.18, 5.3.19, 5.3.20, 5.3.24, 5.3.25, 5.3.28, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.35, 5.3.36, 5.3.37, 5.3.38, 5.3.39, 5.3.40, 5.3.41, 5.3.42, 5.3.46, 5.3.47, 5.3.48, 5.3.49, 5.3.50, 5.3.52, 5.3.55, 5.3.57, 5.3.58, 5.3.59, 5.3.60, 5.3.62, 5.3.62a, 5.3.63, 5.3.64, 5.3.65, 5.3.66, 5.3.67, 5.3.68, 5.3.69, 5.3.70, 5.3.71, 5.3.72, 5.3.73

Datasets:

5.4.14, 5.4.15, 5.4.16, 5.4.17, 5.4.20, 5.4.21, 5.4.22, 5.4.23, 5.4.24, 5.4.25, 5.4.26, 5.4.27

Internet Electronic Transport Related Standards:

Definitions:

10.2.1, 10.2.2, 10.2.3, 10.2.4, 10.2.5, 10.2.6, 10.2.7, 10.2.8, 10.2.9, 10.2.10, 10.2.11, 10.2.12, 10.2.13, 10.2.14, 10.2.15, 10.2.16, 10.2.17, 10.2.18, 10.2.19, 10.2.20, 10.2.21, 10.2.22, 10.2.23, 10.2.24, 10.2.25, 10.2.26, 10.2.27, 10.2.28, 10.2.29, 10.2.30, 10.2.31, 10.2.32, 10.2.33, 10.2.34, 10.2.35, 10.2.36, 10.2.37, 10.2.38, 10.2.39

Standards:

10.3.1, 10.3.3, 10.3.4, 10.3.5, 10.3.6, 10.3.7, 10.3.8, 10.3.9, 10.3.10, 10.3.11, 10.3.12, 10.3.14, 10.3.15, 10.3.16, 10.3.17, 10.3.18, 10.3.19, 10.3.20, 10.3.21, 10.3.22, 10.3.23, 10.3.24, 10.3.25, 10.3.26, 10.3.27, 10.3.28, 10.3.29

Standards for which Waiver or Extension of Time to Comply have been granted:

<u>NAESB Standard</u>	<u>Waiver, Variance or Extension of Time</u>	<u>Relevant Tariff Section and/or Description</u>	<u>Initial Order Granting Request</u>	<u>Most Recent Order Granting Continuation</u>
<u>0.4.1</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>1.3.2</u>	<u>Variance</u>	<u>GT&C Section 6.1 Extension of nomination cycle deadlines for certain transactions</u>	<u>RP06-37-000, November 16, 2005 (unpublished letter order) 154 FERC ¶ 61,250 (2016)</u>	<u>168 FERC ¶ 61,061 (2019)</u>
<u>2.4.1</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>2.4.2</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>2.4.3</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>2.4.4</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>2.4.6</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>3.4.1</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>3.4.2</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>3.4.3</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>3.4.4</u>	<u>Extension</u>	<u>Extension for EDI Implementation</u>		
<u>4.3.60</u>	<u>Waiver</u>	<u>Requirement for multi-factor authentication</u>		

~~NAESB Standard 1.3.2~~ ~~Waiver, Extension of Time or Variance~~
~~1.3.2~~ ~~GT&C Section 6.1(g) contains an extension of the nomination cycle deadlines for certain transactions. (see letter orders issued on November 16, 2005 in Docket No. RP06-37-000 and December 21, 2007 in Docket No. RP08-102-000). NAESB Standard 1.3.2 and its subsections are supported at GT&C Section 6.1. On March 29, 2016 in Docket No. RP16-455-000 the Commission accepted Transporter's application of this extension to the Intraday 3 Nomination Cycle. See 154 FERC ¶ 61,250 (2016).~~

23. Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.2, which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identification or notations are incorporated by reference. Standards that are not incorporated by reference are identified along with the tariff record in which they are located. Standards for which waivers or extensions of time have been granted are also identified.

Standards not Incorporated by Reference and their Location in Tariff:

Pursuant to NAESB's Copyright Procedure Regarding Member and Purchaser Self-Executing Waiver as adopted by the NAESB Board of Directors on April 4, 2013, Transporter may publish in its tariff, compliance filings, in communications with customers or stakeholders in conducting day to day business or in communications with regulatory agencies some or all of the language contained in NAESB standards protected by copyright, provided that Transporter includes appropriate citations in the submission.

Transporter has elected to reproduce only the following Business Practices and Electronic Communications standards, NAESB WGQ Version 3.2, that are protected by NAESB's copyright. With respect to each reproduced standard (including any minor corrections), Transporter incorporates the following: © 1996 - 2020 North American Energy Standards Board, Inc., all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>
1.2.1	Part IV: General Terms and Conditions ("GT&C") Section 6.2(c)(i)
1.2.12	GT&C Sections 1.4(c) and 6.2(c)(vii)
1.3.2(i)-(vi)	GT&C Sections 6.1(a) - (f)
1.3.5	GT&C Section 6.2(b)
1.3.7	GT&C Section 6.2(a)
1.3.11	GT&C Section 6.2(c)(viii)
1.3.15	GT&C Section 13.6(a)
1.3.16	GT&C Section 13.6(b)
1.3.17	GT&C Section 6.6
1.3.19	GT&C Section 6.2(e)
1.3.28	GT&C Section 13.5(e)
1.3.29	GT&C Section 13.5(c)
1.3.31	GT&C Section 13.5(d)
1.3.32	GT&C Section 6.2(c)(i)
1.3.33	GT&C Section 6.2(c)(viii)
1.3.39	GT&C Section 1.4(c)
1.3.51	GT&C Section 6.2(c)(vi)
1.3.64	GT&C Section 6.6(b)
1.3.65	GT&C Section 6.6(c)

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2.2.1	GT&C Section 10.6
2.3.7	GT&C Section 2.1
2.3.8	GT&C Section 2.3
2.3.11	GT&C Section 2.1
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2.3.13	GT&C Section 2.1
2.3.14	GT&C Section 2.2
3.2.1	GT&C Section 1.5
3.3.25	GT&C Section 12.2(a)
5.2.1	GT&C Section 1.8
5.2.2	GT&C Section 6.2(c)(v)
5.3.1	GT&C Section 9.5(b)
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5.3.4	GT&C Section 9.11(h)
5.3.13	GT&C Section 9.10(g)
5.3.14	GT&C Section 9.11(b)
5.3.16	GT&C Section 9.11(b)
5.3.21	Part II: Statement of Rates ("Statement of Rates") Section 1, Footnote 1
5.3.22	Statement of Rates Section 1, Footnote 1
5.3.23	Statement of Rates Section 1, Footnote 1
5.3.26	GT&C Sections 9.7(g) and 9.8(d)
5.3.34	GT&C Section 6.2(c)(v)
5.3.44	GT&C Sections 9.12(a) and (b)
5.3.45	GT&C Section 9.12(b)
5.3.51	GT&C Section 9.7(d)
5.3.53	GT&C Section 9.12(g)
5.3.54	GT&C Section 9.12(f)
5.3.56	GT&C Section 9.12(e)

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Standards for which Waiver or Extension of Time to Comply have been granted:

<u>NAESB Standard</u>	<u>Waiver, Variance or Extension of Time</u>	<u>Relevant Tariff Section and/or Description</u>	<u>Initial Order Granting Request</u>	<u>Most Recent Order Granting Continuation</u>
0.4.1	Extension	Extension for EDI Implementation		
1.3.2	Variance	GT&C Section 6.1 Extension of nomination cycle deadlines for certain transactions	RP06-37-000, November 16, 2005 (unpublished letter order) 154 FERC ¶ 61,250 (2016)	168 FERC ¶ 61,061 (2019)
2.4.1	Extension	Extension for EDI Implementation		
2.4.2	Extension	Extension for EDI Implementation		
2.4.3	Extension	Extension for EDI Implementation		
2.4.4	Extension	Extension for EDI Implementation		
2.4.6	Extension	Extension for EDI Implementation		
3.4.1	Extension	Extension for EDI Implementation		
3.4.2	Extension	Extension for EDI Implementation		
3.4.3	Extension	Extension for EDI Implementation		
3.4.4	Extension	Extension for EDI Implementation		
4.3.60	Waiver	Requirement for multi-factor authentication		