



February 3, 2025

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

Attention: Ms. Debbie-Anne A Reese, Secretary

Re: Order No. 587-AA Compliance Filing;
Cheyenne Plains Gas Pipeline Company, L.L.C.;
Docket No. RP25-

Commissioners:

In compliance with the Federal Energy Regulatory Commission's ("Commission") Final Rule in Docket No. RM96-1-043, ("Order No. 587-AA" or "Final Rule"),¹ Cheyenne Plains Gas Pipeline Company, L.L.C. ("CPG") submits for filing the following tariff record for inclusion in Part IV of its FERC Gas Tariff, First Revised Volume No. 1 ("Tariff"):

Section 23 Compliance with 18 CFR, Section 284.12 Version 7.0.0

Proposed to become effective August 1, 2025 to comply with Order No. 587-AA, this tariff record reflects the latest version, Version 4.0, of the business practice standards adopted by the Wholesale Gas Quadrant ("WGQ") of the North American Energy Standards Board ("NAESB") as adopted by the Commission in Order No. 587-AA.

Reason for Filing

On November 22, 2024, the Commission issued Order No. 587-AA amending its regulations to incorporate by reference, with certain exceptions, Version 4.0.² As described in the Final Rule,³ the Version 4.0 standards include (among other things): 1) a new data element to address technical details for the reporting of storage balances, 2) revisions to a flowing gas standard to identify the applicable contract and support for processes used to allocate the actual flow of gas quantities to parties involved in a transaction, 3) modification to an invoicing-

¹ *Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Order No. 587-AA, 89 FR 97518 (Dec. 9, 2024), 189 FERC ¶ 61,135 (2024) (Final Rule issued in Docket No. RM96-1-043 to be effective on February 7, 2025) (hereinafter "Order No. 587-AA").

² Order No. 587-AA at PP 1 & 14.

³ *Id.* at PP 15-21 & 31-38.

related data element to allow for the identification of multiple rates that may be applicable for a single transaction or service, 4) a new capacity release data element to improve efficiencies by providing a mechanism for a transportation service provider to communicate the locations at which a discounted rate is offered as well as if the rate is associated with a single location, multiple locations, or all locations, and 5) code values for five invoicing-related data elements to ensure the dataset complies with the Accredited Standards Institute X12 Transaction Set 811 Consolidated Service Invoice/Statement. Additionally, the cybersecurity-related standards currently included in various standards manuals are consolidated into a new manual as detailed in the Final Rule.

In Order No. 587-AA, the Commission noted that it would continue the compliance filing requirements first established in Order No. 587-V.⁴ Accordingly, for each standard, Order No. 587-AA requires the pipeline to specify in the tariff section 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.⁵ With the Final Rule and consistent with Order No. 587-V, the Commission also mandated that pipelines request to continue any existing waivers or extensions, as necessary.⁶ The Final Rule requires each interstate natural gas pipeline to submit a compliance filing reflecting the changed standards by February 3, 2025, to take effect on August 1, 2025.⁷

Description of Filing

CPG is hereby filing an updated tariff record in compliance with the Commission's Order No. 587-AA. 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 waivers, extensions of time and variance requested below.

Incorporation of NAESB Version 4.0

Part IV, Section 23 is updated to reflect the addition and removal of certain NAESB WGQ standards in Version 4.0, the applicable copyright years, and the inclusion of a citation to the relevant Commission order(s) on previously accepted variances, waivers and extensions. Additionally, this tariff record reflects the

⁴ Order No. 587-AA at P 24. citing *Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Order No. 587-V, 77 FR 43711 (Jul. 26, 2012), 140 FERC ¶ 61,036 at PP 36-39 (2012).

⁵ Order No. 587-AA at P 25, citing *Trans-Union Interstate Pipeline L.P.*, 141 FERC ¶ 61,167, at P 36 (2012) (Order on compliance filings for Order No. 587-V).

⁶ Order No. 587-AA at P 28.

⁷ See *Id.* at PP 1, 11 & 23.

removal of a previous extension for three standards as well as the removal of the waiver for another standard, given that such requests for these standards are no longer necessary.

Continuance of Variance

In Part IV, Section 6, CPG's Tariff includes a variance to NAESB WGQ Standard 1.3.2, which extends the nomination periods for an additional fifteen minutes.⁸ The additional fifteen minutes conforms to Commission policy that pipelines may modify NAESB standards to provide better service to its customers.⁹ This variance was accepted by the Commission in previous orders.¹⁰

Continuance of Extension

CPG's Tariff includes an extension of time to comply with NAESB WGQ Standards for certain 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 2.4.3, and 3.4.2 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. CPG's original request for extension on these standards was accepted by the Commission in its *Order On Filings In Compliance With Order No. 587-Z*.¹¹

Table for Request to Continue Waivers, Variances or Extensions

As required by Order No. 587-AA for requests for a continuation of a waiver, variance or extension,¹² CPG is providing the table below identifying the standard for which a variance, waiver, or extension of time was granted, and the docket

⁸ 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).

⁹ See *Reliant Energy Gas Transmission Co.*, 93 FERC ¶ 61,141 (2000).

¹⁰ *East Tennessee Natural Gas, LLC*, 179 FERC ¶ 61,150 at P 23 (2022) ("East Tennessee") (Order on filings in compliance with Order No. 587-Z including CPG's filing); *Rager Mountain Storage Co.*, 168 FERC ¶ 61,061 at P 30 (2019) (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) (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).

¹¹ *East Tennessee*, 179 FERC ¶ 61,150 at P 27 (2022).

¹² See Order No. 587-AA at P 28.

number or order citation to the proceeding wherein the waiver, variance or extension was granted.

<u>NAESB WGQ Standard</u>	<u>Waiver, Variance or Extension</u>	<u>Commission Determination</u>
1.3.2	Variance	179 FERC ¶ 61,150 at P23 (2022) 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.
0.4.1 2.4.1 2.4.2 2.4.3 3.4.2 3.4.3 3.4.4	Extension	179 FERC ¶ 61,150 at P27 (2022)

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 record in PDF format.

CPG respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective August 1, 2025, consistent with the Commission’s directive in Order No. 587-AA. 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 any minimal suspension period specified by the Commission.

Correspondence and communications concerning this filing should be directed to:

Ms. Shelly L. Busby
Director, Regulatory
Cheyenne Plains Gas Pipeline Company, L.L.C.
Post Office Box 1087
Colorado Springs, CO 80944-1087
Telephone: (719) 520-4657
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 80944-1087
Telephone: (719) 520-4534
David_Cain@kindermorgan.com

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 she 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 her knowledge and belief; and (iii) that she possesses full power and authority to sign this filing.

Respectfully submitted,

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

By _____ /s/ _____
Shelly L. Busby
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 3rd day of February 2025.

/s/

Shelly L. Busby

Post Office Box 1087
Colorado Springs, CO 80944
(719) 520-4657

23. Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 4.03-2, and the standard revised by Minor Correction MC24002 marked with an asterisk [*], 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 4.03-2, that are protected by NAESB's copyright. With respect to each reproduced standard (including any minor corrections), Transporter incorporates the following: © 1996 - 2025~~0~~ 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:

Definition:

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 Set:

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, 4.3.62~~, 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, ~~4.3.84~~, 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~~

Cybersecurity Related Standards:

Definitions:

12.2.1, 12.2.2, 12.2.3, 12.2.4, 12.2.5, 12.2.6, 12.2.7, 12.2.8, 12.2.9, 12.2.10, 12.2.11, 12.2.12, 12.2.13, 12.2.14, 12.2.15, 12.2.16, 12.2.17, 12.2.18, 12.2.19, 12.2.20, 12.2.21, 12.2.22, 12.2.23, 12.2.24, 12.2.25, 12.2.26, 12.2.27, 12.2.28, 12.2.29, 12.2.30, 12.2.31, 12.2.32, 12.2.33, 12.2.34, 12.2.35, 12.2.36, 12.2.37, 12.2.38, 12.2.39, 12.2.40, 12.2.41

Standards:

12.3.1, 12.3.2, 12.3.3, 12.3.4, 12.3.5, 12.3.6, 12.3.7, 12.3.8, 12.3.9, 12.3.10, 12.3.11, 12.3.12, 12.3.13, 12.3.14, 12.3.15, 12.3.16, 12.3.17, 12.3.18, 12.3.19, 12.3.20, 12.3.21, 12.3.22, 12.3.23, 12.3.24, 12.3.25, 12.3.26, 12.3.27, 12.3.28, 12.3.29, 12.3.30, 12.3.31

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	<u>179 FERC ¶ 61,150 (2022)</u>	
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)	179 68 FERC ¶ 61, 150 64 (2022)19
2.4.1	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.2	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.3	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
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	<u>179 FERC ¶ 61,150 (2022)</u>	
3.4.3	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
3.4.4	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
4.3.60	Waiver	Requirement for multi-factor authentication		

23. Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 4.0, and the standard revised by Minor Correction MC24002 marked with an asterisk [*], 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 4.0, that are protected by NAESB's copyright. With respect to each reproduced standard (including any minor corrections), Transporter incorporates the following: © 1996 - 2025 North American Energy Standards Board, Inc., all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>
1.2.1	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:

Definition:

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 Set:

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

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, 4.3.66, 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, 4.3.85, 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, 4.3.104, 4.3.105, 4.3.106, 4.3.107, 4.3.108, 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

Cybersecurity Related Standards:

Definitions:

12.2.1, 12.2.2, 12.2.3, 12.2.4, 12.2.5, 12.2.6, 12.2.7, 12.2.8, 12.2.9, 12.2.10, 12.2.11, 12.2.12, 12.2.13, 12.2.14, 12.2.15, 12.2.16, 12.2.17, 12.2.18, 12.2.19, 12.2.20, 12.2.21, 12.2.22, 12.2.23, 12.2.24, 12.2.25, 12.2.26, 12.2.27, 12.2.28, 12.2.29, 12.2.30, 12.2.31, 12.2.32, 12.2.33, 12.2.34, 12.2.35, 12.2.36, 12.2.37, 12.2.38, 12.2.39, 12.2.40, 12.2.41

Standards:

12.3.1, 12.3.2, 12.3.3, 12.3.4, 12.3.5, 12.3.6, 12.3.7, 12.3.8, 12.3.9, 12.3.10, 12.3.11, 12.3.12, 12.3.13, 12.3.14, 12.3.15, 12.3.16, 12.3.17, 12.3.18, 12.3.19, 12.3.20, 12.3.21, 12.3.22, 12.3.23, 12.3.24, 12.3.25, 12.3.26, 12.3.27, 12.3.28, 12.3.29, 12.3.30, 12.3.31

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	179 FERC ¶ 61,150 (2022)	
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)	179 FERC ¶ 61,150 (2022)
2.4.1	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
2.4.2	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
2.4.3	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
3.4.2	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
3.4.3	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
3.4.4	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	