



February 3, 2025

Ms. Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N. E.  
Washington, D.C. 20426

Re: Elba Express Company  
Compliance Filing Pursuant to Order 587-AA  
Docket No. RP25-\_\_\_\_\_

Dear Ms. Reese:

Pursuant to Section 4 of the Natural Gas Act (“NGA”) and Section 154 of the regulations of the Federal Energy Regulatory Commission (“Commission” or “FERC”) and the Commission’s Order No. 587-AA in Docket No. RM96-1-043 (“Order No 587-AA”),<sup>1</sup> Elba Express Company (“EEC”) hereby submits for filing with the Commission as part of its Eighth Revised Volume No. 1, the tariff record listed below proposed to be effective August 1, 2025.

#### Section 29 - NAESB Standards Version 9.0.0

As required by Order No. 587-AA, EEC requests an effective date of August, 1, 2025 for the proposed tariff record.

#### **Statement of Nature, Reasons and Basis for Filing**

On November 22, 2024, the Commission issued a Final Rule in Docket No. RM96-1-043 to incorporate by reference into its regulations Version 4.0 of business practice standards as developed by the Wholesale Gas Quadrant (“WGQ”) of the North American Energy Standards Board (“NAESB”). The NAESB Version 4.0 package of standards contains revisions to enhance the cybersecurity-related standards that support the use of multi-factor authentication and new guidance encouraging the practice of whitelisting. This NAESB Version 4.0 also contains revisions to promote increased efficiencies in conducting commercial transactions as well as two new addendums to the NAESB Base Contract for the Sale and Purchase of Natural Gas that support transactions for certified gas and renewable natural gas. Each interstate natural gas pipeline is required to file a compliance filing reflecting the changed standards by February 3, 2025, to take effect on August 1, 2025.<sup>2</sup>

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<sup>1</sup> *Standards for Business Practices of Interstate Natural Gas Pipelines*, Order No. 587-AA, 189 FERC ¶ 61,135 (2024) (“Order No. 587-AA”).

<sup>2</sup> *Id.* at P1.

There are several Electronic Data Interchange (“EDI”) related data set requirements that are not being used by EEC’s customers for which EEC is requesting a continuation of an existing waiver or extension of time. These are data sets that are not being used by EEC’s customers for which EEC is requesting a continuation of the existing waiver or extension of time. Order No. 587-AA maintained the process set forth in earlier orders for the continuation of such waiver requests. Specifically, Order No. 587-AA states:<sup>3</sup>

If the pipeline is requesting a continuation of an existing waiver or extension of time, it must include a table in its transmittal letter that identifies the standard for which the Commission granted a waiver or extension of time, and the docket number or order citation to the proceeding in which the Commission granted the waiver or extension of time. The pipeline also must present an explanation for why such waiver or extension of time should remain in force with regard to the WGQ Version 4.0 Standards.

Accordingly, the below table references the standard and the order citation for which the Commission granted the waiver or extension of time. As noted above, EEC has not received a request from any party to receive information via EDI pursuant to these data sets. Therefore, EEC respectfully requests a continuation of the extension of time for compliance until sixty days after EEC receives a request to comply with these listed EDI data set standards. This sixty day period will allow time for EEC to test and implement any of the listed EDI data sets.

| NAESB Standard | Order Citation of Waiver or Extension of Time |
|----------------|---|
| 0.4.1          | 179 FERC ¶ 61,150                             |
| 2.4.1          | 179 FERC ¶ 61,150                             |
| 2.4.2          | 179 FERC ¶ 61,150                             |
| 2.4.3          | 179 FERC ¶ 61,150                             |
| 2.4.5          | 179 FERC ¶ 61,150                             |
| 2.4.6          | 179 FERC ¶ 61,150                             |
| 3.4.2          | 179 FERC ¶ 61,150                             |
| 3.4.3          | 179 FERC ¶ 61,150                             |
| 3.4.4          | 179 FERC ¶ 61,150                             |

**Effective Date**

EEC respectfully requests that the Commission accept the tendered tariff record effective August 1, 2025, in accordance with the implementation date established by the Commission under Order No. 587-AA.

**Procedural Matters**

In accordance with the applicable provisions of Part 154 of the Commission’s regulations,<sup>4</sup> EEC is submitting an eTariff XML filing package, which includes the following:

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<sup>3</sup> *Id.* at P28.

<sup>4</sup> 18 C.F.R. §§ 154.1 – 154.603 (2024).

1. This transmittal letter; and
2. Clean and Marked versions of the tendered tariff record in PDF format.

EEC respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective on August 1, 2025 in compliance with Order No. 587-AA. With respect to any tariff record the Commission allows to go into effect without change, EEC hereby moves to place the tendered tariff record into effect at the end any minimal suspension period specified by the Commission.

As required by Section 154.208 of the Commission's Regulations, copies of this filing are being made available at EEC's offices in Birmingham, Alabama, and electronically mailed to EEC's customers and to interested state commissions.

The names, titles, and mailing addresses of the persons to whom communications concerning this filing are to be addressed and to whom service is to be made are:

Ryan C. Leahy  
Director, Regulatory  
Elba Express Company, L.L.C.  
Post Office Box 2563  
Birmingham, Alabama 35202-2563  
(205) 325-7105  
[ryan\\_leahy@kindermorgan.com](mailto:ryan_leahy@kindermorgan.com)

Patricia S. Francis  
Vice President and Managing Counsel  
Elba Express Company, L.L.C.  
Post Office Box 2563  
Birmingham, Alabama 35202-2563  
(205) 325-7696  
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These persons have been designated for service in accordance with Rule 203 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.203 (2024)).

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,

ELBA EXPRESS COMPANY, L.L.C.

/s/ Ryan Leahy  
Ryan Leahy  
Director, Regulatory  
Elba Express Company, L.L.C.  
Post Office Box 2563  
Birmingham, Alabama 35202-2563  
(205) 325-7105  
[ryan\\_leahy@kindermorgan.com](mailto:ryan_leahy@kindermorgan.com)

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all EEC's customers and interested state commissions.

Dated at Birmingham, Alabama this 3rd day of February 2025.

/s/ Ryan Leahy  
Ryan Leahy  
Director, Regulatory  
Elba Express Company, L.L.C.  
Post Office Box 2563  
Birmingham, Alabama 35202-2563  
(205) 325-7105  
[ryan\\_leahy@kindermorgan.com](mailto:ryan_leahy@kindermorgan.com)

## SECTION 4.29

### NAESB STANDARDS

COMPANY 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. Notwithstanding this Section 29, COMPANY shall adhere to the NAESB WGQ Standards as modified by Order No. 587-AA.

#### NAESB WGQ Version 3.2 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, COMPANY 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 COMPANY includes appropriate citations in the submission.

COMPANY 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), COMPANY incorporates the following: Copyright 2025 NAESB North American Energy Standards Board, Inc., all rights reserved.

#### Additional Standards

##### Nomination Related Standards

###### Definitions:

1.2.5 Nominations, Section 4.12 - 12.1 (j) , V 2.0.0

###### Standards:

1.3.2(i-vi) Nominations, Section 4.12 - 12.1 (c) , V 4.0.0  
1.3.15 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.16 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.28 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.29 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.30 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.31 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.80 Nominations, Section 4.12 - 12.3 (c) , V 5.0.0

##### Flowing Gas Related Standards

###### Standards:

2.3.14 Measuring Equipment, Section 4.5 – 5.5, V 2.0.0  
2.3.16 Determination of Rec. and Del., Section 4.13 - 13.1 (b), V 0.0.0  
2.3.20 Determination of Rec. and Del., Section 4.13 - 13.1 (d), V 0.0.0  
2.3.26 Determination of Rec. and Del., Section 4.13 - 13.5, V 3.0.0  
2.3.40 Resolution of Imbalances & Adjustment, Section 4.14 – 14 (e), V 7.0.0  
2.3.47 Resolution of Imbalances & Adjustment, Section 4.14 – 14 (e), V 7.0.0

##### Invoicing Related Standards

Definitions:

3.2.1 Definitions, Section 4.1 (q), V 2.0.0

Standards:

3.3.7 Billing and Payment, Section 4.15 – 15.1, V 3.0.0  
3.3.14 Billing and Payment, Section 4.15 – 15.1, V 3.0.0  
3.3.15 Billing and Payment, Section 4.5 – 5.5, V 2.0.0  
3.3.17 Billing and Payment, Section 4.15 – 15.3, V 0.0.0  
3.3.18 Billing and Payment, Section 4.15 – 15.2, V 0.0.0  
3.3.19 Billing and Payment, Section 4.15 – 15.3, V 0.0.0

Capacity Release Standards

Definitions:

5.2.4 Definitions, Section 4.1 (ll), V 2.0.0  
5.2.5 Definitions, Section 4.1 (kk), V 2.0.0

Standards:

5.3.2 Shipper Release of Firm Capacity, Section 4.20 – 20.6 (a), V 6.0.0  
5.3.13 Shipper Release of Firm Capacity, Section 4.20 – 20.4 (a), V 3.0.0  
5.3.14 Shipper Release of Firm Capacity, Section 4.20 – 20.6 (b)(ii), V 3.0.0  
5.3.15 Shipper Release of Firm Capacity, Section 4.20 – 20.4 (a), V 2.0.0  
5.3.16 Shipper Release of Firm Capacity, Section 4.20 – 20.6 (b)(ii), V 2.0.0  
5.3.19 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iv), V 2.0.0  
5.3.44 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.45 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.47 Notices, Section 4.18, V 0.0.0, Shipper Release of Firm Capacity, Section 4.20 – 20.6 (k), V 2.0.0  
5.3.48 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.49 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.51 Shipper Release of Firm Capacity, Section 4.20 – 20.6(c)(v)(e), V 3.0.0  
5.3.52 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 2.0.0  
5.3.53 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.54 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.55 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 2.0.0  
5.3.56 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.57 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 2.0.0  
5.3.58 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 6.0.0  
5.3.59 Shipper Release of Firm Capacity, Section 4.20 – 20.4 (a), V 2.0.0  
5.3.60 Shipper Release of Firm Capacity, Section 4.20 – 20.3 (b)(iii), V 2.0.0  
5.3.62 Shipper Release of Firm Capacity, Section 4.20 – 20.6 (c)(x), V 2.0.0

NAESB WGQ Standards - Version 3.2 Standards, Definitions, and Data Sets Incorporated by Reference:

Additional Standards

General

Definitions:

0.2.5

Standards:

0.3.1, 0.3.2, 0.3.16, 0.3.17

Gas/Electric Operational Communications

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

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

Standards:

0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15

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

Operating Capacity and Unsubscribed:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Storage Information

Dataset:

0.4.1

Operational Information

Dataset:

0.4.2, 0.4.3

Nomination Related Standards

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.6, 1.2.8, 1.2.9, 1.2.10, 1.2.11, 1.2.12, 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, 1.3.5, 1.3.6, 1.3.7, 1.3.8, 1.3.9, 1.3.11, 1.3.13, 1.3.14, 1.3.17, 1.3.18, 1.3.19, 1.3.20, 1.3.21, 1.3.22, 1.3.23, 1.3.24, 1.3.25, 1.3.26, 1.3.27, 1.3.32, 1.3.33, 1.3.34, 1.3.35, 1.3.36, 1.3.37, 1.3.38, 1.3.39, 1.3.40, 1.3.41, 1.3.42, 1.3.43, 1.3.44, 1.3.45, 1.3.46, 1.3.48, 1.3.51, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.64, 1.3.65, 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, 1.3.81, 1.3.82

Dataset:

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:

2.2.1, 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, 2.3.7, 2.3.8, 2.3.9, 2.3.10, 2.3.11, 2.3.12, 2.3.13, 2.3.15, 2.3.17, 2.3.18, 2.3.19, 2.3.21, 2.3.22, 2.3.23, 2.3.25, 2.3.27, 2.3.28, 2.3.29, 2.3.30, 2.3.31, 2.3.32, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 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

Data Set:

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, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.16, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 3.3.26, 3.3.27

Dataset:

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 Standards

Definitions:

5.2.1, 5.2.2, 5.2.3

Standards:

5.3.1, 5.3.3, 5.3.4, 5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.18, 5.3.20, 5.3.21, 5.3.22, 5.3.23, 5.3.24, 5.3.25, 5.3.26, 5.3.28, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.34, 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, 5.3.50, 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

Dataset:

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

Cyber Security 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 or Extension of Time</u>         |
|-----------------------|--|
| 0.4.1                 | Extension of time (for EDI implementation) |
| 2.4.1                 | Extension of time (for EDI implementation) |
| 2.4.2                 | Extension of time (for EDI implementation) |
| 2.4.3                 | Extension of time (for EDI implementation) |
| 2.4.5                 | Extension of time (for EDI implementation) |
| 2.4.6                 | Extension of time (for EDI implementation) |
| 3.4.2                 | Extension of time (for EDI implementation) |
| 3.4.3                 | Extension of time (for EDI implementation) |
| 3.4.4                 | Extension of time (for EDI implementation) |

COMPANY agrees to use, and incorporates herein by reference, NAESB's Model Trading Partner Agreement for transacting business with parties who choose to use the electronic delivery mechanism standards set forth in Section 4 of the most recently published version of the NAESB Standards.

COMPANY agrees to accept and provide standardized data elements for EDI pursuant to the most recently published version of the NAESB Standards adopted and placed into effect by the Commission which are incorporated herein by reference. A copy of COMPANY'S Implementation Guide for EDI transactions is available upon request.

COMPANY agrees to use, and incorporates herein by reference, NAESB's Funds Transfer Agent Agreement pursuant to the most recently published version of the NAESB Standards to be used to supplement COMPANY'S GT&C in order to appoint an agent for all transactions wherein there is a need for instantaneous transfer of title of gas from a seller to buyer to buyer's repurchaser.

COMPANY agrees to use, and incorporates herein by reference, NAESB's Base Contract for Sale and Purchase of Natural Gas as well as the Model Credit Support Addendum to the Base Contract pursuant to the most recently published version of the NAESB Standards in order to facilitate purchase and sale transactions of gas on a firm or interruptible basis.

## SECTION 4.29

### NAESB STANDARDS

COMPANY has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3-24.0, 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. Notwithstanding this Section 29, COMPANY shall adhere to the NAESB WGQ Standards as modified by Order No. 587-AAZ.

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#### Additional Standards

##### Nomination Related Standards

###### Definitions:

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1.3.16 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.28 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.29 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.30 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.31 Reimb. of Fuel Used and LAUF Gas, Section 4.25 – 25.1, V 0.0.0  
1.3.80 Nominations, Section 4.12 - 12.3 (c) , V 5.0.0

##### Flowing Gas Related Standards

###### Standards:

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2.3.16 Determination of Rec. and Del., Section 4.13 - 13.1 (b), V 0.0.0  
2.3.20 Determination of Rec. and Del., Section 4.13 - 13.1 (d), V 0.0.0  
2.3.26 Determination of Rec. and Del., Section 4.13 - 13.5, V 3.0.0  
2.3.40 Resolution of Imbalances & Adjustment, Section 4.14 – 14 (e), V 7.0.0  
2.3.47 Resolution of Imbalances & Adjustment, Section 4.14 – 14 (e), V 7.0.0

##### Invoicing Related Standards

Definitions:

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Standards for which waiver or extension of time to comply have been granted:

| <u>NAESB Standard</u> | <u>Waiver or Extension of Time</u>                         |
|-----------------------|--|
| 0.4.1                 | Extension of time (for EDI implementation)                 |
| 2.4.1                 | Extension of time (for EDI implementation)                 |
| 2.4.2                 | Extension of time (for EDI implementation)                 |
| 2.4.3                 | Extension of time (for EDI implementation)                 |
| <del>2.4.4</del>      | <del>Extension of time (for EDI implementation)</del>      |
| 2.4.5                 | Extension of time (for EDI implementation)                 |
| 2.4.6                 | Extension of time (for EDI implementation)                 |
| <del>3.4.1</del>      | <del>Extension of time (for EDI implementation)</del>      |
| 3.4.2                 | Extension of time (for EDI implementation)                 |
| 3.4.3                 | Extension of time (for EDI implementation)                 |
| 3.4.4                 | Extension of time (for EDI implementation)                 |
| <del>4.3.60</del>     | <del>Waiver (to require more than a single password)</del> |

COMPANY agrees to use, and incorporates herein by reference, NAESB's Model Trading Partner Agreement for transacting business with parties who choose to use the electronic delivery mechanism standards set forth in Section 4 of the most recently published version of the NAESB Standards.

COMPANY agrees to accept and provide standardized data elements for EDI pursuant to the most recently published version of the NAESB Standards adopted and placed into effect by the Commission which are incorporated herein by reference. A copy of COMPANY'S Implementation Guide for EDI transactions is available upon request.

COMPANY agrees to use, and incorporates herein by reference, NAESB's Funds Transfer Agent Agreement pursuant to the most recently published version of the NAESB Standards to be used to supplement COMPANY's GT&C in order to appoint an agent for all transactions wherein there is a need for instantaneous transfer of title of gas from a seller to buyer to buyer's repurchaser.

COMPANY agrees to use, and incorporates herein by reference, NAESB's Base Contract for Sale and Purchase of Natural Gas as well as the Model Credit Support Addendum to the Base Contract pursuant to the most recently published version of the NAESB Standards in order to facilitate purchase and sale transactions of gas on a firm or interruptible basis.