



Elba Express  
Company, L.L.C.  
a Kinder Morgan company

May 9, 2019

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D. C. 20426

Re: Elba Express Company, L.L.C.  
Docket No. RP19-881-\_\_\_\_  
Order No. 587-Y Correction Filing

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act and Part 154 of the Federal Energy Regulatory Commission's ("Commission") Regulations, Elba Express Company, L.L.C. ("EEC") hereby submits for filing and approval the following Tariff Section of its FERC Gas Tariff ("Tariff")

Section 4.29 – General Terms and Conditions – NAESB Standards, Version 7.1.0

### **Background**

On March 25, 2019, EEC filed with the Commission its Order No. 587-Y Compliance Filing in Docket No. RP19-881 ("March filing") in order to comply with the Commission's November 15, 2018 Order No. 587-Y<sup>1</sup>. In the March filing, EEC submitted Tariff Section 4.29 – General Terms and Conditions – NAESB Standards, Version 7.0.0 to (1) incorporate the two NAESB Standards adopted by reference in Order No. 587-Y; (2) to reflect NAESB WGQ Version 3.1 instead of version 3.0; (3) to remove the reference to Minor Corrections marked with an asterisk [\*] which are now included in Version 3.1; and (4) to update the NAESB Copyright year.

### **Nature, Basis and Reasons for the Proposed Tariff Changes**

Subsequent to submission of the March filing, EEC determined it failed to include a sentence in Tariff Section 4.29 stating that there were no standards for which a waiver or extension of time to comply had been granted. In this filing EEC files corrected Tariff Section 4.29 version 7.1.0. to add this sentence. As a courtesy to FERC staff and EEC customers, the only marked change in version 7.1.0 is the addition of this sentence. All other marked changes submitted in the March filing are still applicable. EEC has Overtaken By Events (OBEd) Tariff

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<sup>1</sup> *Standards for Business Practices of Interstate Natural Gas Pipelines*, Order No. 587-Y Final Rule, in Docket No. RM96-1-041, 165 FERC ¶ 61,109 (2018) ("Order No. 587-Y").

Sections 4.29 Version 7.0.0 submitted in the March filing and replaced it by Tariff Section 4.29 Version 7.1.0 as submitted in this filing.

EEC respectfully requests a shortened comment period for this filing and requests the Commission accept this filing and place Tariff Section 4.29, Version 7.1.0 in effect on the proposed effective date of August 1, 2019.

### **Procedural Matters**

Pursuant to the applicable provisions of Section 154.7 of the Commission's regulations, EEC submits the following eTariff XML filing package, filed as a zip (compressed) file, containing:

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

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 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 as follows:

T. Brooks Henderson  
Director – Rates & Regulatory  
Elba Express Company, L.L.C.  
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Birmingham, Alabama 35202-2563  
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Respectfully submitted,

ELBA EXPRESS COMPANY, L.L.C.

/s/ T. Brooks Henderson  
T. Brooks Henderson  
Director – Rates & Regulatory  
Elba Express Company, L.L.C.  
Post Office Box 2563  
Birmingham, Alabama 35202-2563  
(205) 325-3843  
[brooks\\_henderson@kindermorgan.com](mailto:brooks_henderson@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 9<sup>th</sup> day of May, 2019.

/s/ T. Brooks Henderson  
T. Brooks Henderson  
Director – Rates & Regulatory  
Elba Express Company, L.L.C.  
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Birmingham, Alabama 35202-2563  
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**CLEAN VERSION OF TARIFF RECORD**

## SECTION 4.29

### NAESB STANDARDS

COMPANY has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.1, 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. Notwithstanding this Section 29, COMPANY shall adhere to the NAESB WGQ Standards as modified by Order No. 587-Y.

#### NAESB WGQ Version 3.1 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 3.1, that are protected by NAESB's copyright. With respect to each reproduced standard (including any minor corrections), COMPANY incorporates the following: Copyright 2017 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 2.0.0  
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 3.0 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

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, 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

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

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

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



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

None

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.

# **MARKED VERSION OF TARIFF RECORD**

## SECTION 4.29

### NAESB STANDARDS

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#### Additional Standards

##### Nomination Related Standards

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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  
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##### 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

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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  
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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  
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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  
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5.3.55 Shipper Release of Firm Capacity, Section 4.20 – 20. 3 (b)(iii), V 2.0.0  
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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 2.0.0  
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

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

None

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.