

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;  
El Paso Natural Gas 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"),<sup>1</sup> El Paso Natural Gas Company, L.L.C. ("EPNG") submits for filing the following tariff record for inclusion in its FERC Gas Tariff, Third Revised Volume No. 1A ("Tariff"):

Part IV Section 23 Compliance with 18 CFR, Section 284.12 Version 7.0.0

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.<sup>2</sup> 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 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,

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<sup>1</sup> *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").

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

extension of time, or other variance with respect to compliance with the standard.<sup>3</sup>

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.<sup>4</sup> The Commission also mandated that pipelines request to continue any existing waivers or extensions.<sup>5</sup> 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.<sup>6</sup>

### **Description of Filing**

EPNG is hereby filing an updated tariff record in compliance with the Commission's Order No. 587-Z. Specifically, EPNG 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 and variances requested below.

#### *Incorporation of NAESB Version 3.2*

Part IV, Section 23 is updated to reflect the addition of and removal of certain NAESB WGQ standards in Version 3.2, the applicable copyright years, and the inclusion of citations to the relevant Commission order on previously accepted variances and waivers. Additionally, this 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.

#### *Continuance of Variance/Waiver*

In Part IV, Section 6, EPNG's Tariff includes a variance to NAESB WGQ Standard 1.3.2,<sup>7</sup> which extends the nomination periods for an additional fifteen minutes.<sup>8</sup> The additional fifteen minutes conforms to Commission policy that pipelines may modify NAESB standards to provide better service to its customers.<sup>9</sup> This variance was accepted by the Commission in previous orders.<sup>10</sup>

EPNG's Tariff also contains a variance to NAESB WGQ Standard 1.3.6 for automatic hourly entitlement enhancement nomination ("HEEN") adjustments. This standard stipulates that nominations received after the nomination deadline should be scheduled after the nominations received before the deadline. The variance gives EPNG the ability as permitted by Section 8.1(i)(iii)(a) of the

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<sup>3</sup> Order No. 587-Z at P 27.

<sup>4</sup> 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").

<sup>5</sup> Order No. 587-Z at P 27.

<sup>6</sup> See Order No. 587-Z at PP 1, 25.

<sup>7</sup> See *El Paso Natural Gas Co.*, Docket No. RP10-22-000 (Oct. 28, 2009) (letter order applying NAESB Standard 1.3.2 nomination deadline to certain transactions).

<sup>8</sup> EPNG also has additional late day nomination cycles. *El Paso Natural Gas Co.*, 114 FERC ¶ 61,305 at PP 209-21 (2006); *El Paso Natural Gas Co.*, Docket No. RP12-713-000 (May 24, 2012) (letter order accepting modification to late day cycles).

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

<sup>10</sup> *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 EPNG'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 EPNG's filing); *El Paso Natural Gas Co.*, Docket No. RP13-104-000 (Nov. 16, 2012) (letter order accepting tariff records implementing fifteen minute extension of shipper nomination deadlines in variance of NAESB Standard 1.3.2); *El Paso Natural Gas Co.*, Docket No. RP05-533-000 (Aug. 25, 2005) (letter order accepting tariff sheets modifying NAESB Standard 1.3.2 by extending the nomination deadline by 15 minutes).

General Terms and Conditions of the Tariff to adjust automatically a HEEN nomination after the nomination deadline in the event that a shipper increases its flowing gas nomination, such that the sum of the flowing gas nomination plus the HEEN nomination exceeds the path quantity. This variance preserves an important feature of HEEN to allow EPNG to provide the additional flexibility of HEEN and was previously accepted in a letter order dated September 26, 2008 in Docket No. RP08-538-000.<sup>11</sup>

EPNG's Tariff does not include NAESB WGQ Standard 2.3.31. Standard 2.3.31 states that no imbalance penalty should be imposed when a prior period adjustment applied to the current period causes or increases a current monthly penalty. In lieu of this standard, EPNG implemented Prior Period Measurement Adjustment ("PPMA") provisions in Section 10.2(h) of its General Terms and Conditions of EPNG's Tariff which were previously accepted by the Commission.<sup>12</sup> These provisions prevent a PPMA from increasing an imbalance in the current month and provides further protection in subsequent months. The Commission has previously granted waivers to permit the use of these provisions.<sup>13</sup>

EPNG's proposed tariff record continues to acknowledge a variance from the NAESB standards that reference the data element "route." For EPNG, this data element signifies a specific path for transportation from a list provided by the pipeline. EPNG has included a statement that its references to "flow path" in the Tariff are synonymous with "route", as displayed on EPNG's electronic bulletin board. In this manner, EPNG will continue to support the NAESB standard while allowing its customers to continue to use historic terminology.

*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,<sup>14</sup> EPNG 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>Commission Determination</u>
1.3.2	Variance	168 FERC ¶ 61,061 at P30 (2019); 154 FERC ¶ 61,250 at P45 (2016); letter order issued on May 24, 2012 in Docket No. RP12-713-000; 114 FERC ¶ 61,305 (2006); letter order issued on August 25, 2005 in Docket No. RP05-533-000
1.3.6	Variance	168 FERC ¶ 61,061 at P31 (2019); 154 FERC ¶ 61,250 at P46 (2016); letter order dated September 26, 2008 in Docket No. RP08-538-000
2.3.31	Waiver	168 FERC ¶ 61,061 at P28 (2019); 154 FERC ¶ 61,250 at P43 (2016); letter order dated June 20, 2007 in Docket Nos. RP05-422-021 and RP06-226-004

<sup>11</sup> The Commission recognized in *El Paso Natural Gas Co.*, Docket No. RP05-422-000, et al. (Aug. 31, 2007) (letter order), the numerous compromises reached in EPNG's settlement including the stipulations pertaining to the HEEN provisions when issuing the order. See also *Rager Mountain*, 168 FERC ¶ 61,061 at P 31 (2019); *Eastern Shore*, 154 FERC ¶ 61,250 at P 46 (2016); *El Paso Natural Gas Co.*, Docket No. RP13-104-000 (Nov. 16, 2012) (letter order granting variance for NAESB Standard 1.3.6).

<sup>12</sup> This provision is part of the Monthly Imbalance Settlement accepted in *El Paso Natural Gas Co.*, Docket Nos. RP05-422-021 & RP06-226-004 (June 20, 2007) (letter order).

<sup>13</sup> See *Rager Mountain*, 168 FERC ¶ 61,061 at P 28 (2019); *Eastern Shore*, 154 FERC ¶ 61,250 at P 43 (2016); *El Paso Natural Gas Co.*, Docket No. RP13-104-000 (Nov. 16, 2012) (letter order granting variance for NAESB Standard 2.3.31).

<sup>14</sup> See Order No. 587-Z at P 27.

<u>NAESB WGQ Standard</u>	<u>Waiver or Variance</u>	<u>Commission Determination</u>
Various	Variance	168 FERC ¶ 61,061 (2019); 154 FERC ¶ 61,250 (2016)

#### *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.” EPNG is in the process of implementing a multi-factor logon authentication that customers will use to access EPNG’s web site. This new feature provides a more secure logon process benefiting the shipper and EPNG 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, EPNG’s logon requirements will exceed Standard 4.3.60. Therefore, EPNG requests a waiver of Standard 4.3.60, which requires a single logon/password.

#### *Request for Extension of Time*

The NAESB WGQ Standards include a number of data sets for Electronic Data Interchange (“EDI”) related requirements. Though EPNG 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, 2.4.2, 2.4.4, 2.4.6 and 3.4.1 through 3.4.4. Therefore, EPNG 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 EPNG to comply with these EDI data set standards. This 60-day period will allow time for EPNG 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.<sup>15</sup> Thus, good cause exists to grant EPNG’s request for a limited extension of time pursuant to the guidelines presented in Order No. 587-V.<sup>16</sup>

#### **Procedural Matters**

EPNG 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.

EPNG 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, EPNG 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.

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<sup>15</sup> 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 EPNG’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 EPNG’s request).

<sup>16</sup> 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).

Correspondence and communications concerning this filing should be directed to:

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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.

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,

EL PASO NATURAL GAS 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 EPNG'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 10<sup>th</sup> day of November 2021.

/s/

Francisco Tarin

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

## **Clean Tariff Section**

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 Communication 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>
1.3.2(i – vi)	Part IV: General Terms and Conditions ("GT&C") Section 6.1(a)
1.3.51	GT&C Section 6.1(a)(xi)
1.3.64	GT&C Section 6.6(e)
1.3.65	GT&C Section 6.6(e)
3.2.1	GT&C Section 1.7
3.3.17	GT&C Section 12.4
5.2.2	GT&C Section 6.1(a)(xi)
5.2.4	GT&C Section 1.56B
5.2.5	GT&C Section 1.56A
5.3.2	GT&C Section 9.7(b)
5.3.22	Part II: Statement of Rates, Section 4, Footnote 4
5.3.34	GT&C Section 6.1(a)(xii)
5.3.44	GT&C Section 9.17(a)
5.3.45	GT&C Section 9.17(b)
5.3.51	GT&C Section 9.3(d)
5.3.53	GT&C Section 9.17(e)
5.3.54	GT&C Section 9.17(e)
5.3.56	GT&C Section 9.17(d)



**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:

1.2.1, 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, 1.2.12, 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, 1.3.7, 1.3.8, 1.3.9, 1.3.11, 1.3.13, 1.3.14, 1.3.15, 1.3.16, 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, 1.3.28, 1.3.29, 1.3.30, 1.3.31, 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, 1.3.53, 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:

2.2.1, 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, 2.3.14, 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, 2.3.32, 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, 3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 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:

5.2.1, 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, 5.3.13, 5.3.14, 5.3.15, 5.3.16, 5.3.18, 5.3.19, 5.3.20, 5.3.21, 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, 5.3.35, 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>
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 and the addition of late cycles.	RP05-533-000, August 25, 2005 (unpublished letter order) 114 FERC ¶ 61,305 (2006) RP12-713-000, May 24, 2012 (unpublished letter order) 154 FERC ¶ 61,250 (2016)	168 FERC ¶ 61,061 (2019)
1.3.6	Variance	GT&C Section 8.1(i)(iii)(A) Exception for automatic HEEN adjustments.	RP08-538-000, September 26, 2008 (unpublished letter order)	168 FERC ¶ 61,061 (2019)
2.3.31	Waiver	GT&C Section 10.2(h) Transporter's Monthly Imbalance Settlement	RP05-422-021 and RP06-226-004, June 20, 2007 (unpublished letter order)	168 FERC ¶ 61,061 (2019)
2.4.1	Extension	Extension for EDI Implementation		
2.4.2	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		

**Standards for which Waiver or Extension of Time to Comply have been granted (continued)**

<b><u>NAESB Standard</u></b>	<b><u>Waiver, Variance or Extension of Time</u></b>	<b><u>Relevant Tariff Section and/or Description</u></b>	<b><u>Initial Order Granting Request</u></b>	<b><u>Most Recent Order Granting Continuation</u></b>
4.3.60	Waiver	Requirement for multi-factor authentication.		
Various	Variance	Various Transporter’s references to “Flow Path” in this Tariff are synonymous with NAESB’s data element “route”, as displayed on Transporter’s EBB.	154 FERC ¶ 61,250 (2016)	168 FERC ¶ 61,061 (2019)

## **Marked Tariff Section**

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 Communication 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 - ~~2017~~ 2020 North American Energy Standards Board, Inc., all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>
1.3.2(i) – (vi)	Part IV: General Terms and Conditions ("GT&C") Section 6.1(a)
1.3.51	GT&C Section 6.1(a)(xi)
1.3.64	GT&C Section 6.6(e)
1.3.65	GT&C Section 6.6(e)
3.2.1	GT&C Section 1.7
3.3.17	GT&C Section 12.4
5.2.2	GT&C Section 6.1(a)(xi)
5.2.4	GT&C Section 1.56B
5.2.5	GT&C Section 1.56A
5.3.2	GT&C Section 9.7(b)
5.3.22	Part II: Statement of Rates, Section 4, Footnote 4
5.3.34	GT&C Section 6.1(a)(xii)
5.3.44	GT&C Section 9.17(a)
5.3.45	GT&C Section 9.17(b)
5.3.51	GT&C Section 9.3(d)
5.3.53	GT&C Section 9.17(e)
5.3.54	GT&C Section 9.17(e)
5.3.56	GT&C Section 9.17(d)

**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:

1.2.1, 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, 1.2.12, 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, 1.3.7, 1.3.8, 1.3.9, 1.3.11, 1.3.13, 1.3.14, 1.3.15, 1.3.16, 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, 1.3.28, 1.3.29, 1.3.30, 1.3.31, 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, 1.3.53, 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:

2.2.1, 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, 2.3.14, 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, 2.3.32, 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, 3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 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:

5.2.1, 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, 5.3.13, 5.3.14, 5.3.15, 5.3.16, 5.3.18, 5.3.19, 5.3.20, 5.3.21, 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, 5.3.35, 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>
<a href="#"><u>0.4.1</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>1.3.2</u></a>	<a href="#"><u>Variance</u></a>	<a href="#"><u>GT&amp;C Section 6.1 Extension of nomination cycle deadlines for certain transactions and the addition of late cycles.</u></a>	<a href="#"><u>RP05-533-000, August 25, 2005 (unpublished letter order)</u></a> <a href="#"><u>114 FERC ¶ 61,305 (2006)</u></a> <a href="#"><u>RP12-713-000, May 24, 2012 (unpublished letter order)</u></a> <a href="#"><u>154 FERC ¶ 61,250 (2016)</u></a>	<a href="#"><u>168 FERC ¶ 61,061 (2019)</u></a>
<a href="#"><u>1.3.6</u></a>	<a href="#"><u>Variance</u></a>	<a href="#"><u>GT&amp;C Section 8.1(i)(iii)(A) Exception for automatic HEEN adjustments.</u></a>	<a href="#"><u>RP08-538-000, September 26, 2008 (unpublished letter order)</u></a>	<a href="#"><u>168 FERC ¶ 61,061 (2019)</u></a>
<a href="#"><u>2.3.31</u></a>	<a href="#"><u>Waiver</u></a>	<a href="#"><u>GT&amp;C Section 10.2(h) Transporter's Monthly Imbalance Settlement</u></a>	<a href="#"><u>RP05-422-021 and RP06-226-004, June 20, 2007 (unpublished letter order)</u></a>	<a href="#"><u>168 FERC ¶ 61,061 (2019)</u></a>
<a href="#"><u>2.4.1</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>2.4.2</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>2.4.4</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>2.4.6</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>3.4.1</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>3.4.2</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>3.4.3</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		
<a href="#"><u>3.4.4</u></a>	<a href="#"><u>Extension</u></a>	<a href="#"><u>Extension for EDI Implementation</u></a>		

**Standards for which Waiver or Extension of Time to Comply have been granted (continued)**

<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>4.3.60</u>	<u>Waiver</u>	<u>Requirement for multi-factor authentication.</u>		
<u>Various</u>	<u>Variance</u>	<u>Various Transporter's references to "Flow Path" in this Tariff are synonymous with NAESB's data element "route", as displayed on Transporter's EBB.</u>	<u>154 FERC ¶ 61,250 (2016)</u>	<u>168 FERC ¶ 61,061 (2019)</u>

~~— NAESB Standard — Waiver, Extension of Time or Variance~~

~~— 1.3.2 — GT&C Section 6.1 contains an extension of the nomination cycle deadlines for certain transactions and the addition of late day cycles. See letter order dated August 25, 2005 in Docket No. RP05-533-000 and 114 FERC ¶ 61,305 (2006). On May 24, 2012 in Docket No. RP12-713-000 the Commission accepted Transporter's proposal to modify Late Day Nomination Cycle 6 and remove Late Day Nomination Cycle 7. On March 29, 2016 in Docket No. RP16-515-000 the Commission accepted Transporter's application of this extension to the Intraday 3 Nomination Cycle. See 154 FERC ¶ 61,250 (2016).~~

~~— 1.3.6 — Transporter's Tariff contains an exception to NAESB WGQ Standard 1.3.6 for automatic hourly entitlement enhancement nomination ("HEEN") adjustment. See GT&C Section 8.1(i)(iii)(A) of Transporter's Tariff and letter order dated September 26, 2008 in Docket No. RP08-538-000. See 154 FERC ¶ 61,250 (2016).~~

~~— 2.3.31 — NAESB Standard is not included due to Transporter's Monthly Imbalance Settlement accepted in a letter order dated June 20, 2007 in Docket Nos. RP05-422-021 and RP06-226-004. For reference see Section 10.2(h) in the GT&C. See 154 FERC ¶ 61,250 (2016).~~

~~— Various — As referenced in various NAESB WGQ Standards, the data element "route" identifies a specific path for transportation from a list provided by Transporter. Transporter's references to "Flow Path" in this Tariff are synonymous with the data element "route", as displayed on Transporter's EBB. See 154 FERC ¶ 61,250 (2016).~~