



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

Section 23 Compliance with 18 CFR, Section 284.12 Version 8.0.0

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-related data element to allow for the identification of multiple rates that may be

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.

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

EPNG is hereby filing an updated tariff record in compliance with the Commission's Order No. 587-AA. 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 of time and variances 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 removal of a previous extension for two standards as well as the removal of 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 *Id.* 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.

waiver for another standard, given that such requests for these standards are no longer necessary.

Continuance of Variance/Waiver

In Part IV, Section 6, EPNG's Tariff includes a variance to NAESB WGQ Standard 1.3.2,⁸ which extends the nomination periods for an additional fifteen minutes.⁹ The additional fifteen minutes conforms to Commission policy that pipelines may modify NAESB standards to provide better service to its customers.¹⁰ This variance was accepted by the Commission in previous orders.¹¹

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 General Terms and Conditions of the Tariff to adjust automatically a HEEN nomination downward 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 does not exceed the path quantity. This variance preserves an important feature of HEEN to allow EPNG to continue providing the additional flexibility of HEEN.¹² This variance was previously accepted in a letter order dated September 26, 2008 in Docket No. RP08-538-000.¹³

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

⁸ 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).

⁹ 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).

¹⁰ See *Reliant Energy Gas Transmission Co.*, 93 FERC ¶ 61,141 (2000).

¹¹ *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 EPNG's filing); *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).

¹² 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.

¹³ See *East Tennessee*, 179 FERC ¶ 61,150 at P 24 (2022); *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).

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 as part of a settlement.¹⁴ 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.¹⁵

Similar to previous NAESB compliance filings, EPNG’s proposed tariff record continues to acknowledge a variance from the NAESB standards for tariff references to the data element “route.”¹⁶ For EPNG, this data element signifies a specific path for transportation from a list provided by the pipeline. EPNG has included a statement on its proposed tariff record that EPNG’s references to “flow path” in the Tariff are synonymous with the term “route”, as such term is used on EPNG’s electronic bulletin board. The term “flow path” is used extensively in EPNG’s Tariff and firm transportation agreements and shippers are very accustomed to its use and meaning which began approximately twenty years ago. In this manner, EPNG will continue to support the NAESB standard while allowing its customers to continue using terminology specific to EPNG.

Continuance of Extension

EPNG’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 EPNG supports some EDI 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, 2.4.6 and 3.4.2 through 3.4.4. Therefore, EPNG respectfully requests the continuance of an extension for 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 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. EPNG’s original request for extension on these standards was accepted by the Commission in *Order On Filings In Compliance With Order No. 587-Z*.¹⁷

¹⁴ Specifically, 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).

¹⁵ See *East Tennessee*, 179 FERC ¶ 61,150 at P 21 (2022); *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).

¹⁶ This instant filing is consistent with EPNG’s compliance filings accepted in the following: *East Tennessee*, 179 FERC ¶ 61,150 (2022) (Order on filings in compliance with Order No. 587-Z, including EPNG’s filing identifying this variance); *Rager Mountain*, 168 FERC ¶ 61,061 (2019) (Order on filings in compliance with Order No. 587-Y, including EPNG’s filing identifying this variance); *Eastern Shore*, 154 FERC ¶ 61,250 (2016) (Order on filings in compliance with Order No. 587-W, including EPNG’s filing identifying this variance).

¹⁷ *East Tennessee*, 179 FERC ¶ 61,150 at P 27 (2022).

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,¹⁸ 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, 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 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	179 FERC ¶ 61,150 at P24 (2022); 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	179 FERC ¶ 61,150 at P21 (2022); 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
0.4.1 2.4.1 2.4.2 2.4.6 3.4.2 3.4.3 3.4.4	Extension	179 FERC ¶ 61,150 at P27 (2022)
Various	Variance	179 FERC ¶ 61,150 (2022); 168 FERC ¶ 61,061 (2019); 154 FERC ¶ 61,250 (2016)

Procedural Matters

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

- a) a transmittal letter; and

¹⁸ See Order No. 587-AA at P 28.

- 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 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, EPNG 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:

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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 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,

EL PASO NATURAL GAS 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 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 3rd day of February 2025.

/s/

Shelly L. Busby

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Clean Tariff Section(s)

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 Communication 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>
1.3.2(i – vi)	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

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:

5.2.1, 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

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 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)	179 FERC ¶ 61,150 (2022)
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)	179 FERC ¶ 61,150 (2022)
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)	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)	
2.4.6	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)	
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)	179 FERC ¶ 61,150 (2022)

Marked Tariff Section(s)

23. Compliance with 18 CFR, Section 284.12

Transporter 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.

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 3.24.0, 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>
1.3.2(i – vi)	<u>Part IV: General Terms and Conditions ("GT&C")</u> 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

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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

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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

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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~~

Cybersecurity Related Standards:

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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 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)	<u>179 FERC ¶ 61,150 (2022)</u> <u>168 FERC ¶ 61,061 (2019)</u>
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)	<u>179 FERC ¶ 61,150 (2022)</u> <u>168 FERC ¶ 61,061 (2019)</u>
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)	<u>179 FERC ¶ 61,150 (2022)</u> <u>168 FERC ¶ 61,061 (2019)</u>
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>	
2.4.4	Extension	Extension for EDI Implementation		
2.4.6	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
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>	
<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</u>	<u>154 FERC ¶ 61,250 (2016)</u>	<u>179 FERC ¶ 61,150 (2022)</u>

		<u>displayed on Transporter's EBB.</u>		
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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>
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)