

May 9, 2019

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

Re: Southern LNG Company, L.L.C.

Docket No. RP19-880-\_\_\_

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, Southern LNG Company, L.L.C. ("SLNG") hereby submits for filing and approval the following Tariff Section of its FERC Gas Tariff ("Tariff")

Section 4.22 – General Terms and Conditions – NAESB Standards, Version 6.1.0

# **Background**

On March 25, 2019, SLNG filed with the Commission its Order No. 587-Y Compliance Filing in Docket No. RP19-880 ("March filing") in order to comply with the Commission's November 15, 2018 Order No. 587-Y¹. In the March filing, SLNG submitted Tariff Section 4.22 – General Terms and Conditions – NAESB Standards, Version 6.0.0 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, SLNG determined it failed to include a sentence in Tariff Section 4.22 stating that there were no standards for which a waiver or extension of time to comply had been granted. In this filing SLNG files corrected Tariff Section 4.22 version 6.1.0. to add this sentence. As a courtesy to FERC staff and SLNG customers, the only marked change in version 6.1.0 is the addition of this sentence. All other marked changes submitted in the March filing are still applicable. SLNG has Overtaken By Events (OBEd) Tariff

<sup>&</sup>lt;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").

Ms. Kimberly D. Bose May 9, 2019 Page 2

Sections 4.22 Version 6.0.0 submitted in the March filing and replaced it by Tariff Section 4.22 Version 6.1.0 as submitted in this filing.

SLNG respectfully requests a shortened comment period for this filing and requests the Commission accept this filing and place Tariff Section 4.22, Version 6.1.0 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, SLNG 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 SLNG's offices in Birmingham, Alabama and electronically mailed to SLNG's customers and interested state commissions.

The name, title, and mailing addresses of the persons to whom communications concerning this filing are to be addressed and on whom service is to be made is as follows:

T. Brooks Henderson

Director – Rates and Regulatory

Southern LNG Company, L.L.C.

P.O. Box 2563

Birmingham, Alabama 35202-2563

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Respectfully submitted,

SOUTHERN LNG COMPANY, L.L.C.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates and Regulatory
Southern LNG Company, L.L.C.
P.O. Box 2563
Birmingham, Alabama 35202-2563
(205) 325-3843
brooks\_henderson@kindermorgan.com

Enclosures

# **CERTIFICATE OF SERVICE**

I hereby certify that I have served by electronic mail the foregoing document upon all SLNG customers and interested state commissions this 9th day of May 2019.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates and Regulatory
Southern LNG Company, L.L.C.
P.O. Box 2563
Birmingham, Alabama 35202-2563
(205) 325-3843
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# **CLEAN VERSION OF TARIFF RECORD**

### 22. NAESB STANDARDS

Southern LNG 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 recond in which they are located. Notwithstanding this Section 22, Southern LNG shall adhere to the NAESB WGQ Standards as modified by Order No. 587-Y.

### NAESB WGO 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, Southern LNG 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 Southern LNG includes appropriate citations in the submission.

Southern LNG 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), Southern LNG incorporates the following: Copyright 2017 NAESB North American Energy Standards Board, Inc., all rights reserved.

## Additional Standards

Creditworthiness

Standards:	
0.3.3 through 0.3.6	Inquiries and Conditions for Service, Section 4.2 – 2.1 (d)(iii), V 0.0.0
0.3.7	Inquiries and Conditions for Service, Section 4.2- 2.1 (a)(viii), V 0.0.0
0.3.8	Inquiries and Conditions for Service, Section 4.2 – 2.1 (d)(iii), V 0.0.0
0.3.9	Inquiries and Conditions for Service, Section 4.2 - 2.1 (d)(iii), V 0.0.0
0.3.10	Inquiries and Conditions for Service, Section 4.2- 2.1 (a)(viii), V 0.0.0

## Nomination Related Standards

### Definitions:

1.2.6	Definitions, Section 4.1 (t), V 1.0.0

Standards:	
1.3.1	Definitions, Section 4.1 (I), V 3.0.0
1.3.2(i-vi)	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.1 (c), V 4.0.0
1.3.3	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.2, V 4.0.0
1.3.5	Nominations, Scheduling, and Determination of Deliveries, Section 4.12- 12.1 (a), V 1.0.0
1.3.6	Nominations, Scheduling, and Determination of Deliveries, Section $4.12 - 12.1$ (d), V $1.0.0$
1.3.8	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.1 (c), V 4.0.0
1.3.32	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.1 (c), V 1.0.0

# Flowing Gas Related Standards

Standards:	
2.3.5	Nominations, Scheduling, and Determination of Deliveries, Section 4.12
	- 12.6, V 4.0.0
2.3.9	Definitions, Section 4.1 (a), (f), (ii), V 4.0.0
2.3.14	Measuring Equipment, Section 4.5 – 5.4, V 1.0.0
2.3.16	Nominations, Scheduling, and Determination of Deliveries, Section 4.12
	- 12.6, V 1.0.0

4.22. Section 22 NAESB Standards 6.1.0

First Revised Volume No. 1 SLNG Volume 1

2.3.20	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.6 (b), V 1.0.0
2.3.26	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.6 (e), V 4.0.0
2.3.63	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.6 (a), V 1.0.0
Invoicing Related Standards	
Definitions: 3.2.1	Definitions, Section 4.1 (b), V 1.0.0
Standards: 3.3.14 3.3.15 3.3.17 3.3.18	Billing and Payment, Section 4.13 – 13.1, V 2.0.0 Billing and Payment, Section 4.5 – 5.4, V 1.0.0 Billing and Payment, Section 4.13 – 13.3, V 0.0.0 Billing and Payment, Section 4.13 – 13.2, V 0.0.0
3.3.19	Billing and Payment, Section 4.13 – 13.3, V 0.0.0
Capacity Release Standards	
Definitions: 5.2.1 5.2.3 5.2.4 5.2.5	Definitions, Section 4.1 (e), V 1.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.3 (b)(3), V 1.0.0 Definitions, Section 4.1 (pp), V 1.0.0 Definitions, Section 4.1 (oo), V 1.0.0
Standards: 5.3.2 5.3.13 5.3.14 5.3.15 5.3.16 5.3.19	Customer Release of Firm Capacity, Section 4.16 – 16.6 (a), V 5.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.4 (a), V 2.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.6 (b)(3), V 1.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.6 (b)(3), V 1.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.6 (b)(3), V 1.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.3 (b)(4) and
5.3.44 5.3.45 5.3.47	16.6 (c)(5)(G), V 1.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.3 (b)(3), V 5.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.3 (b)(3), V 5.0.0 Notices, Section 4.14, V0.0 and Customer Release of Firm Capacity, Section 4.16 – 16.3 (b)(3), V 1.0.0
5.3.48 5.3.49 5.3.50	Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $5.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $5.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.6$ (c)(5)(E), V $1.0.0$
5.3.51	Customer Release of Firm Capacity, Section 4.16 – 16.6 (c)(5)(F), V 2.0.0
5.3.52 5.3.53 5.3.54 5.3.55 5.3.56 5.3.57 5.3.58 5.3.59 5.3.60 5.3.62	Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $5.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $5.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.3$ (b)(3), V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.4$ (a), V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.5$ , V $1.0.0$ Customer Release of Firm Capacity, Section $4.16 - 16.6$ (c)(9), V $1.0.0$
5.5.5E	535555

NAESB WGQ Standards - Version 3.1 Standards, Definitions, and Data Sets Incorporated by Reference:

# **Additional Standards**

General

SOUTHERN LNG COMPANY, L.L.C.

First Revised Volume No. 1 SLNG Volume 1

4.22. Section 22 **NAESB Standards** 6.1.0

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

Standards:

0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15

Operating Capacity and Unsubscribed: 0.3.18, 0.3.20, 0.3.21, 0.3.22

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

Data Set: 0.4.4

Storage Information

Data Set: 0.4.1

Operational Information

Data Set: 0.4.2, 0.4.3

Nomination Related Standards

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.5, 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:

1.3.4, 1.3.7, 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, 1.3.33, 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, 1.3.75 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

 $2.3.1,\ 2.3.2,\ 2.3.3,\ 2.3.4,\ 2.3.5,\ 2.3.6,\ 2.3.7,\ 2.3.8,\ 2.3.10,\ 2.3.11,\ 2.3.12,\ 2.3.13,\ 2.3.15,\ 2.3.17,\ 2.3.18,$ 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, 2.3.40, 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, 2.3.64, 2.3.65, 2.3.66

SOUTHERN LNG COMPANY, L.L.C. First Povised Volume No. 1

First Revised Volume No. 1 SLNG Volume 1 4.22. Section 22 NAESB Standards 6.1.0

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, 3.3.7, 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

Data Set:

3.4.1, 3.4.2, 3.4.3, 3.4.4

Quadrant Elecctronic 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, 4.3.4, 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:

5.2.2

### 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, 5.3.62a, 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

### Data Set:

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

Southern LNG 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.

Southern LNG agrees to use, and incorporates by reference, NAESB's Funds Transfer Account Agreement pursuant to the most recently published version of the NAESB Standards to be used to supplement Southern

LNG'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.

Southern LNG agrees to use, and incorporates 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 to be used to supplement Southern LNG's GT&C to facilitate purchase and sale transactions of Gas on a Firm or Interruptible basis.

Southern LNG 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 Southern LNG's Implementation Guide for EDI transactions is available upon request.

# MARKED VERSION OF TARIFF RECORD

### 22. NAESB STANDARDS

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0.3.10	Inquiries and Conditions for Service, Section 4.2- 2.1 (a)(viii), V 0.0.0

## Nomination Related Standards

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1.3.2(i-vi)	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.1 (c), V 4.0.0
1.3.3	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.2, V 4.0.0
1.3.5	Nominations, Scheduling, and Determination of Deliveries, Section 4.12- 12.1 (a), V 1.0.0
1.3.6	Nominations, Scheduling, and Determination of Deliveries, Section $4.12 - 12.1$ (d), V $1.0.0$
1.3.8	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.1 (c), V 4.0.0
1.3.32	Nominations, Scheduling, and Determination of Deliveries, Section 4.12 - 12.1 (c), V 1.0.0

# Flowing Gas Related Standards

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2.3.16	Nominations, Scheduling, and Determination of Deliveries, Section 4.12
	- 12.6, V 1.0.0

4.22. Section 22 NAESB Standards 6.1.0

First Revised Volume No. 1 SLNG Volume 1

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3.3.19	Billing and Payment, Section 4.13 – 13.3, V 0.0.0
Capacity Release Standards	
Definitions: 5.2.1 5.2.3 5.2.4 5.2.5	Definitions, Section 4.1 (e), V 1.0.0 Customer Release of Firm Capacity, Section 4.16 – 16.3 (b)(3), V 1.0.0 Definitions, Section 4.1 (pp), V 1.0.0 Definitions, Section 4.1 (oo), V 1.0.0
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General

SOUTHERN LNG COMPANY, L.L.C.

First Revised Volume No. 1 SLNG Volume 1

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

### None

Southern LNG 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.

Southern LNG agrees to use, and incorporates by reference, NAESB's Funds Transfer Account Agreement pursuant to the most recently published version of the NAESB Standards to be used to supplement Southern

LNG'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.

Southern LNG agrees to use, and incorporates 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 to be used to supplement Southern LNG's GT&C to facilitate purchase and sale transactions of Gas on a Firm or Interruptible basis.

Southern LNG 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 Southern LNG's Implementation Guide for EDI transactions is available upon request.