

May 9, 2019

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

Re: Southern Natural Gas Company, L.L.C.

Docket No. RP19-879-___

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

Section 4.40 – General Terms and Conditions – NAESB Standards, Version 7.1.0

Background

On March 25, 2019, SNG filed with the Commission its Order No. 587-Y Compliance Filing in Docket No. RP19-879 ("March filing") in order to comply with the Commission's November 15, 2018 Order No. 587-Y¹. In the March filing, SNG submitted Tariff Section 4.40 – 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, SNG determined it failed to include a sentence in Tariff Section 4.40 stating that there were no standards for which a waiver or extension of time to comply had been granted. In this filing SNG files corrected Tariff Section 4.40 version 7.1.0. to add this sentence. As a courtesy to FERC staff and SNG 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. SNG has Overtaken By Events (OBEd) Tariff

¹ 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 4.40 Version 7.0.0 submitted in the March filing and replaced it by Tariff Section 4.40 Version 7.1.0 as submitted in this filing.

SNG respectfully requests a shortened comment period for this filing and requests the Commission accept this filing and place Tariff Section 4.40, 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, SNG 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 SNG's offices in Birmingham, Alabama and electronically mailed to SNG'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 Southern Natural Gas Company, L.L.C. Post Office Box 2563 Birmingham, Alabama 35202-2563 (205) 325-3843 brooks henderson@kindermorgan.com

Patricia S. Francis Assistant General Counsel Southern Natural Gas Company, L.L.C. Post Office Box 2563 Birmingham, Alabama 35202-2563 (205) 325-7696 patricia_francis@kindermorgan.com

Respectfully submitted,

SOUTHERN NATURAL GAS COMPANY, L.L.C.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates & Regulatory
Southern Natural Gas Company, L.L.C.
Post Office Box 2563
Birmingham, Alabama 35202-2563
(205) 325-3843
brooks_henderson@kindermorgan.com

Enclosures

CERTIFICATE OF SERVICE

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

Dated at Birmingham, Alabama this 9th day of May, 2019.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates & Regulatory
Southern Natural Gas Company, L.L.C.
Post Office Box 2563
Birmingham, Alabama 35202-2563
(205) 325-3843
brooks_henderson@kindermorgan.com

CLEAN VERSION OF TARIFF RECORD

40. 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 40, 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

Creditworthiness

Standards:	
0.3.3 through 0.3.8	Inquiries and Conditions for Service, Section 4.2 – 2.1 (d), V 4.0.0
0.3.9	Inquiries and Conditions for Service, Section 4.2 - 2.1 (c), V 4.0.0
0.3.10	Inquiries and Conditions for Service, Section 4.2- 2.1 (a)(ix), V 4.0.0

Nomination Related Standards

Definitions: 1.2.1 1.2.5 1.2.6 1.2.9 1.2.10 1.2.11	Nominations, Section 4.12 - 12.2 (b), V 5.0.0 Nominations, Section 4.12 - 12.1 (j), V 5.0.0 Definitions, Section 4.1 (v), V 5.0.0 Nominations, Section 4.12 - 12.4 (b), V 5.0.0 Nominations, Section 4.12 - 12.4 (b), V 5.0.0 Nominations, Section 4.12 - 12.4 (b), V 5.0.0
Standards:	
1.3.1	Definitions, Section 4.1 (b), V 7.0.0
1.3.2(i-vi)	Nominations, Section 4.12 - 12.1 (b), (c), 12.3(a), 12.4(b), V 7.0.0
1.3.3	Nominations, Section 4.12 - 12.3 (a), V 7.0.0
1.3.5	Nominations, Section 4.12- 12.1 (b), V 7.0.0
1.3.6	Nominations, Section 4.12 - 12.1 (e), V 5.0.0
1.3.8	Nominations, Section 4.12 - 12.2 (b), V 7.0.0
1.3.9	Nominations, Section 4.12 - 12.2 (b), V 7.0.0
1.3.11	Nominations, Section 4.12 - 12.2 (b), V 7.0.0
1.3.13	Nominations, Section 4.12 - 12.2 (b), V 7.0.0
1.3.15	Nominations, Section 4.12 - 12.1 (a), V 7.0.0
1.3.16	Inquiries and Conditions for Service, Section 4.2 - 2.1 (a), V 4.0.0
1.3.17	Nominations, Section 4.12 - 12.2, V 5.0.0, Form of Service
1 2 20	Agreements, Section 6.9
1.3.20	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.21 1.3.23	Nominations, Section 4.12 - 12.1 (a), V 5.0.0
1.3.24	Nominations, Section 4.12 - 12.1 (b), V 5.0.0
	Nominations, Section 4.12 - 12.1 (j), V 5.0.0
1.3.25 through 1.3.26 1.3.28	Operational Flow Orders, Section 4.41 - 41.1 (a), V 2.0.0
1.3.20	Statement of Rates – FT Settlement, Section 2.1.1, V 6.0.0

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1.3.29 1.3.30 1.3.32 1.3.34 1.3.37 1.3.40 1.3.45 1.3.80	Nominations, Section 4.12 - 12.1 (a), V 5.0.0 Statement of Rates - FT Settlement, Section 2.1.1, V 6.0.0 Nominations, Section 4.12 - 12.2 (b), V 5.0.0 Operational Flow Orders, Section 4.41, V 2.0.0 Nominations, Section 4.12 - 12.1 (c), 12.2 (b), 12.4 (b) V 5.0.0 Nominations, Section 4.12 - 12.4 (b), V 5.0.0 Nominations, Section 4.12 - 12.4 (b), V 5.0.0 Nominations, Section 4.12 - 12.3 (e), V 7.0.0
Flowing Gas Related Standards	
Definitions: 2.2.1	Determination of Rec. and Del., Section 4.13 - 13.3 (a), V 1.0.0
Standards: 2.3.3 2.3.4 2.3.5 2.3.6 2.3.7 2.3.9 2.3.11 2.3.14 2.3.16 2.3.20 2.3.25 2.3.26 2.3.28 2.3.29 2.3.30 2.3.40 2.3.41 2.3.44 2.3.47 2.3.50 2.3.63	Determination of Rec. and Del., Section 4.13 - 13.2 (e), V 1.0.0 Determination of Rec. and Del., Section 4.13 - 13.1 (b), V 1.0.0 Determination of Rec. and Del., Section 4.13 - 13.1 (d), V 3.0.0 Nominations, Section 4.12 - Section 12.1 (c), V 5.0.0 Measuring Equipment, Section 4.5 - 5.5, V 4.0.0 Definitions, Section 4.1 (d), (f), (cc) V 7.0.0 Measuring Equipment, Section 4.5 - 5.5, V 4.0.0 Measuring Equipment, Section 4.5 - 5.5, V 5.0.0 Determination of Rec. and Del., Section 4.13 - 13.1 (b), V 1.0.0 Determination of Rec. and Del., Section 4.13 - 13.1 (d), V 1.0.0 Allocation of Capacity, Section 4.16 - 16.2, V 3.0.0 Determination of Rec. and Del., Section 4.13 - 13.5, V 3.0.0 Billing and Payment, Section 4.15 - 15.1, V 1.0.0 Determination of Rec. and Del., Section 4.13 - 13.3 (a), V 1.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1, V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 8.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0 Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0
Invoicing Related Standards	
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3.2.1 Definitions, Section 4.1 (r), V 5.0.0

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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 5.0.0
3.3.17	Billing and Payment, Section 4.15 – 15.3, V 1.0.0
3.3.18	Billing and Payment, Section 4.15 – 15.2, V 1.0.0
3.3.19	Billing and Payment, Section 4.15 – 15.3, V 1.0.0

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5.2.3	Shipper Release of Firm Capacity, Section 4.22 – 22.3, V 3.0.0
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5.3.2	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (a), V 7.0.0
5.3.3	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (a) and (h), V 3.0.0
5.3.4	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (a), (c)(6) and
	(h), V 3.0.0
5.3.5	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (c)(13), V 3.0.0
5.3.8	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (c)(18), V 3.0.0
5.3.9	Electronic Bulletin Board, Section 4.27, V 1.0.0
5.3.10	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (d), V 3.0.0
5.3.11	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (d), V 3.0.0
5.3.13	Shipper Release of Firm Capacity, Section 4.22 – 22.4 (a), V 4.0.0
5.3.14	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (b)(3), V 4.0.0
5.3.15	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (f), V 3.0.0
5.3.16	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (b)(3), V 3.0.0
5.3.19	Shipper Release of Firm Capacity, Section 4.22 – 22.3 (b)(4), V 3.0.0
5.3.20	Electronic Bulletin Board, Section 4.27, V 1.0.0
5.3.26	Shipper Release of Firm Capacity, Section 4.22 – 22.5 and 22.6, V
	7.0.0
5.3.28	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (c)(6), V
	3.0.0
5.3.34	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (k), V 3.0.0, and
	Electronic Bulletin Board, Section 4.27, V 1.0.0
5.3.39	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (k), V 3.0.0
5.3.44	Shipper Release of Firm Capacity, Section 4.22 – 22.3 (b)(3), V 7.0.0
5.3.45	Shipper Release of Firm Capacity, Section 4.22 – 22.3 (b)(3), V 7.0.0
5.3.47	Notices, Section 4.18, V 1.0.0
5.3.48	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 7.0.0
5.3.49	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 7.0.0
5.3.50	Shipper Release of Firm Capacity, Section 4.22 – 22.6(c)(5)(e), V 4.0.0
5.3.51	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (c)(5), V 4.0.0
5.3.52	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 3.0.0
5.3.53	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 7.0.0
5.3.54	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 7.0.0
5.3.55	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 3.0.0
5.3.56	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 7.0.0
5.3.57	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 3.0.0
5.3.58	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 3.0.0
5.3.59	Shipper Release of Firm Capacity, Section 4.22 – 22. 4 (a), V 3.0.0
5.3.60	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 3.0.0
5.3.62	Shipper Release of Firm Capacity, Section 4.22 – 22. 6 (c)(12), V 3.0.0

NAESB WGQ Version 3.1 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

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0.2.1, 0.2.2, 0.2.3, 0.2.4

Gas/Electric Operational Communications

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Storage Information

Dataset:

0.4.1

Operational Information

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1.3.4, 1.3.7, 1.3.14, 1.3.18, 1.3.19, 1.3.22, 1.3.27, 1.3.31, 1.3.33, 1.3.35, 1.3.36, 1.3.38, 1.3.39, 1.3.41, 1.3.42, 1.3.43, 1.3.44, 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:

2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.8, 2.3.10, 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, 2.3.27, 2.3.31, 2.3.32, 2.3.42, 2.3.43, 2.3.45, 2.3.46, 2.3.48, 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

Dataset

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:

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Quadrant Electronic Delivery Mechanism Related Standards

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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

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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:

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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 General Terms and Conditions 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

40. 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 40, 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.

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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 General Terms and Conditions 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.