

March 25, 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.

Compliance Filing Pursuant to Order No. 587-Y

Docket No. RP19-____-000

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act ("NGA") and Part 154 of the regulations of the Federal Energy Regulatory Commission ("Commission" or "FERC"), Southern Natural Gas Company, L.LC. ("SNG") hereby submits for filing with the Commission as part of its FERC Gas Tariff ("Tariff"), the tariff record listed in Appendix A proposed to be effective August 1, 2019.

Background

On November 15, 2018, the Commission issued a Final Rule in Docket No. RM96-1-041 to incorporate by reference into its regulations Version 3.1 of business practice standards as developed by the Wholesale Gas Quadrant (WGQ) of the North American Energy Standards Board ("NAESB"). Order No. 587-Y includes modifications to the standards to clarify the processing of certain business transactions.

NAESB adopted two substantive revisions to its Nominations Related Standards as follows: (1) it established a standard rounding process for elapsed-prorated-scheduled quantity calculations; and (2) it revised the specifications for the information to be included in a nomination request.

NAESB also adopted three minor revisions to the WGQ Electronic Delivery Mechanism (EDM) Related Standards as follows: (1) it increased the allowable field length in ASCII Comma separated Value Files to 3000 characters; (2) it adopted new Standard 4.3.106 to allow checkboxes and radio buttons in the Transmission Service Providers' (TSP) Electronic Bulletin Boards (EBB); and (3) it modified its standards to update the operating systems and web browsers that entities should support on behalf of users. Additionally, NAESB added clarifying language to the Secure Sockets Layer (SSL)/Transport Layer Security (TLS) protocols.

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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").

Other changes adopted by NAESB included changes to the NAESB WGQ data sets and other technical implementation documentation as well as revisions to the Flowing Gas Related datasets and technical implementation. In addition, NAESB revised the Imbalance Trade data set and revised two Sender's Option data elements. NAESB also adopted revisions to the Capacity Release Related data sets and technical implementation and revised Standard 6.3.1 (i.e., the NAESB Base Contract for Sale and Purchase of Natural Gas) to add language directing users to NAESB's copyright disclaimer posted on the NAESB website. Identical language was added to three additional NAESB WGQ Contracts. Lastly, NAESB adopted modifications to add a self-identification provision that assists end users in determining whether counterparties are commercial market participants as defined by the United States Commodity Futures Trading Commission.²

Each interstate natural gas pipeline is required to file a compliance filing reflecting the changed standards by April 1, 2019, to take effect on August 1, 2019.³

Statement of Nature, Reasons and Basis

SNG is hereby filing the revised tariff record in compliance with the Commission's November 15, 2018 Order No. 587-Y. Specifically, SNG is revising Section 40 of the General Terms and Conditions ("GT&C") of its Tariff as follows: (1) to 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.

Effective Date

SNG respectfully requests that the Commission accept the tendered tariff record effective August 1, 2019, in accordance with the implementation date established by the Commission under Order No. 587-Y.

Materials Enclosed

In accordance with 18 C.F.R. Part 154.7(a) (1) of the Commission's regulations, SNG states that the following items are included in this filing:

- 1. An eTariff XML filing package containing the revised tariff record in electronic format;
- 2. This transmittal letter;
- 3. The tendered tariff record in Appendix A; and
- 4. The redlined tariff record in Appendix B;

² See, Order No 587-Y, at P. 6.

³ See, Order No. 587-Y, at P. 24.

Waivers

SNG respectfully requests any waivers of the Commission's regulations, to the extent necessary, to permit the proposed tariff record to become effective August 1, 2019, consistent with the implementation date established by the Commission in this proceeding. Pursuant to the Commission's regulations, SNG hereby moves to place the tariff record into effect at the end of the suspension period, if any, specified by the Commission.

Service

The undersigned certifies that a copy of this filing has been served pursuant to 18 C.F.R. § 154.208 on SNG's customers and interested state regulatory commissions.

Communications

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
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(205) 325-3843
brooks_henderson@kindermorgan.com

Enclosures

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⁴ 18 C.F.R. §§ 154.7(a)(9) and 154.206.

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 25th day of March, 2019.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates & Regulatory
Southern Natural Gas Company, L.L.C.
Post Office Box 2563
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APPENDIX A SOUTHERN NATURAL GAS COMPANY, L.L.C.

Tariff Record Proposed to be effective August 1, 2019

Section 4.40

Version 7.0.0

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	Nominations, Section 4.12 - 12.2 (b), V 5.0.0
1.2.5	Nominations, Section 4.12 - 12.1 (j), V 5.0.0
1.2.6	Definitions, Section 4.1 (v), V 5.0.0
1.2.9	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.2.10	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.2.11	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
	Agreements, Section 6.9
1.3.20	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.21	Nominations, Section 4.12 - 12.1 (a), V 5.0.0
1.3.23	Nominations, Section 4.12 - 12.1 (b), V 5.0.0
1.3.24	Nominations, Section 4.12 - 12.1 (j), V 5.0.0
1.3.25 through 1.3.26	Operational Flow Orders, Section 4.41 - 41.1 (a), V 2.0.0
1.3.28	Statement of Rates – FT Settlement, Section 2.1.1, V 6.0.0

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	Determination of Rec. and Del., Section 4.13 - 13.2 (e), V 1.0.0
2.3.4	Determination of Rec. and Del., Section 4.13 - 13.1 (b), V 1.0.0
2.3.5	Determination of Rec. and Del., Section 4.13 - 13.1 (d), V 3.0.0
2.3.6	Nominations, Section 4.12 - Section 12.1 (c), V 5.0.0
2.3.7	Measuring Equipment, Section 4.5 – 5.5, V 4.0.0
2.3.9	Definitions, Section 4.1 (d), (f), (cc) V 7.0.0
2.3.11	Measuring Equipment, Section 4.5 – 5.5, V 4.0.0
2.3.14	Measuring Equipment, Section 4.5 – 5.5, V 5.0.0
2.3.16	Determination of Rec. and Del., Section 4.13 - 13.1 (b), V 1.0.0
2.3.20	Determination of Rec. and Del., Section 4.13 - 13.1 (d), V 1.0.0
2.3.25	Allocation of Capacity, Section 4.16 – 16.2, V 3.0.0
2.3.26	Determination of Rec. and Del., Section 4.13 - 13.5, V 3.0.0
2.3.28	Billing and Payment, Section 4.15 – 15.1, V 1.0.0
2.3.29	Determination of Rec. and Del., Section 4.13 - 13.3 (a), V 1.0.0
2.3.30	Resolution of Imb. and Adj., Section 4.14 - 14.1, V 5.0.0
2.3.40	Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 8.0.0
2.3.41	Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0
2.3.44	Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 5.0.0
2.3.47	Resolution of Imb. and Adj., Section 4.14 - 14.1 (f)(1), V 8.0.0
2.3.50	Resolution of Imb. and Adj., Section 4.14 - 14.1 (a), V 5.0.0
2.3.63	Determination of Receipts and Deliveries, Section 4.13 - 13.1 (b)(ii) and 13.2 (a), V 1.0.0
Invoicing Related Standards	
Definitions:	

Definitions:

3.2.1 Definitions, Section 4.1 (r), V 5.0.0

Standards:

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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

Capacity Release Standards

Definitions: 5.2.1

Deminioner	
5.2.1	Definitions, Section 4.1 (s), V 5.0.0
5.2.3	Shipper Release of Firm Capacity, Section 4.22 – 22.3, V 3.0.0
5.2.4	Definitions, Section 4.1 (dd) and (ee), V 5.0.0
5.2.5	Definitions, Section 4.1 (dd), V 5.0.0
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Standards:

5.3.1	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (a) and (e)(1), V 3.0.0
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 5.3.57	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 7.0.0
5.3.58	Shipper Release of Firm Capacity, Section 4.22 – 22. 3 (b)(3), V 3.0.0 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. 3 (b)(3), v 3.0.0 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. 4 (a), V 3.0.0 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. 3 (b)(3), v 3.0.0 Shipper Release of Firm Capacity, Section 4.22 – 22. 6 (c)(12), V 3.0.0
5.5.02	Simple: Melease of Firm Capacity, Section 4.22 - 22. 0 (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

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

Gas/Electric Operational Communications

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

Dataset 0.4.4

Storage Information

Dataset: 0.4.1

Operational Information

Dataset: 0.4.2, 0.4.3

Nomination Related Standards

Definitions:

1.2.2, 1.2.3, 1.2.4, 1.2.8, 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, 1.3.14, 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:

3.4.1, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards

Definitions:

4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 4.2.10, 4.2.11, 4.2.12, 4.2.13, 4.2.14, 4.2.15, 4.2.16, 4.2.17, 4.2.18, 4.2.19, 4.2.20

Standards:

4.3.1, 4.3.2, 4.3.3, 4.3.16, 4.3.17, 4.3.18, 4.3.20, 4.3.22, 4.3.23, 4.3.24, 4.3.25, 4.3.26, 4.3.27, 4.3.28, 4.3.30, 4.3.31, 4.3.32, 4.3.33, 4.3.34, 4.3.35, 4.3.36, 4.3.38, 4.3.40, 4.3.41, 4.3.42, 4.3.43, 4.3.44, 4.3.45, 4.3.46, 4.3.47, 4.3.48, 4.3.49, 4.3.50, 4.3.52, 4.3.53, 4.3.54, 4.3.55, 4.3.57, 4.3.58, 4.3.60, 4.3.61, 4.3.62, 4.3.66, 4.3.67, 4.3.68, 4.3.69, 4.3.72, 4.3.75, 4.3.78, 4.3.79, 4.3.80, 4.3.81, 4.3.82, 4.3.83, 4.3.84, 4.3.85, 4.3.86, 4.3.87, 4.3.89, 4.3.90, 4.3.91, 4.3.92, 4.3.93, 4.3.94, 4.3.95, 4.3.96, 4.3.97, 4.3.98, 4.3.99, 4.3.100, 4.3.101, 4.3.102, 4.3.103, 4.3.104, 4.3.105, 4.3.106

Capacity Release Standards

Definitions:

5.2.2

Standards:

5.3.7, 5.3.12, 5.3.18, 5.3.21, 5.3.22, 5.3.23, 5.3.24, 5.3.25, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.35, 5.3.36, 5.3.37, 5.3.38, 5.3.40, 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

Dataset

5.4.14, 5.4.15, 5.4.16, 5.4.17, 5.4.20, 5.4.21, 5.4.22, 5.4.23, 5.4.24, 5.4.25, 5.4.26, 5.4.27

Internet Electronic Transport Related Standards

Definitions:

10.2.1, 10.2.2, 10.2.3, 10.2.4, 10.2.5, 10.2.6, 10.2.7, 10.2.8, 10.2.9, 10.2.10, 10.2.11, 10.2.12, 10.2.13, 10.2.14, 10.2.15, 10.2.16, 10.2.17, 10.2.18, 10.2.19, 10.2.20, 10.2.21, 10.2.22, 10.2.23, 10.2.24, 10.2.25, 10.2.26, 10.2.27, 10.2.28, 10.2.29, 10.2.30, 10.2.31, 10.2.32, 10.2.33, 10.2.34, 10.2.35, 10.2.36, 10.2.37, 10.2.38

Standards:

10.3.1, 10.3.3, 10.3.4, 10.3.5, 10.3.6, 10.3.7, 10.3.8, 10.3.9, 10.3.10, 10.3.11, 10.3.12, 10.3.14, 10.3.15, 10.3.16, 10.3.17, 10.3.18, 10.3.19, 10.3.20, 10.3.21, 10.3.22, 10.3.23, 10.3.24, 10.3.25, 10.3.26, 10.3.27

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.

APPENDIX B

Marked Version of Tendered Tariff Record

40. NAESB STANDARDS

COMPANY has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.10, and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all 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. Notwithstanding this Section 40, COMPANY shall adhere to the NAESB WGQ Standards as modified by Order No. 587-YW.

NAESB WGQ Version 3.10 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_z - 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 3.10, that are protected by NAESB's copyright. With respect to each reproduced standard (including any minor corrections) COMPANY incorporates the following: Copyright 20174 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	Nominations, Section 4.12 - 12.2 (b), V 5.0.0
1.2.5	Nominations, Section 4.12 - 12.1 (j), V 5.0.0
1.2.6	Definitions, Section 4.1 (v), V 5.0.0
1.2.9	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.2.10	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.2.11	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
Standards:	
1.3.1 <u>*</u>	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 <u>*</u>	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 <u>*</u>	Nominations, Section 4.12 - 12.2 (b), V 7.0.0
1.3.9 <u>*</u>	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
	Agreements, Section 6.9
1.3.20	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.21	Nominations, Section 4.12 - 12.1 (a), V 5.0.0
1.3.23	Nominations, Section 4.12 - 12.1 (b), V 5.0.0
1.3.24	Nominations, Section 4.12 - 12.1 (j), V 5.0.0
1.3.25 through 1.3.26	Operational Flow Orders, Section 4.41 - 41.1 (a), V 2.0.0

1.3.28 1.3.29 1.3.30 1.3.32 1.3.34 1.3.37 1.3.40 1.3.45 1.3.80	Statement of Rates – FT Settlement, Section 2.1.1, V 6.0.0 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 ————————————————————————————————————	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 (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 Determination of Receipts and Deliveries, Section 4.13 - 13.1 (b)(ii) and 13.2 (a), V 1.0.0
Invoicing Related Standards	
Definitions: 3.2.1	Definitions, Section 4.1 (r), V 5.0.0
Standards: 3.3.7 3.3.14 3.3.15 3.3.17 3.3.18 3.3.19	Billing and Payment, Section 4.15 – 15.1, V 3.0.0 Billing and Payment, Section 4.15 – 15.1, V 3.0.0 Billing and Payment, Section 4.5 – 5.5, V 5.0.0 Billing and Payment, Section 4.15 – 15.3, V 1.0.0 Billing and Payment, Section 4.15 – 15.2, V 1.0.0 Billing and Payment, Section 4.15 – 15.3, V 1.0.0
Capacity Release Standards	
Definitions:	Definitions Costion 4.1 (a) V.E.O.O.

Standards:

5.2.1 5.2.3 5.2.4 5.2.5 Definitions, Section 4.1 (s), V 5.0.0 Shipper Release of Firm Capacity, Section 4.22 – 22.3, V 3.0.0 Definitions, Section 4.1 (dd) and (ee), V 5.0.0 Definitions, Section 4.1 (dd)-, V 5.0.0

	5.3.1	Shipper Release of Firm Capacity, Section 4.22 – 22.6 (a) and (e)(1), V $3.0.0$
	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
1	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 3.10 Standards, Definitions, and Data Sets Incorporated by Reference:

Additional Standards

General

Definitions:

0.2.5

Standards:

 $0.3.1, \, 0.3.2, \, 0.3.16, \, 0.3.17$

Gas/Electric Operational Communications

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

Gas/Electric Operational Communications

Standards:

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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
0.4.4^{*}
Storage Information
Dataset:
0.4.1*
Operational Information
Dataset:
0.4.2*, 0.4.3
Nomination Related Standards
Definitions:
1.2.2, 1.2.3, 1.2.4, 1.2.8, 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, 1.3.14, 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
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
2.4.1*, 2.4.2, 2.4.3*, 2.4.4*, 2.4.5*, 2.4.6, 2.4.7, 2.4.8, 2.4.9, 2.4.10, 2.4.11, 2.4.17, 2.4.18
Invoicing Related Standards
Standards:
3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.16, 3.3.21, 3.3.22, 3.3.23,
3.3.24, 3.3.25, 3.3.26
Dataset:
3.4.1<sup>*</sup>, 3.4.2, 3.4.3, 3.4.4
Quadrant Eleectronic Delivery Mechanism Related Standards
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Definitions:

4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 4.2.10, 4.2.11, 4.2.12, 4.2.13, 4.2.14, 4.2.15, 4.2.16, 4.2.17, 4.2.18, 4.2.19, 4.2.20

Standards:

4.3.1, 4.3.2, 4.3.3, 4.3.16, 4.3.17, 4.3.18, 4.3.20, 4.3.22, 4.3.23, 4.3.24, 4.3.25, 4.3.26, 4.3.27, 4.3.28, 4.3.30, 4.3.31, 4.3.32, 4.3.33, 4.3.34, 4.3.35, 4.3.36, 4.3.38, 4.3.40, 4.3.41, 4.3.42, 4.3.43, 4.3.44, 4.3.45, 4.3.46, 4.3.47, 4.3.48, 4.3.49, 4.3.50, 4.3.52, 4.3.53, 4.3.54, 4.3.55, 4.3.57, 4.3.58, 4.3.60, 4.3.61, 4.3.62, 4.3.66, 4.3.67, 4.3.68, 4.3.69, 4.3.72, 4.3.75, 4.3.78, 4.3.79, 4.3.80, 4.3.81, 4.3.82, 4.3.83, 4.3.84, 4.3.85, 4.3.86, 4.3.87, 4.3.89, 4.3.90, 4.3.91, 4.3.92, 4.3.93, 4.3.94, 4.3.95, 4.3.96, 4.3.97, 4.3.98, 4.3.99, 4.3.100, 4.3.101, 4.3.102, 4.3.103, 4.3.104, 4.3.105, 4.3.106

Capacity Release Standards

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5.2.2

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5.3.7, 5.3.12, 5.3.18, 5.3.21, 5.3.22, 5.3.23, 5.3.24, 5.3.25, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.35, 5.3.36, 5.3.37, 5.3.38, 5.3.40, 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

Dataset

5.4.14, 5.4.15, 5.4.16*, 5.4.17, 5.4.20*, 5.4.21*, 5.4.22*, 5.4.23, 5.4.24*, 5.4.25, 5.4.26*, 5.4.27

Internet Electronic Transport Related Standards

Definitions:

10.2.1, 10.2.2, 10.2.3, 10.2.4, 10.2.5, 10.2.6, 10.2.7, 10.2.8, 10.2.9, 10.2.10, 10.2.11, 10.2.12, 10.2.13, 10.2.14, 10.2.15, 10.2.16, 10.2.17, 10.2.18, 10.2.19, 10.2.20, 10.2.21, 10.2.22, 10.2.23, 10.2.24, 10.2.25, 10.2.26, 10.2.27, 10.2.28, 10.2.29, 10.2.30, 10.2.31, 10.2.32, 10.2.33, 10.2.34, 10.2.35, 10.2.36, 10.2.37, 10.2.38

Standards:

10.3.1, 10.3.3, 10.3.4, 10.3.5, 10.3.6, 10.3.7, 10.3.8, 10.3.9, 10.3.10, 10.3.11, 10.3.12, 10.3.14, 10.3.15, 10.3.16, 10.3.17, 10.3.18, 10.3.19, 10.3.20, 10.3.21, 10.3.22, 10.3.23, 10.3.24, 10.3.25, 10.3.26, 10.3.27

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.