



Southern Natural Gas  
Company, L.L.C.  
a Kinder Morgan operated company

October 26, 2021

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 587-Z  
Docket No. RP22-

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act (“NGA”), Part 154 of the regulations of the Federal Energy Regulatory Commission (“Commission” or “FERC”) and in compliance with the Commission’s Final Rule in Docket No. RM96-1-042 (“Order No. 587-Z” or “Final Rule”),<sup>1</sup> Southern Natural Gas Company, L.L.C. (“SNG”) submits for filing the following tariff record for inclusion in its FERC Gas Tariff, Eighth Revised Volume No. 1 (“Tariff”):

Section 40                      NAESB Standards                      Version 8.0.0

Proposed to become effective June 1, 2022, this tariff record reflects the latest version (i.e. Version 3.2) of the business practice standards adopted by the Wholesale Gas Quadrant (“WGQ”) of the North American Energy Standards Board (“NAESB”).

### **Background**

On July 15, 2021, the Commission issued Order No. 587-Z in the above referenced proceeding to incorporate by reference into its regulations Version 3.2 of the business practice standards developed by the WGQ of the NAESB.<sup>2</sup> The revisions made by NAESB in Order No. 587-Z are designed to enhance the natural gas industries system and software security measures and to clarify the processing of certain business transactions.

Some of the security measures being updated include (1) implementation of fixes or patches for known vulnerabilities as soon as reasonably practicable with other trading partners; (2) specify notification timelines to provide notice to trading partners of any systems or software that have been updated and the potential impact of using the vulnerable system; and (3) include both

<sup>1</sup> Standards for Business Practices of Interstate National Gas Pipelines, Order No. 587-Z Final Rule, in Docket No. RM96-1-042, 176 FERC ¶ 61,015 (2021) (Order No. 587-Z).

<sup>2</sup> Id.

specific and broad adoptions of system security measures and specific notification and coordination during outages with affected partners. Some of the business process being clarified include: (1) updating the nominations related standards to allow a service requester to determine which rights of the contract its segmentation nomination is using; and (2) updating the Quadrant Electronic Delivery Mechanism related standards to define a NAESB standard time frame for information to be retained on a pipeline informational postings website.

Each interstate natural gas pipeline is required to file a compliance filing reflecting the changed standards by November 12, 2021, and to be in compliance with the new standards by June 1, 2022.

### **Statement of Nature, Reasons and Basis for the Filing**

SNG is hereby filing a revised tariff record in compliance with the Commission's Order No. 587-Z. Specifically, SNG is revising Section 40 of its General Terms and Conditions ("GT&C") of its Tariff to reflect NAESB Version 3.2.

### **Request for Extension of Time**

There are several Electronic Data Interchange ("EDI") related data set requirements that are not being used by SNG's customers. These EDI related data sets pertain to the following standards: 0.4.1, 2.4.1, 2.4.2, 2.4.3, 2.4.4, 3.4.1, 3.4.2, 3.4.3, and 3.4.4. SNG is in compliance with these data sets except for the EDI aspect. SNG has not received a request from any party to receive information via EDI pursuant to these data sets. Therefore, SNG respectfully requests an extension of time for compliance until sixty days after SNG receives a request to comply with these listed EDI data set standards. This sixty day period will allow time for SNG to test and implement any of the above listed EDI data sets. This request for extension of time is consistent with the guidelines presented in the Final Rule in Docket No. RM96-1-037 (Order No. 587-V).<sup>3</sup> As an oversight, SNG has not earlier requested this extension of time on the above listed EDI data set standards.

### **Request for Waiver**

The NAESB Standard 4.3.60, Version 3.2, has the following wording: "A Customer Activities Web Site should require a single logon/password pair for each user section". SNG is in the process of implementing a multi factor authentication, which would require additional identifying information, versus a single logon/password, to logon to its web site to make it more secure. This new feature should be in place before Version 3.2 becomes effective on June 1, 2022. Once this new multi factor authentication feature is in place, SNG's minimum logon requirements will exceed Standard 4.3.60. Therefore, SNG requests a waiver of Standard 4.3.60 as it relates to requiring a single logon/password.<sup>4</sup>

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<sup>3</sup> Standards for Business Practices of Interstate Natural Gas Pipelines, Order 587-V Final Rule, in Docket No. RM96-1-037, 140 FERC ¶ 61,036, paragraph 38.

<sup>4</sup> The proposed tariff records list Standard 4.3.60 in the waiver section as well as in the incorporated by reference section.

**Procedural Matters**

In accordance with the applicable provisions of Part 154 of the Commission's regulations, SNG is submitting an eTariff XML filing package including the following:

1. A transmittal letter;
2. Appendix A, containing a clean version of the tendered tariff record; and
3. Appendix B, containing a marked version of the tendered tariff record.

SNG respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective June 1, 2022, consistent with the Commission's directive in Order No. 587-Z. With respect to any tariff provision the Commission allows to go into effect without change, SNG hereby moves to place the tendered tariff provisions into effect at the end of the suspension period, if any, specified by the Commission.

Additionally, SNG respectfully requests that the Commission grant all necessary waivers to effectuate this filing.

Copies of this filing are being served on SNG's customers and all interested state commissions.

SNG requests that all Commission orders and correspondence as well as pleadings and correspondence by other parties concerning this filing be served on the following:

T. Brooks Henderson  
Director – Rates & Regulatory  
Southern Natural Gas Company  
Post Office Box 2563  
Birmingham, Alabama 35202-2563  
(205) 325-3843  
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Pursuant to 18 CFR § 154.4(b) and § 385.2005 (a)(2) of the Commission's regulations, the undersigned, having full power and authority to execute this filing, has read this filing and knows its contents, and the contents are true as stated, to the best knowledge and belief of the undersigned.

Respectfully submitted,

/s/ T. Brooks Henderson  
T. Brooks Henderson  
Director – Rates & Regulatory  
Southern Natural Gas Company, L.L.C.

Enclosures

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all customers of Southern Natural Gas Company, L.L.C. and all interested state commissions.

Dated at Birmingham, Alabama, this 26th day of October 2021.

/s/ T. Brooks Henderson  
T. Brooks Henderson  
Director – Rates & Regulatory  
Southern Natural Gas Company, L.L.C.

## **APPENDIX A**

Clean Version of Tendered Tariff Records

40. NAESB STANDARDS

COMPANY has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.2, which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identification or notations are incorporated by reference. Standards that are not incorporated by reference are identified along with the tariff record in which they are located. Standards for which waivers or extensions of time have been granted are also identified. Notwithstanding this Section 40, COMPANY shall adhere to the NAESB WGQ Standards as modified by Order No. 587-Z.

NAESB WGQ Version 3.2 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 3.2, 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	Nominations, Section 4.12 - 12.1 (a), V 5.0.0
1.3.30	Statement of Rates – FT Settlement, Section 2.1.1, V 6.0.0
1.3.32	Nominations, Section 4.12 - 12.2 (b), V 5.0.0
1.3.34	Operational Flow Orders, Section 4.41, V 2.0.0
1.3.37	Nominations, Section 4.12 - 12.1 (c), 12.2 (b), 12.4 (b) V 5.0.0
1.3.40	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.45	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.80	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
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##### 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:

3.2.1	Definitions, Section 4.1 (r), V 5.0.0
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##### Standards:

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	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

##### 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	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 3.2 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, 3.3.27

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, 4.3.62, 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 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, 10.2.39

Standards:

10.3.1, 10.3.3, 10.3.4, 10.3.5, 10.3.6, 10.3.7, 10.3.8, 10.3.9, 10.3.10, 10.3.11, 10.3.12, 10.3.14, 10.3.15, 10.3.16, 10.3.17, 10.3.18, 10.3.19, 10.3.20, 10.3.21, 10.3.22, 10.3.23, 10.3.24, 10.3.25, 10.3.26, 10.3.27, 10.3.28, 10.3.29

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

NAESB Standard

Waiver or Extension of Time

0.4.1	Extension of time (for EDI implementation)
2.4.1	Extension of time (for EDI implementation)
2.4.2	Extension of time (for EDI implementation)
2.4.3	Extension of time (for EDI implementation)
2.4.4	Extension of time (for EDI implementation)
3.4.1	Extension of time (for EDI implementation)
3.4.2	Extension of time (for EDI implementation)
3.4.3	Extension of time (for EDI implementation)
3.4.4	Extension of time (for EDI implementation)
4.3.60	Waiver (to require more than a single password)

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 Records

40. NAESB STANDARDS

COMPANY has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.12, 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.](#) Notwithstanding this Section 40, COMPANY shall adhere to the NAESB WGQ Standards as modified by Order No. 587-12.

NAESB WGQ Version 3.12 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 3.12, 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	Nominations, Section 4.12 - 12.1 (a), V 5.0.0
1.3.30	Statement of Rates – FT Settlement, Section 2.1.1, V 6.0.0
1.3.32	Nominations, Section 4.12 - 12.2 (b), V 5.0.0
1.3.34	Operational Flow Orders, Section 4.41, V 2.0.0
1.3.37	Nominations, Section 4.12 - 12.1 (c), 12.2 (b), 12.4 (b) V 5.0.0
1.3.40	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.45	Nominations, Section 4.12 - 12.4 (b), V 5.0.0
1.3.80	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
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##### 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:

3.2.1	Definitions, Section 4.1 (r), V 5.0.0
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##### Standards:

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	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

##### 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	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 3.2+ 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, [3.3.27](#)

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, [4.3.107](#), [4.3.108](#), [4.3.109](#), [4.3.110](#)

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, [10.2.39](#)

Standards:

10.3.1, 10.3.3, 10.3.4, 10.3.5, 10.3.6, 10.3.7, 10.3.8, 10.3.9, 10.3.10, 10.3.11, 10.3.12, 10.3.14, 10.3.15, 10.3.16, 10.3.17, 10.3.18, 10.3.19, 10.3.20, 10.3.21, 10.3.22, 10.3.23, 10.3.24, 10.3.25, 10.3.26, 10.3.27, [10.3.28](#), [10.3.29](#)

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

None

<u>NAESB Standard</u>	<u>Waiver or Extension of Time</u>
<a href="#">0.4.1</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">2.4.1</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">2.4.2</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">2.4.3</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">2.4.4</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">3.4.1</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">3.4.2</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">3.4.3</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">3.4.4</a>	<a href="#">Extension of time (for EDI implementation)</a>
<a href="#">4.3.60</a>	<a href="#">Waiver (to require more than a single password)</a>

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.

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