

February 3, 2025

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Debbie-Anne A. Reese, Secretary

Re: Order No. 587- AA Compliance Filing;
Young Gas Storage Company, Ltd.;
Docket No. RP25-

Commissioners:

In compliance with the Federal Energy Regulatory Commission's ("Commission") Final Rule in Docket No. RM96-1-043, ("Order No. 587-AA" or "Final Rule"),¹ Young Gas Storage Company, Ltd. ("YGS") submits for filing the following tariff record for inclusion in Part IV of its FERC Gas Tariff, First Revised Volume No. 1 ("Tariff"):

Section 22 Compliance with 18 CFR, Section 284.12 Version 9.0.0

Proposed to become effective August 1, 2025 to comply with Order No. 587-AA, this tariff record reflects the latest version, Version 4.0, of the business practice standards adopted by the Wholesale Gas Quadrant ("WGQ") of the North American Energy Standards Board ("NAESB") as adopted by the Commission in Order No. 587-AA.

Reason for Filing

On November 22, 2024, the Commission issued Order No. 587-AA amending its regulations to incorporate by reference, with certain exceptions, Version 4.0.² As described in the Final Rule,³ the Version 4.0 standards include (among other things): 1) a new data element to address technical details for the reporting of storage balances, 2) revisions to a flowing gas standard to identify the applicable contract and support for processes used to allocate the actual flow of gas quantities to parties involved in a transaction, 3) modification to an invoicing-related data element to allow for the identification of multiple rates that may be

¹ *Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Order No. 587-AA, 89 FR 97518 (Dec. 9, 2024), 189 FERC ¶ 61,135 (2024) (Final Rule issued in Docket No. RM96-1-043 to be effective on February 7, 2025) (hereinafter "Order No. 587-AA").

² Order No. 587-AA, 189 FERC at PP 1 & 14.

³ *Id.* at PP 15-21 & 31-38.

applicable for a single transaction or service, 4) a new capacity release data element to improve efficiencies by providing a mechanism for a transportation service provider to communicate the locations at which a discounted rate is offered as well as if the rate is associated with a single location, multiple locations, or all locations, and 5) code values for five invoicing-related data elements to ensure the dataset complies with the Accredited Standards Institute X12 Transaction Set 811 Consolidated Service Invoice/Statement. Additionally, the cybersecurity-related standards currently included in various standards manuals are consolidated into a new manual as detailed in the Final Rule.

In Order No. 587-AA, the Commission noted that it would continue the compliance filing requirements first established in Order No. 587-V.⁴ Accordingly, for each standard, Order No. 587-AA requires the pipeline to specify in the tariff section listing all the NAESB standards: a) whether the standard is incorporated by reference; b) for those standards not incorporated by reference, the tariff provision that complies with the standard; or c) for those standards with which the pipeline does not comply, an explanatory statement, including an indication of whether the pipeline has been granted a waiver, extension of time, or other variance with respect to compliance with the standard.⁵ With the Final Rule and consistent with Order No. 587-V, the Commission also mandated that pipelines request to continue any existing waivers or extensions, as necessary.⁶ The Final Rule requires each interstate natural gas pipeline to submit a compliance filing reflecting the changed standards by February 3, 2025, to take effect on August 1, 2025.⁷

Description of Filing

YGS is hereby filing an updated tariff record in compliance with the Commission's Order No. 587-AA. Specifically, YGS is revising Section 22 of its General Terms and Conditions to incorporate the NAESB WGQ standards adopted by reference in the Final Rule and to reflect the extensions of time and variances requested below.

Incorporation of NAESB Version 4.0

Part IV, Section 22 is updated to reflect the addition and the removal of certain NAESB WGQ standards in Version 4.0, the applicable copyright years, and the inclusion of a citation to the relevant Commission order(s) on previously accepted variances and extensions. This tariff record also includes the removal of a waiver request that is no longer necessary.

⁴ Order No. 587-AA at P 24, citing *Standards for Bus. Practices of Interstate Nat'l Gas Pipelines*, Order No. 587-V, 77 FR 43711 (Jul. 26, 2012), 140 FERC ¶ 61,036 at PP 36-39 (2012).

⁵ Order No. 587-AA at P 25, citing *Trans-Union Interstate Pipeline L.P.*, 141 FERC ¶ 61,167, at P 36 (2012) ("*Trans Union*") (Order on compliance filings for Order No. 587-V).

⁶ Order No. 587-AA at P 28.

⁷ See *Id.* at PP 1, 11 & 23.

Continuance of Variance and Extensions of Time

In Part IV, Section 6.1, YGS's Tariff includes a variance to NAESB WGQ Standard 1.3.2, which extends the nomination periods for an additional fifteen minutes. The additional fifteen minutes conforms to Commission policy that pipelines may modify NAESB standards to provide better service to its customers.⁸ This variance was accepted by the Commission in previous orders.⁹

Additionally, Part IV, Section 22 provides for extensions of time for NAESB Standards 1.3.17, 1.3.18 and 3.3.6. YGS requests continued extension of the time to comply with these NAESB standards relating to pooling. The Commission has recognized that these NAESB standards apply only if pooling is feasible on YGS's system.¹⁰ YGS's facilities still consist of a single storage field interconnecting it to only one other pipeline system; therefore, pooling remains infeasible. As such, good cause continues to exist to grant YGS an extension of time to implement NAESB WGQ Standards 1.3.17, 1.3.18 and 3.3.6 until 180 days following its receipt of a request from a Part 284 customer after pooling becomes feasible on YGS's system, as previously granted by the Commission.¹¹

YGS's Tariff includes an extension of time to comply with NAESB WGQ Standards for certain data sets for Electronic Data Interchange ("EDI") related requirements. Though YGS supports some EDI data sets, there are several that have never been requested by any party to receive information by EDI pursuant to the data sets found in NAESB Standards: 0.4.1, 2.4.1 through 2.4.6 and 3.4.1 through 3.4.4. Therefore, YGS respectfully requests the continuance of an extension for 60 days after the receipt of a request by a Part 284 shipper to use such a standard and dataset for YGS to comply with these EDI standards. This 60-day period will allow time for YGS to test and implement any of the above listed

⁸ See *Reliant Energy Gas Transmission Co.*, 93 FERC ¶ 61,141 (2000).

⁹ See *East Tennessee Natural Gas, LLC*, 179 FERC ¶ 61,150 at P 23 (2022) ("*East Tennessee*") (Order on filings in compliance with Order No. 587-Z including YGS's filing); *Rager Mountain Storage Co.*, 168 FERC ¶ 61,061 at P 30 (2019) ("*Rager Mountain*") (Order on filings in compliance with Order No. 587-Y including YGS's filing); *Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250 at P 45 (2016) ("*Eastern Shore*") (Order on filings in compliance with Order No. 587-W including YGS's filing); *Trans-Union*, 141 FERC ¶ 61,167 at P 49 (2012) (granting YGS's request to continue variance for extension of nomination cycle deadline by 15 minutes); *Young Gas Storage Co.*, Docket No. RP06-36-000 (Nov. 4, 2005) (letter order accepting tariff records implementing fifteen minutes extension of shipper nomination deadlines in variance of NAESB Standard 1.3.2).

¹⁰ *Eastern Shore*, 154 FERC ¶ 61,250 at P 14 (2016) (explaining a waiver is unnecessary because standards only apply in situations where it is feasible for a pipeline to provide pooling and an extension is therefore appropriate for the identified pipelines including YGS).

¹¹ *East Tennessee*, 179 FERC ¶ 61,150 at P 30 (2022); *Rager Mountain*, 168 FERC ¶ 61,061 at P 45 (2019); *Eastern Shore*, 154 FERC ¶ 61,250 at P 14 (2016); *Trans Union*, 141 FERC ¶ 61,167 at P 16 (2012); *Young Gas Storage Co.*, 78 FERC ¶ 61,130, at 61,506 (1997) (finding YGS need not comply with these standards until its configuration changes to permit pooling).

EDI data sets if and when a shipper requests to use such an EDI data set. The Commission has previously approved YGS's request for good cause shown.¹²

Table for Request to Continue Waivers, Variances or Extensions

As required by Order No. 587-AA for requests for a continuation of a waiver, variance or extension,¹³ YGS is providing the table below identifying the standard for which a waiver, variance or extension of time was granted, and the docket number or order citation to the proceeding wherein the waiver, variance or extension of time was granted.

<u>NAESB WGQ Standard</u>	<u>Waiver, Variance or Extension of Time</u>	<u>Commission Determination</u>
1.3.2	Variance	179 FERC ¶ 61,150 at P23 (2022); 168 FERC ¶ 61,061 at P30 (2019); 154 FERC ¶ 61,250 at P45 (2016); 141 FERC ¶ 61,167 at P 49 (2012); letter order issued on November 4, 2005 in Docket No. RP06-36-000
1.3.17	Extension	179 FERC ¶ 61,150 at P30 (2022); 168 FERC ¶ 61,061 at P 45 (2019); 154 FERC ¶ 61,250 at P 14 (2016);141 FERC ¶ 61,167 at P 16 (2012); 78 FERC ¶ 61,130, at 61,506 (1997)
1.3.18	Extension	179 FERC ¶ 61,150 at P30 (2022); 168 FERC ¶ 61,061 at P 45 (2019); 154 FERC ¶ 61,250 at P 14 (2016); 141 FERC ¶ 61,167 at P 16 (2012); 78 FERC ¶ 61,130 (1997)
3.3.6	Extension	179 FERC ¶ 61,150 at P30 (2022); 168 FERC ¶ 61,061 at P 45 (2019); 154 FERC ¶ 61,250 at P 14 (2016); 141 FERC ¶ 61,167 at P 16 (2012); 78 FERC ¶ 61,130, at 61,506 (1997)
0.4.1 2.4.1 2.4.2 2.4.3 2.4.4 2.4.5 2.4.6 3.4.1 3.4.2 3.4.3 3.4.4	Extension	179 FERC ¶ 61,150 at P27 (2022)

¹² *East Tennessee*, 179 FERC ¶ 61,150 at P 27 (2022).

¹³ See Order No. 587-AA at P 28.

Procedural Matters

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

- a) a transmittal letter; and
- b) clean and marked versions of the tariff record in PDF format.

YGS respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective August 1, 2025, consistent with the Commission's directive in Order No. 587-AA. With respect to any tariff provision the Commission allows to go into effect without change, YGS hereby moves to place the tendered tariff provisions in to effect at the end of any minimal suspension period specified by the Commission.

Correspondence and communications concerning this filing should be directed to:

Ms. Shelly L. Busby
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These persons have been designated for service in accordance with Rule 203 of the Commission's Rules of Practice and Procedure.

The undersigned hereby certifies that she has read this filing and knows (i) the contents of such filing and the attachments; (ii) that the contents as stated in the filing and in the attachments are true to the best of her knowledge and belief; and (iii) that she possesses full power and authority to sign this filing.

Respectfully submitted,

YOUNG GAS STORAGE COMPANY, LTD
Acting by and through its Operator
Colorado Interstate Gas Company, L.L.C

By _____/s/_____
Shelly L. Busby
Director, Regulatory

Enclosures

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing document to be served upon all shippers on YGS's pipeline system and interested state regulatory commissions, in accordance with the requirements of Sections 154.208 and 385.2010 of the Commission's Rules of Practice and Procedures.

Dated at Colorado Springs, Colorado as of this 3rd day of February 2025.

/s/

Shelly L. Busby

Post Office Box 1087
Colorado Springs, CO 80944
(719) 520-4657

22. Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 4.03-2, and the standard revised by Minor Correction MC24002 marked with an asterisk [*], which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identification or notations are incorporated by reference. Standards that are not incorporated by reference are identified along with the tariff record in which they are located. Standards for which waivers or extensions of time have been granted are also identified.

Standards not Incorporated by Reference and their Location in Tariff:

Pursuant to NAESB’s Copyright Procedure Regarding Member and Purchaser Self-Executing Waiver as adopted by the NAESB Board of Directors on April 4, 2013, Transporter may publish in its tariff, compliance filings, in communications with customers or stakeholders in conducting day to day business or in communications with regulatory agencies some or all of the language contained in NAESB standards protected by copyright, provided that Transporter includes appropriate citations in the submission.

Transporter has elected to reproduce only the following Business Practice and Electronic Communications standards, NAESB WGQ Version 4.03-2, that are protected by NAESB’s copyright. With respect to each reproduced standard (including any minor corrections), Transporter incorporates the following: © 1996 - 202~~5~~⁹ North American Energy Standards Board, Inc., all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>
1.2.4	Part IV: General Terms and Conditions (“GT&C”) Section 1.29
1.2.5	GT&C Section 1.40
1.2.8	GT&C Section 1.9(a)
1.2.9	GT&C Section 1.9(b)
1.2.10	GT&C Section 1.9(c)
1.2.11	GT&C Section 1.9(d)
1.2.12	GT&C Section 6.1(e)(vi)
1.3.2(i) – (vi)	GT&C Section 6
1.3.3	GT&C Section 6.1(j)
1.3.7	GT&C Section 6.1(b)(i).
1.3.9	GT&C Section 6.1(b)(v)
1.3.11	GT&C Section 6.1(e)(vii)
1.3.13	GT&C Section 6.1(e)(ix)
1.3.14	GT&C Section 1.55
1.3.19	GT&C Section 6.1(i)
1.3.20	GT&C Section 6.2(c)
1.3.21	GT&C Section 6.1
1.3.22(i)-(iii)	GT&C Sections 6.2(g)
1.3.22(iv)	GT&C Section 6.2(h)
1.3.23	GT&C Section 6.2(f)
1.3.24	GT&C Section 1.40

Standards not Incorporated by Reference and their Location in Tariff:

(Continued)

1.3.25	GT&C Section 1.40
1.3.29	GT&C Section 13.6(c)
1.3.31	GT&C Section 13.6(d)
1.3.32	GT&C Section 6.1(e)(i)
1.3.33	GT&C Section 6.1(e)(vii)
1.3.35	GT&C Section 6.2(a)
1.3.36	GT&C Section 6.2(b)
1.3.37	GT&C Section 6.1(a)(iv)
1.3.38	GT&C Section 6.1(a)(v)
1.3.39	GT&C Section 1.6
1.3.40	GT&C Section 1.9
1.3.44	GT&C Section 6.1(e)(iv)
1.3.45	GT&C Section 6.2(d)
1.3.51	GT&C Section 6.1(e)(v)
2.2.1	GT&C Section 10.1(a)(v)
2.3.3	GT&C Section 10.1(a)(v)
2.3.7	GT&C Section 2.1
2.3.8	GT&C Section 2.2
2.3.9	GT&C Section 1.5
2.3.10	GT&C Section 1.5
2.3.13	GT&C Section 2.1
2.3.14	GT&C Section 2.1
2.3.18	GT&C Section 10.1(b)
2.3.21	GT&C Section 10.1(c)
2.3.22	GT&C Section 10.1(c)(i)
2.3.26	GT&C Section 10.1(e)
2.3.31	GT&C Section 10.1(e)
3.2.1	GT&C Section 1.7
3.3.15	GT&C Section 12.3
3.3.17	GT&C Section 12.2(b)
3.3.25	GT&C Section 12.2(b)
5.2.2	GT&C Section 6.1(e)(iv)(B)
5.2.4	GT&C Section 1.46B
5.2.5	GT&C Section 1.46A
5.3.2	GT&C Section 9.5(c)
5.3.22	Part II: Statement of Rates Section 3, Footnote 3
5.3.34	GT&C Section 6.1(e)(iv)(B)
5.3.44	GT&C Section 9.13
5.3.45	GT&C Section 9.13(b)
5.3.51	GT&C Section 9.7(c)
5.3.53	GT&C Section 9.13(f)
5.3.54	GT&C Section 9.13(f)
5.3.56	GT&C Section 9.13(e)

Standards Incorporated by Reference:

Additional Standards:

General:

Definitions:

0.2.5

Standards:

0.3.1, 0.3.2, 0.3.16, 0.3.17

Creditworthiness:

Standards:

0.3.3, 0.3.4, 0.3.5, 0.3.6, 0.3.7, 0.3.8, 0.3.9, 0.3.10

Gas/Electric Operational Communications:

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

Standards:

0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15

Operating Capacity and Unsubscribed:

Standards:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Datasets:

0.4.2, 0.4.3

Location Data Download:

Standards:

0.3.23, 0.3.24, 0.3.25, 0.3.26, 0.3.27, 0.3.28, 0.3.29

Dataset:

0.4.4

Storage Information:

Dataset:

0.4.1

Nominations Related Standards:

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.6, 1.2.13, 1.2.14, 1.2.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19

Standards:

1.3.1, 1.3.4, 1.3.5, 1.3.6, 1.3.8, 1.3.15, 1.3.16, 1.3.26, 1.3.27, 1.3.28, 1.3.30, 1.3.34, 1.3.41, 1.3.42, 1.3.43, 1.3.46, 1.3.48, 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, 1.3.80, 1.3.81, 1.3.82

Data Sets:

1.4.1, 1.4.2, 1.4.3, 1.4.4, 1.4.5, 1.4.6, 1.4.7

Flowing Gas Related Standards:

Definitions:

2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.4, 2.3.5, 2.3.6, 2.3.11, 2.3.12, 2.3.15, 2.3.16, 2.3.17, 2.3.19, 2.3.20, 2.3.23, 2.3.25, 2.3.27, 2.3.28, 2.3.29, 2.3.30, 2.3.32, 2.3.40, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 2.3.47, 2.3.48, 2.3.50, 2.3.51, 2.3.52, 2.3.53, 2.3.54, 2.3.55, 2.3.56, 2.3.57, 2.3.58, 2.3.59, 2.3.60, 2.3.61, 2.3.62, 2.3.63, 2.3.64, 2.3.65, 2.3.66

Datasets:

2.4.1, 2.4.2, 2.4.3, 2.4.4, 2.4.5, 2.4.6, 2.4.7, 2.4.8, 2.4.9, 2.4.10, 2.4.11, 2.4.17, 2.4.18

Invoicing Related Standards:

Standards:

3.3.3, 3.3.4, 3.3.5, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.16, 3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.26, 3.3.27

Datasets:

3.4.1*, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards:

Definitions:

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

Standards:

4.3.1, 4.3.2, 4.3.3, 4.3.16, 4.3.17, 4.3.18, 4.3.20, 4.3.22, 4.3.23, 4.3.24, 4.3.25, 4.3.26, 4.3.27, 4.3.28, 4.3.30, 4.3.31, 4.3.32, 4.3.33, 4.3.34, 4.3.35, 4.3.36, 4.3.38, 4.3.40, 4.3.41, 4.3.42, 4.3.43, 4.3.44, 4.3.45, 4.3.46, 4.3.47, 4.3.48, 4.3.49, 4.3.50, 4.3.52, 4.3.53, 4.3.54, 4.3.55, 4.3.57, 4.3.58, ~~4.3.60, 4.3.62~~, 4.3.66, 4.3.67, 4.3.68, 4.3.69, 4.3.72, 4.3.75, 4.3.78, 4.3.79, 4.3.80, 4.3.81, 4.3.82, ~~4.3.84~~, 4.3.85, 4.3.86, 4.3.87, 4.3.89, 4.3.90, 4.3.91, 4.3.92, 4.3.93, 4.3.94, 4.3.95, 4.3.96, 4.3.97, 4.3.98, 4.3.99, 4.3.100, 4.3.101, 4.3.102, ~~4.3.103~~, 4.3.104, 4.3.105, 4.3.106, 4.3.107, 4.3.108, ~~4.3.109~~, 4.3.110

Capacity Release Related Standards:

Definitions:

5.2.1, 5.2.3

Standards:

5.3.1, 5.3.3, 5.3.4, 5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.13, 5.3.14, 5.3.15, 5.3.16, 5.3.18, 5.3.19, 5.3.20, 5.3.21, 5.3.23, 5.3.24, 5.3.25, 5.3.26, 5.3.28, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.35, 5.3.36, 5.3.37, 5.3.38, 5.3.39, 5.3.40, 5.3.41, 5.3.42, 5.3.46, 5.3.47, 5.3.48, 5.3.49, 5.3.50, 5.3.52, 5.3.55, 5.3.57, 5.3.58, 5.3.59, 5.3.60, 5.3.62, 5.3.62a, 5.3.63, 5.3.64, 5.3.65, 5.3.66, 5.3.67, 5.3.68, 5.3.69, 5.3.70, 5.3.71, 5.3.72, 5.3.73

Datasets:

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

~~Internet Electronic Transport Related Standards:~~

~~— Definitions:~~

~~10.2.1, 10.2.2, 10.2.3, 10.2.4, 10.2.5, 10.2.6, 10.2.7, 10.2.8, 10.2.9, 10.2.10, 10.2.11, 10.2.12, 10.2.13, 10.2.14, 10.2.15, 10.2.16, 10.2.17, 10.2.18, 10.2.19, 10.2.20, 10.2.21, 10.2.22, 10.2.23, 10.2.24, 10.2.25, 10.2.26, 10.2.27, 10.2.28, 10.2.29, 10.2.30, 10.2.31, 10.2.32, 10.2.33, 10.2.34, 10.2.35, 10.2.36, 10.2.37, 10.2.38, 10.2.39~~

~~— Standards:~~

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

Cybersecurity Related Standards:

Definitions:

12.2.1, 12.2.2, 12.2.3, 12.2.4, 12.2.5, 12.2.6, 12.2.7, 12.2.8, 12.2.9, 12.2.10, 12.2.11,

12.2.12, 12.2.13, 12.2.14, 12.2.15, 12.2.16, 12.2.17, 12.2.18, 12.2.19, 12.2.20, 12.2.21,
12.2.22, 12.2.23, 12.2.24, 12.2.25, 12.2.26, 12.2.27, 12.2.28, 12.2.29, 12.2.30, 12.2.31,
12.2.32, 12.2.33, 12.2.34, 12.2.35, 12.2.36, 12.2.37, 12.2.38, 12.2.39, 12.2.40, 12.2.41

Standards:

12.3.1, 12.3.2, 12.3.3, 12.3.4, 12.3.5, 12.3.6, 12.3.7, 12.3.8, 12.3.9, 12.3.10, 12.3.11,
12.3.12, 12.3.13, 12.3.14, 12.3.15, 12.3.16, 12.3.17, 12.3.18, 12.3.19, 12.3.20, 12.3.21,
12.3.22, 12.3.23, 12.3.24, 12.3.25, 12.3.26, 12.3.27, 12.3.28, 12.3.29, 12.3.30, 12.3.31

Standards for which Waiver or Extension of Time to Comply have been granted:

<u>NAESB Standard</u>	<u>Waiver, Variance or Extension of Time</u>	<u>Relevant Tariff Section and/or Description</u>	<u>Initial Order Granting Request</u>	<u>Most Recent Order Granting Continuation</u>
0.4.1	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
1.3.2	Variance	GT&C Section 6.1 Extension of nomination cycle deadlines.	RP06-36-000, November 4, 2005 (unpublished letter order) 154 FERC ¶ 61,250 (2016)	17968 FERC ¶ 61, 150064 (202219)
1.3.17	Extension	Extension of time for implementation of standard relating to pooling	78 FERC ¶ 61,130 (1997)	17968 FERC ¶ 61, 150064 (202219)
1.3.18	Extension	Extension of time for implementation of standard related to pooling	78 FERC ¶ 61,130 (1997)	17968 FERC ¶ 61, 150064 (202219)
2.4.1	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.2	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.3	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.4	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.5	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
2.4.6	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
3.3.6	Extension	Extension of time for implementation of standard related to pooling	78 FERC ¶ 61,130 (1997)	17968 FERC ¶ 61, 150064 (202219)
3.4.1	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
3.4.2	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
3.4.3	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
3.4.4	Extension	Extension for EDI Implementation	<u>179 FERC ¶ 61,150 (2022)</u>	
4.3.60	Waiver	Requirement for multi-factor authentication		

22. Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 4.0, and the standard revised by Minor Correction MC24002 marked with an asterisk [*], which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identification or notations are incorporated by reference. Standards that are not incorporated by reference are identified along with the tariff record in which they are located. Standards for which waivers or extensions of time have been granted are also identified.

Standards not Incorporated by Reference and their Location in Tariff:

Pursuant to NAESB’s Copyright Procedure Regarding Member and Purchaser Self-Executing Waiver as adopted by the NAESB Board of Directors on April 4, 2013, Transporter may publish in its tariff, compliance filings, in communications with customers or stakeholders in conducting day to day business or in communications with regulatory agencies some or all of the language contained in NAESB standards protected by copyright, provided that Transporter includes appropriate citations in the submission.

Transporter has elected to reproduce only the following Business Practice and Electronic Communications standards, NAESB WGQ Version 4.0, that are protected by NAESB’s copyright. With respect to each reproduced standard (including any minor corrections), Transporter incorporates the following: © 1996 - 2025 North American Energy Standards Board, Inc., all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>
1.2.4	Part IV: General Terms and Conditions (“GT&C”) Section 1.29
1.2.5	GT&C Section 1.40
1.2.8	GT&C Section 1.9(a)
1.2.9	GT&C Section 1.9(b)
1.2.10	GT&C Section 1.9(c)
1.2.11	GT&C Section 1.9(d)
1.2.12	GT&C Section 6.1(e)(vi)
1.3.2(i) – (vi)	GT&C Section 6
1.3.3	GT&C Section 6.1(j)
1.3.7	GT&C Section 6.1(b)(i).
1.3.9	GT&C Section 6.1(b)(v)
1.3.11	GT&C Section 6.1(e)(vii)
1.3.13	GT&C Section 6.1(e)(ix)
1.3.14	GT&C Section 1.55
1.3.19	GT&C Section 6.1(i)
1.3.20	GT&C Section 6.2(c)
1.3.21	GT&C Section 6.1
1.3.22(i)-(iii)	GT&C Sections 6.2(g)
1.3.22(iv)	GT&C Section 6.2(h)
1.3.23	GT&C Section 6.2(f)
1.3.24	GT&C Section 1.40

Standards not Incorporated by Reference and their Location in Tariff:

(Continued)

1.3.25	GT&C Section 1.40
1.3.29	GT&C Section 13.6(c)
1.3.31	GT&C Section 13.6(d)
1.3.32	GT&C Section 6.1(e)(i)
1.3.33	GT&C Section 6.1(e)(vii)
1.3.35	GT&C Section 6.2(a)
1.3.36	GT&C Section 6.2(b)
1.3.37	GT&C Section 6.1(a)(iv)
1.3.38	GT&C Section 6.1(a)(v)
1.3.39	GT&C Section 1.6
1.3.40	GT&C Section 1.9
1.3.44	GT&C Section 6.1(e)(iv)
1.3.45	GT&C Section 6.2(d)
1.3.51	GT&C Section 6.1(e)(v)
2.2.1	GT&C Section 10.1(a)(v)
2.3.3	GT&C Section 10.1(a)(v)
2.3.7	GT&C Section 2.1
2.3.8	GT&C Section 2.2
2.3.9	GT&C Section 1.5
2.3.10	GT&C Section 1.5
2.3.13	GT&C Section 2.1
2.3.14	GT&C Section 2.1
2.3.18	GT&C Section 10.1(b)
2.3.21	GT&C Section 10.1(c)
2.3.22	GT&C Section 10.1(c)(i)
2.3.26	GT&C Section 10.1(e)
2.3.31	GT&C Section 10.1(e)
3.2.1	GT&C Section 1.7
3.3.15	GT&C Section 12.3
3.3.17	GT&C Section 12.2(b)
3.3.25	GT&C Section 12.2(b)
5.2.2	GT&C Section 6.1(e)(iv)(B)
5.2.4	GT&C Section 1.46B
5.2.5	GT&C Section 1.46A
5.3.2	GT&C Section 9.5(c)
5.3.22	Part II: Statement of Rates Section 3, Footnote 3
5.3.34	GT&C Section 6.1(e)(iv)(B)
5.3.44	GT&C Section 9.13
5.3.45	GT&C Section 9.13(b)
5.3.51	GT&C Section 9.7(c)
5.3.53	GT&C Section 9.13(f)
5.3.54	GT&C Section 9.13(f)
5.3.56	GT&C Section 9.13(e)

Standards Incorporated by Reference:

Additional Standards:

General:

Definitions:

0.2.5

Standards:

0.3.1, 0.3.2, 0.3.16, 0.3.17

Creditworthiness:

Standards:

0.3.3, 0.3.4, 0.3.5, 0.3.6, 0.3.7, 0.3.8, 0.3.9, 0.3.10

Gas/Electric Operational Communications:

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

Standards:

0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15

Operating Capacity and Unsubscribed:

Standards:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Datasets:

0.4.2, 0.4.3

Location Data Download:

Standards:

0.3.23, 0.3.24, 0.3.25, 0.3.26, 0.3.27, 0.3.28, 0.3.29

Dataset:

0.4.4

Storage Information:

Dataset:

0.4.1

Nominations Related Standards:

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.6, 1.2.13, 1.2.14, 1.2.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19

Standards:

1.3.1, 1.3.4, 1.3.5, 1.3.6, 1.3.8, 1.3.15, 1.3.16, 1.3.26, 1.3.27, 1.3.28, 1.3.30, 1.3.34, 1.3.41, 1.3.42, 1.3.43, 1.3.46, 1.3.48, 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, 1.3.80, 1.3.81, 1.3.82

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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:

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2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.4, 2.3.5, 2.3.6, 2.3.11, 2.3.12, 2.3.15, 2.3.16, 2.3.17, 2.3.19, 2.3.20, 2.3.23, 2.3.25, 2.3.27, 2.3.28, 2.3.29, 2.3.30, 2.3.32, 2.3.40, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 2.3.47, 2.3.48, 2.3.50, 2.3.51, 2.3.52, 2.3.53, 2.3.54, 2.3.55, 2.3.56, 2.3.57, 2.3.58, 2.3.59, 2.3.60, 2.3.61, 2.3.62, 2.3.63, 2.3.64, 2.3.65, 2.3.66

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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

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3.4.1*, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards:

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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

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4.3.1, 4.3.2, 4.3.3, 4.3.16, 4.3.17, 4.3.18, 4.3.20, 4.3.22, 4.3.23, 4.3.24, 4.3.25, 4.3.26, 4.3.27, 4.3.28, 4.3.30, 4.3.31, 4.3.32, 4.3.33, 4.3.34, 4.3.35, 4.3.36, 4.3.38, 4.3.40, 4.3.41, 4.3.42, 4.3.43, 4.3.44, 4.3.45, 4.3.46, 4.3.47, 4.3.48, 4.3.49, 4.3.50, 4.3.52, 4.3.53, 4.3.54, 4.3.55, 4.3.57, 4.3.58, 4.3.66, 4.3.67, 4.3.68, 4.3.69, 4.3.72, 4.3.75, 4.3.78, 4.3.79, 4.3.80, 4.3.81, 4.3.82, 4.3.85, 4.3.86, 4.3.87, 4.3.89, 4.3.90, 4.3.91, 4.3.92, 4.3.93, 4.3.94, 4.3.95, 4.3.96, 4.3.97, 4.3.98, 4.3.99, 4.3.100, 4.3.101, 4.3.102, 4.3.104, 4.3.105, 4.3.106, 4.3.107, 4.3.108, 4.3.110

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5.3.1, 5.3.3, 5.3.4, 5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.13, 5.3.14, 5.3.15, 5.3.16, 5.3.18, 5.3.19, 5.3.20, 5.3.21, 5.3.23, 5.3.24, 5.3.25, 5.3.26, 5.3.28, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.35, 5.3.36, 5.3.37, 5.3.38, 5.3.39, 5.3.40, 5.3.41, 5.3.42, 5.3.46, 5.3.47, 5.3.48, 5.3.49, 5.3.50, 5.3.52, 5.3.55, 5.3.57, 5.3.58, 5.3.59, 5.3.60, 5.3.62, 5.3.62a, 5.3.63, 5.3.64, 5.3.65, 5.3.66, 5.3.67, 5.3.68, 5.3.69, 5.3.70, 5.3.71, 5.3.72, 5.3.73

Datasets:

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

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Standards:

12.3.1, 12.3.2, 12.3.3, 12.3.4, 12.3.5, 12.3.6, 12.3.7, 12.3.8, 12.3.9, 12.3.10, 12.3.11, 12.3.12, 12.3.13, 12.3.14, 12.3.15, 12.3.16, 12.3.17, 12.3.18, 12.3.19, 12.3.20, 12.3.21, 12.3.22, 12.3.23, 12.3.24, 12.3.25, 12.3.26, 12.3.27, 12.3.28, 12.3.29, 12.3.30, 12.3.31

Standards for which Waiver or Extension of Time to Comply have been granted:

<u>NAESB Standard</u>	<u>Waiver, Variance or Extension of Time</u>	<u>Relevant Tariff Section and/or Description</u>	<u>Initial Order Granting Request</u>	<u>Most Recent Order Granting Continuation</u>
0.4.1	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
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2.4.2	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
2.4.3	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
2.4.4	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
2.4.5	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	
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3.4.4	Extension	Extension for EDI Implementation	179 FERC ¶ 61,150 (2022)	