

168 FERC ¶ 61,061
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;
Cheryl A. LaFleur, Richard Glick,
and Bernard L. McNamee.

Rager Mountain Storage Company LLC	Docket Nos. RP19-581-001
Equitrans, L.P.	RP19-582-001
Northern Natural Gas Company	RP19-821-000
Kern River Gas Transmission Company	RP19-822-000
Dominion Energy Questar Pipeline, LLC	RP19-824-000
Dominion Energy Overthrust Pipeline, LLC	RP19-825-000
Questar Southern Trails Pipeline Company	RP19-826-000
White River Hub, LLC	RP19-828-000
Vector Pipeline L.P.	RP19-839-000
	RP19-839-001
Black Hills Shoshone Pipeline, LLC	RP19-846-000
	RP19-846-001
PGPipeline LLC	RP19-847-000
Algonquin Gas Transmission, LLC	RP19-851-000
NEXUS Gas Transmission, LLC	RP19-852-000
Big Sandy Pipeline, LLC	RP19-853-000
Gulfstream Natural Gas System, L.L.C.	RP19-854-000
Sabal Trail Transmission, LLC	RP19-856-000
Garden Banks Gas Pipeline, LLC	RP19-857-000
Southeast Supply Header, LLC	RP19-858-000
Granite State Gas Transmission, Inc.	RP19-863-000
Mississippi Canyon Gas Pipeline, L.L.C.	RP19-864-000
Nautilus Pipeline Company, L.L.C.	RP19-870-000
Bobcat Gas Storage	RP19-873-000
Egan Hub Storage, LLC	RP19-874-000
East Tennessee Natural Gas, LLC	RP19-875-000
Saltville Gas Storage Company L.L.C.	RP19-876-000
Ozark Gas Transmission, L.L.C.	RP19-877-000
Steckman Ridge, LP	RP19-878-000
Maritimes & Northeast Pipeline, L.L.C.	RP19-884-000
Transcontinental Gas Pipe Line Company, LLC	RP19-885-000
Texas Eastern Transmission, LP	RP19-887-000
Pine Needle LNG Company, LLC	RP19-891-000

Alliance Pipeline L.P.	RP19-894-000
Iroquois Gas Transmission System, L.P.	RP19-895-000
Greylock Pipeline, LLC	RP19-898-000
Freebird Gas Storage, L.L.C.	RP19-904-000
Caledonia Energy Partners, L.L.C.	RP19-906-000
East Cheyenne Gas Storage, LLC	RP19-907-000
High Island Offshore System, L.L.C.	RP19-908-000
Gulf Shore Energy Partners, LP	RP19-910-000
Spire Storage West LLC	RP19-913-000
SG Resources Mississippi, L.L.C.	RP19-915-000
Pine Prairie Energy Center, LLC	RP19-917-000
Rendezvous Pipeline Company, LLC	RP19-926-000
Bison Pipeline LLC	RP19-927-000
Sierrita Gas Pipeline LLC	RP19-928-000
TransColorado Gas Transmission Company LLC	RP19-929-000
El Paso Natural Gas Company, L.L.C.	RP19-930-000
Ruby Pipeline, L.L.C.	RP19-931-000
Northern Border Pipeline Company	RP19-932-000
Mojave Pipeline Company, L.L.C.	RP19-933-000
Golden Triangle Storage, Inc.	RP19-940-000
Gas Transmission Northwest LLC	RP19-941-000
Northwest Pipeline LLC	RP19-951-000
Sabine Pipe Line LLC	RP19-963-000
Chandeleur Pipe Line, LLC	RP19-964-000
Dominion Energy Carolina Gas Transmission, LLC	RP19-969-000
Tennessee Gas Pipeline Company, L.L.C.	RP19-976-000
Colorado Interstate Gas Company, L.L.C.	RP19-984-000
Wyoming Interstate Company, L.L.C.	RP19-985-000
Cheyenne Plains Gas Pipeline Company, L.L.C.	RP19-990-000
Young Gas Storage Company, Ltd.	RP19-994-000
MoGas Pipeline LLC	RP19-997-000
Crossroads Pipeline Company	RP19-1002-000
Southern Star Central Gas Pipeline, Inc.	RP19-1014-000
Columbia Gas Transmission, LLC	RP19-1015-000
MIGC LLC	RP19-1023-000
DBM Pipeline, LLC	RP19-1034-000
KPC Pipeline, LLC	RP19-1035-000
MarkWest New Mexico, L.L.C.	RP19-1036-000
MarkWest Pioneer, L.L.C.	RP19-1037-000
NGO Transmission, Inc.	RP19-1038-000
Venice Gathering System, L.L.C.	RP19-1039-000
B-R Pipeline Company	RP19-1041-000
USG Pipeline Company, LLC	RP19-1042-000

Cheniere Corpus Christi Pipeline, L.P.	RP19-1044-000
	RP19-1044-001
Cheniere Creole Trail Pipeline, L.P.	RP19-1045-000
	RP19-1045-001
ANR Pipeline Company	RP19-1047-000
Discovery Gas Transmission LLC	RP19-1049-000
Cimarron River Pipeline, LLC	RP19-1050-000
National Grid LNG, LLC	RP19-1051-000
Dauphin Island Gathering Partners	RP19-1052-000
Boardwalk Storage Company, LLC	RP19-1056-000
Texas Gas Transmission, LLC	RP19-1057-000
WBI Energy Transmission, Inc.	RP19-1060-000
ANR Storage Company	RP19-1061-000
Gulf South Pipeline Company, LP	RP19-1062-000
Stingray Pipeline Company, L.L.C.	RP19-1064-000
	RP19-1064-001
Western Gas Interstate Company	RP19-1070-000
Portland General Electric Company	RP19-1071-000
Gulf Crossing Pipeline Company LLC	RP19-1072-000
Blue Lake Gas Storage Company	RP19-1075-000
Bluewater Gas Storage, LLC	RP19-1081-000
KO Transmission Company	RP19-1084-000
Eastern Shore Natural Gas Company	RP19-1085-000
Enable Gas Transmission, LLC	RP19-1088-000
American Midstream (AlaTenn), LLC	RP19-1090-000
	RP19-1090-001
American Midstream (Midla), LLC	RP19-1091-001
	RP19-1091-002
Destin Pipeline Company, L.L.C.	RP19-1092-000
	RP19-1092-001
High Point Gas Transmission, LLC	RP19-1093-000
	RP19-1093-001
Trans-Union Interstate Pipeline, L.P.	RP19-1094-000
	RP19-1094-001
Enable Mississippi River Transmission, LLC	RP19-1095-000
WestGas InterState, Inc.	RP19-1097-000
Wyckoff Gas Storage Company, LLC	RP19-1108-000
Total Peaking Services, L.L.C.	RP19-1213-000

ORDER ON FILINGS IN COMPLIANCE WITH ORDER NO. 587-Y

(Issued July 29, 2019)

1. The above-captioned natural gas pipelines each submitted a tariff filing to comply with the requirements established in Order No. 587-Y¹ issued in Docket No. RM96-1-041. The proposed tariff provisions implement the North American Energy Standards Board (NAESB) Wholesale Gas Quadrant's (WGQ) revised business practice standards the Commission incorporated by reference in that rule. As discussed below, the tariff records are accepted, to become effective August 1, 2019, subject to further review and conditions, as discussed in the body of this order.²

I. Background

2. On November 15, 2018, the Commission issued Order No. 587-Y, a Final Rule amending its regulations to incorporate by reference, with certain enumerated exceptions, the latest version (Version 3.1) of business practice standards adopted by the WGQ of NAESB applicable to interstate natural gas pipelines. The revisions made by NAESB in this version of the standards are designed to clarify the processing of certain business transactions. Most notably, NAESB adopted two substantive revisions to its Nominations Related Standards, one to establish a standard rounding process for elapsed-prorated-scheduled quantity³ calculations and a second to revise the specifications for the information to be included in a nomination request. Under Order No. 587-Y, interstate natural gas pipelines were required to file compliance filings with the Commission by April 1, 2019 and are required to comply with the standards incorporated by reference in Order No. 587-Y on and after August 1, 2019.

¹ *Standards for Business Practices of Interstate Natural Gas Pipelines*, Order No. 587-Y, 165 FERC ¶ 61,109 (2018).

² Appendix A to this order summarizes the compliance obligations of each of the filing interstate natural gas pipelines. For questions on compliance obligations you may contact: Oscar F. Santillana, (202) 502-6392, oscar.santillana@ferc.gov.

³ Standard 1.2.12 of the Nominations Related Standards defines the elapsed-prorated-scheduled quantity to mean: “[t]hat portion of the scheduled quantity that would have theoretically flowed up to the effective time of the intraday nomination being confirmed, based upon a cumulative uniform hourly quantity for each nomination period affected.”

3. Each of the above-captioned interstate natural gas pipelines filed tariff records to adopt Version 3.1 of the NAESB WGQ Standards.

II. Notice of Filings

4. Notice of these filings was issued, with interventions and protests due as provided in the Commission's Rules of Practice and Procedure. Pursuant to Rule 214 (18 C.F.R. § 385.214 (2018)), all timely filed motions to intervene and any motions to intervene out-of-time filed before the issuance date of this order are granted. Granting late intervention at this stage of the proceedings will not disrupt the proceedings or place additional burdens on existing parties. No protests or adverse comments were filed.

III. Discussion

A. Waiver Requests

5. In Order No. 587-V, the Commission set out the principles it would apply generally to waiver requests.⁴ In general, the Commission found that all waivers and extensions of time will be granted only in reference to the individual set of NAESB standards being adopted (in this case the NAESB WGQ Version 3.1 Standards). The Commission determined pipelines will need to seek renewal of any such waivers or extensions for each version of the standards the Commission adopts. The Commission also ruled that waivers or extensions of time will not be granted for standards that merely describe the process by which a pipeline must perform a business function, if it performs that function, and where the standard does not require the pipeline to perform the business function. In such a case, as long as the pipeline does not perform the business function, it does not trigger a requirement to comply with the standard and hence no waiver or extension of time is required.⁵

⁴ *Standards for Business Practices of Interstate Natural Gas Pipelines*, Order No. 587-V, 140 FERC ¶ 61,036, at PP 38-39 (2012).

⁵ *Id.* P 38(2) (noting that the Commission has denied waivers of NAESB's gas-electric operational communications standards requested by pipelines on the grounds that their systems do not connect to power plants); *see also Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250, at P 6 (2016) (Order on Filings in Compliance with Order Nos. 587-W and 809); *Trans-Union Interstate Pipeline, L.P.*, 141 FERC ¶ 61,167, at P 18 (2012) (Order on Filings in Compliance with Order No. 587-V).

6. A number of pipelines sought waiver of the requirements of Order No. 587-Y, or extensions of time in which to comply with that order. These requests are discussed below. Any waivers or extensions of time granted herein are limited to the NAESB WGQ Version 3.1 Standards promulgated by Order No. 587-Y.

1. Waivers of Gas Quality Posting Requirements

Waivers Denied

7. Three pipelines, Total Peaking Services, L.L.C. (Total Peaking), B-R Pipeline Company (B-R), and USG Pipeline Company, LLC (USG Pipeline), request waivers of the NAESB WGQ gas quality posting related Standards.⁶ These Standards require a pipeline to post gas quality information on its Informational Postings website and only apply in situations where a pipeline separately measures gas quality. However, Total Peaking, B-R, and USG Pipeline do not separately measure gas quality.⁷ As noted above, waivers or extensions of time are not granted when the pipeline does not perform the business function.⁸

⁶ NAESB WGQ Version 3.1 Standards 4.3.23 (as it relates to gas quality posting), and 4.3.89 through 4.3.93.

⁷ B-R further explains that as provided in B-R's tariff, B-R relies on the upstream pipeline for British thermal unit measurements and gas component analysis. Moreover, B-R explains that data regarding the gas quality are available to its customer and any future customer from the only upstream transporter that delivers gas into B-R. In addition, B-R asserts that while B-R can now receive gas from a second source in the event of an outage that restricts its normal receipts, blending from multiple sources cannot occur. USG Pipeline states that its two shippers can get gas quality information from the upstream pipeline.

⁸ See Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 6 ("waivers or extensions of time will not be granted for standards that merely describe the process by which a pipeline must perform a business function, if it performs that function, and where the standard does not require the pipeline to perform the business function. In such a case, as long as the pipeline does not perform the business function, it does not trigger a requirement to comply with the standard and hence no waiver or extension of time is required.").

8. Thus, we find no need to grant the requested waivers. Accordingly, we will deny Total Peaking's, B-R's, and USG Pipeline's requested waivers relating to gas quality posting as unnecessary.⁹ If, at some point, Total Peaking, B-R, and USG Pipeline separately measure gas quality, the pipelines will be required to comply with the NAESB WGQ gas quality posting related Standards. Accordingly, Total Peaking, B-R, and USG Pipeline are directed to file revised tariff records within 20 days from the date of issuance of this order to remove NAESB WGQ Version 3.1 Standards 4.3.23 (as it relates to gas quality posting), and 4.3.89 through 4.3.93 from the section titled "Standards for which Waiver or Extension of Time to comply has been granted," and include NAESB WGQ Version 3.1 Standards 4.3.23 and 4.3.89 through 4.3.93 in their respective tariffs.¹⁰

2. Waivers of Interstate Pipeline Standards of Conduct Reporting Requirements

9. Three pipelines, B-R, USG Pipeline, and National Grid LNG, LLC (NG LNG), request continuation of their partial waivers of NAESB WGQ Standard 4.3.23 regarding the Standards of Conduct reporting requirements. In support of their requests, the pipelines state that the Commission previously has granted a partial waiver of the affiliate Standards.¹¹ Further, each of the pipelines states that it has posted on its website affiliate-related information required by Order No. 2004 and the revised Standards of Conduct requirements in Order No. 717.¹² In addition, the pipelines contend that Order No. 717 continued the existing partial waivers of the Standards of Conduct.¹³ However,

⁹ See *First ECA Midstream LLC*, 158 FERC ¶ 61,113, at PP 27-28 (2017) (FECAM) (denying waivers of gas quality posting requirements as unnecessary, because the pipeline does not separately measure gas quality).

¹⁰ Total Peaking has already included NAESB WGQ Version 3.1 Standard 4.3.23 in its tariff by listing Standard 4.3.23 in the section titled "Standards Incorporated by Reference."

¹¹ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 19; Order on Filings in Compliance with Order No. 587-V, 141 FERC ¶ 61,167 at P 21.

¹² *Standards of Conduct for Transmission Providers*, Order No. 717, 125 FERC ¶ 61,064 (2008), *order on reh'g and clarification*, Order No. 717-A, 129 FERC ¶ 61,043 (2009), *order on reh'g*, Order No. 717-B, 129 FERC ¶ 61,123 (2009), *order on reh'g*, Order No. 717-C, 131 FERC ¶ 61,045 (2010), *order on reh'g*, Order No. 717-D, 135 FERC ¶ 61,017 (2011).

¹³ Order No. 717, 125 FERC ¶ 61,064 at P 31 ("[E]xisting waivers relating to the Standards shall continue in full force and effect."); *id.* P 32 ("[A]ny entity that has

NAESB WGQ Standard 4.3.23, as it relates to Standards of Conduct reporting, requires a pipeline to post Standards of Conduct information on its Informational Postings website, when applicable. As noted above, waivers or extensions of time are not granted when the pipeline does not perform the business function.¹⁴ Thus, we find no need to grant the requested waivers. Accordingly, we will deny B-R's, USG Pipeline's, and NG LNG's requested waivers relating to Standards of Conduct posting as unnecessary. Accordingly, B-R, USG Pipeline, and NG LNG are directed to file revised tariff records within 20 days from the date of issuance of this order to remove NAESB WGQ Version 3.1 Standard 4.3.23 (as it relates to Standards of Conduct posting) from the section titled "Standards for which a Waiver has been granted," and "Standards for which Waiver or Extension of Time to Comply have been granted," respectively, and include NAESB WGQ Version 3.1 Standard 4.3.23 in their respective tariffs.¹⁵

3. Waiver of the Nomination Timeline

10. NG LNG requests continuation of its waiver of NAESB WGQ Standard 1.3.2(i-vi) governing standard and intra-day timelines with respect to trucking operations and vapor deliveries by displacement. NG LNG states that the Commission previously has granted it such a waiver,¹⁶ and that it continues to operate on the same basis on which the prior waiver was granted.¹⁷ For good cause shown, we grant NG LNG continuation of its

already received a ... partial waiver [of the Standards of Conduct] may continue to rely upon it.").

¹⁴ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 6 ("[A]s long as the pipeline does not perform the business function, it does not trigger a requirement to comply with the standard and hence no waiver or extension of time is required.").

¹⁵ NG LNG has already included NAESB WGQ Version 3.1 Standard 4.3.23 in its tariff by listing Standard 4.3.23 in the standards not incorporated by reference section.

¹⁶ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250.

¹⁷ See *Algonquin LNG, Inc.*, 86 FERC ¶ 61,285 (1999) (*Algonquin LNG*) (finding that the nominations Standards are not applicable to liquefied natural gas (LNG) being transported by truck, because those Standards are intended to standardize nominations and scheduling across the interstate pipeline grid); *Algonquin LNG, Inc.*, 83 FERC ¶ 61,133, at 61,601 (1998) (*Algonquin*) (where the Commission granted waiver of the nominations Standards based on Algonquin's assertion that such intra-day nominations are not possible for deliveries of LNG by truck to storage or from storage to trucks,

requested waiver of NAESB WGQ Version 3.1 Standard 1.3.2(i-vi) governing standard and intra-day timelines, concerning trucking operations and vapor deliveries by displacement, until such time as NG LNG becomes integrated with the interstate pipeline grid.

4. Waiver of the Electronic Data Interchange Data Sets, Electronic Delivery Mechanism Standards, and “Customer Activities” Website Requirements

11. In Order No. 587-V, the Commission explained its policy towards requests for waivers or extensions of time of the Standards related to using the Internet to conduct business transactions¹⁸ and the Standards requiring pipelines to use Electronic Data Interchange (EDI).¹⁹ These electronic requirements fall into three categories:

- 1) The requirement to conduct business over the Internet. The Commission stated that the requirement to conduct business over the Internet will be evaluated based on a pipeline’s individual circumstances, such as the size of the pipeline, the number of shippers, its ability to provide electronic services, the demand for such services, and alternative means by which the pipeline conducts the business practice.
- 2) The requirement to post information on an Internet website. The Commission found that it will rarely grant waivers or extensions of time to comply with the posting requirements because posting of this information is required by the Commission’s regulations and the cost of maintaining and posting information on an Internet website is not great even for smaller pipelines.

because the LNG trucking load and unloading facilities can only accommodate two trucks per day).

¹⁸ Electronic Delivery Mechanism (EDM) standards relate to the use of the Internet for pertinent business practice and electronic communications.

¹⁹ EDI standards require computer-to-computer electronic data interchange of information in files as mapped from the NAESB WGQ datasets and communicated between trading partners over the Internet using the NAESB Internet Electronic Transport.

3) The requirement to support EDI. The Commission stated it will evaluate waivers or extensions of time to comply with the EDI requirements based on a pipeline's individual circumstances, such as the size of the pipeline, the number of shippers, its ability to provide electronic services, the demand for such services, and alternative means by which the pipeline conducts the business practice. For smaller pipelines, the Commission generally grants waivers of the EDI Standards when such pipelines have shown that complying with such Standards would prove unduly burdensome.

12. KO Transmission Company (KOT) requests continuation of its waiver of the NAESB WGQ EDI datasets, EDM Standards, and the "Customer Activities" section of its website. In support of its request, KOT states that it owns a percentage of the facilities operated by Columbia Gas Transmission, LLC (Columbia Gas). KOT further asserts that it assumes as waived for KOT the NAESB WGQ Standards related to the operational responsibilities and activities carried out by Columbia Gas. KOT further states that those operational responsibilities and activities are listed on Columbia Gas' Navigates website under the heading "Customer Activities," and KOT does not maintain a Customer Activities section on its own website. KOT explains that the implementation of the EDI/EDM related standards (i.e., installation of the computer hardware and software necessary to conduct all of the contemplated transactions via the Internet) would be prohibitively expensive given KOT's small size and revenue stream. In addition, KOT explains that the operational circumstances and technical capabilities of KOT based on the shared ownership of facilities have not changed. KOT states that the Commission previously has granted KOT a waiver of the NAESB WGQ Standards relating to EDI datasets, EDM Standards, and the "Customer Activities" section of its website.²⁰ For good cause shown, we grant KOT continuation of its requested waivers.²¹

²⁰ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 26.

²¹ NAESB WGQ Version 3.1 Standards 0.3.27 through 0.3.29, 1.3.3, 1.3.23, 1.3.36, 1.3.37, 1.3.38, 1.3.45, 1.3.48, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.79, 1.3.81, 1.3.82, 1.4.7, 2.3.21, 2.3.32, 2.3.51 through 2.3.53, 2.3.66, 3.3.22 through 3.3.24, 4.3.1 through 4.3.3, 4.3.27, 4.3.28, 4.3.42 through 4.3.49, 4.3.52 through 4.3.55, 4.3.57, 4.3.58, 4.3.60 through 4.3.62, 4.3.66, 4.3.67, 4.3.69, 4.3.75, 4.3.78 through 4.3.85, 4.3.87, 4.3.100, 4.3.101, 5.3.10, 5.3.11, 5.3.13, 5.3.14, 5.3.32, 5.3.34, 5.3.40, 5.3.41, 5.3.42, 5.3.48, 5.3.72, 10.3.1, 10.3.3 through 10.3.12, and 10.3.14 through 10.3.27.

13. KOT requests waiver of NAESB WGQ Flowing Gas Related Principle 2.1.6. However, in Order No. 587-U,²² the Commission made it optional for pipelines to adopt NAESB WGQ Principles. Thus, KOT's requested waiver to comply with NAESB WGQ Flowing Gas Related Principle 2.1.6 is moot.

14. MoGas Pipeline LLC (MoGas) requests continuation of its waiver of the NAESB WGQ Standards related to EDI datasets. In support of its request, MoGas states that as a small pipeline it previously was granted waivers of the NAESB WGQ Standards relating to EDI datasets.²³ Further, MoGas states that none of its shippers have requested the use of an EDI mechanism. For good cause shown, we grant MoGas continuation of its requested waivers.²⁴

15. WestGas InterState, Inc. (WestGas) requests continuation of its waiver of the NAESB WGQ EDI datasets, EDM Standards, and the "Customer Activities" section of its website. In support of its request, WestGas states that the Commission previously has granted WestGas waivers of the NAESB WGQ Standards relating to EDI datasets, EDM Standards, and the "Customer Activities" section of its website due to WestGas' operational and market circumstances.²⁵ WestGas explains that its system consists of an 11-mile pipeline with one receipt and two delivery points. WestGas notes that it only has two firm shippers and its net operating income for 2018 was approximately \$85,816, with total operating revenues of \$169,990. WestGas further asserts that it has never received a request from any shipper for capacity release. For good cause shown, we grant WestGas continuation of its requested waivers.²⁶

²² See *Standards for Business Practices for Interstate Natural Gas Pipelines*, Order No. 587-U, 130 FERC ¶ 61,212 (2010).

²³ *MoGas Pipeline LLC*, 157 FERC ¶ 61,036, at P 9 (2016) (*MoGas*).

²⁴ NAESB WGQ Version 3.1 Standards 0.4.2 through 0.4.3, 1.4.1 through 1.4.7, 2.4.1 through 2.4.8, 2.4.10, 2.4.11, 2.4.17, 2.4.18, 3.4.1 through 3.4.4, 5.4.14 through 5.4.17, 5.4.24 through 5.4.27.

²⁵ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 28.

²⁶ NAESB WGQ Version 3.1 Standards 0.3.18, 0.3.20 through 0.3.23, 0.3.25 through 0.3.29, 1.3.48, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.81, 2.3.32, 2.3.40, 2.3.46, 2.3.66, 3.3.23, 3.3.24, 4.3.1 through 4.3.3, 4.3.22, 4.3.24 through 4.3.28, 4.3.31 through 4.3.36, 4.3.38, 4.3.40 through 4.3.50, 4.3.52 through 4.3.55, 4.3.57, 4.3.58, 4.3.60 through 4.3.62, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.85,

16. However, we will deny WestGas' requested waiver to comply with NAESB WGQ Version 3.1 Standard 1.3.82. Standard 1.3.82 establishes a standard rounding process for elapsed-prorated-scheduled quantity.²⁷ Specifically, Standard 1.3.82 provides that "[w]hen calculating the elapsed-prorated-scheduled quantity, parties should utilize at least 7 decimal places when the remainder for the calculation is greater than zero. The calculated elapsed-prorated-scheduled quantity should be rounded to the nearest dekatherm, Gigajoule (Canada), or Gigacalorie (Mexico)." To the extent the standard is related to EDI/EDM, the standard includes business practices that may be implemented without the use of EDI/EDM. As such, WestGas has not supported its requested waiver to comply. Nevertheless, the Commission finds that granting an extension of time to comply with NAESB WGQ Version 3.1 Standard 1.3.82 is appropriate. Thus, we grant WestGas an extension of time until 180 days following its receipt of a request from a customer before it must commence compliance with NAESB WGQ Version 3.1 Standard 1.3.82. Accordingly, WestGas is directed to file revised tariff records within 20 days from the date of issuance of this order to change the reference from waiver to extension of time for NAESB WGQ Version 3.1 Standard 1.3.82 in the section titled "Standards for which Waiver or Extension of Time to Comply have been granted." This finding is without prejudice to WestGas submitting a revised waiver request that provides more support for its request. Such a request should detail exactly what provisions would require a waiver to comply with, along with a description of any obstacles the pipeline sees to compliance and the timeline for resolving these issues.

17. Total Peaking requests continuation of its waiver of the NAESB WGQ EDI datasets, EDM Standards, and the "Customer Activities" section of its website. In support of its request, Total Peaking states that the Commission previously has granted Total Peaking waivers of the NAESB WGQ Standards relating to EDI datasets, EDM Standards, and the "Customer Activities" section of its website due to Total Peaking's operational and market circumstances.²⁸ Total Peaking explains that its system consists of an LNG storage tank. Total Peaking states that it is located behind a local distribution

4.3.100, 4.3.103 through 4.3.106, 5.3.10, 5.3.11, 5.3.13, 5.3.14, 5.3.34, 5.3.41, 5.3.42, 5.3.48, 5.3.72, 5.3.73, 5.4.23, 10.3.6, 10.3.12, 10.3.16, and 10.3.18.

²⁷ Standard 1.2.12 of the Nominations Related Standards defines the elapsed-prorated-scheduled quantity to mean:

That portion of the scheduled quantity that would have theoretically flowed up to the effective time of the intraday nomination being confirmed, based upon a cumulative uniform hourly quantity for each nomination period affected.

²⁸ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 29.

company's city gate and can only physically receive gas either by tank or truck from its interconnection with the local distribution company. For good cause shown, we grant Total Peaking continuation of its requested waivers.²⁹

18. Greylock Pipeline, LLC (Greylock Pipeline) requests continuation of its waiver of the NAESB WGQ EDI datasets, EDM Standards, and the "Customer Activities" section of its website. In support of its request, Greylock Pipeline states that the Commission previously has granted Greylock Pipeline waivers of the NAESB WGQ Standards relating to EDI datasets, EDM Standards, and the "Customer Activities" section of its website due to Greylock Pipeline's operational and market circumstances.³⁰ Greylock Pipeline explains that it is a small pipeline with two shippers. Specifically, Greylock Pipeline states that its system consists of a 16-mile pipeline with a limited number of receipt and delivery points. For good cause shown, we grant Greylock Pipeline continuation of its requested waivers.³¹

19. Gulf Shore Energy Partners, LP (Gulf Shore) requests continuation of its waiver of the NAESB WGQ EDI datasets, EDM Standards, and the "Customer Activities" section of its website. In support of its request, Gulf Shore states that the Commission previously has granted Gulf Shore waivers of the NAESB WGQ Standards relating to EDI datasets, EDM Standards, and the "Customer Activities" section of its website due to Gulf Shore's

²⁹ NAESB WGQ Version 3.1 Standards 0.3.22, 1.3.48, 1.3.51, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.79, 4.3.66 through 4.3.69, 4.3.94, 4.3.99 through 4.3.102, 5.3.31 through 5.3.33, 5.3.38, 5.3.70 through 5.3.72, 5.4.14 through 5.4.17, 10.3.1, 10.3.3 through 10.3.12, and 10.3.14 through 10.3.27.

³⁰ Greylock Pipeline states that the Commission previously granted waiver of the NAESB WGQ EDI datasets, EDM Standards, and the "Customer Activities" section of the pipeline's website to its predecessor company, FECAM. *See FECAM*, 158 FERC ¶ 61,113 at P 29 (granting in part and denying in part FECAM's requested waivers, and directing FECAM to make a compliance filing); *see also First ECA Midstream LLC*, Docket Nos. RP16-1173-001 and RP16-1173-002 (May 5, 2017) (delegated order) (accepting tariff records effective September 15, 2016, as requested).

³¹ NAESB WGQ Version 3.1 Standards 0.3.21, 0.3.22, 1.3.48, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.79, 1.4.3, 2.3.6, 2.3.25, 2.3.32, 2.3.42, 2.3.51 through 2.3.53, 2.4.1 through 2.4.3, 2.4.5 through 2.4.11, 2.4.17, 2.4.18, 3.3.23, 3.3.24, 4.3.1 through 4.3.3, 4.3.16 through 4.3.18, 4.3.20, 4.3.22 through 4.3.28, 4.3.30 through 4.3.36, 4.3.38, 4.3.40 through 4.3.50, 4.3.52 through 4.3.55, 4.3.57, 4.3.58, 4.3.60 through 4.3.62, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.87, 4.3.89, 4.3.91, 4.3.94, 4.3.99 through 4.3.106, 5.3.10, 5.3.13, 5.3.14, 5.3.35, 5.3.72, 5.4.14 through 5.4.16, 5.4.21 through 5.4.27, 10.3.1, 10.3.3 through 10.3.12, and 10.3.14 through 10.3.27.

operational and market circumstances.³² Gulf Shore explains that its system consists of a five-foot pipeline connecting the interstate pipeline systems of Transcontinental Gas Pipe Line Company, LLC (Transco) and Florida Gas Transmission Company, LLC. Gulf Shore notes that it only has one firm shipper, and one receipt point and one delivery point. Gulf Shore asserts that it has never received a request for a capacity release from any shipper. Gulf Shore contends that the implementation of the EDI/EDM related Standards would be unduly burdensome given Gulf Shore's small size and limited number of customers. For good cause shown, we grant Gulf Shore continuation of its requested waivers.³³

5. Waivers of Index-Based Capacity Release Standards

20. Dominion Energy Carolina Gas Transmission, LLC (DECG) and Total Peaking request continuation of their limited waivers of the EDI and Internet requirements for the NAESB WGQ index-based capacity release Standards 5.4.20, and 5.4.24 through 5.4.27. These Standards provide additional flexibility to shippers and create a uniform method that enables releasing and replacement shippers to use third-party rate indices to create rate formulas for capacity releases that will better reflect the value of capacity. These Standards also reflect a reasonable compromise for dealing with copyright issues that arise in using copyrighted gas indices to set prices, ensuring that shippers have a reasonable choice of available indices to use while equitably spreading the costs entailed by the use of such indices among the pipelines and shippers. In support of their requests, the pipelines state that the Commission previously has granted a waiver of the EDI and Internet requirements for the index-based capacity release Standards.³⁴ DECG and Total Peaking assert that there are no representative index references for their respective pipelines, and that shippers are unlikely to request such releases.

³² *Gulf Shore Energy Partners, LP*, 155 FERC ¶ 61,177, at P 7 (2016) (*Gulf Shore*).

³³ NAESB WGQ Version 3.1 Standards 0.3.21, 0.3.22, 0.4.1 through 0.4.3, 1.3.48, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.79, 1.4.1 through 1.4.7, 2.3.6, 2.3.25, 2.3.32, 2.3.42, 2.3.51 through 2.3.53, 2.4.1 through 2.4.11, 2.4.17, 2.4.18, 3.3.23, 3.3.24, 3.4.1 through 3.4.4, 4.3.1 through 4.3.3, 4.3.16 through 4.3.18, 4.3.20, 4.3.22 through 4.3.28, 4.3.30 through 4.3.36, 4.3.38, 4.3.40 through 4.3.50, 4.3.52 through 4.3.55, 4.3.57, 4.3.58, 4.3.60 through 4.3.62, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.87, 4.3.89 through 4.3.106, 5.3.10, 5.3.13, 5.3.14, 5.3.35, 5.3.72, 5.4.14 through 5.4.17, 5.4.20 through 5.4.27, 10.3.1, 10.3.3 through 10.3.12, and 10.3.14 through 10.3.27.

³⁴ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at PP 33-34.

21. We find it appropriate to grant DECG and Total Peaking a continuation of their respective limited waivers of the electronic requirements of the NAESB WGQ index-based capacity release standards. We grant a continuation of their limited waivers of the EDI and Internet requirements for the index-based capacity release NAESB WGQ Version 3.1 Standards 5.4.20, and 5.4.24 through 5.4.27 based on the administrative burden and costs for DECG and Total Peaking, and the low probability of a releasing shipper on the requesting pipeline's system requesting to utilize index-based pricing. However, to the extent DECG and Total Peaking request waiver of the business practice standards that require a pipeline to support index-based capacity releases, DECG and Total Peaking have not supported such a request. Therefore, we deny waiver of NAESB's business practices for index-based capacity releases.

6. Waiver of Closing of Measurement Timeline

22. USG Pipeline requests a continuation of its waiver of NAESB WGQ Standard 2.3.7, which provides that "[t]he cutoff for the closing of measurement is 5 business days after business month." USG Pipeline states that it is a small pipeline with two customers and does not deliver gas to any other pipeline. USG Pipeline contends that it may not receive a closeout of upstream measurements within the timeline provided in NAESB WGQ Standard 2.3.7, because it relies on its upstream pipeline (i.e., East Tennessee Natural Gas, LLC) for measurements of gas delivered into USG Pipeline. Therefore, USG Pipeline asserts that it needs additional time to process the information to close out measurements to its customer(s). Specifically, USG Pipeline requests that it be permitted to maintain its current tariff language, which allows USG Pipeline to close out measurements to its customer(s) up to three business days after it receives a closeout of an upstream pipeline's measurements. We grant USG Pipeline a continuation of its requested waiver of NAESB WGQ Version 3.1 Standard 2.3.7. This will afford USG Pipeline additional time to process the information to close out measurements to its customer(s).

7. Waiver of Bumping Requirements for Enhanced Nomination Services

23. Texas Gas Transmission, LLC (Texas Gas) and Gulf South Pipeline Company, LP (Gulf South) request a continuation of their limited waivers of NAESB WGQ Standard 1.3.39, which provides that "[b]umping that affects transactions on multiple Transportation Service Providers (TSP) should occur at grid-wide synchronization times only." Both pipelines state that the Commission accepted their tariff filings to establish Enhanced Nominations Service (ENS) for firm shippers. Under these services, firm shippers have the right to bump interruptible service during additional nomination cycles

occurring at times other than the pipeline's standard nomination cycles.³⁵ The pipelines argue that a limited waiver of Standard 1.3.39 is required to allow bumping to occur during their respective additional nomination cycles. We grant Texas Gas and Gulf South a continuation of their requested limited waivers of NAESB WGQ Version 3.1 Standard 1.3.39. This will afford the pipelines' ENS customers the additional opportunities to utilize such capacity included in this firm service.

24. ANR Pipeline Company (ANR) requests a continuation of its limited waiver of NAESB WGQ Standard 1.3.39. ANR explains that General Terms and Conditions (GT&C) section 6.6.1 of ANR's tariff provides for seven total nomination cycles, with bumping allowed in the standard NAESB Evening, Intraday 1, and Intraday 2 nomination cycles, and limited bumping by Rate Schedule Firm Transportation Service (FTS)-3 shippers³⁶ in the standard NAESB Intraday 3 nomination cycle and additional non-standard Morning and Last Intraday nomination cycles. ANR asserts that its two additional non-standard nomination cycles are limited to receipt and delivery points located in ANR's Northern Segment, and were approved by the Commission as part of ANR's Order No. 637 compliance filing on December 20, 2001.³⁷ In support of its request, ANR argues that a limited waiver of NAESB WGQ Standard 1.3.39 is required to allow limited bumping by Rate Schedule FTS-3 shippers to occur during its additional non-standard Morning and Last Intraday nomination cycles. ANR states that the Commission previously has granted ANR a limited waiver of NAESB WGQ Standard 1.3.39.³⁸

25. For good cause shown, we grant ANR a continuation of its requested limited waiver of NAESB WGQ Version 3.1 Standard 1.3.39 as it pertains to its additional non-standard nomination cycles. This will afford ANR's Rate Schedule FTS-3 customers the additional opportunities to utilize such capacity included in this firm service.

³⁵ Texas Gas notes that its service does not permit bumping after ENS Additional Nomination Cycle No. 5. *See Texas Gas Transmission, LLC*, 138 FERC ¶ 61,176, at P 3 (2012).

³⁶ Rate Schedule FTS-3, targeted primarily for electric generation providers, provides variable hourly flow rights, short notice commencement and shut-down service, and flexibility to manage variances between receipts and deliveries.

³⁷ *ANR Pipeline Co.*, 97 FERC ¶ 61,323 (2001), *order on reh'g and compliance*, 104 FERC ¶ 61,320 (2003).

³⁸ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 40.

8. Waiver of D-U-N-S Identification Number Requirements

26. Northern Natural Gas Company (Northern), Rendezvous Pipeline Company, LLC (Rendezvous), and Portland General Electric Company (PGE) request a continuation of their waivers of NAESB WGQ Standard 0.3.2, which pertains to use of proprietary entity codes when the Dun & Bradstreet, Inc.'s D-U-N-S identification numbers for shippers (D-U-N-S® Number) is not available. The pipelines explain that they use the Tax Identification (Tax ID) number provided by the shipper in the D-U-N-S® Number field when the D-U-N-S® Number is not available. Thus, the pipelines request a continuation of their waivers of NAESB WGQ Standard 0.3.2 to continue to use the shipper-provided Tax ID number if the shipper does not have a D-U-N-S® Number. For good cause shown, we grant Northern, Rendezvous, and PGE a continuation of their requested waivers of NAESB WGQ Version 3.1 Standard 0.3.2.

9. Waiver of Bumping During the Intraday 3 Nomination Cycle

27. ANR requests a continuation of its limited waiver of NAESB WGQ Standard 1.3.2(v), limited only to that portion of the standard which states that bumping is not allowed during the Intraday 3 Nomination Cycle. ANR states that a limited waiver will allow Rate Schedule FTS-3³⁹ shippers to bump interruptible service in the Intraday 3 nomination cycle. In support of its request, ANR states that the remainder of ANR's Intraday 3 nomination cycle provision adheres to the timeline and notice requirements set forth in NAESB WGQ Standard 1.3.2(v). Further, ANR states that the Commission previously has granted ANR a limited waiver of NAESB WGQ Standard 1.3.2(v).⁴⁰ For good cause shown, we grant ANR a continuation of its requested limited waiver of NAESB WGQ Version 3.1 Standard 1.3.2(v) as it pertains to its Rate Schedule FTS-3 service. This will afford ANR's FTS-3 customers the additional opportunities to utilize such capacity included in this firm service.

10. Waiver of Standard 2.3.31

28. El Paso Natural Gas Company, L.L.C. (EPNG) requests a continuation of its waiver of NAESB WGQ Standard 2.3.31, which provides that "[n]o imbalance penalty should be imposed when a prior period adjustment applied to the current period causes or increases a current month penalty." In support of its request, EPNG states that, in lieu of

³⁹ As discussed above, Rate Schedule FTS-3, targeted primarily for electric generation providers, provides variable hourly flow rights, short notice commencement and shut-down service, and flexibility to manage variances between receipts and deliveries.

⁴⁰ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 42.

following this standard, EPNG implemented Prior Period Measurement Adjustment (PPMA) provisions.⁴¹ Further, EPNG states that the Commission previously has accepted EPNG's monthly imbalance settlement provisions.⁴² In addition, EPNG states that the Commission previously has granted EPNG a waiver of NAESB WGQ Standard 2.3.31.⁴³ For good cause shown, we grant EPNG a continuation of its requested waiver of NAESB WGQ Version 3.1 Standard 2.3.31.

11. Waiver of Standard 2.3.64

29. EPNG requests a continuation of its waiver of NAESB WGQ Standard 2.3.64, which provides that “[u]nder normal operating conditions, at a location which is covered by an [Operational Balancing Agreement (OBA)],⁴⁴ the scheduled quantity should be the allocated quantity.” In support of its request, EPNG states that the Commission previously has granted EPNG a waiver of NAESB WGQ Standard 2.3.64.⁴⁵ In lieu of following this standard, GT&C section 10.5 of EPNG's tariff provides that the allocation of quantities shall be governed by the pre-determined allocation methods set forth in EPNG's tariff or by an applicable OBA. However, we are concerned with EPNG's request for waiver to comply with NAESB WGQ Version 3.1 Standard 2.3.64. NAESB WGQ Version 3.1 Standard 2.3.64 applies only to OBAs. Nevertheless, the fact that EPNG might also use pre-determined allocation methods set forth in its tariff to govern the allocation of certain quantities does not obviate its obligation to comply with the

⁴¹ El Paso Natural Gas Company, L.L.C., FERC NGA Gas Tariff, EPNG Tariffs, Part IV: GT&C, Section 10 - Imbalance Management (discussing PPMA imbalance resolution provisions in GT&C section 10.2(h)(ii) of EPNG's tariff, which provides in relevant part that “[i]n the event a PPMA increases a Shipper's current monthly imbalance, the PPMA shall be applied in the Month following the Month in which the PPMA was made. Should an imbalance greater than five percent (5%) remain in the next Month ... PPMA imbalance-related quantities shall be cashed out at one hundred percent (100%) of the applicable Cash Out Index Price.”).

⁴² See *El Paso Natural Gas Co.*, 119 FERC ¶ 61,275 (2007).

⁴³ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 43.

⁴⁴ NAESB WGQ Version 3.1 Standard 2.2.1, provides that “[a]n OBA is a contract between two parties which specifies the procedures to manage operating variances at an interconnect.”

⁴⁵ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 44.

standard with respect to its OBAs. Section 284.12(b) of the Commission regulations requires a pipeline to enter into OBAs at all points of interconnection between its system and the system of another interstate or intrastate pipeline.⁴⁶ The Commission has explained that an OBA “ensures that a shipper, once it has properly nominated and had its gas confirmed, will not be subjected to imbalance penalties resulting from the transfer of gas between the pipelines.”⁴⁷ The NAESB WGQ Standard reflects this definition by requiring that “the scheduled quantity should be the allocated quantity.” EPNG does not fully explain why the waiver is necessary, how its approach protects shippers from imbalances, why its approach is equal to or exceeds the NAESB WGQ Standard, or whether EPNG provides equal service when using the pre-determined allocation methods set forth in its tariff such that the scheduled quantity equals the allocated quantity. Accordingly, EPNG is directed to make a compliance filing within 20 days from the date of issuance of this order addressing whether it is complying with the Commission’s OBA regulation, or justify why it requires a waiver to comply with NAESB WGQ Version 3.1 Standard 2.3.64. Such revised waiver request should detail exactly what provisions would require more time to comply with, along with a description of any obstacles the pipeline sees to compliance and the timeline for resolving these issues.

B. Variances on Nomination Deadlines and Adjustments

30. Eight pipelines⁴⁸ request a continuation of their variances pertaining to NAESB WGQ Standard 1.3.2, for a 15 minute extension of the deadlines for nominations leaving the control of the nominating party, and for receipt of nominations by transporter. Generally, the referenced pipelines state that the Commission previously has granted an extension of the nomination cycle deadlines, and that they continue to operate on the same basis on which the variance previously was granted.⁴⁹ For good cause shown, we grant the referenced pipelines an extension of this variance.

⁴⁶ 18 C.F.R. § 284.12(b)(2)(i) (2018).

⁴⁷ *Standards for Business Practices of Interstate Natural Gas Pipelines*, Order No. 587-G, FERC Stats. & Regs. ¶ 31,062, at 30,675 (1998) (cross-referenced at 83 FERC ¶ 61,029).

⁴⁸ Sierrita Gas Pipeline LLC, Ruby Pipeline, L.L.C., Cheyenne Plains Gas Pipeline Company, L.L.C., Young Gas Storage Company, Ltd. (Young Gas), Mojave Pipeline Company, L.L.C., Wyoming Interstate Company, L.L.C., Colorado Interstate Gas Company, L.L.C., and EPNG.

⁴⁹ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 45.

31. EPNG requests a continuation of its variance pertaining to NAESB WGQ Standard 1.3.6, for automatic Hourly Entitlement Enhancement Nomination (HEEN) adjustments. NAESB WGQ Version 3.1 Standard 1.3.6 provides that “[n]ominations received after nomination deadline should be scheduled after the nominations received before the nomination deadline.” EPNG states that the requested variance gives EPNG the option to adjust a HEEN nomination after the nomination deadline to match a corresponding opposite change to a shipper’s flowing gas nomination. EPNG states that it previously has been granted this variance, and that it continues to operate on the same basis on which the variance previously was granted.⁵⁰ For good cause shown, we grant EPNG an extension of this variance.

C. Extensions of Time

1. Limited Extensions of Time to Implement Certain Requirements

a. Black Hills Shoshone Pipeline, LLC

32. Black Hills Shoshone Pipeline, LLC (Shoshone Pipeline) requests an extension of time until May 31, 2020 to implement certain NAESB WGQ Version 3.1 Standards.⁵¹ Shoshone Pipeline states that Black Hills Energy Services Company (BHSC) currently manages the Shoshone Pipeline transportation services with software from the vendor Quorum. Shoshone Pipeline explains that BHSC has been using the Quorum Pipeline Transaction Management (QPTM) for over 10 years. Shoshone Pipeline states that BHSC and Quorum are currently engaged in an integration project of additional assets to QPTM. Shoshone Pipeline asserts that prior to the implementation of changes to QPTM, Shoshone Pipeline will be unable to implement certain Standards until its integration project has been completed, which Shoshone Pipeline states is expected to be May 31, 2020.

33. We find that Shoshone Pipeline has provided good cause for the Commission to grant its request for an extension of time. Shoshone Pipeline is requesting an extension of time only to accommodate delays in establishing its electronic processing systems. Therefore, we find that granting the requested extension of time to implement the requirements set forth in NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80,

⁵⁰ *Id.* P 46.

⁵¹ NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106.

and 4.3.106 as they apply to electronic processes,⁵² until May 31, 2020, will not affect business functionality or adversely impact Shoshone Pipeline's customers. However, consistent with Commission precedent, we clarify that the extension of time granted herein does not apply to the requirements set forth in NAESB WGQ Version 3.1 Standard 1.4.1 related to the posting of proprietary location codes⁵³ on the pipelines' Internet website.⁵⁴ Accordingly, we will require Shoshone Pipeline to file revised tariff records within 20 days of the date of issuance of this order to include NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled "Standards for which a Waiver or Extension of Time to Comply has been granted," and state "extensions of time for NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 until May 31, 2020 in light of a contemplated integration project."

b. Cheniere Corpus Christi Pipeline, L.P., Cheniere Creole Trail Pipeline, L.P.

34. Cheniere Corpus Christi Pipeline, L.P. (Corpus Christi) and Cheniere Creole Trail Pipeline, L.P. (Creole Trail) request an extension of time until November 1, 2019 to implement certain NAESB WGQ Version 3.1 Standards.⁵⁵ Corpus Christi and Creole Trail state that they currently manage their transaction management system with software from a third-party vendor, including implementation of NAESB WGQ Standards. Corpus Christi and Creole Trail explain that they are currently engaged in a system upgrade to implement certain of the NAESB WGQ Version 3.1 Standards and other non-related system changes. Corpus Christi and Creole Trail assert that it is anticipated that the system upgrade will be ready no later than November 1, 2019. Corpus Christi and Creole Trail state that they are committed to working closely with their respective

⁵² See *Destin Pipeline Co., L.L.C.*, 160 FERC ¶ 61,116, at P 7 (2017) (*Destin*) (where the Commission granted the requested extension of time until August 26, 2017, to comply with certain of the NAESB WGQ Version 3.0 Standards relating to electronic processing).

⁵³ Proprietary location codes are used by interstate pipelines to identify active interconnection points, referenced in their Form No. 549B, Index of Customers, through the website postings.

⁵⁴ See *Equitrans L.P.*, 153 FERC ¶ 61,320, at PP 10-13 (2015) (*Equitrans*) (where the Commission denied the requested extension of time to implement the requirements for the NAESB WGQ Version 3.0 Standards related to the posting of proprietary location codes on the pipeline's Internet website).

⁵⁵ NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106.

shippers, interconnecting parties, and EDI trading partners to address any concerns that may arise during this implementation time period.

35. We find that Corpus Christi and Creole Trail have provided good cause for the Commission to grant their requests for extension of time. The pipelines request extensions of time only to accommodate delays in establishing their electronic processing systems. Therefore, we find that granting the requested extensions of time to implement the requirements set forth in NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 as they apply to electronic processes,⁵⁶ until November 1, 2019, will not affect business functionality or adversely impact their respective customers. However, consistent with Commission precedent, we clarify that the extensions of time granted herein do not apply to the requirements set forth in NAESB WGQ Version 3.1 Standard 1.4.1 related to the posting of proprietary location codes on the pipelines' Internet website.⁵⁷ Accordingly, we will require Corpus Christi and Creole Trail to file revised tariff records within 20 days of the date of issuance of this order to include NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled "Standards for which Waiver or Extension of Time to Comply have been granted;" and state "extensions of time until November 1, 2019 in light of a contemplated system upgrade."

c. American Midstream (AlaTenn), LLC, American Midstream (Midla), LLC, Destin Pipeline Company, L.L.C., High Point Gas Transmission, LLC, Trans-Union Interstate Pipeline, L.P.

36. American Midstream (AlaTenn), LLC, American Midstream (Midla), LLC, Destin Pipeline Company, L.L.C., High Point Gas Transmission, LLC, and Trans-Union Interstate Pipeline, L.P. (Trans-Union) request an extension of time until May 31, 2020 to implement certain NAESB WGQ Version 3.1 Standards.⁵⁸ The pipelines state that they currently manage their respective gas information management system with the QPTM software from the vendor Quorum, including implementation of NAESB Standards. The pipelines assert that they are currently engaged in a system upgrade, and that prior to the

⁵⁶ See *Tallgrass Interstate Gas Transmission, LLC*, 167 FERC ¶ 61,041, at P 7 (2019) (*Tallgrass*) (where the Commission granted the requested extension of time of certain of the NAESB WGQ Version 3.1 Standards relating to electronic processing until December 31, 2020, in light of a contemplated transition to a new gas information management system).

⁵⁷ See *Equitrans*, 153 FERC ¶ 61,320 at PP 10-13.

⁵⁸ NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106.

implementation of changes to QPTM, the pipelines will be unable to implement certain Standards until their system upgrade has been completed, which the pipelines state is expected to be May 31, 2020.

37. We find that the referenced pipelines have provided good cause for the Commission to grant their request for an extension of time. The pipelines are requesting an extension of time only to accommodate delays in establishing their electronic processing systems. Therefore, we find that granting the requested extension of time to implement the requirements set forth in NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 as they apply to electronic processes,⁵⁹ until May 31, 2020, will not affect business functionality or adversely impact the pipelines' respective customers. However, consistent with Commission precedent, we clarify that the extension of time granted herein does not apply to the requirements set forth in NAESB WGQ Version 3.1 Standard 1.4.1 related to the posting of proprietary location codes on the pipelines' Internet website.⁶⁰ Accordingly, we will require the referenced pipelines to file revised tariff records within 20 days of the date of issuance of this order to include NAESB WGQ Version 3.1 Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in a section titled "Standards for which Waiver or Extension of Time to Comply have been granted," and "Standards for which Extension of Time to Comply have been granted," respectively, and state "extensions of time until May 31, 2020 in light of a contemplated system upgrade."

d. Stingray Pipeline Company, L.L.C.

38. Stingray Pipeline Company, L.L.C. (Stingray) requests an extension of time until November 1, 2019 to implement certain NAESB WGQ Version 3.1 Standards.⁶¹ Stingray states that it currently manages its gas information management system with the QPTM software from the vendor Quorum. Stingray asserts that it is currently engaged in a system upgrade, and that prior to the implementation of changes to QPTM, Stingray will be unable to implement certain Standards until its system upgrade has been completed, which Stingray states is expected to be November 1, 2019.

39. We find that Stingray has provided good cause for the Commission to grant its request for an extension of time. Stingray is requesting an extension of time only to accommodate delays in establishing its electronic processing systems. Therefore, we find that granting the requested extension of time to implement the requirements set forth in NAESB WGQ Version 3.1 Standards 1.3.82, 4.3.80, and 4.3.106 as they apply to

⁵⁹ See *Destin*, 160 FERC ¶ 61,116 at P 7.

⁶⁰ See *Equitrans*, 153 FERC ¶ 61,320 at PP 10-13.

⁶¹ NAESB WGQ Version 3.1 Standards 1.3.82, 4.3.80, and 4.3.106.

electronic processes,⁶² until November 1, 2019, will not affect business functionality or adversely impact Stingray's customers. Accordingly, we will require Stingray to file revised tariff records within 20 days of the date of issuance of this order to include NAESB WGQ Version 3.1 Standards 1.3.82, 4.3.80, and 4.3.106 in the section titled "Standards for which Waiver or Extension of Time to Comply have been granted;" and state "extensions of time of NAESB WGQ Version 3.1 Standards 1.3.82, 4.3.80, and 4.3.106 until November 1, 2019 in light of a contemplated system upgrade."

2. Extensions of Time to Implement EDI, EDM, and Internet Electronic Transport Requirements

40. Sixty-four pipelines request an extension of time to implement NAESB WGQ Version 3.1 Standards relating to various EDI, EDM, and Internet Electronic Transport (IET).⁶³ requirements until such time as the pipelines are requested by a Part 284, open access customer to provide such electronic data services.⁶⁴ Generally, the referenced

⁶² See *Tallgrass*, 167 FERC ¶ 61,041 at P 7.

⁶³ IET refers to electronic transaction messaging standards which, in concert with Quadrant-specific EDM (QEDMs), enable NAESB parties to securely and reliably exchange transactions over the Internet.

⁶⁴ PGPipeline, LLC (PGPipeline), Greylock Pipeline, Gulf Shore, USG Pipeline, B-R, Gulf Crossing Pipeline Company LLC (Gulf Crossing), Boardwalk Storage Company, LLC (Boardwalk Storage), Northern, DECG, Gulf South, Kern River Gas Transmission Company (Kern River), Shoshone Pipeline, Texas Gas, Pine Needle LNG Company, LLC (Pine Needle), Transco, Chandeaur Pipe Line, LLC (Chandeaur), Sabine Pipe Line LLC (Sabine), Golden Triangle Storage, Inc. (GTS), Southern Star Central Gas Pipeline, Inc. (Southern Star), Bobcat Gas Storage (Bobcat), East Tennessee Natural Gas, LLC (East Tennessee), Egan Hub Storage, LLC (Egan Hub), Questar Southern Trails Pipeline Company (Southern Trails), Stingray, White River Hub, LLC (White River), Dominion Energy Questar Pipeline, LLC, Ozark Gas Transmission, L.L.C. (Ozark), East Cheyenne Gas Storage, LLC (East Cheyenne), Steckman Ridge, LP (Steckman), Saltville Gas Storage Company L.L.C. (Saltville), Bluewater Gas Storage, LLC (Bluewater), MarkWest Pioneer, L.L.C. (MarkWest Pioneer), SG Resources Mississippi, L.L.C. (SG Resources), Big Sandy Pipeline, LLC (Big Sandy), Cimarron River Pipeline, LLC (Cimarron), Dauphin Island Gathering Partners (Dauphin Island), WBI Energy Transmission, Inc. (WBI Energy), Northwest Pipeline LLC (Northwest), Algonquin Gas Transmission, LLC (Algonquin), NEXUS Gas Transmission, LLC (NEXUS), Tennessee Gas Pipeline Company, L.L.C. (Tennessee), Maritimes & Northeast Pipeline, L.L.C. (Maritimes), Gulfstream Natural Gas System, L.L.C. (Gulfstream), Southeast Supply Header, LLC (SESH), Texas Eastern Transmission, LP (Texas Eastern), Pine Prairie Energy Center, LLC (Pine Prairie), Iroquois Gas

pipelines state that the Commission previously has granted an extension of time to comply with these Standards, and that they continue to operate on the same basis that the Commission relied on when it previously granted extensions for compliance with these Standards.⁶⁵ For good cause shown, we grant the referenced interstate natural gas pipelines an extension of time⁶⁶ to comply with EDI, EDM, and IET transactions, as requested.⁶⁷ The extensions of time are limited to the NAESB WGQ Version 3.1

Transmission System, L.P. (Iroquois), PGE, KPC Pipeline, LLC (KPC), NGO Transmission, Inc., (NGO Transmission), Spire Storage West LLC (Spire Storage), Wyckoff Gas Storage Company, LLC (Wyckoff), Garden Banks Gas Pipeline, LLC (Garden Banks), Mississippi Canyon Gas Pipeline, L.L.C. (Mississippi Canyon), Nautilus Pipeline Company, L.L.C. (Nautilus), DBM Pipeline, LLC (DBM Pipeline), Rendezvous, MarkWest New Mexico, L.L.C. (MarkWest New Mexico), Total Peaking, WestGas, NG LNG, Sabal Trail Transmission, LLC (Sabal Trail), Dominion Energy Overthrust Pipeline, LLC (DEOP), and Western Gas Interstate Company (Western).

⁶⁵ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at PP 57-58; *FECAM*, 158 FERC ¶ 61,113 at P 29; *Gulf Shore*, 155 FERC ¶ 61,177 at P 8.

⁶⁶ Gulf Crossing, Boardwalk Storage, Northern, DECG, Gulf South, Kern River, Shoshone Pipeline, Texas Gas, Pine Needle, Transco, Chandeleur, Sabine, and Sabal Trail are granted an extension of time until 60 days after they receive a request from a customer to utilize such standards and datasets. Gulf Shore, GTS, Southern Star, Bobcat, East Tennessee, Egan Hub, Southern Trails, Stingray, White River, Ozark, East Cheyenne, Steckman, Saltville, Bluewater, MarkWest Pioneer, SG Resources, Big Sandy, Cimarron, Dauphin Island, WBI Energy, Northwest, Algonquin, NEXUS, Tennessee, Maritimes, Gulfstream, SESH, Texas Eastern, Pine Prairie, Iroquois, PGE, KPC, NGO Transmission, Spire Storage, DEOP, and Wyckoff are granted an extension of time until 90 days after they receive a request from a customer to offer transactions or data via their websites. Nautilus, Garden Banks, and Mississippi Canyon are granted an extension of time until 120 days after they receive a request from a customer to implement the requested standards. PGPipeline is granted an extension of time until 150 days after it receives a request from a customer to utilize such datasets. DBM Pipeline, Rendezvous, MarkWest New Mexico, Total Peaking, and WestGas are granted an extension of time until 180 days after they receive a request from a customer to implement the requested standards. NG LNG is granted an extension of time until the LNG storage facility becomes physically connected to the interstate pipeline grid.

⁶⁷ NAESB WGQ Version 3.1 Standards 0.3.1, 0.3.22, 0.3.23, 0.3.25 through 0.3.29, 0.4.1 through 0.4.4, 1.3.3, 1.3.4, 1.3.9, 1.3.11, 1.3.13, 1.3.20 through 1.3.25, 1.3.27, 1.3.36 through 1.3.38, 1.3.40 through 1.3.46, 1.3.48, 1.3.51, 1.3.53, 1.3.55, 1.3.56,

Standards promulgated by Order No. 587-Y,⁶⁸ and will be in effect until a Part 284 customer requests the referenced pipeline to offer the EDI, EDM, and IET transactions or data via its website. Further, the referenced pipelines must be fully compliant with the NAESB WGQ Version 3.1 Standards as it relates to proprietary location codes.⁶⁹

41. However, we will deny Gulf Shore's request for extension of time to comply with NAESB WGQ Version 3.1 Standard 1.3.39. Standard 1.3.39 provides that "[b]umping that affects transactions on multiple [TSPs] should occur at grid-wide synchronization times only." However, Gulf Shore does not explain whether its tariff provides for an enhanced nominations service where firm shippers have the right to bump interruptible service during additional nomination cycles occurring at times other than the pipeline's standard nomination cycles. Further, NAESB WGQ Version 3.1 Standard 1.3.39 does not appear to require the provision of data using EDI/EDM and Interactive website

1.3.58, 1.3.62, 1.3.65, 1.3.70, 1.3.72 through 1.3.75, 1.3.79, 1.3.81, 1.3.82 (as it relates to B-R's, PGE's, USG Pipeline's, and Rendezvous' customer activities website requirements), 1.4.1 through 1.4.7, 2.3.1, 2.3.5, 2.3.6, 2.3.11 through 2.3.14, 2.3.21, 2.3.25, 2.3.32, 2.3.40 through 2.3.44, 2.3.46 (as it relates to Greylock Pipeline's, Gulf Shore's, and WestGas' customer activities website requirements), 2.3.51 through 2.3.53, 2.3.65, 2.3.66, 2.4.1 through 2.4.11, 2.4.17, 2.4.18, 3.3.3 through 3.3.5, 3.3.7, 3.3.8, 3.3.10 through 3.3.13, 3.3.15, 3.3.22 through 3.3.24, 3.3.26, 3.4.1 through 3.4.4, 4.3.1 through 4.3.3, 4.3.16 through 4.3.18, 4.3.20, 4.3.22, 4.3.24 through 4.3.28, 4.3.30 through 4.3.36, 4.3.38, 4.3.40 through 4.3.50, 4.3.52 through 4.3.55, 4.3.57, 4.3.58, 4.3.60 through 4.3.62, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.87, 4.3.89 through 4.3.95, 4.3.99 through 4.3.106, 5.3.10 through 5.3.14, 5.3.15 and 5.3.16 (as it relates to Total Peaking's customer activities website requirements), 5.3.18, 5.3.20, 5.3.24, 5.3.26, 5.3.31 through 5.3.42, 5.3.48, 5.3.50, 5.3.54, 5.3.70 through 5.3.72, 5.4.14 through 5.4.17, 5.4.20 through 5.4.27, 10.3.1, 10.3.3 through 10.3.12, and 10.3.14 through 10.3.27.

⁶⁸ See *B-R Pipeline Co.*, 128 FERC ¶ 61,126, at P 6 (2009) (each time the Commission adopts new versions of the standards, a pipeline seeking to retain an existing waiver must request a waiver of the new standards).

⁶⁹ See *Equitrans*, 153 FERC ¶ 61,320 at PP 9-13 (where the Commission explained that compliance with the requirements set forth in the Standards as they apply to the posting on a pipeline's Internet website of information on proprietary location codes does not require an interstate pipeline to incur substantial additional software upgrade costs, and enables the Commission and customers to continue to identify active interconnection points, referenced in their Form No. 549B, Index of Customers, through the website postings).

requirements. Nevertheless, to the extent the standard is related to EDI/EDM, the standard includes business practices that may be implemented without the use of EDI/EDM. As such, Gulf Shore has not supported its request for extension of time to comply. Accordingly, Gulf Shore is directed to file revised tariff records within 20 days from the date of issuance of this order to remove NAESB WGQ Version 3.1 Standard 1.3.39 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted,” and include NAESB WGQ Version 3.1 Standard 1.3.39 in its tariff. This finding is without prejudice to Gulf Shore submitting a revised extension request that provides more support for its request. Such a request should detail exactly what provisions would require more time to comply with, along with a description of any obstacles it sees to compliance and the timeline for resolving these issues.

42. Nine pipelines⁷⁰ request an extension of time to comply with NAESB WGQ Version 3.1 Standard 4.3.23 relating to an Informational Postings website. We will deny the referenced pipelines’ request for extension of time to comply with Standard 4.3.23 relating to an Informational Postings website. Standard 4.3.23 provides in relevant part that “[TSPs] should establish an Informational Postings [website] accessible via the Internet, which contains [categories and subcategories].” This relevant part of NAESB WGQ Version 3.1 Standard 4.3.23 does not appear to require the provision of data using EDI/EDM and Interactive website requirements. Nevertheless, to the extent this relevant part of the standard is related to EDI/EDM, the standard includes business practices that may be implemented without the use of EDI/EDM. Moreover, the referenced pipelines have each established an Informational Postings website accessible via the Internet, which contains categories and subcategories, as provided in NAESB WGQ Version 3.1 Standard 4.3.23. As such, the referenced pipelines have not supported their requests for extension of time to comply. Accordingly, the referenced pipelines are directed to file revised tariff records within 20 days from the date of issuance of this order to remove NAESB WGQ Version 3.1 Standard 4.3.23 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;,” and include NAESB WGQ Version 3.1 Standard 4.3.23 in their respective tariffs. This finding is without prejudice to the referenced pipelines submitting a revised extension of time request that provides

⁷⁰ PGE, NGO Transmission, Rendezvous, DBM Pipeline, KPC, MarkWest New Mexico, Western, MarkWest Pioneer, and Shoshone Pipeline.

more support for their request. Such a request should detail exactly what provisions would require more time to comply with, along with a description of any obstacles the pipelines see to compliance and the timeline for resolving these issues.

3. Extensions of Time of Requirement to Support Index-Based Capacity Releases

43. Eight pipelines⁷¹ request a continuation of their extensions of time of NAESB WGQ Standard 5.3.65, which is a business practice standard that requires a pipeline to support indexed-based capacity releases. The requesting pipelines assert that there are no representative index references for their respective pipeline systems, and that shippers are unlikely to request such releases. Consistent with Commission precedent,⁷² and the requesting pipelines' contention that there are no representative index references for their respective pipeline systems, and that shippers are unlikely to request such releases, we find it reasonable to not require the requesting pipelines to acquire and pay for the licenses necessary to support indices at this time. Thus, we grant the referenced pipelines an extension of time to comply with NAESB WGQ Version 3.1 Standard 5.3.65 and its requirement to support at least two non-public price index references until a releasing shipper presents an index-based capacity release. If such a request is made, the referenced pipelines will need to pay whatever licensing costs are necessary to cover their processing of the release.⁷³

44. We also grant PGPipeline, PGE, and Spire Storage an extension of time to comply with NAESB WGQ Version 3.1 Standards 5.3.62 through 5.3.64, and 5.3.66 through 5.3.69 and their requirement to support at least two non-public price index references until a releasing shipper presents an index-based capacity release.

⁷¹ USG Pipeline, Trans-Union, PGPipeline, Total Peaking, MoGas, B-R, PGE, and Spire Storage.

⁷² *MoGas*, 157 FERC ¶ 61,036 at PP 10-11.

⁷³ The requesting pipelines will not have to support more than two indices at any time, because any subsequent releasing shippers will be able to avail themselves of the index or indices currently supported by the requesting pipelines.

4. Extensions of Time of Pooling Standards

45. Seven pipelines⁷⁴ request continuation of their respective extensions of time of the NAESB WGQ Standards governing pooling.⁷⁵ The referenced pipelines state that the Commission has granted such extensions of time in the past.⁷⁶ We grant the referenced pipelines an extension of time to comply with the NAESB WGQ Version 3.1 Standards relating to pooling⁷⁷ until 180 days following their receipt of a request from a Part 284 customer, at which time the referenced pipelines must commence compliance with the NAESB WGQ Version 3.1 Standards relating to pooling.

D. Extensions of Time of Title Transfer Tracking Standards

46. USG Pipeline requests an extension of time to comply with NAESB WGQ Version 3.1 title transfer tracking related Standards. In support of its request, USG Pipeline explains that it is a small, two-customer pipeline and the burden of compliance would be substantial and would greatly exceed the benefits that might allegedly accrue. Given USG Pipeline's operational, customer, and market circumstances, we find that granting an extension of time to comply with the NAESB WGQ Version 3.1 title transfer tracking related Standards is appropriate. We grant USG Pipeline an extension of time to implement such Standards until such time as it receives a request from a Part 284 customer to implement the NAESB WGQ Version 3.1 title transfer tracking related Standards.⁷⁸

47. B-R requests an extension of time to comply with NAESB WGQ Version 3.1 title transfer tracking related Standards. In support of its request, B-R explains that it only serves a single, affiliated customer that B-R asserts has a Part 157 agreement and that, at this time, it does not serve, nor has it ever served, any customers under its Part 284 tariff. Given B-R's operational, customer, and market circumstances, we find that granting an

⁷⁴ Young Gas, MoGas, Blue Lake Gas Storage Company, ANR Storage Company, NG LNG, PGPipeline, and WestGas.

⁷⁵ Pooling is: (1) the aggregation of gas from multiple physical and/or logical points to a single physical or logical point, and/or (2) the dis-aggregation of gas from a single physical or logical point to multiple physical and/or logical points.

⁷⁶ *MoGas*, 157 FERC ¶ 61,036 at P 8; Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 14.

⁷⁷ NAESB WGQ Version 3.1 Standards 1.3.17, 1.3.18, and 3.3.6.

⁷⁸ NAESB WGQ Version 3.1 Standards 1.3.64 through 1.3.77.

extension of time to comply with the NAESB WGQ Version 3.1 title transfer tracking related Standards is appropriate. We grant B-R an extension of time to implement such Standards until such time as it receives a request from a Part 284 customer to implement the NAESB WGQ Version 3.1 title transfer tracking related Standards.⁷⁹

48. WBI Energy requests an extension of time to comply with NAESB WGQ Version 3.1 title transfer tracking related Standard 1.3.64. In support of its request, WBI Energy explains that it is unable to accommodate title transfer tracking services and no customer has requested these services. Given WBI Energy's operational and customer circumstances, we find that granting an extension of time to comply with Standard 1.3.64 is appropriate. We grant WBI Energy an extension of time to implement Standard 1.3.64 until such time as it receives a request from a Part 284 customer to implement NAESB WGQ Version 3.1 Standard 1.3.64.

49. Discovery Gas Transmission LLC (Discovery) requests an extension of time to comply with NAESB WGQ Version 3.1 title transfer tracking related Standards, and a waiver of the electronic components of the interactive website requirements. In support of its request, Discovery explains that it is a small pipeline with a limited physical footprint. Further, Discovery asserts that price formation does not occur on Discovery's system, because the commingled gas stream is not fungible with pipeline-quality gas typically found in onshore interstate natural gas pipelines, and no customer conducts multiple transactions or trades throughout the entirety of Discovery's pipeline system. Discovery further asserts that all of its jurisdictional transportation revenue is collected from usage-based rates, and thus no capacity release occurs on Discovery's system. In addition, Discovery states that its proprietary gas management system (i.e., GasKit) is not fully NAESB compliant. Discovery, however, asserts that GasKit is sufficiently robust and user-friendly so that customers are able to transact their transportation business as needed. Discovery further states that updates occur periodically to enhance transactional experience and business offerings. Lastly, Discovery asserts that the data elements associated with conducting electronic communications via EDI and all datasets have not been requested for use by any of Discovery's shippers.

50. Given Discovery's operational, customer, and market circumstances and the information presented, we find that granting an extension of time to comply with the NAESB WGQ Version 3.1 title transfer tracking related Standards is appropriate. We grant Discovery an extension of time to implement such Standards until 90 days after it receives a request from a Part 284 customer to implement the NAESB WGQ Version 3.1

⁷⁹ NAESB WGQ Version 3.1 Standards 1.3.64, 1.3.66 through 1.3.69, 1.3.71, 1.3.76, and 1.3.77.

title transfer tracking related Standards.⁸⁰ Further, for good cause shown, we grant Discovery its requested waiver of the electronic components of the interactive website requirements.⁸¹

51. NG LNG requests an extension of time to comply with NAESB WGQ Version 3.1 title transfer tracking related Standards. In support of its request, NG LNG explains that it operates an LNG storage facility, which NG LNG states is not physically connected to the interstate natural gas pipeline grid. Given NG LNG's operational and market circumstances, we find that granting an extension of time to comply with the NAESB WGQ Version 3.1 title transfer tracking related Standards is appropriate. We grant NG LNG an extension of time to implement such Standards until the LNG storage facility becomes physically connected to the interstate natural gas pipeline grid.⁸²

E. Other Waivers and Extensions of Time Based on Market and Operational Circumstances

1. PGPipeline

52. PGPipeline requests a continuation of its extension of time to comply with NAESB WGQ Standard 1.3.6, which provides that "[n]ominations received after nomination deadline should be scheduled after the nominations received before the nomination deadline." In support of its request, PGPipeline explains that it is a small, one-customer pipeline and that the burden of compliance would be substantial. PGPipeline further states that it previously has been granted this extension of time, and that it continues to operate on the same basis on which the extension of time was granted.⁸³ Given PGPipeline's operational, customer, and market circumstances, we find

⁸⁰ NAESB WGQ Version 3.1 Standards 1.3.17, 1.3.18, 1.3.64 through 1.3.74, 1.3.76, and 1.3.77.

⁸¹ NAESB WGQ Version 3.1 Standards 0.3.23, 0.3.26, 0.3.27, 0.3.28, 0.4.1 through 0.4.4, 1.3.48, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.79, 1.3.81, 1.4.1 through 1.4.7, 2.3.32, 2.3.51 through 2.3.53, 2.3.65, 2.3.66, 2.4.1 through 2.4.11, 2.4.17, 2.4.18, 3.4.1 through 3.4.4, 4.3.42 through 4.3.50, 4.3.52 through 4.3.55, 4.3.57, 4.3.58, 4.3.60 through 4.3.62, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.87, 4.3.105, 5.3.42, 5.3.72, 5.4.14 through 5.4.17, and 5.4.20 through 5.4.27.

⁸² NAESB WGQ Version 3.1 Standards 1.3.64, 1.3.66 through 1.3.69, 1.3.71, 1.3.72, and 1.3.74 through 1.3.77.

⁸³ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 80.

that granting PGPipeline a continuation of its requested extension of time to comply with NAESB WGQ Version 3.1 Standard 1.3.6 is appropriate. Thus, we grant PGPipeline a continuation of its requested extension of time to implement such Standard until such time as it receives a request from a Part 284 customer to implement the NAESB WGQ Version 3.1 Standard.

2. NG LNG

53. NG LNG requests continuation of waivers of various NAESB WGQ Standards, given its unique operational and market circumstances.⁸⁴ NG LNG explains that it operates an LNG storage facility and is not physically connected to the interstate natural gas pipeline grid. NG LNG asserts that the Commission previously has granted NG LNG numerous waivers from complying with the NAESB WGQ Standards.⁸⁵ Given NG LNG's operational and market circumstances, we find that granting NG LNG a continuation of its requested waiver to comply with the requested NAESB WGQ Version 3.1 Standards is appropriate.⁸⁶

54. Further, NG LNG requests a continuation of its extension of time of NAESB WGQ Standard 5.3.2 governing the timeline for the processing of biddable and non-biddable firm capacity releases. NG LNG states that the Commission previously has

⁸⁴ NG LNG requests waiver of NAESB WGQ Standards related to electronic communications, scheduling equality, flexible points, and segmentation.

⁸⁵ NG LNG states that the Commission previously granted waiver of the nomination Standards to its predecessor company, Algonquin LNG. *See Algonquin LNG*, 86 FERC ¶ 61,285 (finding that the nominations Standards are not applicable to LNG being transported by truck, because those Standards are intended to standardize nominations and scheduling across the interstate pipeline grid); *Algonquin*, 83 FERC at 61,601 (where the Commission granted waiver of the nominations Standards based on Algonquin's assertion that such intra-day nominations are not possible for deliveries of LNG by truck to storage or from storage to trucks, because the LNG trucking load and unloading facilities can only accommodate two trucks per day).

⁸⁶ NAESB WGQ Version 3.1 Standards 1.3.22, 1.3.24, 1.3.25, 1.3.27, 1.3.32, 1.3.35 through 1.3.46, 1.3.48, 1.3.51, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 2.3.1 through 2.3.6, 2.3.8, 2.3.10 through 2.3.23, 2.3.25, 2.3.27 through 2.3.31, 2.3.40 through 2.3.48, 2.3.50 through 2.3.64, 3.3.22 through 3.3.24, 3.3.26, 4.3.22, 4.3.23, 4.3.25, 5.3.20 through 5.3.22, 5.3.24, 5.3.31 through 5.3.42, 5.3.44 through 5.3.46, 5.3.48, 5.3.50, 5.3.54, and 5.4.24 through 5.4.27.

granted it such extension of time,⁸⁷ and that it offers firm LNG storage service under Rate Schedule FST-LG. For good cause shown, we grant NG LNG a continuation of its requested extension of time to implement such Standard until a Part 284 customer requests NG LNG to commence compliance with NAESB WGQ Version 3.1 Standard 5.3.2. NG LNG must comply with the capacity release Standard if, in the future, the LNG storage facility becomes physically connected to the interstate natural gas pipeline grid, and NG LNG provides firm transportation service.

3. Portland General Electric Company

55. PGE requests extensions of time of various NAESB WGQ Standards, given its unique operational and market circumstances. PGE explains that it owns a percentage of a 17-mile interstate pipeline system extending from a point near Kelso, Washington to a terminus point near Port Westward, Oregon. Given PGE's operational and market circumstances, we find that granting the requested extensions of time of the specified NAESB WGQ Version 3.1 Standards is appropriate.⁸⁸

a. Extensions of Time of Standards 6.3.1, 6.3.3, and 6.3.5

56. PGE requests extensions of time of NAESB WGQ Version 3.1 Standards 6.3.1 (i.e., the NAESB Base Contract for Sale and Purchase of Natural Gas), 6.3.3 (i.e., EDI Trading Partner Agreement), and 6.3.5 (i.e., WGQ Master Agreement for Purchase, Sale or Exchange of Liquid Hydrocarbons). As part of the NAESB WGQ Version 3.1 package of standards, NAESB revised Standard 6.3.1 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. Further, NAESB adopted modifications to the cover page of Standard 6.3.1 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.

57. We will deny the requested extensions of time of NAESB WGQ Version 3.1 Standards 6.3.1, 6.3.3, and 6.3.5, because these Standards are not required to be incorporated by reference by Order No. 587-Y. As explained in Order No. 587-Y, in the Version 3.1 Notice of Proposed Rulemaking (NOPR), the Commission proposed to incorporate by reference, in its regulations, the NAESB WGQ Version 3.1 Standards, with the exception of NAESB's standards specifying, *inter alia*, the terms of optional

⁸⁷ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 24.

⁸⁸ NAESB WGQ Version 3.1 Standards 2.3.54 through 2.3.64.

model contracts.⁸⁹ Specifically, in the Version 3.1 NOPR, the Commission proposed to continue its past practice⁹⁰ of not incorporating by reference into its regulations any optional model contracts, because the Commission does not require the use of these contracts. Consistent with the Version 3.1 NOPR, in Order No. 587-Y, the Commission amended Part 284 of its regulations to incorporate by reference the NAESB WGQ Version 3.1 Standards, with the exception of, *inter alia*, the optional model contracts. Accordingly, PGE is directed to file revised tariff records within 20 days from the date of issuance of this order to remove NAESB WGQ Version 3.1 Standards 6.3.1, 6.3.3, and 6.3.5 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted.”

4. Venice Gathering System, L.L.C.

58. Venice Gathering System, L.L.C. (Venice) requests continuation of its extension of time to comply with certain NAESB WGQ capacity release related Standards. In support of its request, Venice states that the Commission previously has granted it such extension of time.⁹¹ Venice further states that it is a small pipeline with declining throughput. In addition, Venice states that, although it offers capacity release for shippers under Rate Schedule FTS-1, there are no current shippers who are interested in service under the firm rate schedule for which Venice performs the business function, and it does not anticipate receiving any requests for capacity release on Venice’s system with respect to that service in the future. For good cause shown, we grant Venice a continuation of its extension of time until 60 days following its receipt of a request from a customer until it must commence compliance with the requested NAESB WGQ Version 3.1 capacity release related Standards.⁹²

⁸⁹ Order No. 587-Y, 165 FERC ¶ 61,109 at PP 21-22 (citing *Standards for Business Practices of Interstate Natural Gas Pipelines*, Notice of Proposed Rulemaking, 164 FERC ¶ 61,125, at n.1 & P 16 (2018) (Version 3.1 NOPR).

⁹⁰ See, e.g., *Standards for Business Practices of Interstate Natural Gas Pipelines*, Notice of Proposed Rulemaking, 152 FERC ¶ 61,055, at P 20 (2015).

⁹¹ Order on Filings in Compliance with Order Nos. 587-W and 809, 154 FERC ¶ 61,250 at P 84.

⁹² NAESB WGQ Version 3.1 Standards 5.3.44, 5.3.45, 5.3.48, 5.3.49, 5.3.53, 5.3.54, 5.3.56, 5.3.73, 5.4.14 through 5.4.17, 5.4.20, and 5.4.23 through 5.4.27.

F. Compliance Filing Deficiencies

59. Pipelines identified as having failed to comply with various aspects of the Standards or whose waiver or extension of time requests were denied are directed to file revised tariff records within 20 days from the date of issuance of this order. To help assist the pipelines, in Appendix A we have summarized the compliance obligations of all the pipelines subject to this order.⁹³

The Commission orders:

(A) All the tariff records filed by the interstate natural gas pipelines listed in the caption of this order are hereby accepted to be effective August 1, 2019, as proposed, subject to the applicable conditions discussed in the body of this order and summarized in Appendix A to this order.

(B) Extensions of time and/or waivers are hereby granted in some instances and denied in others, as discussed in the body of this order, and the extensions of time and/or waivers granted herein are limited to the NAESB WGQ's Version 3.1 Standards promulgated by Order No. 587-Y. Those natural gas pipelines whose waiver and extensions of time requests are denied in this order are directed to update their tariffs within 20 days from the date of issuance of this order to reinstate all waivers and extensions denied.

(C) Consistent with the directives in this order, any pipeline subject to a directive to make a compliance filing must make that compliance filing within 20 days from the date of issuance of this order to revise its tariff to comply with this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

⁹³ See *supra* n.2.

Appendix A*Summary of Compliance Obligations*

Company Name	Compliance Obligation
Alliance Pipeline L.P.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (3) Remove Standard 1.3.47
American Midstream (AlaTenn), LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (3) Remove the asterisk [*] from Standard 5.4.24 in 46-GT&C Section 36, Tariff Update (NAESB Standards); (4) Remove Standards 1.3.82, 4.3.80, and 4.3.106 from the section titled “Standards Incorporated by Reference;” (5) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in a section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (6) State “extensions of time until May 31, 2020 in light of a contemplated system upgrade”
American Midstream (Midla), LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (3) Remove Standards 1.3.82, 4.3.80, and 4.3.106 from the section titled “Standards Incorporated by Reference;” (4) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in a section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (5) State “extensions of time until May 31, 2020 in light of a contemplated system upgrade”
Bison Pipeline LLC	Either list Standard 1.3.73 in the section titled “Standards Incorporated by Reference: – Nominations Related Standards;” or include the text of the Standard

Company Name	Compliance Obligation
Black Hills Shoshone Pipeline, LLC	(1) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled “Standards for which a Waiver or Extension of Time to Comply has been granted;” (2) State “extensions of time for standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 until May 31, 2020 in light of a contemplated integration project;” (3) Remove Standard 4.3.80 from the section titled “Standards Incorporated by Reference;” (4) Remove the reference to NAESB WGQ Versions 2.1 and 3.0; (5) Remove the reference “and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Part 7.35, GTC NAESB; (6) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (7) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (8) Remove the asterisks [*] from the Standards, Datasets, and Principles in Part 7.35, GTC NAESB; (9) Remove Standard 4.3.23 from the section titled “Standards for which a Waiver or Extension of Time to Comply has been granted;” (10) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;” or include the text of the Standard
Bluewater Gas Storage, LLC	(1) Either list Definition 0.2.5 in the section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (2) Either list Standards 4.2.11, 4.2.20, and 5.2.2 in the section titled “Standards Incorporated by Reference;” or include the text of the Standards
Boardwalk Storage Company, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition
B-R Pipeline Company	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: –

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	Definition;” or include the text of the Definition; (3) Remove Standards 4.3.23 (as it relates to gas quality posting), and 4.3.89 through 4.3.93 from the section titled “Standards for which a Waiver has been granted;” (4) Either list Standards 4.3.89 through 4.3.93 in the section titled “Standards Incorporated by Reference;” or include the text of the Standards; (5) Remove Standard 4.3.23 (as it relates to Standards of Conduct posting) from the section titled “Standards for which a Waiver has been granted;” (6) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;” or include the text of the Standard; (7) List Standard 4.3.106 in the section titled “Standards for which an extension of time has been granted:”
Caledonia Energy Partners, L.L.C.	Remove Standards 1.3.49, 4.3.5, 4.3.51, and 5.3.27
Cheniere Corpus Christi Pipeline, L.P.	(1) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (2) State “extensions of time until November 1, 2019 in light of a contemplated system upgrade”
Cheniere Creole Trail Pipeline, L.P.	(1) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (2) State “extensions of time until November 1, 2019 in light of a contemplated system upgrade”
Columbia Gas Transmission, LLC	Remove Standard 2.3.49
Crossroads Pipeline Company	Either list Standard 1.3.28 in the section titled “Nominations Related Standards: – Standards;” or include the text of the Standard, but not both
DBM Pipeline, LLC	(1) Remove Standard 4.3.23 from the section titled “Standards for which an Extension of Time to Comply has been granted;” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;” or include the text of the Standard
Destin Pipeline Company, L.L.C.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:-

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	Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (3) Either list Standard 0.3.17 in the section titled “Additional Standards: - General: - Standards;” or include the text of the Standard; (4) Remove Standards 1.3.82, 4.3.80, and 4.3.106 from the section titled “Standards Incorporated by Reference;” (5) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (6) State “extensions of time until May 31, 2020 in light of a contemplated system upgrade”
Discovery Gas Transmission LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition
Dominion Energy Overthrust Pipeline, LLC	(1) Change the reference from “NAESB WGQ Version 3.0” to “NAESB WGQ Version 3.1” in Section 27, North American Energy Standards Board (NAESB) Standards; (2) Remove the reference “and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Section 27, North American Energy Standards Board (NAESB) Standards; (3) Remove the asterisks [*] from the Standards and Datasets in Section 27, North American Energy Standards Board (NAESB) Standards
Dominion Energy Questar Pipeline, LLC	(1) Change the reference from “NAESB WGQ Version 3.0” to “NAESB WGQ Version 3.1” in Pt. 1 Section 26, North American Energy Standards Board (NAESB) Standards; (2) Remove the reference “and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Pt. 1 Section 26, North American Energy Standards Board (NAESB) Standards; (3) Remove the asterisks [*] from the Standards and Datasets in Pt. 1 Section 26, North American Energy Standards Board (NAESB) Standards

Company Name	Compliance Obligation
East Cheyenne Gas Storage, LLC	Either list Standards 2.4.9, 2.4.10, and 2.4.11 in a section titled “Flowing Gas Related Standards: - Data Sets;,” or include the text of the Standards
Eastern Shore Natural Gas Company	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
El Paso Natural Gas Company, L.L.C.	Justify its waiver of Standard 2.3.64
Enable Gas Transmission, LLC	Include Definition 0.2.5 with the term “General;”
Enable Mississippi River Transmission, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
Equitrans, L.P.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
Freebird Gas Storage, L.L.C.	(1) Remove Standards 1.3.49, 4.3.5, and 5.3.27; (2) Either list Standard 4.3.49 in the section titled “Standards Incorporated by Reference: - Quadrant Electronic Delivery Mechanism Related Standards;,” or include the text of the Standard
Garden Banks Gas Pipeline, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
Gas Transmission Northwest LLC	(1) Change the reference from “1.3.2(v) GT&C – Nominations, 6.19.4(b), except as provided for in 6.19.4(b)(5) and 6.19.4(c) of these General Terms and Conditions” to “1.3.2(v) GT&C – Nominations, 6.19.4(b);” (2) Remove Standard 1.3.2(v) from section titled “Standards for which Waiver or Extension of

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	Time to Comply have been granted;” because the pipeline is not requesting a waiver or extension of time to comply with the referenced standard
Golden Triangle Storage, Inc.	(1) Remove Standards 1.3.56, 4.3.52, 10.3.1, 10.3.3 through 10.3.12, and 10.3.14 through 10.3.27 from the section titled “Standards Incorporated by Reference;” (2) Change the reference from “Limited Waiver for Extension of Time ...” to “Extension of Time ...” in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;”
Granite State Gas Transmission, Inc.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (3) Indicate adoption of Standard 1.3.2(i-vi) in the section titled “Standards not Incorporated by Reference and their Location in Tariff: - 6.22 Nominations, 6.22 Nominations, 4.0.0; (4) Remove Standard 1.3.2(vi) from the section titled “Standards Incorporated by Reference;” (5) Remove Standard 4.3.5; (6) Remove the asterisk [*] from Standard 5.3.56 in 6.24 NAESB, 6.24 NAESB
Greylock Pipeline, LLC	(1) Remove Standard 5.3.72 from the section titled “Standards Incorporated by Reference: - Capacity Release Standards: - Standards;” (2) Either list Standard 5.3.73 in the section titled “Standards Incorporated by Reference: - Capacity Release Standards: - Standards;” or include the text of the Standard
Gulf Crossing Pipeline Company LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition
Gulf Shore Energy Partners, LP	(1) Remove Standard 1.3.39 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (2) Either list Standard 1.3.39 in the section titled “Standards Incorporated by

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	Reference: - Nominations Related Standards,” or include the text of the Standard; (3) Remove Standard 1.3.27 from the section titled “Standards Incorporated by Reference: - Nominations Related Standards:”
Gulf South Pipeline Company, LP	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
High Island Offshore System, L.L.C.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
High Point Gas Transmission, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (3) Remove Standard 4.3.5; (4) Remove Standards 1.3.82, 4.3.80, and 4.3.106 from the section titled “Standards Incorporated by Reference;” (5) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled “Standards for which Extension of Time to Comply have been granted;,” (6) State “extensions of time until May 31, 2020 in light of a contemplated system upgrade”
KO Transmission Company	(1) Remove the reference “all marked with an asterisk [*]” from Section 33, Compliance with 18 C.F.R. Section 284.12; (2) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (3) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (4) Remove the asterisks [*] from the Standards and Datasets in Section 33, Compliance with 18 C.F.R. Section 284.12; (5) Remove Standard 4.3.106 from the section titled “Quadrant Electronic Delivery Mechanism Related Standards;” (6) List Standard 4.3.106 in the section titled “Standards for

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	Which Waiver or Extension of Time to Comply Have Been Granted:;” (7) Remove Principle 2.1.6 from the section titled “Standards for Which Waiver or Extension of Time to Comply Have Been Granted:;”
KPC Pipeline, LLC	(1) Remove Standard 4.3.23 from the section titled “Standards for which an Extension of Time to Comply has been granted:;” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference:;” or include the text of the Standard
Maritimes & Northeast Pipeline, L.L.C.	(1) Change the reference from 4.3.406 to 4.3.106 in 32., North American Energy Standards Board; (2) Change the reference from “Standards for which Waiver or Extension of Time to Comply have been granted” to “Standards for which Waiver or Extension of Time to Comply have been granted”
MarkWest New Mexico, L.L.C.	(1) Remove Standard 4.3.23 from the section titled “Standards for which an Extension of Time to Comply has been granted:;” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference:;” or include the text of the Standard
MarkWest Pioneer, L.L.C.	(1) Remove Standard 4.3.23 from the section titled “Standards for which an Extension of Time to Comply has been granted:;” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference:;” or include the text of the Standard
MIGC LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions:;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General Definitions:;” or include the text of the Definition; (3) Either list Standards 0.3.26, 0.3.27, and 0.3.28 in the section titled “Additional Standards: – Location Data Download:;” or include the text of the Standards; (4) Either list Standards 1.3.3 and 1.3.81 in the section titled “Nominations Related Standards: – Standards:;” or include the text of the Standards; (5) Remove Standards 1.3.47, 1.3.50, 1.3.52, 1.3.54, 1.3.57, 1.3.59, 1.3.61, 1.3.63, 2.3.33, 2.3.34, 2.3.35, 4.3.5, 4.3.29, 4.3.39, 4.3.56, 4.3.65, 4.3.73, 4.3.74, and 4.3.76; (6)

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	Either list Standard 2.3.66 in the section titled “Flowing Gas Related Standards: – Standards;,” or include the text of the Standard; (7) Either list Standards 4.3.103, 4.3.104, and 4.3.105 in the section titled “Quadrant Electronic Delivery Mechanism Related Standards: - Standards;,” or include the text of the Standards
Mississippi Canyon Gas Pipeline, L.L.C.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (3) Remove Standard 3.3.20
MoGas Pipeline LLC	(1) Remove the reference “and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Section 7.25, GTC - NAESB Standards; (2) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (3) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (4) Remove the asterisks [*] from the Standards and Datasets in Section 7.25, GTC - NAESB Standards
National Grid LNG, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (3) Either list Standard 1.3.82 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standard; (4) Remove Standard 4.3.23 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;,”
NGO Transmission, Inc.	(1) Remove Standard 4.3.23 from the section titled “Standards for which an Extension of Time to Comply has been granted;,” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standard

Company Name	Compliance Obligation
Northern Border Pipeline Company	Either list Standards 4.3.90 and 4.3.91 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standards
PGPipeline LLC	Either list Standards 5.3.13 and 5.3.14 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standards
Pine Prairie Energy Center, LLC	Remove Standards 1.3.3, 1.3.37, 1.3.45, 1.3.56, 1.3.65, 4.3.44, 4.3.52, 4.3.55, 4.3.67, 4.3.80 through 4.3.84, 4.3.101, 4.3.102, 5.3.35, and 5.3.70 from the section titled “Standards Incorporated by Reference;.”
Portland General Electric Company	(1) Change the reference from NAESB WGQ Version 3.0 to NAESB WGQ Version 3.1 in Part IV - GT&C - Section 25 - NAESB Standards; (2) Remove the reference “and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Part IV - GT&C - Section 25 - NAESB Standards; (3) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications;,” (4) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (5) Remove the asterisks [*] from the Standards and Datasets in Part IV - GT&C - Section 25 - NAESB Standards; (6) Remove Standard 4.3.23 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;,” (7) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standard; (8) Remove Standards 6.3.1, 6.3.3, and 6.3.5 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;,” (9) Change the reference from “WGQ/REQ/RGQ Internet Electronic Transport;” to “Internet Electronic Transport Related Standards” in Part IV - GT&C - Section 25 - NAESB Standards
Questar Southern Trails Pipeline Company	(1) Change the reference from “NAESB WGQ Version 3.0” to “NAESB WGQ Version 3.1” in Section 28, North American Energy Standards Board (NAESB) Standards; (2) Remove the reference “and the standards

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	revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Section 28, North American Energy Standards Board (NAESB) Standards; (3) Remove the asterisks [*] from the Standards and Datasets in Section 28, North American Energy Standards Board (NAESB) Standards
Rager Mountain Storage Company LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition
Rendezvous Pipeline Company, LLC	(1) Remove Standard 4.3.23 from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;” or include the text of the Standard
SG Resources Mississippi, L.L.C.	Remove Standards 1.3.3, 1.3.37, 1.3.45, 1.3.56, 1.3.65, 4.3.44, 4.3.52, 4.3.55, 4.3.67, 4.3.80 through 4.3.84, 4.3.101, 4.3.102, 5.3.35, and 5.3.70 from the section titled “Standards Incorporated by Reference;”
Stingray Pipeline Company, L.L.C.	(1) List Standards 1.3.82, 4.3.80, and 4.3.106 in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;” (2) State “extensions of time for Standards 1.3.82, 4.3.80, and 4.3.106 until November 1, 2019 in light of a contemplated system upgrade;” (3) Remove Standards 1.3.82, 4.3.80, and 4.3.106 from the section titled “Standards Incorporated by Reference;”
Tennessee Gas Pipeline Company, L.L.C.	(1) Change the reference from “Waiver” to “Extension of Time” in the section titled “FERC Authorization for Initial and Confirmation of Waiver” in Sheet No. 394H, ; (2) Change the reference from “RP16-567-000, March 29, 2016 (unpublished letter order)” to “154 FERC ¶ 61,250” in Sheet No. 394H, ,
Texas Gas Transmission, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a

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	section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition
Total Peaking Services, L.L.C.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (3) Remove the asterisks [*] from the Standards and Datasets in 7.29-GT&C, (North American Energy Standards Board); (4) Either list Standard 1.3.82 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standard; (5) Change the reference from “Extension” to “Waiver limited to electronic standards” for Standards 5.4.20, and 5.4.24 through 5.4.27 in 7.29-GT&C, (North American Energy Standards Board); (6) Remove Standards 4.3.23 (waiver to extent relates to gas quality posting), and 4.3.89 through 4.3.93 from the section titled “Standards for which Waiver or Extension of Time to comply has been granted;,” (7) Either list Standards 4.3.89 through 4.3.93 in the section titled “Standards Incorporated by Reference;,” or include the text of the Standards
TransColorado Gas Transmission Company LLC	Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,”
Trans-Union Interstate Pipeline, L.P.	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;,” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;,” or include the text of the Definition; (3) Remove the asterisk [*] from Standard 5.4.26 in GTC - 31, NAESB Standards; (4) Change the reference from “Waiver” to “Extension of Time” for Standard 5.3.65 in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted;,” (5) Remove Standards 1.3.82, 4.3.80, and 4.3.106 from the section titled “Standards Incorporated by Reference;,” (6) List Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 in the section titled “Standards for which Waiver or

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	Extension of Time to Comply have been granted;” (7) State “extensions of time for Standards 1.3.82, 1.4.1, 4.3.80, and 4.3.106 until May 31, 2020 in light of a contemplated system upgrade
USG Pipeline Company, LLC	(1) Remove Definition 0.2.5 from the section titled “Gas/Electric Operational Communications:- Definitions;” (2) Either list Definition 0.2.5 in a section titled “Additional Standards: – General: – Definition;” or include the text of the Definition; (3) Remove Standards 4.3.23 (as it relates to gas quality posting), and 4.3.89 through 4.3.93 from the section titled “Standards for which a Waiver has been granted;” (4) Either list Standards 4.3.89 through 4.3.93 in the section titled “Standards Incorporated by Reference;” or include the text of the Standards; (5) Remove Standard 4.3.23 (as it relates to Standards of Conduct posting) from the section titled “Standards for which a Waiver has been granted;” (6) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;” or include the text of the Standard; (7) List Standard 4.3.106 in the section titled “Standards for which an extension of time has been granted;”
Vector Pipeline L.P.	Change the reference from “10.2.3, 10.2.4, 10.2.5, 10.2.6, 10.2.7, and 10.2.8” to “10.1.3, 10.1.4, 10.1.5, 10.1.6, 10.1.7, and 10.1.8” in the section titled “Internet Electronic Transport Related Standards: - Principles (Optional)” in Sheet No. 159E, GT&C: Creditworthiness
Venice Gathering System, L.L.C.	(1) Include Standard 5.3.2 in the section titled “Standards not Incorporated by Reference and their Location in Tariff.” referencing tariff records Sheet No. 98, General Terms and Conditions, Sheet No. 99, Capacity Release; (2) Revise the text of Standard 5.3.2 addressing non-biddable releases in Sheet No. 99, Capacity Release and Sheet No. 101, Capacity Release
WBI Energy Transmission, Inc.	Remove the asterisks [*] from the Datasets in Sheet No. 255A, ,

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Western Gas Interstate Company	(1) Remove Standard 4.3.23 from the section titled “Standards for which an Extension of Time to Comply has been granted;” (2) Either list Standard 4.3.23 in the section titled “Standards Incorporated by Reference;” or include the text of the Standard
WestGas InterState, Inc.	Change the reference from waiver to extension of time for Standard 1.3.82 in the section titled “Standards for which Waiver or Extension of Time to Comply have been granted.”
White River Hub, LLC	(1) Change the reference from “NAESB WGQ Version 3.0” to “NAESB WGQ Version 3.1” in Section 26, North American Energy Standards Board (NAESB) Standards; (2) Remove the reference “and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*]” from Section 26, North American Energy Standards Board (NAESB) Standards; (3) Remove the asterisks [*] from the Standards and Datasets in Section 26, North American Energy Standards Board (NAESB) Standards
Wyckoff Gas Storage Company, LLC	Remove Standards 1.3.3, 1.3.37, 1.3.45, 1.3.56, 1.3.65, 4.3.44, 4.3.52, 4.3.55, 4.3.67, 4.3.80 through 4.3.84, 4.3.101, 4.3.102, 5.3.35, and 5.3.70 from the section titled “Standards Incorporated by Reference”