

192 FERC ¶ 61,089
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Mark C. Christie, Chairman;
David Rosner, Lindsay S. See,
and Judy W. Chang.

Black Hills Shoshone Pipeline, LLC	Docket Nos. RP25-349-000
East Tennessee Natural Gas, LLC	RP25-366-000
Saltville Gas Storage Company L.L.C.	RP25-367-000
Southeast Supply Header, LLC	RP25-368-000
Sabal Trail Transmission, LLC	RP25-369-000
Kern River Gas Transmission Company	RP25-370-000
	RP25-370-001
Northern Natural Gas Company	RP25-371-000
Sabine Pipe Line LLC	RP25-377-000
Gulfstream Natural Gas System, L.L.C.	RP25-378-000
DBM Pipeline, LLC	RP25-381-000
MountainWest Pipeline, LLC	RP25-384-001
MountainWest Overthrust Pipeline, LLC	RP25-385-001
White River Hub, LLC	RP25-386-001
KPC Pipeline, LLC	RP25-391-000
MarkWest New Mexico, L.L.C.	RP25-392-000
ANR Pipeline Company	RP25-395-000
ANR Storage Company	RP25-397-000
Blue Lake Gas Storage Company	RP25-398-000
NEXUS Gas Transmission, LLC	RP25-406-000
Texas Eastern Transmission, LP	RP25-411-000
Big Sandy Pipeline, LLC	RP25-415-000
MarkWest Pioneer, L.L.C.	RP25-421-000
Rendezvous Pipeline Company, LLC	RP25-422-000
Western Gas Interstate Company	RP25-423-000
Northwest Pipeline LLC	RP25-425-000
	RP25-425-001
Algonquin Gas Transmission, LLC	RP25-432-000
Maritimes & Northeast Pipeline, L.L.C.	RP25-433-000
Carolina Gas Transmission, LLC	RP25-436-000
RH energytrans, LLC	RP25-445-000
Bobcat Gas Storage	RP25-453-000
Egan Hub Storage, LLC	RP25-455-000
Cadeville Gas Storage LLC	RP25-456-001
SG Resources Mississippi, L.L.C.	RP25-461-001

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Perryville Gas Storage LLC	RP25-462-001
Steckman Ridge, LP	RP25-463-000
Pine Prairie Energy Center, LLC	RP25-465-001
Monroe Gas Storage Company, LLC	RP25-466-001
Equitrans, L.P.	RP25-475-000
Rager Mountain Storage Company LLC	RP25-476-000
Mountain Valley Pipeline, LLC	RP25-477-000
Iroquois Gas Transmission System, L.P.	RP25-478-000
PGPipeline LLC	RP25-479-000
WBI Energy Transmission, Inc.	RP25-480-000
	RP25-480-001
Gulf Shore Energy Partners, LP	RP25-484-000
	RP25-484-001
PPG Shawville Pipeline, LLC	RP25-491-001
High Island Offshore System, L.L.C.	RP25-492-001
TransCameron Pipeline, LLC	RP25-493-000
Natural Gas Pipeline Company of America LLC	RP25-494-000
Venture Global Gator Express, LLC	RP25-495-000
Kinder Morgan Illinois Pipeline LLC	RP25-496-000
Stingray Pipeline Company, L.L.C.	RP25-497-000
	RP25-497-001
Horizon Pipeline Company, L.L.C.	RP25-498-000
Transcontinental Gas Pipe Line Company, LLC	RP25-499-000
Tres Palacios Gas Storage LLC	RP25-500-000
Southern Star Central Gas Pipeline, Inc.	RP25-501-000
Pine Needle LNG Company, LLC	RP25-502-000
Garden Banks Gas Pipeline, LLC	RP25-503-000
Mississippi Canyon Gas Pipeline, L.L.C.	RP25-504-000
Southern Natural Gas Company, L.L.C.	RP25-505-000
Southern LNG Company, L.L.C.	RP25-506-000
Nautilus Pipeline Company, L.L.C.	RP25-507-000
Elba Express Company, L.L.C.	RP25-509-000
Midcontinent Express Pipeline LLC	RP25-510-000
Golden Triangle Storage, LLC	RP25-513-001
Wyoming Interstate Company, L.L.C.	RP25-514-000
Cheyenne Plains Gas Pipeline Company, L.L.C.	RP25-516-000
Young Gas Storage Company, Ltd.	RP25-518-000
Spire STL Pipeline LLC	RP25-520-001
Colorado Interstate Gas Company, L.L.C.	RP25-521-000
Wyckoff Gas Storage Company, LLC	RP25-522-001
East Cheyenne Gas Storage, LLC	RP25-524-000
	RP25-524-001
Ruby Pipeline, L.L.C.	RP25-526-000

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	RP25-526-001
	RP25-526-002
TransColorado Gas Transmission Company LLC	RP25-530-000
Carlsbad Gateway, LLC	RP25-531-000
Sierrita Gas Pipeline LLC	RP25-532-000
Mojave Pipeline Company, L.L.C.	RP25-533-000
El Paso Natural Gas Company, L.L.C.	RP25-534-000
Roaring Fork Interstate Gas Transmission, LLC	RP25-535-002
Leaf River Energy Center LLC	RP25-536-000
	RP25-536-001
Spire MoGas Pipeline LLC	RP25-537-000
	RP25-537-001
Texas Gas Transmission, LLC	RP25-538-000
Gulf South Pipeline Company, LLC	RP25-539-000
Boardwalk Storage Company, LLC	RP25-541-000
Discovery Gas Transmission LLC	RP25-543-000
Bluewater Gas Storage, LLC	RP25-544-001
Tennessee Gas Pipeline Company, L.L.C.	RP25-545-000
Stagecoach Pipeline & Storage Company LLC	RP25-546-000
Dauphin Island Gathering Partners	RP25-547-000
Arlington Storage Company, LLC	RP25-548-000
Kinder Morgan Louisiana Pipeline LLC	RP25-549-000
Double E Pipeline, LLC	RP25-551-000
WestGas InterState, Inc.	RP25-554-001
Spire Storage West LLC	RP25-559-000
	RP25-559-001
National Grid LNG, LLC	RP25-813-000
B-R Pipeline, LLC	RP25-958-000
USG Pipeline Company, LLC	RP25-959-000

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

(Issued July 28, 2025)

1. The above-captioned interstate natural gas pipelines each submitted a tariff filing to comply with the requirements established in Order No. 587-AA¹ issued in Docket No. RM96-1-043. 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 Order No. 587-AA. As discussed

¹ *Standards for Bus. Pracs. of Interstate Nat. Gas Pipelines*, Order No. 587-AA, 189 FERC ¶ 61,135 (2024).

below, we accept the tariff records, to become effective August 1, 2025, as discussed in the body of this order. The tariff records listed in the Appendix are rejected as moot.² As discussed below, the tariff record filed by National Grid LNG, LLC (NG LNG) in Docket No. RP25-813-000 is accepted and suspended, to become effective August 1, 2025, subject to the outcome of hearing procedures established in Docket No. RP25-473-000.

I. Background

2. On November 22, 2024, the Commission issued Order No. 587-AA, a final rule amending its regulations to incorporate by reference, with certain enumerated exceptions, the latest version (Version 4.0) 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 promote greater efficiency and reliability of the natural gas industry's operations and strengthen the cybersecurity protections provided within the standards. Most notably, NAESB adopted new WGQ Cybersecurity Related Standards, which focus on strengthening the cybersecurity practices used by the industry through the mitigation of potential vulnerabilities and the use of secure communication and encryption methodologies. Under Order No. 587-AA, interstate natural gas pipelines were required to file compliance filings with the Commission by February 3, 2025 and are required to comply with the standards incorporated by reference in Order No. 587-AA on and after August 1, 2025.

3. Each of the above-captioned interstate natural gas pipelines filed tariff records to adopt Version 4.0 of the NAESB WGQ Standards.

II. Notice of Filings

4. Public notice of these filings was issued. Interventions and protests were due as provided in section 154.210 of the Commission's regulations.³ Pursuant to Rule 214,⁴ all timely motions to intervene and any unopposed motions to intervene out-of-time filed before the issuance date of this order are granted. Granting late intervention at this stage of the proceeding will not disrupt this proceeding or place additional burdens on existing parties. On May 20, 2025, the National Grid Gas Delivery Companies⁵ filed a motion to intervene and adverse comments in Docket No. RP25-813-000.

² See Appendix.

³ 18 C.F.R. § 154.210 (2024).

⁴ 18 C.F.R. § 385.214 (2024).

⁵ The National Grid Gas Delivery Companies include Boston Gas Company d/b/a National Grid; The Brooklyn Union Gas Company d/b/a National Grid NY; KeySpan

III. Discussion

A. Tariff Records

5. Under Order No. 587-AA, interstate natural gas pipelines were required to file compliance filings with the Commission by February 3, 2025 and are required to comply with the standards incorporated by reference in Order No. 587-AA on and after August 1, 2025. Each of the above-captioned interstate natural gas pipelines filed tariff records to adopt Version 4.0 of the NAESB WGQ Standards. We accept the tariff records filed by the interstate natural gas pipelines listed in the caption of this order, to become effective August 1, 2025, as proposed, except for the tariff records listed in the Appendix. The underlying tariff records listed in the Appendix were not Overtaken by Events by the interstate natural gas pipelines in their corresponding underlying docket or sub-docket. Newer versions of the corresponding tariff record(s) listed in the Appendix were subsequently filed by the interstate natural gas pipelines. Therefore, the underlying tariff records listed in the Appendix are pending Commission action in the Commission's eTariff Staff Client database. Accordingly, we reject the tariff records filed by the interstate natural gas pipelines listed in the Appendix as moot.

B. Waiver Requests

6. In Order No. 587-V, the Commission set out the principles it would apply generally to waiver requests.⁶ In general, the Commission found that all requests for 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 4.0 Standards). The Commission determined that interstate natural gas pipelines will need to seek renewal of any such waivers or extensions for each version of the standards the Commission adopts. The Commission also stated 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.⁷

Gas East Corporation d/b/a National Grid; and Niagara Mohawk Power Corporation d/b/a National Grid, all subsidiaries of National Grid USA, Inc.

⁶ *Standards for Bus. Pracs. of Interstate Nat. Gas Pipelines*, Order No. 587-V, 140 FERC ¶ 61,036, at PP 38-39 (2012).

⁷ *Id.* P 38.

7. Several pipelines sought waiver of the requirements of Order No. 587-AA, or extensions of time to comply with that final rule. These requests are discussed below. Any waivers or extensions of time granted herein are limited to the NAESB WGQ Version 4.0 Standards promulgated by Order No. 587-AA.

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

8. In Order No. 587-V, the Commission explained its policy regarding requests for waivers or extensions of time of the Standards related to using the Internet to conduct business transactions and the Standards requiring pipelines to use Electronic Data Interchange (EDI).⁸ 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.
- 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

⁸ 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.

when such pipelines have shown that complying with such Standards would prove unduly burdensome.

9. WestGas InterState, Inc. (WGI) requests continuation of its waiver of the NAESB WGQ EDI datasets, Electronic Delivery Mechanism (EDM)⁹ Standards, and the “Customer Activities” section of its website.¹⁰ In support of its request, WGI states that the Commission previously has granted WGI waivers of the NAESB WGQ Standards relating to EDI datasets, EDM Standards, and the “Customer Activities” section of its website due to WGI’s operational and market circumstances.¹¹ WGI explains that its system consists of an 11-mile pipeline with one receipt and two delivery points. WGI asserts that it only has two firm shippers and has never received a request from any shipper for capacity release.¹² WGI states that it complies with the Commission’s communications and reporting requirements through means that do not require an interactive website or adoption of EDM/EDI communications standards and will continue to comply with those specified standards in that manner.¹³ For good cause shown, we grant WGI continuation of its requested waivers.¹⁴

10. Gulf Shore Energy Partners, LP (Gulf Shore) requests continuation of its waiver of the NAESB WGQ EDI datasets, EDM Standards, and the “Customer Activities”

⁹ EDM standards relate to the use of the Internet for pertinent business practice and electronic communications. EDM standards establish the framework for the electronic dissemination and communication of information between parties in the North American wholesale gas marketplace.

¹⁰ WGI Transmittal at 3-4.

¹¹ *E. Tenn. Nat. Gas, LLC*, Order No. 587-Z, 179 FERC ¶ 61,150, at P 11 (2022) (Order on Filings in Compliance with Order No. 587-Z).

¹² WGI Transmittal at 2.

¹³ *Id.* at 4.

¹⁴ NAESB WGQ Version 4.0 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, 2.3.66, 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, 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, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.82, 4.3.85, 4.3.100, 4.3.104 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, and 5.4.23.

section of its website.¹⁵ 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 operational and market circumstances.¹⁶ 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 two firm shippers, 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.¹⁷ For good cause shown, we grant Gulf Shore continuation of its requested waivers.¹⁸

2. Waiver of Index-Based Capacity Release Standards

11. Carolina Gas Transmission, LLC (CGT) requests continuation of its waiver of the electronic requirements for the NAESB WGQ index-based capacity release standards 5.4.20, and 5.4.24 through 5.4.27.¹⁹ 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. Further, the standards 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 incurred by the use of such indices among the pipelines and shippers. In support of its request, CGT states that due to the configuration and operation

¹⁵ Gulf Shore Transmittal at 1-2.

¹⁶ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 13.

¹⁷ Gulf Shore Transmittal at 2.

¹⁸ NAESB WGQ Version 4.0 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, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.82, 4.3.85 through 4.3.87, 4.3.89 through 4.3.102, 4.3.104 through 4.3.108, 4.3.110, 5.3.10, 5.3.13, 5.3.14, 5.3.35, 5.3.72, 5.4.14 through 5.4.17, and 5.4.20 through 5.4.27.

¹⁹ CGT Transmittal at 1-2.

of its system, there are no gas indices that represent the value of transportation on its system. CGT further states that it has not received a shipper request for index-based pricing and that it would incur substantial costs and administrative burden to implement the electronic requirements for the index-based capacity release standards.²⁰ CGT states that the Commission previously has granted CGT a waiver of the electronic requirements for the index-based capacity release standards.²¹

12. We deny CGT's requested waiver of the electronic requirements for the NAESB WGQ index-based capacity release Version 4.0 Standards 5.4.20, and 5.4.24 through 5.4.27. Waiver of the electronic requirements for the NAESB WGQ index-based capacity release Version 4.0 Standards 5.4.20, and 5.4.24 through 5.4.27 is not appropriate in this instance. We waive NAESB WGQ Standards only when the pipeline cannot provide the service at all. An extension of time is more appropriate in this instance because CGT may be able to provide index-based capacity release service in the future, but currently has no requests for index-based capacity release service. Therefore, we find it appropriate in this instance to grant CGT an extension of time of the electronic requirements for the NAESB WGQ index-based capacity release Version 4.0 Standards 5.4.20, and 5.4.24 through 5.4.27 because CGT has not received a shipper request to use index-based pricing at this time. Accordingly, we require CGT to file a revised tariff record to change the reference from "Waiver" to "Extension of Time" for NAESB WGQ Version 4.0 Standards 5.4.20, and 5.4.24 through 5.4.27 in the section titled "Standards for which waivers or extensions of time to comply have been granted."

3. Waiver of Closing of Measurement Timeline

13. USG Pipeline Company, LLC (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."²² 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 (East Tennessee)) 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).

²⁰ *Id.* at 2.

²¹ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 15.

²² USG Pipeline Transmittal at 6.

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.²³ For good cause shown, we grant USG Pipeline a continuation of its requested waiver of NAESB WGQ Version 4.0 standard 2.3.7. This will afford USG Pipeline additional time to process the information to close out measurements to its customer(s).

4. Waiver of Bumping Requirements for Enhanced Nomination Services

14. Gulf South Pipeline Company, LLC (Gulf South) and Texas Gas Transmission, LLC (Texas Gas) request a continuation of their 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.²⁴ The pipelines argue that a waiver of NAESB WGQ standard 1.3.39 is required to allow bumping to occur during their respective additional nomination cycles. For good cause shown, we grant Gulf South and Texas Gas a continuation of their requested waivers of NAESB WGQ Version 4.0 standard 1.3.39. This will afford the pipelines' ENS customers the additional opportunities to use such capacity included in this firm service.

15. ANR Pipeline Company (ANR) requests a continuation of its waiver of NAESB WGQ standard 1.3.39. ANR explains that General Terms and Conditions (GT&C) section 6.6.1 of its 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 shippers²⁵ 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

²³ *Id.*

²⁴ *See Tex. Gas Transmission, LLC*, 138 FERC ¶ 61,176, at P 3 (2012) (explaining that Texas Gas' service does not permit bumping after ENS Additional Nomination Cycle No. 5). *See also* Texas Gas Transmission, LLC, Tariffs, § 6.12 (G T & C - Nominations, Confirmations, and Scheduling) (15.0.0).

²⁵ 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.

Segment, and were approved by the Commission as part of ANR's Order No. 637 compliance filing on December 20, 2001.²⁶ In support of its request, ANR argues that a 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.²⁷ For good cause shown, we grant ANR a continuation of its requested waiver of NAESB WGQ Version 4.0 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 use such capacity included in this firm service.

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

16. Northern Natural Gas Company (Northern) and Rendezvous Pipeline Company, LLC (Rendezvous) request a continuation of their respective waivers of NAESB WGQ standard 0.3.2, which pertains to the 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. Therefore, 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.²⁸ For good cause shown, we grant Northern and Rendezvous a continuation of their requested waivers of NAESB WGQ Version 4.0 standard 0.3.2.

6. Waiver of Bumping During the Intraday 3 Nomination Cycle

17. ANR requests a continuation of its 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 waiver will allow Rate Schedule FTS-3²⁹ 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

²⁶ *ANR Pipeline Co.*, 97 FERC ¶ 61,323 (2001), *order on reh'g and compliance*, 104 FERC ¶ 61,320 (2003).

²⁷ ANR Transmittal at 5, 10.

²⁸ Northern Transmittal at 2.

²⁹ 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.

NAESB WGQ standard 1.3.2(v).³⁰ ANR states that the Commission previously has granted ANR a waiver of NAESB WGQ standard 1.3.2(v) as it pertains to its Rate Schedule FTS-3 service.³¹ For good cause shown, we grant ANR a continuation of its requested waiver of NAESB WGQ Version 4.0 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 use such capacity included in this firm service.

7. Waiver of Standard 2.3.31 On Imbalance Penalties

18. 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 following this standard, EPNG implemented Prior Period Measurement Adjustment (PPMA) provisions.³² EPNG states that these provisions prevent a PPMA from increasing an imbalance in the current month and provides further protection in subsequent months.³³ Further, EPNG states that the Commission previously has accepted EPNG's monthly imbalance settlement provisions.³⁴ EPNG also states that the Commission previously has granted EPNG a waiver of NAESB WGQ standard 2.3.31.³⁵ For good cause shown, we grant EPNG a continuation of its requested waiver of NAESB WGQ Version 4.0 standard 2.3.31.

³⁰ ANR Transmittal at 5.

³¹ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 20.

³² EPNG Transmittal at 4. El Paso Natural Gas Company, L.L.C., EPNG Tariffs, pt. IV (GT&C), § 10 (Imbalance Management) (8.0.0.) (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.”).

³³ *Id.*

³⁴ *See El Paso Nat. Gas Co.*, 119 FERC ¶ 61,275 (2007).

³⁵ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 21.

C. Variances on Nomination Deadlines and Adjustments

19. Eight pipelines³⁶ 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.³⁷ For good cause shown, we grant the referenced pipelines an extension of this variance.

20. EPNG requests a continuation of its variance pertaining to NAESB WGQ standard 1.3.6, for automatic Hourly Entitlement Enhancement Nomination (HEEN) adjustments.³⁸ NAESB WGQ 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.³⁹ For good cause shown, we grant EPNG an extension of this variance.

D. Extensions of Time

1. Extensions of Time to Implement EDI, EDM, and IET Requirements

21. Ninety-one pipelines request an extension of time to implement NAESB WGQ Version 4.0 Standards relating to various EDI, EDM, and Internet Electronic Transport

³⁶ Mojave Pipeline Company, L.L.C. (Mojave), Cheyenne Plains Gas Pipeline Company, L.L.C. (CPG), Sierrita Gas Pipeline LLC (Sierrita), Wyoming Interstate Company, L.L.C. (WIC), Ruby Pipeline, L.L.C. (Ruby), Colorado Interstate Gas Company, L.L.C. (CIG), Young Gas Storage Company, Ltd. (YGS), and EPNG.

³⁷ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 23.

³⁸ EPNG Transmittal at 3.

³⁹ *Id.* Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 24.

(IET)⁴⁰ technical requirements until such time as the pipelines are requested by a Part 284, open access customer to provide such electronic data services.⁴¹ Generally, the

⁴⁰ IET requirements refer to electronic transactions which, in concert with Quadrant-specific EDM (QEDM), enable NAESB parties to securely and reliably exchange transactions over the Internet.

⁴¹ Gulf Shore, USG Pipeline, B-R Pipeline, LLC (B-R), PPG Shawville Pipeline, LLC (Shawville Pipeline), Boardwalk Storage Company, LLC (Boardwalk Storage), Northern, CGT, Kern River Gas Transmission Company (Kern River), Pine Needle LNG Company, LLC (Pine Needle), Transco, PGPipeline LLC (PGPipeline), Sabine Pipe Line LLC (Sabine), Golden Triangle Storage, LLC (GTS), Southern Star Central Gas Pipeline, Inc. (Southern Star), Bobcat Gas Storage (Bobcat), East Tennessee, Egan Hub Storage, LLC (Egan Hub), Stingray Pipeline Company, L.L.C. (Stingray), White River Hub, LLC (White River), MountainWest Pipeline, LLC (MountainWest), East Cheyenne Gas Storage, LLC (East Cheyenne), Steckman Ridge, LP (Steckman Ridge), 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. (SGRM), Big Sandy Pipeline, LLC (Big Sandy), 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 Transmission System, L.P. (Iroquois), KPC Pipeline, LLC (KPC), Black Hills Shoshone Pipeline, LLC (Shoshone Pipeline), 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), Rendezvous, MarkWest New Mexico, L.L.C. (MarkWest New Mexico), Sabal Trail Transmission, LLC (Sabal Trail), Stagecoach Pipeline & Storage Company LLC (Stagecoach), Arlington Storage Company, LLC (Arlington), Southern LNG Company, L.L.C. (Southern LNG), MountainWest Overthrust Pipeline, LLC (Overthrust), RH energytrans, LLC (RH), Mojave, CPG, Sierrita, WIC, Ruby, TransColorado Gas Transmission Company LLC (TransColorado), CIG, YGS, Leaf River Energy Center LLC (Leaf River), Kinder Morgan Louisiana Pipeline LLC (KMPLP), TransCameron Pipeline, LLC (TransCameron), WGI, Kinder Morgan Illinois Pipeline LLC (KMIP), Spire STL Pipeline LLC (Spire STL), Horizon Pipeline Company, L.L.C. (Horizon), DBM Pipeline, LLC (DBM Pipeline), Gulf South, Texas Gas, EPNG, Double E Pipeline, LLC (Double E), Carlsbad Gateway, LLC (Gateway), Western Gas Interstate Company, Monroe Gas Storage Company, LLC (Monroe), Perryville Gas Storage LLC (Perryville), Spire MoGas Pipeline LLC (Spire MoGas), Venture Global Gator Express, LLC (Gator

referenced 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.⁴² Generally, the referenced pipelines also state that these standards reference communications and/or transactions via EDI, EDM, and/or IET. In addition, the referenced pipelines generally state that they have not received a request for EDI, EDM, and IET transactions and do not anticipate that they will receive such a request in the foreseeable future. For good cause shown, we grant the referenced interstate natural gas pipelines an extension of time⁴³ to comply with EDI, EDM, and IET technical

Express), Cadeville Gas Storage LLC (Cadeville), Natural Gas Pipeline Company of America (Natural), Tres Palacios Gas Storage LLC (Tres Palacios), Equitrans, L.P. (Equitrans), Rager Mountain Storage Company LLC (Rager Mountain), Mountain Valley Pipeline, LLC (Mountain Valley), Southern Natural Gas Company, L.L.C. (SNG), Elba Express Company, L.L.C. (EEC), Midcontinent Express Pipeline LLC (MEP), High Island Offshore System, L.L.C. (HIOS), and Roaring Fork Interstate Gas Transmission, LLC (RFIGT).

⁴² Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 27.

⁴³ Boardwalk Storage, Northern, CGT, Kern River, Sabine, Stagecoach, Arlington, MEP, Southern LNG, Mojave, CPG, Sierrita, WIC, Ruby, TransColorado, CIG, YGS, KMLP, KMIP, Pine Needle, Horizon, Transco, Gulf South, EPNG, Texas Gas, SNG, Natural, EEC, and Sabal Trail are granted an extension of time until 60 days after they receive a request from a customer to implement the requested standards and datasets. Gulf Shore, GTS, Bobcat, East Tennessee, Egan Hub, Stingray, White River, East Cheyenne, Steckman Ridge, Saltville, Bluewater, MarkWest Pioneer, SGRM, Big Sandy, Dauphin Island, WBI Energy, Northwest, Algonquin, NEXUS, Tennessee, Maritimes, Gulfstream, SESH, Texas Eastern, Pine Prairie, Iroquois, KPC, Spire Storage, RH, Southern Star, Leaf River, TransCameron, MountainWest, Double E, Monroe, Perryville, Overthrust, Gator Express, Cadeville, Tres Palacios, and Wyckoff are granted an extension of time until 90 days after they receive a request from a customer to implement the requested standards and datasets. Garden Banks, Nautilus, 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. Spire STL, Spire MoGas, and PGPipeline are granted an extension of time until 150 days after they receive a request from a customer to implement the requested datasets. Rendezvous, MarkWest New Mexico, WGI, DBM Pipeline, Shawville Pipeline, and RFIGT are granted an extension of time until 180 days after they receive a request from a customer to implement the requested standards. Equitrans, Rager Mountain, and Mountain Valley are granted an extension of time until January 1, 2026 due to a gas management system software

requirements, as requested.⁴⁴ The extensions of time are limited to the NAESB WGQ Version 4.0 Standards⁴⁵ promulgated by Order No. 587-AA, 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 4.0 Standards as it relates to proprietary location codes.⁴⁶

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

22. Seven pipelines⁴⁷ request 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

upgrade. HIOS is granted an extension of time until September 30, 2026 due to a gas management system software upgrade.

⁴⁴ NAESB WGQ Version 4.0 Standards 0.3.1, 0.3.21, 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, 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 WGI's, B-R'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 WGI's and Gulf Shore's 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, 3.3.27, 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, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.82, 4.3.85 through 4.3.87, 4.3.89 through 4.3.95, 4.3.99 through 4.3.102, 4.3.104 through 4.3.108, 4.3.110, 5.3.10 through 5.3.16, 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, and 12.3.1 through 12.3.31.

⁴⁵ 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).

⁴⁶ See *Equitrans, L.P.*, 153 FERC ¶ 61,320, at PP 9-13 (2015).

⁴⁷ USG Pipeline, PG Pipeline, B-R, Gateway, Spire STL, Spire MoGas, and Spire Storage.

such releases. Consistent with Commission precedent,⁴⁸ 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. Therefore, for good cause shown, we grant the referenced pipelines an extension of time to comply with NAESB WGQ Version 4.0 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.⁴⁹

23. Further, for good cause shown, we grant PGPipeline, Gateway, and Spire Storage an extension of time to comply with NAESB WGQ Version 4.0 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.

3. Extensions of Time of Pooling Standards

24. Eight pipelines⁵⁰ request continuation of their respective extensions of time of the NAESB WGQ standards governing pooling.⁵¹ The referenced pipelines state that the Commission has granted such extensions of time in the past.⁵² For good cause shown, we grant the referenced pipelines an extension of time to comply with the NAESB WGQ Version 4.0 Standards relating to pooling⁵³ until 180 days following their receipt of a

⁴⁸ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 28.

⁴⁹ 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.

⁵⁰ Blue Lake Gas Storage Company, ANR Storage Company, YGS, WGI, Gateway, Spire STL, Spire MoGas, and PGPipeline.

⁵¹ 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.

⁵² Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 30.

⁵³ NAESB WGQ Version 4.0 Standards 1.3.17, 1.3.18, and 3.3.6.

request from a Part 284 customer, at which time the referenced pipelines must commence compliance with the NAESB WGQ Version 4.0 Standards relating to pooling.

4. Extensions of Time of Title Transfer Tracking Standards

25. USG Pipeline requests an extension of time to comply with NAESB WGQ Version 4.0 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.⁵⁴ Given USG Pipeline's operational, customer, and market circumstances, for good cause shown, we find that granting an extension of time to comply with the NAESB WGQ Version 4.0 title transfer tracking related standards is appropriate. For good cause shown, 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 4.0 title transfer tracking related standards.⁵⁵

26. B-R requests an extension of time to comply with NAESB WGQ Version 4.0 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.⁵⁶ Given B-R's operational, customer, and market circumstances, for good cause shown, we find that granting an extension of time to comply with the NAESB WGQ Version 4.0 title transfer tracking related standards is appropriate. For good cause shown, 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 4.0 title transfer tracking related standards.⁵⁷

27. WBI Energy requests an extension of time to comply with NAESB WGQ Version 4.0 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. For good cause shown, we grant WBI Energy an extension of time to

⁵⁴ USG Pipeline Transmittal at 5.

⁵⁵ NAESB WGQ Version 4.0 Standards 1.3.64 through 1.3.77.

⁵⁶ B-R Transmittal at 5.

⁵⁷ NAESB WGQ Version 4.0 Standards 1.3.64, 1.3.66 through 1.3.69, 1.3.71, 1.3.76, and 1.3.77.

implement standard 1.3.64 until such time as it receives a request from a Part 284 customer to implement NAESB WGQ Version 4.0 standard 1.3.64.

28. Discovery Gas Transmission LLC (Discovery) requests an extension of time to comply with NAESB WGQ Version 4.0 title transfer tracking related standards, and a waiver and extension of time of the electronic components of the interactive website requirements. In support of its request, Discovery explains that the data elements associated with conducting electronic communications via EDM and all datasets have not been requested for use by any of Discovery's shippers. Further, Discovery states that price formation does not occur on Discovery's system because with the varying qualities of unprocessed gas delivered into Discovery's system, the commingled gas stream is not fungible with pipeline-quality gas transported across onshore interstate pipelines and due to the location of Discovery's system upstream of market centers. In addition, Discovery states that given the absence of trading, capacity release, and price formation activities, there is no demand, and hence, no need for this related electronic business functionality. Discovery further states that the NAESB WGQ standards associated with title transfer have not been requested by any of Discovery's shippers.⁵⁸

29. Further, Discovery states that no capacity release occurs on the Discovery system. Discovery explains that with two exceptions, transportation on Discovery's system is rendered under Discovery's FT-2 Rate Schedule or its interruptible IT Rate Schedule. Discovery further explains that the FT-2 Rate Schedule allows a shipper to receive firm service at a usage-based rate if production is committed to Discovery for transportation for the life of the lease. Discovery notes that because the shipper pays a usage-based rate, capacity release is not available.⁵⁹

30. In addition, Discovery states that it has three agreements for firm service under its traditional FT-1 Rate Schedule which Discovery states qualify for capacity release. Discovery states that those shippers have never requested use of capacity release. Discovery states that if those shippers were to request to release any capacity, Discovery could manually effectuate such release pursuant to the terms of the capacity release section of its tariff. Discovery states that all of Discovery's jurisdictional transportation revenue is collected from usage rates and no capacity release occurs.⁶⁰

31. Discovery explains that it uses a proprietary gas management system (i.e., GasKit) accessible through its Customer Activities website. Further, Discovery states that shippers, or their agents, log-in to GasKit through the internet and input their daily or

⁵⁸ Discovery Transmittal at 2.

⁵⁹ *Id.* at 2-3.

⁶⁰ *Id.* at 3.

periodic nominations. Discovery further states that shippers can generate multiple reports in various formats within GasKit at any time that provide information regarding their transactions. Discovery notes that GasKit is not fully NAESB compliant. Specifically, Discovery explains that GasKit does not contain title transfer or capacity release functionality, and, it has limited EDM electronic communication functionality. Moreover, Discovery notes that neither GasKit content nor Discovery's public internet website content are 100% mapped to NAESB datasets. Nevertheless, Discovery asserts that GasKit is a user-friendly and robust system, and updates occur periodically to enhance transactional experience and business offerings.⁶¹

32. Given Discovery's operational, customer, and market circumstances and the information presented, for good cause shown, we find that granting an extension of time to comply with the NAESB WGQ Version 4.0 title transfer tracking related standards is appropriate. For good cause shown, 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 4.0 title transfer tracking related standards.⁶² Further, for good cause shown, we grant Discovery its requested waiver of the electronic components of the interactive website requirements.⁶³ Lastly, for good cause shown, we grant Discovery an extension of time until 90 days after it receives a request from a Part 284 customer to implement certain electronic components of the interactive website requirements.⁶⁴

33. Dauphin Island requests an extension of time to comply with NAESB WGQ Version 4.0 title transfer tracking related standards, and a waiver of the electronic components of the interactive website requirements. In support of its request, Dauphin Island explains that the data elements associated with conducting electronic communications via EDM and all datasets have not been requested for use by any of Dauphin Island's shippers. Further, Dauphin Island states that price formation does not

⁶¹ *Id.*

⁶² NAESB WGQ Version 4.0 Standards 1.3.17, 1.3.18, 1.3.64 through 1.3.74, 1.3.76, and 1.3.77.

⁶³ NAESB WGQ Version 4.0 Standards 0.3.23, 0.3.26 through 0.3.28, and 0.4.1 through 0.4.4.

⁶⁴ NAESB WGQ Version 4.0 Standards 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, 4.3.66 through 4.3.69, 4.3.72, 4.3.75, 4.3.78 through 4.3.82, 4.3.85 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.

occur on Dauphin Island's system because with the varying qualities of unprocessed gas delivered into Dauphin Island's system, the commingled gas stream is not fungible with pipeline-quality gas transported across onshore interstate pipelines and due to the location of Dauphin Island's system upstream of market centers. In addition, Dauphin Island states that given the absence of trading, capacity release and price formation activities, there is no demand, and hence, no need for this related electronic business functionality. Dauphin Island further states that the NAESB WGQ standards associated with title transfer have not been requested by any of Dauphin Island's shippers.⁶⁵

34. Dauphin Island explains that it uses a proprietary gas management system (i.e., GasKit) accessible through its Customer Activities website. Further, Dauphin Island states that shippers, or their agents, log-in to GasKit through the internet and input their daily or periodic nominations. Dauphin Island further states that shippers can generate multiple reports in various formats within GasKit at any time that provide information regarding their transactions. Dauphin Island notes that GasKit is not fully NAESB compliant. Specifically, Dauphin Island explains that GasKit does not contain title transfer or capacity release functionality, and, it has limited EDM electronic communication functionality. Moreover, Dauphin Island notes that neither GasKit content nor Dauphin Island's public internet website content are 100% mapped to NAESB datasets. Nevertheless, Dauphin Island asserts that GasKit is a user-friendly and robust system, and updates occur periodically to enhance transactional experience and business offerings.⁶⁶

35. Given Dauphin Island's operational, customer, and market circumstances and the information presented, for good cause shown, we find that granting an extension of time to comply with the NAESB WGQ Version 4.0 title transfer tracking related standards is appropriate. For good cause shown, we grant Dauphin Island 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 4.0 title transfer tracking related standards.⁶⁷ Further, for good cause shown, we grant Dauphin Island its requested waiver of the electronic components of the interactive website requirements.⁶⁸

⁶⁵ Dauphin Island Transmittal at 2.

⁶⁶ *Id.* at 2-3.

⁶⁷ NAESB WGQ Version 4.0 Standards 1.3.17, 1.3.18, 1.3.64, 1.3.66 through 1.3.69, 1.3.71, 1.3.76, and 1.3.77.

⁶⁸ NAESB WGQ Version 4.0 Standards 0.3.23, 0.3.26 through 0.3.28, and 0.4.1 through 0.4.4.

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

1. PGPipeline

36. 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.⁶⁹ 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.⁷⁰ Given PGPipeline’s operational, customer, and market circumstances, we find, for good cause shown, that granting PGPipeline a continuation of its requested extension of time to comply with NAESB WGQ Version 4.0 standard 1.3.6 is appropriate. For good cause shown, 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 4.0 standard 1.3.6.

2. NG LNG

37. NG LNG requests waivers and extensions of time of various NAESB WGQ Version 4.0 Standards.

38. Specifically, NG LNG requests continuation of its waiver of NAESB WGQ Standard 1.3.2(i-vi) governing the standard timely and evening and intra-day nomination timelines with respect to trucking operations and vapor deliveries by displacement. NG LNG states that the Commission previously has granted it such a waiver,⁷¹ and that it continues to operate on the same basis on which the prior waiver was granted.⁷²

⁶⁹ PGPipeline Transmittal at 2.

⁷⁰ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 39.

⁷¹ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 40.

⁷² NG LNG Transmittal at 3 (citing Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 40)). See Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 40, n.81 (explaining that the Commission previously granted waiver of the nomination standards to its predecessor company, Algonquin LNG); NG LNG Transmittal at 2, n.5 & attach. A (citing *Algonquin LNG*,

39. Further, NG LNG requests continuation of its extension of time to implement NAESB WGQ Version 4.0 Standards relating to various EDI, EDM, and IET technical requirements until such time as NG LNG is requested by a Part 284, open access customer to provide such electronic data services. NG LNG states that the Commission previously has granted an extension of time to comply with these standards, and that it continues to operate on the same basis that the Commission relied on when it previously granted extensions for compliance with these standards.⁷³

40. In addition, NG LNG requests continuation of its extensions of time⁷⁴ to comply with the NAESB WGQ Version 4.0 Standards governing pooling. NG LNG states that the Commission has granted it such extensions of time in the past.⁷⁵

41. Moreover, NG LNG requests continuation of its extension of time to comply with NAESB WGQ Version 4.0 title transfer tracking related standards.⁷⁶ 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. NG LNG states that the Commission previously has granted it such an extension of time.⁷⁷

Inc., 86 FERC ¶ 61,285 (1999) (*Algonquin LNG*)). See *Algonquin LNG*, 86 FERC ¶ 61,285 (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)); NG LNG Transmittal at 5, Attachment A (citing *Algonquin LNG, Inc.*, 83 FERC ¶ 61,133 (1998) (*Algonquin*)). See *Algonquin*, 83 FERC ¶ 61,133 (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)).

⁷³ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 27.

⁷⁴ NAESB WGQ Version 4.0 Standards 1.3.17, 1.3.18, and 3.3.6.

⁷⁵ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 30.

⁷⁶ NAESB WGQ Version 4.0 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.

⁷⁷ Order on Filings in Compliance with Order No. 587-Z, 179 FERC ¶ 61,150 at P 38.

42. NG LNG states that on May 25, 2023, NG LNG placed into service a natural gas liquefier to provide liquefaction service at its existing LNG storage facility.⁷⁸ NG LNG asserts that NG LNG remains physically unconnected to the interstate pipeline grid or any electric power plant and does not have any plans and is unlikely to establish such interconnection in the foreseeable future.⁷⁹

43. NG LNG states that as has been the case historically, NG LNG is physically connected to the distribution system of The Narragansett Electric Company d/b/a Rhode Island Energy (RIE) downstream of one of its city-gate interconnections with the Algonquin system. NG LNG states that LNG may be delivered by customers to the NG LNG facility in tanker trucks and then redelivered to customers primarily by vaporizing the stored LNG and delivering such revaporized LNG directly to the RIE distribution system and by displacement to the interstate Algonquin system. NG LNG further states that redelivery of LNG to customers' tanker trucks is also an option available to customers. NG LNG asserts that with the addition of liquefaction facilities placed into service in 2023, NG LNG also may receive natural gas from customers for liquefaction from the RIE distribution system by displacement from the Algonquin system.⁸⁰

44. NG LNG asserts that NG LNG's facilities and operations remain unique. NG LNG argues that its facilities continue to not be physically connected to the interstate pipeline grid or any electric power plant, and all movement of natural gas occurs via displacement arrangements across the RIE distribution system. Thus, NG LNG argues that good cause exists to continue the applicability of all such waivers and extensions of time.⁸¹

45. The National Grid Gas Delivery Companies request that the Commission defer consideration of NG LNG's compliance filing and waiver requests in the instant proceeding in Docket No. RP25-813-000 pending the outcome of the ongoing hearing procedures in Docket No. RP25-473-000. Further, the National Grid Gas Delivery Companies request the Commission to state that nothing in such an order constitutes a substantive determination on any issue raised in the instant proceeding in Docket

⁷⁸ NG LNG Transmittal at 2 (citing *Nat'l Grid LNG LLC*, 165 FERC ¶ 61,031 (2018) (Fields Point Liquefaction Project Certificate Order); Notice of Commencement of Service on May 25, 2023 and Affirmative Statement, Docket Nos. CP16-121-000 and RP23-76-000 (filed June 2, 2023)).

⁷⁹ NG LNG Transmittal at 2.

⁸⁰ *Id.*

⁸¹ *Id.* at 3.

No. RP25-813-000 pending the outcome of the proceedings in Docket No. RP25-473-000.⁸²

46. The National Grid Gas Delivery Companies state that in 2023, NG LNG placed into service its liquefaction facilities. The National Grid Gas Delivery Companies state that whereas prior to liquefaction capabilities, NG LNG only could deliver natural gas into the interstate pipeline grid, the liquefaction service added bidirectional capability, and now NG LNG receives natural gas from and delivers natural gas to the interstate pipeline grid through RIE, which the National Grid Gas Delivery Companies state provides interstate transportation service pursuant to a limited jurisdiction certificate issued under section 284.224 of the Commission's regulations.⁸³

47. The National Grid Gas Delivery Companies argue that, as noted in Docket No. RP25-473-000, NG LNG has not demonstrated that it is not integrated with the interstate pipeline grid. Additionally, the National Grid Gas Delivery Companies argue that NG LNG has not demonstrated why it should not be subject to the NAESB standards, regardless of whether it connects to a pipeline certificated under section 284.224 of the Commission's regulations, or any other provision of the Commission's regulations. Therefore, the National Grid Gas Delivery Companies argue that NG LNG has not demonstrated it is eligible for continued waivers or that its proposed tariff records are just and reasonable, and therefore, the tariff records may be unjust and unreasonable.⁸⁴

48. Given the circumstances before us, we will defer ruling on the instant waiver and accept and suspend NG LNG's tariff record⁸⁵ filed in Docket No. RP25-813-000, for the nominal period to become effective August 1, 2025, subject to the outcome of hearing

⁸² The National Grid Gas Delivery Companies at 5-7. The National Grid Gas Delivery Companies state that in the proceeding in Docket No. RP25-473-000, NG LNG has filed a full Natural Gas Act section 4 general rate proceeding as well as modifications to its NAESB standards tariff records, and the Commission accepted those tariff records, suspended them subject to refund and the outcome of hearing proceedings established in that proceeding (citing *National Grid LNG, LLC*, 190 FERC ¶ 61,129 (2025) (*National Grid LNG*)).

⁸³ The National Grid Gas Delivery Companies at 4-5.

⁸⁴ *Id.* at 5.

⁸⁵ National Grid LNG, LLC, Tariffs, Service Agreements, and Rate Schedules, § 34 (North American Energy Standards Board) ("NAESB") (9.0.0).

procedures established in another proceeding in Docket No. RP25-473-000 where issues addressing NAESB WGQ related standards are being considered.⁸⁶

49. Based upon a review of the filing, we find that NG LNG's proposed tariff record has not been shown to be just and reasonable, and may be unjust, unreasonable, unduly discriminatory or preferential, or otherwise unlawful. Accordingly, and as described in this order, we accept such tariff record for filing and suspend its effectiveness for the nominal period, to be effective August 1, 2025, subject to the outcome of the hearing established in Docket No. RP25-473-000.

50. The Commission's policy regarding rate suspensions is that rate filings generally should be suspended for the maximum period permitted by statute where preliminary study leads the Commission to believe that the filing may be unjust, unreasonable, or that it may be inconsistent with other statutory standards.⁸⁷ The Commission has recognized, however, that shorter suspensions may be warranted in circumstances where suspensions for the maximum period may lead to harsh and inequitable results.⁸⁸ Such circumstances exist here, where the party has filed to comply with the NAESB WGQ Version 4.0 Standards. Therefore, we accept and nominally suspend the proposed tariff record filed in Docket No. RP25-813-000, to take effect upon motion on August 1, 2025, subject the outcome of the hearing established in Docket No. RP25-473-000.

⁸⁶ We note that in the proceeding in Docket No. RP25-473-000, the Commission accepted and suspended, subject to refund and the outcome of hearing procedures, tariff record National Grid LNG, LLC, Tariffs, Service Agreements, and Rate Schedules, § 19 (Scheduling Of Service) (4.0.0), which addresses the standard NAESB WGQ nomination timeline. See *National Grid LNG*, 190 FERC ¶ 61,129. In the instant proceeding in Docket No. RP25-813-000, NG LNG is requesting waiver of the standard NAESB WGQ nomination timeline and waiver of other NAESB WGQ nominations related standards. Therefore, we believe it is not appropriate to grant NG LNG's requested waivers of certain NAESB WGQ Version 4.0 Standards in the instant proceeding in Docket No. RP25-813-000. We believe it is more appropriate to consider NG LNG's requested waivers after the proceeding concludes in Docket No. RP25-473-000.

⁸⁷ See *Great Lakes Gas Transmission Co.*, 12 FERC ¶ 61,293 (1980) (five-month suspension).

⁸⁸ See *Valley Gas Transmission, Inc.*, 12 FERC ¶ 61,197 (1980) (one-day suspension).

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The Commission orders:

(A) 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, 2025, as proposed, except for the tariff records listed in the Appendix.

(B) The tariff records listed in the Appendix are rejected as moot.

(C) The tariff record filed in Docket No. RP25-813-000 is accepted and suspended for a nominal period, to become effective August 1, 2025, subject to the outcome of hearing procedures established in Docket No. RP25-473-000.

(D) The tariff record filed in Docket No. RP25-436-000 is accepted, to become effective August 1, 2025, subject to conditions, as discussed in the body of this order.

(E) Extensions of time and waivers are hereby granted, as discussed in the body of this order, and the extensions of time and waivers granted herein are limited to the NAESB WGQ's Version 4.0 Standards promulgated by Order No. 587-AA.

By the Commission.

(S E A L)

Carlos D. Clay,
Deputy Secretary.

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Appendix

Northwest Pipeline LLC
Fifth Revised Volume No. 1

Tariff Records Filed in Docket No. RP25-425-000 Rejected as Moot:

[Sheet No. 279B, GT&C - Electronic Communications \(9.0.0\)](#)

[Sheet No. 279C, GT&C - Electronic Communications \(10.0.0\)](#)

WBI Energy Transmission, Inc.
Third Revised Volume No. 1

Tariff Records Filed in Docket No. RP25-480-000 Rejected as Moot:

[Sheet No. 254, Section 44: NAESB Definitions, Standards and Data Dictionary \(9.0.0\)](#)

[Sheet No. 255, \(7.0.0\)](#)

Gulf Shore Energy Partners, LP
Gulf Shore Energy Partners, LP GAS TARIFF ORIGINAL VOLUME NO. 1

Tariff Record Filed in Docket No. RP25-484-000 Rejected as Moot:

[GTC Section 8.29, North American Standards Board 4.0 \(11.0.0\)](#)

Stingray Pipeline Company, L.L.C.
Fifth Revised Volume No. 1

Tariff Record Filed in Docket No. RP25-497-000 Rejected as Moot:

[GT&C Section 33., North American Energy Standards Board \(NAESB\) \(3.0.0\)](#)

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East Cheyenne Gas Storage, LLC
Tariffs

Tariff Record Filed in Docket No. RP25-524-000 Rejected as Moot:

[Nth Amrcn Energy Stds Brd, GT&C Section 22 - North American Energy Standards Board \(2.0.0\)](#)

Ruby Pipeline, L.L.C.
Ruby Tariff

Tariff Record Filed in Docket No. RP25-526-000 Rejected as Moot:

[Part IV: GT&C, Section 23 - Compliance With 18 CFR, Section 284.12 \(7.0.0\)](#)

Ruby Pipeline, L.L.C.
Ruby Tariff

Tariff Record Filed in Docket No. RP25-526-001 Rejected as Moot:

[Part IV: GT&C, Section 23 - Compliance With 18 CFR, Section 284.12 \(7.1.0\)](#)

Leaf River Energy Center LLC
Leaf River Energy Center LLC, FERC Gas Tariff

Tariff Record Filed in Docket No. RP25-536-000 Rejected as Moot:

[GTC, 6.23 North American Energy Standards Board \(9.0.0\)](#)

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Spire MoGas Pipeline LLC
Baseline Tariff

Tariff Record Filed in Docket No. RP25-537-000 Rejected as Moot:

[Section 7.25, GTC - NAESB Standards 4.0 \(8.0.0\)](#)

Spire Storage West LLC
FERC Gas Tariff

Tariff Record Filed in Docket No. RP25-559-000 Rejected as Moot:

[Section 6.25, NAESB \(9.0.0\)](#)

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