

January 30, 2025

Ms. Debbie-Anne A. Reese, Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re: Columbia Gulf Transmission, LLC

NAESB 4.0 Compliance Docket No. RP25- -000

Dear Ms. Reese:

Columbia Gulf Transmission, LLC 700 Louisiana Street, Suite 1300 Houston, TX 77002-2700

Sorana Linder Director, Rates, Tariffs, & Modernization

tel (832) 320-5209

email Sorana_Linder@tcenergy.com
web https://ebb.tceconnects.com

Pursuant to Section 4 of the Natural Gas Act and Part 154 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations 1 and in compliance with the Commission Order No. 587-AA filed in Docket No. RM96-1-043, *et al.*, 2 Columbia Gulf Transmission, LLC ("Columbia Gulf") hereby submits for filing certain tariff sections to be part of its FERC Gas Tariff, Third Revised Volume No. 1 ("Tariff"). 3 Columbia Gulf requests that the Commission accept the tariff sections, filed herein as Appendix A, to become effective August 1, 2025.

Correspondence

The names, titles and mailing address of the persons to whom correspondence and communications concerning this filing should be directed are as follows:

¹ 18 C.F.R Part 154 (2024).

² Standards for Business Practices of Interstate Natural Gas Pipelines, 189 FERC¶ 61,135 (2024) ("Order No. 587-AA")

³ Specifically, Part VII, Gen. Terms & Conditions, Table of Contents and Part VII.36, Gen. Terms and Conditions, NAESB WGQ Standards.

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Columbia Gulf Transmission, LLC
700 Louisiana Street, Suite 1300
Houston, Texas 77002-2700
Tel. (832) 320-5879
E-mail: john ryan@tcenergy.com

Sorana Linder *
Director, Rates, Tariffs & Modernization
Columbia Gulf Transmission, LLC
700 Louisiana Street, Suite 1300
Houston, Texas 77002-2700
Tel. (832) 320-5209
E-mail: sorana linder@tcenergy.com

Statement of Nature, Reasons and Basis for Filing

On November 22, 2024, the Commission issued Order No. 587-AA, approving Version 4.0 of the Wholesale Gas Quadrant ("WGQ") Standards ("Version 4.0 Standards") adopted by the North American Energy Standards Board ("NAESB"). The revisions included in the Version 4.0 Standards are designed to promote greater efficiency in business processes and commercial transactions and strengthen cybersecurity protections of the natural gas industry. Natural gas pipelines were directed to submit their compliance filings by February 3, 2025, with an effective date of August 1, 2025.⁴ In compliance with Order No. 587-AA, Columbia Gulf has revised its Tariff section listed in Appendix A to reflect the incorporation of the updated data sets in the following Business Practice Standards:⁵

<u>Manual</u>	Business Practice Standards	
0	Additional Standards	
2	Flowing Gas Related Standards	
3	Invoicing Related Standards	
4	Quadrant Electronic Delivery Mechanism Standards	
5	Capacity Release Related Standards	
10	WGQ / REQ / RGQ Internet Electronic Transport	
126	Cybersecurity Related Standards	

In addition, Columbia Gulf updated its Table of Contents to reflect a minor housekeeping edit related to the title page of Section VII.36, Gen. Terms & Conditions, NAESB WGQ Standards.

^{*} Persons designated for official service pursuant to Rule 2010.

⁴ Order No. 587-AA, at P 11 (2024).

⁵ Order No. 587-AA, at P 10 (2024).

⁶ New manual of standards included in WGQ Version 4.0 business practice standards.

Contents of Filing

 $In \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, with \, Section \, 154.502 \, of \, the \, Commission's \, regulations, Columbia \, Gulf \, is \, submitting \, accordance \, where \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, Gulf \, is \, submitting \, accordance \, columbia \, columbia$

the following via its electronic tariff filing:

1. This transmittal letter;

2. A clean version of the tariff sections (Appendix A); and

3. A marked version of the tariff sections (Appendix B).

Certificate of Service

As required by Sections 154.502(c)(2) of the Commission's regulations, a copy of this filing is

being served upon all of Columbia Gulf's existing customers and interested state regulatory

agencies. A copy of this letter, together with any attachments, is available during regular business

hours for public inspection at Columbia Gulf's principal place of business.

Pursuant to Section 385.2005 of the Commission's regulations, the undersigned has read this filing

and knows its contents, and the contents are true as stated, to the best of her knowledge and belief.

Additionally, the undersigned possesses full power and authority to sign such filing.

Any questions regarding this filing may be directed to Sorana Linder at (832) 320-5209.

Respectfully submitted,

Columbia Gulf Transmission, LLC

Sorana Linder

Director, Rates, Tariffs, & Modernization

Enclosures

3

Appendix A

Clean Tariff

Section	<u>Description</u>	<u>Version</u>
VII.	GT&C, Table of Contents	11.0.0
VII.36	GT&C, NAESB WGQ Standards	12.0.0

GENERAL TERMS AND CONDITIONS (TABLE OF CONTENTS)

Section

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- 2 Electronic Bulletin Board (EBB)
- 3 Requests for Service
- 4 Availability of Capacity for Firm Services
- 5 Service Agreement and Electronic Contracting
- 6 Nominating, Scheduling and Monitoring
- 7 Capacity Allocation
- 8 Meter Allocations
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- 10 Billing and Payment
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- 20 Discounting
- 21 Regulatory Fees
- 22 Possession of Gas
- Warranty of Title to Gas
- 24 Warranty of Eligibility for Transportation
- 25 Gas Quality
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- 28 Notices
- 29 Complaint Resolution Procedure
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- 32 Transportation Retainage Adjustment ("TRA")
- 33 Contract Demand Reduction Option
- 34 Negotiated Rates
- 35 Construction of Laterals
- 36 NAESB WGQ Standards
- 37 Offsystem Pipeline Capacity
- 38 Reimbursement of Sales and Use Taxes
- 39 Operational Purchases and Sales
- 40 Reservation Charge Credits

36. NAESB WGQ STANDARDS

Compliance with 18 CFR, Section 284.12

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

Standards not Incorporated by Reference and their Location in Tariff:

NAESB Standard 1.2.3	<u>Tariff Record</u> GTC Section 1.38
1.2.4	GTC Section 1.24
1.2.5	GTC Section 1.36
1.2.6	GTC Section 1.35
1.2.9	GTC Section 1.7(a)
1.2.11	GTC Section 1.7(b)
1.2.12	GTC Section 1.14
1.2.15	GTC Section 1.49
1.2.16	GTC Section 1.49
1.3.1	GTC Section 1.19
1 2 2(::)	GTC Section 1.31 (a-e)
1.3.2(i-vi)	GTC Section 6.2(e)
1.3.3	GTC Section 6.3(c)(6)
1.3.6	GTC Section 6.2(h)(4)
1.3.9	GTC Section 6.2(h)
1.3.11	GTC Section 6.2(h)
1.3.13	GTC Section 6.2(h)
1.3.14	GTC Section 1.11
1.3.15	GTC Section 6.2(b)
1.3.16	GTC Section 6.2(b)

1.3.19	GTC Section 6.2(f)
1.3.22	GTC Section 6.3(d)
1.3.28	GTC Section 6.2(b)
1.3.32	GTC Section 6.2(h)
1.3.33	GTC Section 6.2(h)
1.3.40	GTC Section 6.3(i)
1.3.44	GTC Section 6.3(k)
1.3.51	GTC Section 7.2(c)(3)(vii)
1.3.80	GTC Section 6.2(1)
2.2.1	GTC Section 1.32
2.2.2	GTC Section 18.6(a)(1)
2.2.3	GTC Section 18.6(a)(2)
2.3.3	GTC Section 8.3(b)
2.3.4	GTC Section 8.3(c)
2.3.6	GTC Section 8.3(e)
2.3.11	GTC Section 8.4(a)
2.3.13	GTC Section 8.4(a)
2.3.16	GTC Section 8.3(a)
2.3.18	GTC Section 8.3(a)
2.3.20	GTC Section 8.3(d)
2.3.26	GTC Section 8.4(b)
2.3.30	GTC Section 18.6(b)(1)
2.3.31	GTC Section 19.4(g)
2.3.40	GTC Section 18.6(b)(5)
2.3.41	GTC Section 18.6(b)(2)
2.3.42	GTC Section 18.6(b)(3)
2.3.43	GTC Section 18.6(b)(4)
2.3.44	GTC Section 18.6(b)(6)
2.3.45	GTC Section 18.6(b)(9)
2.3.47	GTC Section 18.6(b)(10)

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2.3.48	GTC Section 18.6(b)(12)
2.3.50	GTC Section 18.6(b)(7)
3.2.1	GTC Section 1.4
3.3.9	GTC Section 10.1
3.3.17	GTC Section 10.5(a)
3.3.18	GTC Section 10.5(a)
3.3.19	GTC Section 10.5(d)
3.3.25	GTC Section 10.5(a)
5.2.1	GTC Section 1.8
5.2.2	GTC Section 1.18
5.2.3	GTC Section 1.13
5.3.1	GTC Section 14.1(b)
5.3.2	GTC Section 14.1(c)
5.3.3	GTC Section 14.2(c)
5.3.4	GTC Section 14.2(c)
5.3.13	GTC Section 14.4(f)
5.3.14	GTC Section 14.2(d)
5.3.16	GTC Section 14.2(d)
5.3.24	GTC Section 14.3(e)
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5.3.34	GTC Section 16.3(a)
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5.3.35	GTC Section 16.3(b)
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5.3.45	GTC Section 14.8(c)
5.3.49	GTC Section 14.8(c)
5.3.55	GTC Section 14.8(d)
5.3.57	GTC section 14.8(d)
5.3.59	GTC Section 14.5(e)
5.3.60	GTC Section 14.9(d)
5.3.63	GTC Section 14.2(c)(2)
5.3.64	GTC Section 14.2(c)(2)

Standards Incorporated by Reference:

Additional Standards:

General:

Definition:

0.2.5

Standards:

0.3.1, 0.3.2, 0.3.16, 0.3.17

Creditworthiness:

Standards:

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

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Datasets:

Columbia Gulf Transmission, LLC FERC Tariff Third Revised Volume No. 1 VII.36. Gen. Terms and Conditions NAESB WGQ Standards Version 12.0.0

0.4.2, 0.4.3

Location Data Download:

Standards:

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

Dataset:

0.4.4

Storage Information:

Dataset:

0.4.1

Nominations Related Standards:

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Cybersecurity Related Standards:

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

NAESB Standard Waiver or Extension of Time

Appendix B

Marked Tariff

Section	Description	<u>Version</u>
VII.	GT&C, Table of Contents	11.0.0
VII.36	GT&C, NAESB WGQ Standards	12.0.0

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34	Negotiated Rates
35	Construction of Laterals
36	Compliance with 18 CFR, Section 284.12 NAESB WGQ Standards
37	Offsystem Pipeline Capacity

Reimbursement of Sales and Use Taxes

Operational Purchases and Sales

Reservation Charge Credits

36. NAESB WGQ STANDARDSCOMPLIANCE WITH 18 CFR, SECTION 284.12

Compliance with 18 CFR, Section 284.12

Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.24.0, and the standard revised by Minor Correction MC24002 marked with an asterisk [*], which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identification or notations are incorporated by reference. Standards that are not incorporated by reference are identified along with the tariff record in which they are located. Standards for which waivers or extensions of time have been granted are also identified.

Standards not Incorporated by Reference and their Location in Tariff:

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5.3.25	GTC Section 14.3(d)
	GTC Section 7.2(c)(3)(vii)
5.3.34	GTC Section 16.3(a)
	GTC Section 17.3(e)(1)
	GTC Section 7.2(c)(3)(vii)
5.3.35	GTC Section 16.3(b)
	GTC Section 17.3(e)(2)
	GTC Section 7.2(c)(3)(vii)
5.3.36	GTC Section 16.3(c)
	GTC Section 17.3(e)(3)
5.3.44	GTC Section 14.8(c)

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5.3.45	GTC Section 14.8(c)
5.3.49	GTC Section 14.8(c)
5.3.55	GTC Section 14.8(d)
5.3.57	GTC section 14.8(d)
5.3.59	GTC Section 14.5(e)
5.3.60	GTC Section 14.9(d)
5.3.63	GTC Section 14.2(c)(2)
5.3.64	GTC Section 14.2(c)(2)

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

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