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Kelly Griffin
Director, Rates & Regulatory

August 27, 2026

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

Re: Hardy Storage Company, LLC
NAESB 4.0 Compliance
Docket No. RP26-_____-000

Dear Ms. Reese:

Pursuant to Section 4 of the Natural Gas Act and Part 154 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations¹ and in compliance with the Commission Order No. 587-AB filed in Docket No. RP96-1-044, *et al.*,² Hardy Storage Company, LLC ("Hardy") hereby submits for filing a revised tariff section to be part of its FERC Gas Tariff, First Revised Volume No. 1 ("Tariff").³ Hardy requests that the Commission accept the tariff section, filed herein as Appendix A, to become effective January 1, 2027.

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 (2026).

² *Standards for Business Practices of Interstate Natural Gas Pipelines*, 195 FERC ¶ 61,135 (2026) ("Order No. 587-AB")

³ Specifically, Part VI.31, Gen. Terms and Conditions, NAESB WGQ Standards.

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* Persons designated for official service pursuant to Rule 2010.

Statement of Nature, Reasons and Basis for Filing

On May 22, 2026, the Commission issued Order No. 587-AB, amending 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 revised Version 4.0 Standards are designed to streamline the process for accessing publicly available gas-electric coordination data during extreme cold weather or emergency events. Natural gas pipelines were directed to submit their compliance filings by September 1, 2026, with an effective date of January 1, 2027.⁴ In compliance with Order No. 587-AB, Hardy 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>	<u>Business Practice Standards</u>
0	Additional Standards
5	Capacity Release Related Standards
12 ⁶	Cybersecurity Related Standards

⁴ Order No. 587-AB, at P 14 & 15 (2026).

⁵ Order No. 587-AB, at P 11 (2026).

⁶ In addition to updating the required standards, Hardy is deleting Standard Definition 12.2.20, which had already been removed from the original Version 4.0 Standards but was inadvertently retained in the Version 4.0 Standards Sample Tariff published by the Commission on November 25, 2024, and, as a result, was also retained in Part VI.31 of Hardy’s Tariff.

Contents of Filing

In accordance with Section 154.502 of the Commission's regulations, Hardy is submitting the following via its electronic tariff filing:

1. This transmittal letter;
2. A clean version of the tariff section (Appendix A); and
3. A marked version of the tariff section (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 Hardy'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 Hardy'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 Kelly Griffin at (832) 320-5335.

Respectfully submitted,

Hardy Storage Company, LLC



Kelly Griffin
Director, Rates & Regulatory

Enclosures

Appendix A

Clean Tariff

<u>Section</u>	<u>Description</u>	<u>Version</u>
VI.31	GT&C, NAESB WGQ Standards	9.0.0

31. 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:

<u>NAESB Standard</u>	<u>Tariff Record</u>
0.3.3	GTC Section 9.6(b)
0.3.4	GTC Section 9.6(b)
0.3.5	GTC Section 9.6(d)
0.3.6	GTC Section 9.6(e)
0.3.7	GTC Section 9.6(f)
0.3.8	GTC Section 9.6(g)
0.3.9	GTC Section 9.6(h)
0.3.10	GTC Section 9.6(i)
1.2.3	GTC Section 1.33
1.2.4	GTC Section 1.23
1.2.5	GTC Section 1.31
1.2.6	GTC Section 1.30
1.2.9	GTC Section 1.7(a)
1.2.11	GTC Section 1.7(b)
1.2.12	GTC Section 1.16
1.2.15	GTC Section 1.40
1.2.16	GTC Section 1.40
1.3.1	GTC Section 1.18
1.3.2(i-vi)	GTC Section 1.28
	GTC Section 6.2(e)
1.3.3	GTC Section 6.3(c)(5)
1.3.6	GTC Section 6.2(h)(3)
1.3.7	GTC Section 6.2(d)
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
1.3.19	GTC Section 6.2(f)
1.3.22	GTC Section 6.3(d)

1.3.32	GTC Section 6.2(h)
1.3.40	GTC Section 6.3(g)
1.3.44	GTC Section 6.3(h)
2.2.1	GTC Section 1.29
2.3.3	GTC Section 8.1(c)
2.3.4	GTC Section 8.1(d)
2.3.6	GTC Section 8.1(f)
2.3.11	GTC Section 8.4(a)
2.3.13	GTC Section 8.4(a)
2.3.20	GTC Section 8.1(e)
2.3.26	GTC Section 8.2(a)
3.2.1	GTC Section 1.3
3.3.9	GTC Section 10.1(a)
3.3.17	GTC Section 10.2(a)
3.3.18	GTC Section 10.2(a)
3.3.19	GTC Section 10.2(a)
3.3.25	GTC Section 10.2(a)
5.2.1	GTC Section 1.8
5.2.2	GTC Section 1.13
5.2.3	GTC Section 1.15
5.3.1	GTC Section 13.1(b)
5.3.2	GTC Section 13.1(c)
5.3.3	GTC Section 13.2(c)(1)
5.3.4	GTC Section 13.2(c)(1)
5.3.13	GTC Section 13.4(g)
5.3.14	GTC Section 13.2(d)
5.3.15	GTC Section 13.4(g)
5.3.16	GTC Section 13.2(d)
5.3.24	GTC Section 13.3(e)
5.3.25	GTC Section 13.3(d)
5.3.34	GTC Section 7.2(b)(3)
	GTC Section 15.3(a)
	GTC Section 16.1(e)(1)
5.3.35	GTC Section 7.2(b)(3)
	GTC Section 15.3(b)
	GTC Section 16.1(e)(2)
5.3.36	GTC Section 7.2(b)(3)
	GTC Section 15.3(c)
	GTC Section 16.1(e)(3)
5.3.44	GTC Section 13.8(c)
5.3.45	GTC Section 13.8(c)
5.3.49	GTC Section 13.8(c)
5.3.55	GTC Section 13.8(d)
5.3.57	GTC Section 13.8(d)

5.3.63

GTC Section 13.2(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

Gas/Electric Operational Communications:

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

Standards:

0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15, 0.3.30

Operating Capacity and Unsubscribed:

Standards:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Datasets:

0.4.2, 0.4.3

Location Data Download:

Standards:

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

Dataset:

0.4.4

Storage Information

Dataset:

0.4.1

Nominations Related Standards:

Definitions:

1.2.1, 1.2.2, 1.2.8, 1.2.10, 1.2.13, 1.2.14, 1.2.17, 1.2.18, 1.2.19

Standards:

1.3.4, 1.3.5, 1.3.8, 1.3.15, 1.3.16, 1.3.17, 1.3.18, 1.3.20, 1.3.21, 1.3.23, 1.3.24, 1.3.25, 1.3.26, 1.3.27, 1.3.28, 1.3.29, 1.3.30, 1.3.31, 1.3.33, 1.3.34, 1.3.35, 1.3.36, 1.3.37, 1.3.38, 1.3.39, 1.3.41, 1.3.42, 1.3.43, 1.3.45, 1.3.46, 1.3.48, 1.3.51, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.64, 1.3.65, 1.3.66, 1.3.67, 1.3.68, 1.3.69, 1.3.70, 1.3.71, 1.3.72, 1.3.73, 1.3.74, 1.3.75, 1.3.76, 1.3.77, 1.3.79, 1.3.80, 1.3.81, 1.3.82

Datasets:

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

Flowing Gas Related Standards:

Definitions:

2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.5, 2.3.7, 2.3.8, 2.3.9, 2.3.10, 2.3.12, 2.3.14, 2.3.15, 2.3.16, 2.3.17, 2.3.18, 2.3.19, 2.3.21, 2.3.22, 2.3.23, 2.3.25, 2.3.27, 2.3.28, 2.3.29, 2.3.30, 2.3.31, 2.3.32, 2.3.40, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 2.3.47, 2.3.48, 2.3.50, 2.3.51, 2.3.52, 2.3.53, 2.3.54, 2.3.55, 2.3.56, 2.3.57, 2.3.58, 2.3.59, 2.3.60, 2.3.61, 2.3.62, 2.3.63, 2.3.64, 2.3.65, 2.3.66

Datasets:

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

Invoicing Related Standards:

Standards:

3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.26, 3.3.27

Datasets:

3.4.1*, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards:

Definitions:

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

Standards:

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

Capacity Release Standards:

Definitions:

5.2.4, 5.2.5

Standards:

5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.18, 5.3.19, 5.3.20, 5.3.21, 5.3.22, 5.3.23, 5.3.26, 5.3.28, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.37, 5.3.38, 5.3.39, 5.3.40, 5.3.41, 5.3.42, 5.3.46, 5.3.47, 5.3.48, 5.3.50, 5.3.51, 5.3.52, 5.3.53, 5.3.54, 5.3.56, 5.3.58, 5.3.59, 5.3.60, 5.3.62, 5.3.62a, 5.3.64, 5.3.65, 5.3.66, 5.3.67, 5.3.68, 5.3.69, 5.3.70, 5.3.71, 5.3.72, 5.3.73, 5.3.74

Datasets:

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

Cybersecurity Related Standards:

Definitions:

12.2.1, 12.2.2, 12.2.3, 12.2.4, 12.2.5, 12.2.6, 12.2.7, 12.2.8, 12.2.9, 12.2.10, 12.2.11, 12.2.12, 12.2.13, 12.2.14, 12.2.15, 12.2.16, 12.2.17, 12.2.18, 12.2.19, 12.2.21, 12.2.22, 12.2.23, 12.2.24, 12.2.25, 12.2.26, 12.2.27, 12.2.28, 12.2.29, 12.2.30, 12.2.31, 12.2.32, 12.2.33, 12.2.34, 12.2.35, 12.2.36, 12.2.37, 12.2.38, 12.2.39, 12.2.40, 12.2.41

Standards:

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

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

NAESB Standard

Waiver or Extension of Time

Appendix B

Marked Tariff

<u>Section</u>	<u>Description</u>	<u>Version</u>
VI.31	GT&C, NAESB WGQ Standards	9.0.0

31. NAESB WGQ STANDARDS

Compliance with 18 CFR, Section 284.12

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<u>NAESB Standard</u>	<u>Tariff Record</u>
0.3.3	GTC Section 9.6(b)
0.3.4	GTC Section 9.6(b)
0.3.5	GTC Section 9.6(d)
0.3.6	GTC Section 9.6(e)
0.3.7	GTC Section 9.6(f)
0.3.8	GTC Section 9.6(g)
0.3.9	GTC Section 9.6(h)
0.3.10	GTC Section 9.6(i)
1.2.3	GTC Section 1.33
1.2.4	GTC Section 1.23
1.2.5	GTC Section 1.31
1.2.6	GTC Section 1.30
1.2.9	GTC Section 1.7(a)
1.2.11	GTC Section 1.7(b)
1.2.12	GTC Section 1.16
1.2.15	GTC Section 1.40
1.2.16	GTC Section 1.40
1.3.1	GTC Section 1.18
1.3.2(i-vi)	GTC Section 1.28
	GTC Section 6.2(e)
1.3.3	GTC Section 6.3(c)(5)
1.3.6	GTC Section 6.2(h)(3)
1.3.7	GTC Section 6.2(d)
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
1.3.19	GTC Section 6.2(f)
1.3.22	GTC Section 6.3(d)

1.3.32	GTC Section 6.2(h)
1.3.40	GTC Section 6.3(g)
1.3.44	GTC Section 6.3(h)
2.2.1	GTC Section 1.29
2.3.3	GTC Section 8.1(c)
2.3.4	GTC Section 8.1(d)
2.3.6	GTC Section 8.1(f)
2.3.11	GTC Section 8.4(a)
2.3.13	GTC Section 8.4(a)
2.3.20	GTC Section 8.1(e)
2.3.26	GTC Section 8.2(a)
3.2.1	GTC Section 1.3
3.3.9	GTC Section 10.1(a)
3.3.17	GTC Section 10.2(a)
3.3.18	GTC Section 10.2(a)
3.3.19	GTC Section 10.2(a)
3.3.25	GTC Section 10.2(a)
5.2.1	GTC Section 1.8
5.2.2	GTC Section 1.13
5.2.3	GTC Section 1.15
5.3.1	GTC Section 13.1(b)
5.3.2	GTC Section 13.1(c)
5.3.3	GTC Section 13.2(c)(1)
5.3.4	GTC Section 13.2(c)(1)
5.3.13	GTC Section 13.4(g)
5.3.14	GTC Section 13.2(d)
5.3.15	GTC Section 13.4(g)
5.3.16	GTC Section 13.2(d)
5.3.24	GTC Section 13.3(e)
5.3.25	GTC Section 13.3(d)
5.3.34	GTC Section 7.2(b)(3)
	GTC Section 15.3(a)
	GTC Section 16.1(e)(1)
5.3.35	GTC Section 7.2(b)(3)
	GTC Section 15.3(b)
	GTC Section 16.1(e)(2)
5.3.36	GTC Section 7.2(b)(3)
	GTC Section 15.3(c)
	GTC Section 16.1(e)(3)
5.3.44	GTC Section 13.8(c)
5.3.45	GTC Section 13.8(c)
5.3.49	GTC Section 13.8(c)
5.3.55	GTC Section 13.8(d)
5.3.57	GTC Section 13.8(d)

5.3.63

GTC Section 13.2(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

Gas/Electric Operational Communications:

Definitions:

0.2.1, 0.2.2, 0.2.3, 0.2.4

Standards:

0.3.11, 0.3.12, 0.3.13, 0.3.14, 0.3.15, [0.3.30](#)

Operating Capacity and Unsubscribed:

Standards:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Datasets:

0.4.2, 0.4.3

Location Data Download:

Standards:

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

Dataset:

0.4.4

Storage Information

Dataset:

0.4.1

Nominations Related Standards:

Definitions:

1.2.1, 1.2.2, 1.2.8, 1.2.10, 1.2.13, 1.2.14, 1.2.17, 1.2.18, 1.2.19

Standards:

1.3.4, 1.3.5, 1.3.8, 1.3.15, 1.3.16, 1.3.17, 1.3.18, 1.3.20, 1.3.21, 1.3.23, 1.3.24, 1.3.25, 1.3.26, 1.3.27, 1.3.28, 1.3.29, 1.3.30, 1.3.31, 1.3.33, 1.3.34, 1.3.35, 1.3.36, 1.3.37, 1.3.38, 1.3.39, 1.3.41, 1.3.42, 1.3.43, 1.3.45, 1.3.46, 1.3.48, 1.3.51, 1.3.53, 1.3.55, 1.3.56, 1.3.58, 1.3.62, 1.3.64, 1.3.65, 1.3.66, 1.3.67, 1.3.68, 1.3.69, 1.3.70, 1.3.71, 1.3.72, 1.3.73, 1.3.74, 1.3.75, 1.3.76, 1.3.77, 1.3.79, 1.3.80, 1.3.81, 1.3.82

Datasets:

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

Flowing Gas Related Standards:

Definitions:

2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.5, 2.3.7, 2.3.8, 2.3.9, 2.3.10, 2.3.12, 2.3.14, 2.3.15, 2.3.16, 2.3.17, 2.3.18, 2.3.19, 2.3.21, 2.3.22, 2.3.23, 2.3.25, 2.3.27, 2.3.28, 2.3.29, 2.3.30, 2.3.31, 2.3.32, 2.3.40, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 2.3.47, 2.3.48, 2.3.50, 2.3.51, 2.3.52, 2.3.53, 2.3.54, 2.3.55, 2.3.56, 2.3.57, 2.3.58, 2.3.59, 2.3.60, 2.3.61, 2.3.62, 2.3.63, 2.3.64, 2.3.65, 2.3.66

Datasets:

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

Invoicing Related Standards:

Standards:

3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.26, 3.3.27

Datasets:

3.4.1*, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards:

Definitions:

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

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