

153 FERC ¶ 61,320
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

December 18, 2015

In Reply Refer To:
Equitrans L.P.
Docket No. RP16-205-000

Equitrans L.P.
EQT Plaza
625 Liberty Ave, Suite 1700
Pittsburgh, PA 15222

Attention: Paul W. Diehl

Dear Mr. Diehl:

1. On November 18, 2015, you filed on behalf of Equitrans L.P. (Equitrans) a motion for extension of time until September 30, 2017,¹ to implement certain of the North American Energy Standards Board (NAESB) Version 3.0 standards (Version 3.0 Standards) adopted by the Wholesale Gas Quadrant (WGQ) and approved by the Commission's October 16, 2015 order.² For the reasons discussed below, the Commission grants in part and denies in part the request for extension of time.
2. On October 16, 2015, the Commission issued Order No. 587-W amending its regulations³ to incorporate by reference the latest version (Version 3.0) of seven business

¹ Equitrans also would like an extension of time until August 31, 2017, to submit its filing containing these revised tariff records and we also grant this request subject to the changes made within this order.

² *Standards for Business Practices of Interstate Natural Gas Pipelines; Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, Order No. 587-W, 80 FR 67302 (Nov. 2, 2015) FERC Stats. & Regs. ¶ 31,373 (2015) (Cross-Referenced at 153 FERC ¶ 61,061 (2015)) (Order No. 587-W).

³ 18 C.F.R. § 284.12 (2015).

practice standards adopted by the NAESB WGQ applicable to interstate natural gas pipelines. These updated business practice standards contain and supplement the revisions to the NAESB scheduling standards accepted by the Commission in Order No. 809⁴ as part of the Commission's efforts to harmonize gas-electric scheduling coordination. In addition, the updated standards revise the codes used to identify receipt and delivery locations in the "Index of Customers." Further, for consistency with the revisions to the Index of Customers, the Commission amended its regulations by making conforming changes to the regulations on interstate natural gas pipeline filings and postings. These changes are required to be implemented on April 1, 2016, and the interstate natural gas pipelines must file tariff records to reflect the changed standards by February 1, 2016.

3. Equitrans filed the instant request for extension of time to comply with the following NAESB WGQ Version 3.0 Standards: 0.3.18, 0.3.20, 0.3.23, 0.3.24, 0.3.25, 0.3.26, 0.3.28, 0.3.29, 0.4.2, 0.4.3, 0.4.4, 1.4.1, 1.4.2, 1.4.3, 1.4.4, 1.4.5, 1.4.6, 1.4.7, 2.4.1, 2.4.3, 2.4.4, 2.4.5, 5.3.73, 5.4.16, 5.4.17, 5.4.20, 5.4.21, 5.4.22, 5.4.24, 5.4.25, and 5.4.26 and submits that good cause exists to grant its request. Specifically, Equitrans states that it has been working with its third party vendor to implement the changes required by Order No. 809, which adopts modified scheduling practices used by interstate pipelines to schedule natural gas transportation service and provides additional contracting flexibility to firm natural gas transportation customers through the use of multi-party transportation contracts. Equitrans states that the schedule to comply with Order No. 809 is identical to that adopted for the Version 3.0 Standards in Order No. 587-W, and it has been working with its vendor to upgrade its existing software in response to that mandate.

4. Equitrans asserts that, as a result of the discussions with its vendor, it expects to be fully compliant with the provision of Order No. 809, as well as with all of the new or modified definitions of the Version 3.0 Standards on April 1, 2016. However, Equitrans contends that, to become fully compliant with all of the Version 3.0 Standards, it must either upgrade to the newest planned release of its gas management system (GMS) software (Version 2016) or wait for its third party vendor to develop a patch with the remaining Version 3.0 Standards and then apply this patch to its current system before fully upgrading to GMS Version 2016. Equitrans argues that neither of these options could be accomplished before the April 1, 2016 deadline established in Order No. 587-W. Equitrans states that it could complete the GMS Version 2016 upgrade by September 30,

⁴ *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, Order No. 809, Final Rule, 80 FR 23197 (Apr. 24, 2015), FERC Stats. & Regs. ¶ 31,368 (Order No. 809).

2017; the temporary patch could be completed by April 1, 2017. However, Equitrans states that, because the temporary patch would delay its implementation of GMS Version 2016 and its corresponding customer benefits,⁵ it would like an extension until September 30, 2017, to implement the GMS Version 2016 upgrade.

5. Equitrans asserts that it has not received any requests from its customers to provide them with the type of data changes related to the Version 3.0 Standards identified in its requested extension. Moreover, Equitrans asserts that it does not believe that any customer would be negatively impacted by the delay in compliance as either (1) a current work around is in place, (2) Equitrans is providing more data than required, or (3) the changes are minor in nature. Equitrans further asserts that these standards do not materially impact the day-to-day transactional activities of Equitrans, but nevertheless, it will continue to work with its vendor to expedite the process and to implement the Version 3.0 Standards on a more expedited schedule, if possible.

6. Equitrans asserts that there is Commission precedent for granting its request. Equitrans states that, in a similar situation, when implementing the NAESB Version 1.8 Standards, Sabine Pipe Line LLC's compliance solution required an entirely new platform to enable the software to run properly, as well as thorough testing and troubleshooting of the software to ensure compliance with the requirements of the Version 1.8 Standards. Equitrans states that Sabine requested several extensions of time to comply and these requests were all granted by the Commission.⁶

7. Finally, in light of the requirement to submit its tariff filing by February 1, 2016, to comply with the rest of the NAESB WGQ Version 3.0 Standards, Equitrans requests

⁵ Equitrans states that the GMS Version 2016 benefits include a modern web-based user interface that supports a single sign-on via the user's desktop, tablet or smartphone. Equitrans also states that the new GMS Version 2016 will redesign the user experience for simplicity, personalization, and intuitive workflows.

⁶ Equitrans Motion at 6 (citing Sabine Pipe Line LLC, Motion of Sabine Pipe Line LLC for Extension of Time to Comply with Requirements of Order No. 587-T, Docket No. RM96-1-029 (May 27, 2009). The Commission approved the motion on May 29, 2009. Sabine Pipe Line LLC, Motion of Sabine Pipe Line LLC for Extension of Time to Comply with Requirements of Order No. 587-T, Docket No. RM96-1-029 (February 26, 2010). The Commission approved the motion on March 19, 2010. Sabine Pipe Line LLC, Motion of Sabine Pipe Line LLC for Extension of Time to Comply with Requirements of Order No. 587-T, Docket No. RM96-1-029 (September 30, 2010). The Commission approved the motion on October 22, 2010).

Commission action by no later than December 18, 2015, to ensure that it has proper notice of its compliance deadline.

8. Public notice of the filing was issued on November 24, 2015. Interventions and protests were due as provided in section 154.210 of the Commission's regulations (18 C.F.R. § 154.210 (2015)). Pursuant to Rule 214, 18 C.F.R. § 385.214 (2015), 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. No protests or adverse comments were filed.

9. The Commission has reviewed Equitrans' request for an extension of time and finds that its request is adequately supported, except for the standards related to proprietary location codes, as further discussed below. Equitrans states that it has developed a work around to serve its customers and ensure that it will be compliant with Order No. 809 by April 1, 2016, and therefore, we find that granting the requested extension of time to implement the requirements for NAESB WGQ Version 3.0 Standards 0.3.18, 0.3.20, 0.3.28, 1.4.2, 1.4.7, 2.4.4, 5.3.73, 5.4.16, 5.4.17, 5.4.20, 5.4.21, and 5.4.22 until September 30, 2017 will not affect a business functionality or adversely impact its customers. Further, the extension of time will help ensure that the software upgrade can be completed by September 30, 2017.

10. However, the Commission denies Equitrans' requested extension of time to implement the requirements for the Version 3.0 Standards set forth in its motion related to the posting of proprietary location codes on the pipeline's Internet website. These standards are: 0.3.23, 0.3.24, 0.3.25, 0.3.26, 0.3.29, 0.4.2, 0.4.3, 0.4.4, 1.4.1, 1.4.3, 1.4.4, 1.4.5, 1.4.6, 2.4.1, 2.4.3, 2.4.5, 5.4.24, 5.4.25, and 5.4.26.

11. Compliance with the Version 3.0 Standards requiring interstate pipelines to post on their Internet websites information on the proprietary location codes does not require an interstate pipeline to incur substantial additional software upgrade costs. In Order No. 587-W, the Commission explained that the updated NAESB Standards match up with the transition from common codes to the proprietary codes used by interstate pipelines to identify points.⁷ The Commission further explained that these will be the codes assigned by the transportation service providers for the identification of locations. Further, requiring interstate pipelines to post information regarding proprietary codes on the pipelines' Internet website by April 1, 2016, enables the Commission and customers to

⁷ Order No. 587-W, 153 FERC ¶ 61,061 at P 6.

continue to identify active interconnection points referenced in the Index of Customers⁸ through the website postings thereafter.

12. In general, pipelines ought to be able to post active point information on their internet website regardless of when they update their software. To implement these changes, a pipeline needs to only: (1) develop an initial database of proprietary location codes for all current active receipt and delivery points; (2) post the initial database of proprietary location codes for all active points on its internet website; and (3) not delete any receipt and delivery point from its database of proprietary location codes once a point becomes inactive.

13. The requirement for interstate pipelines to maintain and post on their websites a complete listing of all receipt and delivery points, including inactive points, is prospective only. As the Commission explained in Order No. 587-W, for the convenience of those reviewing past Index of Customer filings, or those wishing to compare past Index of Customers filings to newer Index of Customers filings, we will post the old common code file for past indices, containing a listing of inactive points, on the Commission's website prior to April 1, 2016.⁹ Pipelines will then be able to take the old common code database after April 1, 2016, extract old inactive points from the database, and combine that with the pipeline's current database of proprietary location codes reflecting current active receipt and delivery points to have a complete listing of both active and inactive points.

14. Accordingly, the Commission will require Equitrans to submit tariff records as part of its February 1, 2016, compliance filing obligation incorporating the 19 NAESB WGQ Version 3.0 standards identified above related to posting of proprietary location codes on a pipeline's internet website, with an implementation date of April 1, 2016, as set forth in Order No. 587-W.

By direction of the Commission.

Nathaniel J. Davis, Sr.,
Deputy Secretary.

⁸ *Id.* P 41 (The Commission explained that when pipelines make their Form No. 549B, Index of Customers filing for the second quarter of 2016 and thereafter they should do so using the new location names and codes for all active points.).

⁹ *See* Order No. 587-W, 153 FERC ¶ 61,061 at P 23.