

155 FERC ¶ 61,160
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

May 12, 2016

In Reply Refer To:
Trans-Union Interstate Pipeline, L.P.
Docket No. RP16-850-000

Trans-Union Interstate Pipeline, L.P.
c/o Stinson Leonard Street LLP
1775 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20006

Attention: Steven A. Weiler

Dear Mr. Weiler:

1. On April 15, 2016, you filed on behalf of Trans-Union Interstate Pipeline, L.P. (Trans-Union) a tariff filing containing a revised tariff record¹ reflecting Trans-Union's request for an extension of time to comply with certain of the North American Energy Standards Board (NAESB) Version 3.0 business practice standards (Version 3.0 Standards) adopted by NAESB's Wholesale Gas Quadrant (WGQ) and incorporated by reference by the Commission in Order No. 587-W.² As discussed below, in this order we will accept Trans-Union's tariff record for filing, effective April 1, 2016, as requested, subject to Trans-Union making an additional compliance filing as described in this order. Additionally, as discussed below, we will grant Trans-Union's request for an extension of time to comply with NAESB WGQ Version 3.0 Standard 0.4.4 relating to electronic

¹ Trans-Union Interstate Pipeline, L.P., FERC NGA Gas Tariff, Trans-Union Interstate Pipeline, L.P. 10142010, [GTC - 31, NAESB Standards, 5.0.0](#).

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 Fed. Reg. 67,302 (Nov. 2, 2015), FERC Stats. & Regs. ¶ 31,373 (2015) (Order No. 587-W).

processing, but clarify the scope of the extension we are granting regarding the requirement to post proprietary location codes on a pipeline's Internet website.

2. On April 16, 2015, the Commission issued Order No. 809,³ a final rule amending the Commission's regulations to incorporate by reference standards developed and filed by NAESB relating to the scheduling of transportation service on interstate natural gas pipelines to better coordinate the scheduling practices of the wholesale natural gas and electric industries, as well as to provide additional scheduling flexibility to all shippers on interstate natural gas pipelines. In Order No. 809, the Commission revised the nationwide Timely Nomination Cycle nomination deadline for scheduling natural gas transportation from 11:30 a.m. Central Clock Time (CCT) to 1:00 p.m. CCT and revised the intraday nomination timeline, to include adding an additional intraday scheduling opportunity during the gas operating day. The Commission required interstate natural gas pipelines to comply with the revised NAESB standards incorporated in that rule beginning on April 1, 2016.⁴ In addition, the Commission required pipelines to file tariff records to reflect the changed standards by February 1, 2016.⁵

3. On October 16, 2015, the Commission issued Order No. 587-W, a final rule amending its regulations to incorporate by reference the latest version (Version 3.0) of seven business practice standards adopted by the WGQ of NAESB applicable to interstate natural gas pipelines. These updated business practice standards contain and supplement the revisions to the NAESB scheduling standards previously accepted by the Commission in Order No. 809 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 were required to be implemented on April 1, 2016, and the Commission required interstate natural gas pipelines to file tariff records to reflect the changed standards by February 1, 2016. These implementation dates were picked to coincide with the previously established implementation dates set in Order No. 809 to allow pipelines to make only a single tariff filing covering both Order Nos. 809 and 587-W.

³ *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, Order No. 809, 80 Fed. Reg. 23,198 (Apr. 24, 2015), FERC Stats. & Regs. ¶ 31,368 (2015) (Order No. 809).

⁴ Order No. 809, FERC Stats. & Regs. ¶ 31,368 at P 168.

⁵ *Id.*

4. Trans-Union's tariff filing requests an extension of time so that it can defer compliance with NAESB WGQ Version 3.0 Standard 0.4.4 until such time as Trans-Union receives a request from a Part 284, open access customer for Trans-Union to provide it with electronic data services. Trans-Union submits that good cause exists to grant its extension request. In support of its request, Trans-Union states that, when it made its original NAESB WGQ Version 3.0 compliance filing on February 1, 2016, it inadvertently failed to seek an extension of time to comply with NAESB WGQ Version 3.0 Standard 0.4.4. Trans-Union explains that it is a small, two-customer pipeline and the burden of compliance with this requirement would be substantial and would greatly exceed the benefits that might allegedly accrue. Trans-Union asserts that it has not received any requests from its customers to provide them with the type of data services related to the NAESB WGQ Version 3.0 Standard identified in its requested extension.

5. Trans-Union also requests waiver of the Commission's 30-day notice requirement⁶ so that the tariff record referenced in footnote No. 1 can become effective on April 1, 2016.

6. Notice of Trans-Union's filing was published in the *Federal Register*, 81 Fed. Reg. 23,697 (2016), with interventions and protests due on or before April 27, 2016. None was filed.

7. The Commission has reviewed Trans-Union's request for an extension of time and finds that Trans-Union has provided good cause for the Commission to grant its request for a time extension for compliance with NAESB WGQ Version 3.0 Standard 0.4.4. However, as discussed below, we clarify the scope of the extension we are granting as to the posting of proprietary location codes. We also will grant Trans-Union's request for waiver of notice so that the tariff record referenced in footnote No. 1 becomes effective on April 1, 2016.

8. Specifically, we will grant Trans-Union's requested extension of time to implement the requirements set forth in NAESB WGQ Version 3.0 Standard 0.4.4 related to Electronic Data Interchange, Electronic Delivery Mechanism, and Internet Electronic Transport transactions. The extension of time is limited to the NAESB WGQ Version 3.0 Standards promulgated by Order No. 587-W⁷ and will be in effect until such time as

⁶ 18 C.F.R. § 154.207 (2015).

⁷ See *B-R Pipeline Co.*, 128 FERC ¶ 61,126, at P 6 (2009) (each time the Commission adopts a new version of the standards, pipelines must request a waiver of the new standards).

Trans-Union is requested by a Part 284, open access customer to provide such electronic data services. However, the Commission clarifies that this extension of time does not apply to the requirements set forth in NAESB WGQ Version 3.0 Standard 0.4.4 related to the posting of information on proprietary location codes on the pipeline's Internet website.

9. In *Equitrans L.P.*, the Commission denied the requested extension for the Version 3.0 Standards as they relate to the posting of proprietary location codes on a pipeline's Internet website.⁸ The Commission explained that compliance with the requirements set forth in those standards as they apply to the posting on a pipeline's Internet website of proprietary location codes does not require an interstate pipeline to incur substantial additional software upgrade costs.⁹ The Commission further explained that requiring interstate pipelines to post information regarding proprietary codes on the pipelines' Internet website by April, 1, 2016 enables the Commission and customers to continue to identify active interconnection points referenced in the Index of Customers through the website postings thereafter.¹⁰

10. In general, interstate natural gas pipelines ought to be able to post active point information on their Internet websites. To implement these changes, a pipeline needs only to (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.

11. Accordingly, Trans-Union is directed to file a revised tariff record within 20 days from the date of issuance of this order to revise NAESB WGQ Version 3.0 Standard 0.4.4 in the section of its tariff titled "Standards for which Waiver or Extension of Time to Comply have been granted" to clarify that the extension of time does not apply to the requirements of this standard related to the posting of information on proprietary location codes on the pipeline's Internet website.

⁸ *Equitrans L.P.*, 153 FERC ¶ 61,320, at PP 9-11 (2015).

⁹ *Id.* P 11.

¹⁰ *Id.* (citing Order No. 587-W, FERC Stats. & Regs. ¶ 31,373 at P 41) where the Commission explained that when pipelines make their Form No. 549-B (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.

12. Trans-Union's referenced tariff record is hereby accepted for filing, to be effective April 1, 2016, subject to it making a compliance filing with 20 days from the date of issuance of this order revising its tariff as discussed in the body of this order. Further, Trans-Union's request for waiver of section 154.207 of the Commission's Regulations is hereby granted, subject to the applicable conditions as discussed in the body of this order. Trans-Union's request for extension of time granted herein is limited to the NAESB WGQ's Version 3.0 Standards promulgated by Order No. 587-W.

By direction of the Commission.

Kimberly D. Bose,
Secretary.