



August 16, 2019

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Gas Transmission Northwest LLC
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700

John A. Roscher
Director, Rates & Tariffs

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Re: Gas Transmission Northwest LLC
Compliance Filing
Docket No. RP19-941-_____

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act (“NGA”) and Part 154 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,¹ and in compliance with the Commission order issued July 29, 2019, in Docket No. RP19-941-000, *et al.*, (“July 29 Order”),² Gas Transmission Northwest LLC (“GTN”) respectfully submits for filing revised Section 6.41³ to be part of its FERC Gas Tariff, Fourth Revised Volume No. 1-A (“Tariff”). GTN respectfully requests that the Commission accept revised Section 6.41, included herein as Appendix A, to be effective August 1, 2019.

Correspondence

The names, titles, mailing addresses, and telephone numbers of those persons to whom correspondence and communications concerning this filing should be addressed are as follows:

¹ 18 C.F.R. Part 154 (2019).

² *Order on Filings in Compliance with Order No. 587-Y*, 168 FERC ¶ 61,061 at ordering paragraphs (A) and (C) (2019).

³ Part 6.41. – General Terms & Conditions, Gas Industry Standards (“Section 6.41”).

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* Persons designated for official service pursuant to Rule 2010.

Statement of the Nature, Reasons and Basis for Filing

To comply with FERC Order No. 587-Y,⁴ on March 28, 2019, in Docket No. RP19-941-000, GTN filed a revised Section 6.41 to reflect the implementation of the most recent North American Energy Standards Board (NAESB) Standards, Version 3.1 (“Standards”), to become effective August 1, 2019 (“March Filing”). In its July 29 Order, the Commission accepted GTN’s March Filing to become effective as proposed, subject to further review and conditions as described herein.

In its March Filing, GTN requested certain revisions to Section 6.41 in order to implement the Standards in accordance with Order No. 587-Y. In its July 29 Order, the Commission identified GTN as having a compliance obligation, and directed GTN to make two (2) modifications to Section 6.41, including: a) changing a reference from “1.3.2(v) GT&C – Nominations, 6.19.4(b), except as provided for in 6.19.4(b)(5) and 6.19.4(c) of these General Terms and Conditions” to “1.3.2(v) GT&C – Nominations, 6.19.4(b)”; and b) remove Standard 1.3.2(v) from the section titled “Standards for which Waiver or Extension of Time to Comply have been granted.”⁵

To comply with the Commission’s directive, GTN is submitting in the instant filing revised Section 6.41 to modify its reference to Standard 1.3.2(v) in the “Standards not Incorporated by Reference

⁴ *Standards for Business Practices of Interstate Natural Gas Pipelines, Order No. 587-Y*, 165 FERC ¶ 61,109 (2018) (“Order No. 587-Y”).

⁵ July 29 Order at Appendix A. The July 29 Order further requires that the compliance filing reflecting the revisions described herein be submitted within 20 days from the date of issuance of the order.

and their Location in Tariff’ area of Section 6.41, and to remove the reference to Standard 1.3.2(v) from the “Standards for which Waiver or Extension of Time to Comply” area of Section 6.41.

Request for Waivers

GTN respectfully requests that the Commission grant all waivers of its regulations and GTN’s Tariff to accept this filing and approve Section 6.41 to be effective as requested herein.

Effective Date

GTN requests that the Commission accept Section 6.41, enclosed as Appendix A, to be effective August 1, 2019.

Material Enclosed

In accordance with Sections 154.7 and 154.201 of the Commission’s regulations and Order No. 714,⁶ GTN is submitting the following XML filing package, which includes:

1. This transmittal letter;
2. The clean version of Section 6.41 (Appendix A); and
3. A marked version of Section 6.41 (Appendix B).

Certificate of Service

As required by Section 154.7(b) and Section 154.208 of the Commission’s regulations, copies of this filing are being served on all of GTN’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 GTN’s principal place of business.

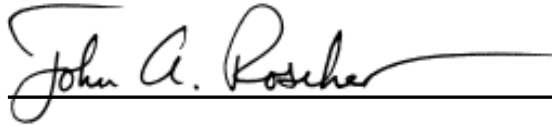
Pursuant to Section 385.2005 of the Commission’s regulations, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of his knowledge and belief. The undersigned possesses full power and authority to sign such filing.

⁶ *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008) (“Order No. 714”).

Any questions regarding this filing may be directed to David A. Alonzo at (832) 320-5477.

Respectfully submitted,

GAS TRANSMISSION NORTHWEST LLC

A handwritten signature in black ink that reads "John A. Roscher". The signature is written in a cursive style and is positioned above a solid horizontal line.

John A. Roscher
Director, Rates & Tariffs

Enclosures

Appendix A

Gas Transmission Northwest LLC *FERC Gas Tariff, Fourth Revised Volume No. 1-A*

Clean Tariff

<u>Section Description</u>	<u>Version</u>
Part 6.41 – General Terms & Conditions, Gas Industry Standards	v.8.0.0

6.41 GAS INDUSTRY STANDARDS

Compliance with 18 CFR, Section 284.12

GTN has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.1, 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>
1.2.4	GT&C – Definitions, 6.1(27)
1.3.1	GT&C – Definitions, 6.1(1)
1.3.2(i-iv, vi)	GT&C – Nominations, 6.19.4(b)
1.3.2(v)	GT&C – Nominations, 6.19.4(b)
1.3.5	GT&C – Nominations, 6.19.4(a)
1.3.6	GT&C – Nominations, 6.19.4(b)(v)
1.3.7	GT&C – Nominations, 6.19.4(c)(1)
1.3.8	GT&C – Nominations, 6.19.4(c)(2)
1.3.9	GT&C – Nominations, 6.19.4(c)(3)
1.3.11	GT&C – Nominations, 6.19.4(c)(2)
1.3.19	GT&C – Nominations, 6.19.4(a)
2.3.7	GT&C – Inspection of Equipment and Records, 6.6(3)
2.3.9	GT&C – Definitions, 6.1(7)
2.3.11	GT&C – Inspection of Equipment and Records, 6.6(3)
2.3.14	GT&C – Inspection of Equipment and Records, 6.6(3)
3.3.14	GT&C – Billing, 6.7(1)
3.3.15	GT&C – Payment, 6.8(5)
3.3.17	GT&C – Payment, 6.8(1)
5.3.2	GT&C – Scheduling of Parcels, Bids, and Notifications, 6.28.8
5.3.3	GT&C – Allocation of Parcels, 6.28.7(a)
5.3.7	GT&C – Capacity Recall and Reput, 6.28.9(b)
5.3.8	GT&C – Capacity Recall and Reput, 6.28.9(c)
5.3.13	GT&C – Bidding for a Parcel, 6.28.6(d)
5.3.14	GT&C – Posting of a Parcel, 6.28.5
5.3.15	GT&C – Bidding for a Parcel, 6.28.6(d)
5.3.26	GT&C – Notice Requirements, 6.28.3(c)
5.3.55	GT&C – Capacity Recall and Reput, 6.28.9(a)

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

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

Operating Capacity and Unsubscribed:

Standards:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Data Sets:

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:

Data Sets:
0.4.1

Nominations Related Standards:

Definitions:
1.2.1, 1.2.2, 1.2.3, 1.2.5, 1.2.6, 1.2.8, 1.2.9, 1.2.10, 1.2.11, 1.2.12, 1.2.13, 1.2.14,
12.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19

Standards:
1.3.3, 1.3.4, 1.3.13, 1.3.14, 1.3.15, 1.3.16, 1.3.17, 1.3.18, 1.3.20, 1.3.21, 1.3.22,
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, 1.3.32, 1.3.33,
1.3.34, 1.3.35, 1.3.36, 1.3.37, 1.3.38, 1.3.39, 1.3.40, 1.3.41, 1.3.42, 1.3.43, 1.3.44,
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

Data Sets:
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:
2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:
2.3.1, 2.3.2, 2.3.3, 2.3.4, 2.3.5, 2.3.6, 2.3.8, 2.3.10, 2.3.12, 2.3.13, 2.3.15, 2.3.16,
2.3.17, 2.3.18, 2.3.19, 2.3.20, 2.3.21, 2.3.22, 2.3.23, 2.3.25, 2.3.26, 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

Data Sets:
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:

Definition:
3.2.1

Standards:

3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.16,
3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 3.3.26

Data Sets:

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, 4.2.19, 4.2.20

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, 4.3.60, 4.3.61, 4.3.62, 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, 4.3.83, 4.3.84, 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, 4.3.103, 4.3.104, 4.3.105, 4.3.106

Capacity Release Standards:

Definitions:

5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5

Standards:

5.3.1, 5.3.4, 5.3.5, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.16, 5.3.18, 5.3.19, 5.3.20, 5.3.21,
5.3.22, 5.3.23, 5.3.24, 5.3.25, 5.3.28, 5.3.29, 5.3.31, 5.3.32, 5.3.33, 5.3.34, 5.3.35,
5.3.36, 5.3.37, 5.3.38, 5.3.39, 5.3.40, 5.3.41, 5.3.42, 5.3.44, 5.3.45, 5.3.46, 5.3.47,
5.3.48, 5.3.49, 5.3.50, 5.3.51, 5.3.52, 5.3.53, 5.3.54, 5.3.56, 5.3.57, 5.3.58, 5.3.59,
5.3.60, 5.3.62, 5.3.62a, 5.3.63, 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

Data Sets:

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

Internet Electronic Transport Related Standards:

Definitions:

10.2.1, 10.2.2, 10.2.3, 10.2.4, 10.2.5, 10.2.6, 10.2.7, 10.2.8, 10.2.9, 10.2.10, 10.2.11,
10.2.12, 10.2.13, 10.2.14, 10.2.15, 10.2.16, 10.2.17, 10.2.18, 10.2.19, 10.2.20,

10.2.21, 10.2.22, 10.2.23, 10.2.24, 10.2.25, 10.2.26, 10.2.27, 10.2.28, 10.2.29,
10.2.30, 10.2.31, 10.2.32, 10.2.33, 10.2.34, 10.2.35, 10.2.36, 10.2.37, 10.2.38

Standards:

10.3.1, 10.3.3, 10.3.4, 10.3.5, 10.3.6, 10.3.7, 10.3.8, 10.3.9, 10.3.10, 10.3.11, 10.3.12,
10.3.14, 10.3.15, 10.3.16, 10.3.17, 10.3.18, 10.3.19, 10.3.20, 10.3.21, 10.3.22,
10.3.23, 10.3.24, 10.3.25, 10.3.26, 10.3.27

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

NAESB Standard

Waiver or Extension of Time

Appendix B

Gas Transmission Northwest LLC *FERC Gas Tariff, Fourth Revised Volume No. 1-A*

Marked Tariff

<u>Section Description</u>	<u>Version</u>
Part 6.41 – General Terms & Conditions, Gas Industry Standards	v.8.0.0

6.41 GAS INDUSTRY STANDARDS

Compliance with 18 CFR, Section 284.12

GTN has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.1, 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>
1.2.4	GT&C – Definitions, 6.1(27)
1.3.1	GT&C – Definitions, 6.1(1)
1.3.2(i-iv, vi)	GT&C – Nominations, 6.19.4(b)
1.3.2(v)	GT&C – Nominations, 6.19.4(b), except as provided for in 6.19.4(b)(5) and 6.19.4(c) of these General Terms and Conditions
1.3.5	GT&C – Nominations, 6.19.4(a)
1.3.6	GT&C – Nominations, 6.19.4(b)(v)
1.3.7	GT&C – Nominations, 6.19.4(c)(1)
1.3.8	GT&C – Nominations, 6.19.4(c)(2)
1.3.9	GT&C – Nominations, 6.19.4(c)(3)
1.3.11	GT&C – Nominations, 6.19.4(c)(2)
1.3.19	GT&C – Nominations, 6.19.4(a)
2.3.7	GT&C – Inspection of Equipment and Records, 6.6(3)
2.3.9	GT&C – Definitions, 6.1(7)
2.3.11	GT&C – Inspection of Equipment and Records, 6.6(3)
2.3.14	GT&C – Inspection of Equipment and Records, 6.6(3)
3.3.14	GT&C – Billing, 6.7(1)
3.3.15	GT&C – Payment, 6.8(5)
3.3.17	GT&C – Payment, 6.8(1)
5.3.2	GT&C – Scheduling of Parcels, Bids, and Notifications, 6.28.8
5.3.3	GT&C – Allocation of Parcels, 6.28.7(a)
5.3.7	GT&C – Capacity Recall and Reput, 6.28.9(b)
5.3.8	GT&C – Capacity Recall and Reput, 6.28.9(c)
5.3.13	GT&C – Bidding for a Parcel, 6.28.6(d)
5.3.14	GT&C – Posting of a Parcel, 6.28.5
5.3.15	GT&C – Bidding for a Parcel, 6.28.6(d)
5.3.26	GT&C – Notice Requirements, 6.28.3(c)
5.3.55	GT&C – Capacity Recall and Reput, 6.28.9(a)

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

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

Operating Capacity and Unsubscribed:

Standards:

0.3.18, 0.3.20, 0.3.21, 0.3.22

Data Sets:

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:

Data Sets:

0.4.1

Nominations Related Standards:

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.5, 1.2.6, 1.2.8, 1.2.9, 1.2.10, 1.2.11, 1.2.12, 1.2.13, 1.2.14, 1.2.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19

Standards:

1.3.3, 1.3.4, 1.3.13, 1.3.14, 1.3.15, 1.3.16, 1.3.17, 1.3.18, 1.3.20, 1.3.21, 1.3.22, 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, 1.3.32, 1.3.33, 1.3.34, 1.3.35, 1.3.36, 1.3.37, 1.3.38, 1.3.39, 1.3.40, 1.3.41, 1.3.42, 1.3.43, 1.3.44, 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

Data Sets:

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:

2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5

Standards:

2.3.1, 2.3.2, 2.3.3, 2.3.4, 2.3.5, 2.3.6, 2.3.8, 2.3.10, 2.3.12, 2.3.13, 2.3.15, 2.3.16, 2.3.17, 2.3.18, 2.3.19, 2.3.20, 2.3.21, 2.3.22, 2.3.23, 2.3.25, 2.3.26, 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

Data Sets:

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:

Definition:

3.2.1

Standards:

3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.16,
3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 3.3.26

Data Sets:

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, 4.2.19, 4.2.20

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

1.3.2(v)	Limited Waiver, as provided for in 6.19.4(b)(5) and 6.19.4(c) of these General Terms and Conditions
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