



January 31, 2025

Ms. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Guardian Pipeline, L.L.C.
Order No. 587-AA Compliance Filing
NAESB WGQ Business Practice Standards, Version 4.0
Docket No. RP25-446-000

Dear Ms. Reese:

Pursuant to Section 4 of the Natural Gas Act and Part 154 of the Federal Energy Regulatory Commission's ("Commission") regulations and the Commission's Order No. 587-AA¹ issued November 22, 2024, in Docket No. RM96-1-043, Guardian Pipeline, L.L.C. ("Guardian") respectfully submits for filing and acceptance the tariff record listed below for inclusion in its FERC Gas Tariff, Volume No. 1 ("Tariff"). The proposed tariff record is submitted to become effective August 1, 2025.

Part 8.35, GT&C – NAESB WGQ Standards, v. 8.0.0

Statement of Nature, Reasons, and Basis for the Proposed Changes

On November 22, 2024, in Docket No. RM96-1-043, the Commission issued Order No. 587-AA (the "Order") amending Section 284.12 of its open access regulations, 18 C.F.R. § 284.12, governing standards for conducting business practices and electronic communications with interstate natural gas pipelines. Specifically, the Commission adopted, with certain enumerated exceptions, the latest version ("Version 4.0") of the consensus industry standards promulgated by the Wholesale Gas Quadrant ("WGQ") of the North American Energy Standards Board ("NAESB") by incorporating these standards by reference into its regulations.

The revised tariff record included herein reflects the Version 4.0 standards adopted by the Order and incorporated by reference into the Commission's regulations. Additionally, General Terms & Conditions Section 35 of the Tariff reflects the format of the tariff provision set forth in the Sample Tariff Record issued by the Commission on November 25, 2024.²

¹ *Standards for Business Practices of Interstate Natural Gas Pipelines*, Docket No. RM96-1-043, Order No. 587-AA, 176 FERC ¶ 61,135 (November 22, 2024) ("Order").

² *Sample Tariff Record, General Terms and Conditions in Compliance with 18 C.F.R., Section 284.12*, Docket No. RM96-1-043 (November 25, 2023).

Adoption of Standards

Consistent with the requirements in the Order, Guardian submits revisions to Section 35 of the General Terms and Conditions (“GT&C”) of its Tariff to reflect the latest version of the NAESB standards adopted by Commission.

Guardian proposes to consolidate the standards from Books 4 and 10 into new Book 12. Guardian also proposes to adopt by reference the modifications to existing referenced standards required by NAESB Version 4.0. Section 35 of the GT&C also has been revised to reference NAESB Version 4.0 and update NAESB’s limited copyright waiver language.

Proposed Effective Date

Pursuant to section 154.207 of the Commission’s regulations and Order No. 587-AA,³ Guardian respectfully requests that the proposed tariff record be approved effective August 1, 2025. In accordance with section 154.7(a)(9) of the Commission’s regulations, Guardian hereby files a motion to place the proposed tariff record into effect at the end of any suspension period if one is so ordered by the Commission in this proceeding.

Waivers and Extensions of Time

Pursuant to section 154.207 of the Commission’s regulations and the Order,⁴ Guardian has not requested any additional waivers of Version 4.0 of NAESB’s standards. Guardian has not requested an extension beyond August 1, 2025, for implementation of NAESB Version 4.0 Standards.

Pursuant to section 154.7(a)(7) of the Commission’s regulations, Guardian has not identified any additional waivers of the Commission’s regulations needed to permit its filing to become effective as proposed; however, Guardian respectfully requests that, should the Commission determine that any such waivers are required, the Commission grant such waivers as are necessary in order that the revised tariff record may be made effective as proposed.

Materials Enclosed

In accordance with section 154.7 of the Commission’s regulations, the following items are included in this filing:

³ Order No. 587-AA at P 23.

⁴ Order No. 587-AA at PP 27-29.

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1. an eTariff XML filing package containing the proposal in electronic format;
2. a transmittal letter in PDF format, which incorporates the Statement of Nature, Reasons, and Basis for the filing required by section 154.7(a)(6) of the Commission's regulations;
3. Appendix A – a clean version of the tariff record in PDF format for publishing in eLibrary; and
4. Appendix B – a marked version of the tariff record in PDF format for publishing in eLibrary.

Service and Correspondence

In accordance with section 154.208 of the Commission's regulations, the undersigned certifies that a copy of this filing has been served electronically on Guardian's customers and affected state regulatory commissions. A paper copy of this filing may only be served if a customer has been granted waiver of electronic service pursuant to Part 390 of the Commission's regulations. In addition, a copy of this filing is available for public inspection during regular business hours at Guardian's office at 100 West Fifth Street, Tulsa, Oklahoma 74103.

It is requested that a copy of all communications, correspondence, and pleadings with respect to this filing be sent to:

Adina Owen Assistant General Counsel DT Midstream 600 Travis Street, Suite 3250 Houston, Texas 77002 (832) 712-5554 Email: regulatory@dtmidstream.com

Pursuant to section 385.2005 and section 385.2011(c)(5) 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 knowledge and belief of the undersigned.

Any questions regarding this filing may be directed to Adina Owen at (832) 712-555.

Respectfully submitted,

/s/ Adina Owen

Adina Owen
Assistant General Counsel
DT Midstream
600 Travis Street, Suite 3250
Houston, Texas 77002

Attachments

Appendix A

Clean Tariff Record

35. NORTH AMERICAN ENERGY STANDARDS BOARD WHOLESALE GAS QUADRANT ("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). 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:

Pursuant to NAESB's Copyright Procedure Regarding Member and Purchaser Self-Executing Waiver as adopted by the NAESB Board of Directors on April 4, 2013, Transporter may publish in its tariff, compliance filings, in communications with customers or stakeholders in conducting day to day business or in communications with regulatory agencies some or all of the language contained in NAESB standards protected by copyright, provided that Transporter includes appropriate citations in the submission.

Transporter has elected to reproduce the following NAESB WGQ standards and selected optional principles subject to NAESB's limited copyright waiver. With respect to each reproduced standard, Transporter incorporates the following: © 1996 – 2023 NAESB, all rights reserved.

<u>NAESB Standard</u>	<u>Tariff Record</u>	<u>Tariff Provision</u>
Creditworthiness Standards:		
0.3.3	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(b)(i)
0.3.4	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(c)(i)
0.3.5	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(c)(ii)
0.3.6	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(b)(ii)
0.3.7	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(a)(i); 10.5(a)(ii)
0.3.8	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.3(e)
0.3.9	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(b)(iv)
0.3.10	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(d)
Nominations Related Standards:		
1.2.6	Part 8, Section 2; GT&C – Definitions	Definition: "Operational Flow Order" and "OFO"
1.3.1	Part 8, Section 2; GT&C – Definitions	Definition: "Day" or "Gas Day"
1.3.2 (i-vi)	Part 8, Section 11; GT&C – Nominations	11.1(b)(i-vi)

Flowing Gas Related Standards:

2.3.5	Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	13.1(a); 13.2(a)
2.3.7	Part 8, Section 5; GT&C – Measurement and Measurement Equipment	5.12
2.3.11	Part 8, Section 5; GT&C – Measurement and Measurement Equipment	5.12
2.3.12	Part 8, Section 5; GT&C – Measurement and Measurement Equipment; Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	5.12; 13.3
2.3.13	Part 8, Section 5; GT&C – Measurement and Measurement Equipment	5.12
2.3.14	Part 8, Section 5; GT&C – Measurement and Measurement Equipment	5.12
2.3.15	Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	13.1(a); 13.2(a)
2.3.16	Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	13.1(a); 13.2(a)
2.3.18	Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	13.1(a); 13.2(a)
2.3.26	Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	13.3
2.3.40	Part 8, Section 19; GT&C – Resolution of Imbalances	19.2(b)
2.3.41	Part 8, Section 19; GT&C – Resolution of Imbalances	19.2(c)
2.3.45	Part 8, Section 19; GT&C – Resolution of Imbalances	19.2(d)
2.3.46	Part 8, Section 19; GT&C – Resolution of Imbalances	19.2(e)
2.3.47	Part 8, Section 19; GT&C – Resolution of Imbalances	19.2(f)

Invoicing Related Standards:

3.2.1	Part 8, Section 2; GT&C – Definitions	Definition: "Business Day"
3.3.15	Part 8, Section 8; GT&C – Billing	8.6
3.3.25	Part 8, Section 8; GT&C – Billing	8.2

Quadrant Electronic Delivery Mechanism Related Standards:

4.1.40	Part 8, Section 3; GT&C – Quality	3.7(b)
4.3.89	Part 8, Section 3; GT&C – Quality	3.7(a)
4.3.90	Part 8, Section 3; GT&C – Quality	3.7(a)
4.3.91	Part 8, Section 3; GT&C – Quality	3.7(a)
4.3.92	Part 8, Section 3; GT&C – Quality	3.7(a)
4.3.107	Part 8, Section 20; GT&C – Web Site	20.3

Capacity Release Related Standards:

5.2.3	Part 8, Section 2; GT&C – Definitions	Definition: "Elapsed Prorata Capacity"
5.3.1	Part 8, Section 21; GT&C – Capacity Release	21.4(b)

5.3.2	Part 8, Section 21; GT&C – Capacity Release	21.3(d); 21.4(b)
5.3.4	Part 8, Section 21; GT&C – Capacity Release	21.4(h)
5.3.5	Part 8, Section 21; GT&C – Capacity Release	21.2(a)(xi)
5.3.13	Part 8, Section 21; GT&C – Capacity Release	21.4(f)
5.3.14	Part 8, Section 21; GT&C – Capacity Release	21.2(b)
5.3.15	Part 8, Section 21; GT&C – Capacity Release	21.4(f)
5.3.16	Part 8, Section 21; GT&C – Capacity Release	21.2(b)
5.3.19	Part 8, Section 21; GT&C – Capacity Release	21.4(h); 21.6(d)
5.3.26	Part 8, Section 21; GT&C – Capacity Release	21.2(a)(xi); 21.4(c)
5.3.44	Part 8, Section 21; GT&C – Capacity Release	21.9
5.3.54	Part 8, Section 21; GT&C – Capacity Release	21.9(g)
5.3.55	Part 8, Section 21; GT&C – Capacity Release	21.5(g)
5.3.59	Part 8, Section 21; GT&C – Capacity Release	21.7(c)
5.3.60	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.7(v)
5.3.73	Part 8, Section 21; GT&C – Capacity Release	21.11

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

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, 1.2.3, 1.2.4, 1.2.5, 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, 1.3.5, 1.3.6, 1.3.7, 1.3.8, 1.3.9, 1.3.11, 1.3.13, 1.3.14, 1.3.15, 1.3.16, 1.3.17, 1.3.18, 1.3.19, 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

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:

2.2.1, 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, 2.3.6, 2.3.8, 2.3.9, 2.3.10, 2.3.17, 2.3.19, 2.3.20, 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, 2.3.42, 2.3.43, 2.3.44, 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, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.16, 3.3.17, 3.3.18, 3.3.19, 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, 4.3.93, 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, 4.3.108, 4.3.110

Capacity Release Standards:

Definitions:

5.2.1, 5.2.2, 5.2.4, 5.2.5

Standards:

5.3.3, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.18, 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, 5.3.45, 5.3.46, 5.3.47, 5.3.48, 5.3.49, 5.3.50, 5.3.51, 5.3.52, 5.3.53, 5.3.56, 5.3.57, 5.3.58, 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

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, 12.2.20, 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

Appendix B

Marked Tariff Record

35. NORTH AMERICAN ENERGY STANDARDS BOARD WHOLESALE GAS QUADRANT ("NAESB WGQ") STANDARDS

Compliance with 18 CFR, Section 284.12

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0.3.9	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(b)(iv)
0.3.10	Part 8, Section 10; GT&C – Service Requests and Contracting for Service	10.5(d)
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2.3.12	Part 8, Section 5; GT&C – Measurement and Measurement Equipment; Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	5.12; 13.3
2.3.13	Part 8, Section 5; GT&C – Measurement and Measurement Equipment	5.12
2.3.14	Part 8, Section 5; GT&C – Measurement and Measurement Equipment	5.12
2.3.15	Part 8, Section 13; GT&C – Determination of Receipts and Deliveries	13.1(a); 13.2(a)
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2.3.47	Part 8, Section 19; GT&C – Resolution of Imbalances	19.2(f)

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3.3.25	Part 8, Section 8; GT&C – Billing	8.2

Quadrant Electronic Delivery Mechanism Related Standards:

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4.3.92	Part 8, Section 3; GT&C – Quality	3.7(a)
4.3.107	Part 8, Section 20; GT&C – Web Site	20.3

Capacity Release Related Standards:

5.2.3	Part 8, Section 2; GT&C – Definitions	Definition: "Elapsed Prorata Capacity"
5.3.1	Part 8, Section 21; GT&C – Capacity Release	21.4(b)

5.3.2	Part 8, Section 21; GT&C – Capacity Release	21.3(d); 21.4(b)
5.3.4	Part 8, Section 21; GT&C – Capacity Release	21.4(h)
5.3.5	Part 8, Section 21; GT&C – Capacity Release	21.2(a)(xi)
5.3.13	Part 8, Section 21; GT&C – Capacity Release	21.4(f)
5.3.14	Part 8, Section 21; GT&C – Capacity Release	21.2(b)
5.3.15	Part 8, Section 21; GT&C – Capacity Release	21.4(f)
5.3.16	Part 8, Section 21; GT&C – Capacity Release	21.2(b)
5.3.19	Part 8, Section 21; GT&C – Capacity Release	21.4(h); 21.6(d)
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