



## NORTH AMERICAN ENERGY STANDARDS BOARD

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May 21, 2024  
Filed Electronically

The Honorable Debbie-Anne A. Reese  
Federal Energy Regulatory Commission  
888 First Street, N.E. Room 1A  
Washington, DC 20426

RE: Standards for Business Practices of Interstate Natural Gas Pipelines (Docket No. RM96-1-043)

Dear Ms. Reese:

The North American Energy Standards Board (“NAESB”) herewith voluntarily submits this report to the Federal Energy Regulatory Commission (“FERC” or “Commission”) regarding errata to Version 4.0 of the NAESB Wholesale Gas Quadrant (“WGQ”) Business Practice Standards, currently the subject of a Notice of Proposed Rulemaking issued by the Commission on March 21, 2024 in Docket No. RM96-1-043. Version 4.0 of the NAESB WGQ Business Practice Standards was ratified by the NAESB membership and subsequently submitted to the Commission on September 29, 2023. The minor correction included in this report, Minor Correction MC24002, was adopted by the WGQ Executive Committee on May 2, 2024 and modifies NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice included in the WGQ Invoicing Related Standards.

This report is being filed electronically in Adobe Acrobat® Portable Document Format (.pdf). All of the documents are also available on the NAESB website ([www.naesb.org](http://www.naesb.org)). Please feel free to call the NAESB office (713-356-0060) or refer to the NAESB website should you have any questions or need additional information regarding Version 4.0 of the NAESB WGQ Business Practice Standards.

Respectfully submitted

Ms. Rae McQuade  
President, North American Energy Standards Board

cc with enclosures:

Chairman, Willie L. Phillips, Federal Energy Regulatory Commission  
Commissioner, Allison Clements, Federal Energy Regulatory Commission  
Commissioner, Mark C. Christie, Federal Energy Regulatory Commission

Mr. Matthew Christiansen, General Counsel, Office of the General Counsel, Federal Energy  
Regulatory Commission  
Mr. Joseph H. McClelland, Director, Office of Energy Infrastructure Security, Federal Energy  
Regulatory Commission  
Ms. Jette Gebhart, Director, Office of Energy Market Regulation, Federal Energy Regulatory  
Commission  
Ms. Jignasa Gadani, Director, Office of Energy Policy and Innovation, Federal Energy  
Regulatory Commission

Mr. Michael Desselle, Chairman & CEO, North American Energy Standards Board  
Mr. Paul Smith, Vice Chairman, North American Energy Standards Board  
Mr. Jonathan Booe, Executive Vice President & COO, North American Energy Standards Board  
Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Enclosures (all documents and links are available publicly on the NAESB website – [www.naesb.org](http://www.naesb.org))

- Appendix A Minor Correction MC24002 Recommendation
- Appendix B NAESB WGQ Executive Committee Notational Ballot Results Approving Minor Correction MC24002
- Appendix C Notice to NAESB WGQ Members of Executive Committee Adoption of Minor Correction MC24002
- Appendix D NAESB Operating Procedures for Minor Clarifications and Corrections to Standards



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**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**Standards for Business Practices  
of Natural Gas Pipelines**

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**Docket No. RM96-1-043**

The North American Energy Standards Board (“NAESB”) voluntarily submits this report in accordance with the Federal Energy Regulatory Commission (“FERC” or “Commission”) Notice of Proposed Rulemaking (“NOPR”) *Standards for Business Practices of Interstate Natural Gas Pipelines* issued on March 21, 2024 in Docket No. RM96-1-043.<sup>1</sup> This report is to update the Commission on the May 2, 2024 NAESB Wholesale Gas Quadrant (“WGQ”) Executive Committee adoption of Minor Correction MC24002, included in this report.<sup>2</sup>

On April 15, 2024, NAESB received the request for minor correction, Minor Correction MC24002, jointly submitted by Boardwalk Pipelines, Eastern Gas Transmission and Storage, Inc., Kinder Morgan, Inc., and TC Energy Corporation. Minor Correction MC24002 revises NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice included in the WGQ Invoicing Related Standards within Version 4.0 of the NAESB WGQ Business Practice Standards. NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice supports the communication of invoices between trading partners, including transactions for natural gas transportation and sales and related charges and/or allowances. The request proposed the incorporation of standards changes that were adopted and ratified by NAESB in response to Standards Request R19011 and Minor Correction MC22005 but inadvertently omitted from Version 3.2 and Version 4.0 of the NAESB WGQ Business Practice Standards. The standard changes resulting from the adoption of Minor Correction MC24002 were applied on May 17, 2024.

As identified in Minor Correction MC24002, both Standards Request R19011 and Minor Correction MC22005 revised the Electronic Delivery Mechanism (EDI) X12 Mapping Guidelines for NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice. On March 23, 2020, prior to the publication of Version 3.2 of the NAESB WGQ Business Practice Standards, NAESB ratified standards in response to Standards Request R19011. The ratified standards included modifications to the EDI X12 Mapping Guidelines for NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice to ensure the hierarchal structure of the dataset complied with the Accredited Standards Institute (ACS) X12 Transaction Set 811 Consolidated Service Invoice / Statement. In response to Minor Correction MC22005, the EDI X12 Mapping Guidelines for NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice

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<sup>1</sup> Notice of Proposed Rulemaking, *Standards for Business Practices of Interstate Natural Gas Pipelines*, 89 Fed. Reg. 23954 (March 21, 2024), 18 FERC ¶ 284 (2024).

<sup>2</sup> Minor Correction MC24002 is posted to the NAESB website and available at the following link: [https://naesb.org/pdf4/wgq\\_mc24002.docx](https://naesb.org/pdf4/wgq_mc24002.docx)



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was revised to add code values for five data elements. This minor correction became effective November 23, 2022 prior to the publication of Version 4.0 of the NAESB WGQ Business Practice Standards.

In accordance with the NAESB Operating Procedures for Minor Clarifications and Corrections to Standards, the NAESB office distributed Minor Correction MC24002 for NAESB WGQ Executive Committee consideration and vote via notational ballot on April 25, 2024. At the close of the notational ballot period on May 2, 2024, the minor correction obtained the requisite simple majority support for adoption by the NAESB WGQ Executive Committee, with eighteen votes in favor and none in opposition. Following the adoption, the minor correction was posted for a two-week comment period beginning on May 3, 2024 and concluding on May 17, 2024. No comments were received. Consistent with the NAESB Operating Procedures for minor corrections discovered during the editorial review process, the effective date for Minor Correction MC24002 is May 17, 2024.

The report is organized into four appendices. Appendix A contains Minor Correction MC24002. Appendix B and Appendix C provide hyperlinks to the NAESB WGQ Executive Committee notational ballot results approving the minor correction and the notice to WGQ members regarding the adoption of Minor Correction MC24002, respectively. Appendix D includes the NAESB Operating Procedures for Minor Clarifications and Corrections to Standards. The list of appendices shown below in tabular form include the FERC docket number of the amended standard, the version of the standard amended, and a description of the amendments:

Appendices	Description
Appendix A	<p>Minor Correction MC24002</p> <p><b>MC24002</b> applies to Docket No. RM96-1-043 and the EDI X12 Mapping Guidelines for NAESB WGQ Standard No. WGQ Standard No. 3.4.1 – Transportation / Sales Invoice included in the WGQ Invoicing Related Business Practice Standards within Version 4.0 of the NAESB WGQ Business Practice Standards, for which the FERC issued a NOPR on March 21, 2024</p> <p><u>Errata to Version 4.0 of the NAESB WGQ Business Practice Standards:</u></p> <p>NAESB WGQ Invoicing Related Standards: The purpose of the minor correction is to modify the EDI X12 Mapping Guidelines for NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice to address a publication error and incorporate changes consistent with those approved by the NAESB WGQ as part of recommendations to support Standards Request R19011 and Minor Correction MC22005</p>



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<b>Appendices</b>	<b>Description</b>
Appendix B	NAESB WGQ Executive Committee Notational Ballot Results Approving Minor Correction MC24002
Appendix C	Notice to NAESB WGQ Members of Executive Committee Adoption of Minor Correction MC24002
Appendix D	NAESB Operating Procedures for Minor Clarifications and Corrections to Standards

We appreciate the opportunity to provide this minor correction to the Commission. Minor Correction MC24002 impacts Version 4.0 of the NAESB WGQ Business Practice Standards currently the subject of the March 21, 2024 FERC NOPR in Docket No. RM96-1-043. If there are any questions or additional information is required, do not hesitate to contact the NAESB office (713-356-0060, [naesb@naesb.org](mailto:naesb@naesb.org)).

Appendix A contains Minor Correction MC24002, a minor correction to Version 4.0 of the NAESB WGQ Invoicing Related Business Practice Standards:



**RECOMMENDATION TO NAESB WGQ EXECUTIVE COMMITTEE**  
**Minor Correction / Clarification**  
**As Approved by the WGQ Executive Committee on May 2, 2024**

**Request No.: MC24002**  
**Requester: Multiple Pipelines – See attached**

**1. RECOMMENDED ACTION**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION**

- Change to Existing Practice
- Status Quo
- Correction

**2. TYPE OF DEVELOPMENT / MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle [x.1.z]
- Definition [x.2.z]
- Business Practice Standard [x.3.z]
- Document [x.4.z]
- Data Element [x.4.z]
- Code Value [x.4.z]
- X12 Implementation Guide [x.4.z]
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle [x.1.z]
- Definition [x.2.z]
- Business Practice Standard [x.3.z]
- Document [x.4.z]
- Data Element [x.4.z]
- Code Value [x.4.z]
- X12 Implementation Guide [x.4.z]
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:** To be applied to NAESB WGQ Standards Versions 3.2 and 4.0 as an errata to the published version.

- Correct the X12 EDISM for the following data set(s) so that the published version is consistent with the approved Recommendations for R19011 and MC22005:

NAESB WGQ Standard No. 3.4.1 Transportation / Sales Invoice

This recommendation also includes the following attachments:

Attachment 1 – List of Requesters:

[https://naesb.org/member\\_login\\_check.asp?doc=wgq\\_mc24002\\_rec\\_050324\\_attach1.docx](https://naesb.org/member_login_check.asp?doc=wgq_mc24002_rec_050324_attach1.docx)

Attachment 2 – R19011 Recommendation Form:

[https://naesb.org/member\\_login\\_check.asp?doc=wgq\\_mc24002\\_rec\\_050324\\_attach2.docx](https://naesb.org/member_login_check.asp?doc=wgq_mc24002_rec_050324_attach2.docx)

Attachment 3 – G811TSINFIX (correct X12 EDISM):

[https://naesb.org/member\\_login\\_check.asp?doc=wgq\\_mc24002\\_rec\\_050324\\_attach3.pdf](https://naesb.org/member_login_check.asp?doc=wgq_mc24002_rec_050324_attach3.pdf)

Attachment 4 – MC22005 Recommendation Form:

[https://naesb.org/member\\_login\\_check.asp?doc=wgq\\_mc24002\\_rec\\_050324\\_attach4.docx](https://naesb.org/member_login_check.asp?doc=wgq_mc24002_rec_050324_attach4.docx)



**RECOMMENDATION TO NAESB WGQ EXECUTIVE COMMITTEE**  
**Minor Correction / Clarification**  
**As Approved by the WGQ Executive Committee on May 2, 2024**

**Request No.: MC24002**  
**Requester: Multiple Pipelines – See attached**

**TECHNICAL CHANGE LOG:** (all instructions to accomplish the recommendation)

**Document Name and No.:** NAESB WGQ Standard No. 3.4.1 Transportation / Sales Invoice

**Description of Change: X12 EDISM**

Replace the existing X12 EDISM for 811 Consolidated Service Invoice/Statement (G811TSIN) in the NAESB WGQ X12 Implementation Guide with the X12 EDISM attached to this Recommendation (G811TSINFIX).

Apply MC22005 modifications to the corrected X12 EDISM (G811TSINFIX).

**4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

The published X12 Implementation Guide for NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice is incorrect in Version 3.2, and now in Version 4.0, and should be corrected to be consistent with the WGQ EC approved Recommendations for R19011 and MC22005.

**b. Description of Recommendation:**

The Subcommittee Co-Chairs recommend an errata to Version 3.2 and Version 4.0 be filed as soon as practicable, as the published implementation is incorrect and inconsistent with the previously WGQ EC approved recommendations and will delay implementation with Trading Partners.

Attached is the X12 EDISM file that should be used for Standard No. 3.4.1. This is the same file that was attached to the R19011 Recommendation form, which was approved by the WGQ Executive Committee on Feb 20, 2020. MC22005 approved changes should be applied on top of the R19011 approved changes.

While conducting testing with a Trading Partner, a Pipeline noticed an error with the X12 Implementation Guide for NAESB WGQ Standard No. 3.4.1 – Transportation / Sales Invoice. The issue was reviewed by the co-chairs of the subcommittee, who found the following:

Prior to publication of Version 3.2, the Joint IR/Technical Subcommittee recommended changes (R19011) to the X12 Implementation Guide. These recommended changes were approved by the WGQ Executive Committee during the Feb 20, 2020, meeting. However, the published Version 3.2 did not include the recommended changes noted above. This error in the publication was not caught during the publication process because no Transportation / Sales Invoice testing was being conducted with Trading Partners at that time.

It is not reasonable to delay the implementation to another version when the error was in the publication itself, and not due to a failure to submit the changes in a timely manner. Therefore, we respectfully request that NAESB make the corrections to the v4.0 Implementation Guide and file an errata with the FERC during the open comment period for the Notice of Proposed Rulemaking for RM96-1-043.





**RECOMMENDATION TO NAESB WGQ EXECUTIVE COMMITTEE**

**Minor Correction / Clarification**

**As Approved by the WGQ Executive Committee on May 2, 2024**

**Request No.: MC24002**

**Requester: Multiple Pipelines – See attached**

**Information Requirements / Technical Subcommittee**

See the following meeting minutes for the Joint Information Requirements / Technical Subcommittees:

- April 22, 2024

**Motion:**

Adopt the proposed implementation for MC24002 to be applied in NAESB WGQ Versions 3.2 and 4.0 as an errata, as set forth in Attachments 1, 2, 3 and 4 to the April 22, 2024, meeting minutes of the NAESB WGQ Joint Information Requirements / Technical Subcommittees.

*Motion Passed*

Appendix B NAESB WGQ Executive Committee Notational Ballot Results Approving Minor Correction MC24002

Appendix B contains the action taken by the NAESB WGQ Executive Committee via notational ballot to approve Minor Correction MC 24002:

<b>Appendix</b>	<b>NAESB WGQ Executive Committee Notational Ballot Results</b>
Appendix B	Minor Correction MC24002 as approved by the WGQ Executive Committee on May 2, 2024
	Results: <a href="https://naesb.org/pdf4/wgq_ec042524_mc_action_ballot_results.docx">https://naesb.org/pdf4/wgq_ec042524_mc_action_ballot_results.docx</a>

Appendix C Notice to NAESB WGQ Members of Executive Committee Adoption of Minor Correction MC24002

Appendix C contains the correspondence sent to all NAESB WGQ members to provide notice of the Executive Committee action taken on Minor Correction MC24002, to request comments, and to inform of future actions and timelines related to the minor correction.

<b>Appendix</b>	<b>NAESB WGQ Request for Minor Correction Comments</b>
Appendix C	Minor Correction MC24002 Request for Comments – Due May 17, 2024 <a href="https://naesb.org/pdf4/wgq_mc050324reqcom.doc">https://naesb.org/pdf4/wgq_mc050324reqcom.doc</a> No Comments Received

Appendix D NAESB Operating Procedures for Minor Clarifications and Corrections to Standards

Appendix D contains the excerpt from the NAESB Operating Procedures detailing the procedures to be followed for minor clarifications and corrections to existing NAESB WGQ Business Practice Standards.

## **Procedures for Minor Corrections as excerpted from the NAESB Operating Procedures**

### **D. Minor Clarifications and Corrections to Standards**

Minor clarifications and corrections to existing standards include: (a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor; (b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation; (c) clarifications or corrections to add code values to tables; and (d) clarifications and corrections that do not materially change a standard. Any request for a minor clarification or correction to an existing standard should be submitted in writing to the executive director. This request shall include a description of the minor clarification or correction and the reason the clarification or correction should be implemented.

#### **1. Processing of Requests**

The executive director shall promptly notify the EC and any appropriate subcommittee(s) of the receipt of the request. The members of the applicable quadrant's EC shall promptly determine whether the request meets the definition of a minor clarification or correction. Through the decision of the vice chair of the applicable quadrant, this determination may be delegated to one of the quadrant's subcommittees, with the concurrence of the subcommittee chair, in which case the subcommittee shall make a prompt decision.

If the request is determined to meet the definition of minor clarification or correction, the applicable quadrant's EC, with input from any subcommittee(s) to which the request has been forwarded, shall act on the request within one month of its receipt. A meeting to discuss the request is not required; the decision may be made by notational vote. A simple majority of the votes received shall determine the outcome. The members of the applicable quadrant's EC shall be given at least three working days to consider and vote on the request.

#### **2. Public Notice**

The results of the vote on the request for a minor clarification or correction shall be posted on the NAESB website and the members of the applicable quadrant shall be notified of the request by e-mail. If the request has been approved by the applicable quadrant's EC, the notification shall include a brief description of the request, the contact name and number of the requester so that further information can be obtained, and the proposed effective date of the clarification or correction. Any interested party shall have an opportunity to comment on the request, and the comments shall be posted on the NAESB website. The comment period is two weeks.

#### **3. Final Disposition of Approved Requests**

If no comments are received on an approved request, the standard shall be clarified or corrected as specified in the approved request on the effective date proposed. If comments are received, they shall be forwarded to the members of the applicable quadrant's EC for consideration. Each comment requires a public written response from the applicable quadrant's EC. The applicable quadrant's EC shall determine whether changes are necessary as a result of the comments. Members of the applicable quadrant's EC shall be given three working days to consider the comments and determine the outcome, which shall be decided by a simple majority of the votes received. A meeting to discuss the request is not required; the decision may be made by notational vote. The standard shall be clarified or corrected in accordance with the outcome of the vote, effective with the completion of voting, and notice thereof shall be posted on the NAESB website. In the case of minor corrections which are discovered during the editorial review process of publication of a new version and are categorized as clarifications under (b) or (c) above<sup>1</sup>, the proposed effective date may be (i) two weeks from the date of public notice, following simple majority approval by the applicable Quadrant(s) EC(s) of the shortened effective date, or (ii) one month from the date of the public notice. For all others, the proposed effective date of the minor clarification or correction shall normally be one month from the date of the public notice upon simple majority approval of the applicable Quadrant(s) EC(s).

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<sup>1</sup> Minor clarifications and corrections to existing standards include: (a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor; (b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation; (c) clarifications or corrections to add code values to tables; and (d) clarifications and corrections that do not materially change a standard.