

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Ave, NW
Suite 200
Washington, D.C. 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

James F. Bowe, Jr.
Partner
Direct Dial: +1 202 626 9601
Direct Fax: +1 202 626 3737
jbowe@kslaw.com

November 11, 2021

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Spire Storage West LLC –
Order No. 587-Z Compliance Filing
Docket No. RP22-____-000

Dear Ms. Bose:

Spire Storage West LLC (“Spire Storage”) hereby proposes to make certain changes to its FERC Gas Tariff to comply with Order No. 587-Z,¹ in which the Federal Energy Regulatory Commission (“FERC” or “Commission”) modified its regulations to adopt Version 3.2 of the North American Energy Standards Board (“NAESB”) Wholesale Gas Quadrant (“WGQ”) Standards. Accordingly, pursuant to Section 4 of the Natural Gas Act, 15 U.S.C. 717c (2021), and Part 154 of the Commission’s Regulations, 18 C.F.R. Part 154 (2021), Spire Storage tenders for filing and acceptance, and inclusion in Spire Storage’s FERC Gas Tariff, Original Volume No. 1, the revised tariff section listed below.

Section 6.25 – North American Energy Standards Board Version 8.0.0

Spire Storage respectfully requests that the revised tariff section be accepted for filing and made effective as of June 1, 2022, which is the date the Commission has established for pipelines to implement the rulemaking changes promulgated by Order No. 587-Z.²

¹ *Standards for Bus. Practices of Interstate Nat. Gas Pipelines*, Order No. 587-Z, 176 FERC ¶ 61,015 (2021).

² *Id.* at P 25.

Statement of Nature, Reasons and Basis for Proposed Modifications

On July 15, 2021, the Commission adopted changes to its regulations to incorporate Version 3.2 of the NAESB WGQ Standards in Order No. 587-Z. Order No. 587-Z requires jurisdictional pipelines and storage companies to make compliance filings by November 12, 2021. Accordingly, Spire Storage is proposing changes to the General Terms and Conditions Section 6.25 of its tariff to incorporate Version 3.2 of the NAESB WGQ Standards.

Order No. 587-Z requires “[i]f the pipeline is requesting a continuation of a previously granted waiver or extension of time to comply with certain NAESB WGQ standards, it must include a table in its transmittal letter that states the standard for which a waiver or extension of time was granted, and the docket number or order citation to the proceeding in which the waiver or extension of time was granted.”³ Spire Storage requests continuation of previously granted extensions of time, as discussed below.⁴

EDI, EDM and IET Communications

The Commission has previously granted Spire Storage an extension of time to implement Electronic Data Interchange (“EDI”)/Electronic Delivery Mechanism (“EDM”) and Flat File (“FF”)/EDM communications until ninety (90) days following a request that it provide such communications.⁵ Most recently in response to Spire Storage’s Order No. 587-Y compliance filing (Docket No. RP19-913), the Commission granted Spire Storage’s request for continuance of its extension of time to comply with EDI, EDM, and Internet Electronic Transport (“IET”) transactions.⁶ Spire Storage has not received a request for EDI, EDM and IET communications and does not anticipate that it will receive such a request in the foreseeable future. In accordance with the requirements of Order No. 587-Z, Spire Storage respectfully requests continuation of this extension of time.⁷

As stated above, Order No. 587-Z requires a pipeline requesting a continuation of an existing waiver or extension of time to include a table in its transmittal letter that states the standard for which a waiver or extension of time was granted, and the docket number or order citation to

³ Order No. 587-Z at P 27.

⁴ The extensions of time were originally granted to Ryckman Creek Resources, LLC (“Ryckman Creek”) before its name was changed to Spire Storage West LLC. *See Spire Storage West LLC*, Docket No. RP18-824-000 (unpublished delegated letter order issued June 13, 2018 accepting Spire Storage name change tariff filing).

⁵ *See Rager Mountain Storage Co. LLC, et al.*, 168 FERC ¶ 61,061 at P 40 (2019); *see also Ryckman Creek Resources, LLC*, 136 FERC ¶ 61,061, at P 74 (2011); *Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250 at P 57 (2016) (granting Ryckman Creek an extension of time to implement EDI, EDM, and IET).

⁶ *Id.*

⁷ Version 3.2 of the NAESB WGQ Standards deleted Standard 4.3.83, which Spire Storage had previously received an extension of time to implement; accordingly, Spire Storage is deleting reference to Standard 4.3.83 from its tariff.

the proceeding in which the waiver or extension was granted.⁸ In accordance with Order No. 587-Z, Spire Storage sets forth the below table containing the EDI, EDM, and/or IET related standards for which Spire Storage (and previously, Ryckman Creek) has been granted previously an extension of time:

4.3.52	4.3.55	4.3.80	4.3.81	4.3.82
4.3.84	5.3.70	5.3.71	5.3.72	5.4.24
5.4.25	5.4.26	5.4.27	10.3.15	10.3.11
10.3.14				

The docket number or order citation to the proceeding in which the waiver or extension of time was granted can be found in footnote 5.⁹

Index Based Capacity Releases

Spire Storage seeks continuation of the extension of time previously granted to implement certain NAESB standards regarding support for index-based capacity releases until such time as a releasing shipper presents an index-based capacity release to Spire Storage.¹⁰

In accordance with Order No. 587-Z, Spire Storage sets forth the below table containing the indexed-based capacity release related standards for which Spire Storage (and previously, Ryckman Creek) has been granted previously an extension of time:

5.3.62	5.3.63	5.3.64	5.3.65	5.3.66
5.3.67	5.3.68	5.6.69		

The docket number or order citation to the proceeding in which the waiver or extension of time was granted can be found in footnotes 5 and 9.

⁸ Order No. 587-Z at P 27.

⁹ In addition to the standards listed in the table above, a number of the standards include references to EDI, EDM and/or IET. *See Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250 at P 57, n.82 (providing an aggregate listing of the NAESB standards for which the Commission has granted pipelines an extension of time to comply with EDI, EDM and/or IET). The extension of time to comply with the standards related to EDI, EDM and/or IET would necessarily mean that Spire Storage would not be able to provide the EDI/EDM and/or IET communications referenced in those standards.

¹⁰ *See Rager Mountain Storage Co. LLC, et al.*, 168 FERC ¶ 61,061 at PP 43-44.

Motion to Place Tariff Section into Effect

Pursuant to Section 154.7(a)(9) of the Commission's Regulations, 18 C.F.R. § 154.7(a)(9), Spire Storage moves to place the aforementioned revised tariff section into effect on June 1, 2022. Spire Storage hereby reserves its right to file a motion to place the tariff section referenced herein into effect as of the end of any suspension period order by the Commission.

List of Materials Enclosed

Pursuant to Section 154.7(a)(1) of the Commission's Regulations, 18 C.F.R. § 154.7(a)(1), the following material is submitted herewith:

- (a) a Statement of the Nature, Reasons and Basis for the filing (contained in this transmittal letter);
- (b) an enumeration herein of the revised tariff section being filed;
- (c) the revised tariff section in XML Schema format;
- (d) a clean copy of the revised tariff section in .pdf format for posting in the Commission's eLibrary; and
- (e) a redline version of the revised tariff section in accordance with the provisions of Section 154.201(a) of the Commission's regulations, 18 C.F.R. § 154.201(a).

Waivers

Spire Storage respectfully requests any waivers that the Commission may deem necessary in order that the Commission may accept the tariff section filed herewith and make it effective as of June 1, 2022.

Posting and Certificate of Service

In accordance with the provisions of Section 154.2(d) of the Commission's Regulations, 18 C.F.R. § 154.2(d), copies of this filing are available for public inspection during regular business hours in a convenient form and place at Spire Storage's offices in Houston, Texas and at the Spire Storage facilities in Wyoming. In addition, Spire Storage is serving copies of the instant filing on its customers and on the interested State Commission. Such service meets the requirements of Section 154.208 of the Commission's Regulations, 18 C.F.R. § 154.208.

Ms. Kimberly D. Bose

November 11, 2021

Page 5

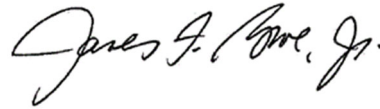
Communications

Questions concerning this filing and all Commission orders and correspondence, as well as pleadings and correspondence from persons concerning this filing, should be served upon each of the following:

Tyler R. Brown
King & Spalding LLP
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309
Phone 404-572-2809
trbrown@kslaw.com

Sean Jamieson
General Counsel
Spire Storage West LLC
3773 Richmond Avenue
Suite 300
Houston, Texas 77046
Phone: 346-308-7555
Sean.jamieson@spireenergy.com

Sincerely,

A handwritten signature in black ink, appearing to read "James F. Bowe, Jr.", written in a cursive style.

James F. Bowe, Jr.
Partner

GENERAL TERMS AND CONDITIONS

6.25 NORTH AMERICAN ENERGY STANDARDS BOARD

Spire has adopted the Business Practices and Electronic Communications Standards, NAESB Wholesale Gas Quadrant (“WGQ”) Version 3.2, which are required by the Commission in 18 C.F.R. 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 (GT&C Section)</u>	
0.3.3	6.3.10(d)	Request for Service
0.3.4	6.3.10(d)	Request for Service
0.3.5	6.3.10(d)	Request for Service
0.3.6	6.3.10(d)	Request for Service
0.3.7	6.3.10(d)	Request for Service
0.3.8	6.3.10(d)	Request for Service
0.3.9	6.3.10(d)	Request for Service
0.3.10	6.3.10(d)	Request for Service
1.3.2(i-vi)	6.7	Nominations and Scheduling
5.3.2	6.10	Capacity Release
5.3.13	6.10	Capacity Release
5.3.14	6.10	Capacity Release

Standards Incorporated by Reference:

Additional Standards:

General:

Principles:

0.1.1, 0.1.2, 0.1.3

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 Capacity:

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:

Principles:

1.1.1, 1.1.2, 1.1.3, 1.1.4, 1.1.10, 1.1.11, 1.1.12, 1.1.13, 1.1.14, 1.1.15, 1.1.16,
1.1.18, 1.1.20, 1.1.21, 1.1.22

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.4, 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:

1.3.1, 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:

Principles:

2.1.1, 2.1.2, 2.1.3, 2.1.4, 2.1.5, 2.1.6

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, 2.3.7, 2.3.8, 2.3.9, 2.3.10, 2.3.11, 2.3.12, 2.3.13, 2.3.14, 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

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:

Principles:

3.1.1, 3.1.2

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, 3.3.14, 3.3.15, 3.3.16, 3.3.17, 3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 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:

Principles:

4.1.2, 4.1.3, 4.1.4, 4.1.6, 4.1.7, 4.1.10, 4.1.12, 4.1.13, 4.1.15, 4.1.16, 4.1.17, 4.1.18, 4.1.19, 4.1.20, 4.1.21, 4.1.22, 4.1.23, 4.1.24, 4.1.26, 4.1.27, 4.1.28, 4.1.29,

4.1.30, 4.1.32, 4.1.33, 4.1.34, 4.1.35, 4.1.36, 4.1.37, 4.1.38, 4.1.39, 4.1.40

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, 4.3.53, 4.3.54, 4.3.57, 4.3.58, 4.3.60, , 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, 4.3.85, 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, 4.3.107, 4.3.108, 4.3.109, 4.3.110

Capacity Release Related Standards:

Principles:

5.1.1, 5.1.2, 5.1.3, 5.1.4

Definitions:

5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5

Standards:

5.3.1, 5.3.3, 5.3.4, 5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.15, 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, 5.3.26, 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, 5.3.55, 5.3.56, 5.3.57, 5.3.58, 5.3.59, 5.3.60, 5.3.62a, 5.3.73

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,

Internet Electronic Transport Related Standards:

Principles:

10.1.1, 10.1.2, 10.1.3, 10.1.4, 10.1.5, 10.1.6, 10.1.7, 10.1.8, 10.1.9, 10.1.10

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, 10.2.39

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, 10.3.12, 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, 10.3.28, 10.3.29

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

Spire's incorporation of the foregoing standards is subject to the extension of time granted in its July 29, 2011 certificate order (136 FERC ¶ 61,061) and in Commission orders accepting compliance filings in subsequent NAESB rulemakings to (1) implement EDI/EDM and IET communications until 90 Days following receipt of a request from a Part 284 customer that it provide such communications and (2) implement standards supporting index-based capacity release until such a release is requested by a customer. *See Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250 at PP 32 and 57 (2016). These standards for which an extension of time was granted are listed below:

NAESB Standard	Waiver or Extension of Time
4.3.52	EDI/EDM and IET
4.3.55	EDI/EDM and IET
4.3.80	EDI/EDM and IET
4.3.81	EDI/EDM and IET
4.3.82	EDI/EDM and IET
4.3.84	EDI/EDM and IET
5.3.62	Index-Based Capacity Release
5.3.63	Index-Based Capacity Release
5.3.64	Index-Based Capacity Release
5.3.65	Index-Based Capacity Release
5.3.66	Index-Based Capacity Release
5.3.67	Index-Based Capacity Release
5.3.68	Index-Based Capacity Release
5.3.69	Index-Based Capacity Release
5.3.70	EDI/EDM and IET
5.3.71	EDI/EDM and IET
5.3.72	EDI/EDM and IET
5.4.24	EDI/EDM and IET
5.4.25	EDI/EDM and IET
5.4.26	EDI/EDM and IET
5.4.27	EDI/EDM and IET
10.3.11	EDI/EDM and IET
10.3.14	EDI/EDM and IET
10.3.15	EDI/EDM and IET

GENERAL TERMS AND CONDITIONS

6.25 NORTH AMERICAN ENERGY STANDARDS BOARD

Spire has adopted the Business Practices and Electronic Communications Standards, NAESB Wholesale Gas Quadrant (“WGQ”) Version 3.24, which are required by the Commission in 18 C.F.R. 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 (GT&C Section)</u>	
0.3.3	6.3.10(d)	Request for Service
0.3.4	6.3.10(d)	Request for Service
0.3.5	6.3.10(d)	Request for Service
0.3.6	6.3.10(d)	Request for Service
0.3.7	6.3.10(d)	Request for Service
0.3.8	6.3.10(d)	Request for Service
0.3.9	6.3.10(d)	Request for Service
0.3.10	6.3.10(d)	Request for Service
1.3.2(i-vi)	6.7	Nominations and Scheduling
5.3.2	6.10	Capacity Release
5.3.13	6.10	Capacity Release
5.3.14	6.10	Capacity Release

Standards Incorporated by Reference:

Additional Standards:

General:

Principles:

0.1.1, 0.1.2, 0.1.3

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 Capacity:

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:

Principles:

1.1.1, 1.1.2, 1.1.3, 1.1.4, 1.1.10, 1.1.11, 1.1.12, 1.1.13, 1.1.14, 1.1.15, 1.1.16,
1.1.18, 1.1.20, 1.1.21, 1.1.22

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.4, 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:

1.3.1, 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:

Principles:

2.1.1, 2.1.2, 2.1.3, 2.1.4, 2.1.5, 2.1.6

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, 2.3.7, 2.3.8, 2.3.9, 2.3.10, 2.3.11, 2.3.12, 2.3.13, 2.3.14, 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

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:

Principles:

3.1.1, 3.1.2

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, 3.3.14, 3.3.15, 3.3.16, 3.3.17, 3.3.18, 3.3.19, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 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:

Principles:

4.1.2, 4.1.3, 4.1.4, 4.1.6, 4.1.7, 4.1.10, 4.1.12, 4.1.13, 4.1.15, 4.1.16, 4.1.17, 4.1.18, 4.1.19, 4.1.20, 4.1.21, 4.1.22, 4.1.23, 4.1.24, 4.1.26, 4.1.27, 4.1.28, 4.1.29,

4.1.30, 4.1.32, 4.1.33, 4.1.34, 4.1.35, 4.1.36, 4.1.37, 4.1.38, 4.1.39, 4.1.40

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, 4.3.53, 4.3.54, 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, 4.3.85, 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, 4.3.107, 4.3.108, 4.3.109, 4.3.110

Capacity Release Related Standards:

Principles:

5.1.1, 5.1.2, 5.1.3, 5.1.4

Definitions:

5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5

Standards:

5.3.1, 5.3.3, 5.3.4, 5.3.5, 5.3.7, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 5.3.15, 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, 5.3.26, 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, 5.3.55, 5.3.56, 5.3.57, 5.3.58, 5.3.59, 5.3.60, 5.3.62a, 5.3.73

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,

Internet Electronic Transport Related Standards:

Principles:

10.1.1, 10.1.2, 10.1.3, 10.1.4, 10.1.5, 10.1.6, 10.1.7, 10.1.8, 10.1.9, 10.1.10

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, 10.2.39

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, 10.3.12, 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, 10.3.28, 10.3.29

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

Spire's incorporation of the foregoing standards is subject to the extension of time granted in its July 29, 2011 certificate order (136 FERC ¶ 61,061) and in Commission orders accepting compliance filings in subsequent NAESB rulemakings to (1) implement EDI/EDM and IET communications until 90 Days following receipt of a request from a Part 284 customer that it provide such communications and (2) implement standards supporting index-based capacity release until such a release is requested by a customer. *See Eastern Shore Natural Gas Co.*, 154 FERC ¶ 61,250 at PP 32 and 57 (2016). These standards for which an extension of time was granted are listed below:

NAESB Standard	Waiver or Extension of Time
4.3.52	EDI/EDM and IET
4.3.55	EDI/EDM and IET
4.3.80	EDI/EDM and IET
4.3.81	EDI/EDM and IET
4.3.82	EDI/EDM and IET
4.3.83	EDI/EDM and IET
4.3.84	EDI/EDM and IET
5.3.62	Index-Based Capacity Release
5.3.63	Index-Based Capacity Release
5.3.64	Index-Based Capacity Release
5.3.65	Index-Based Capacity Release
5.3.66	Index-Based Capacity Release
5.3.67	Index-Based Capacity Release
5.3.68	Index-Based Capacity Release
5.3.69	Index-Based Capacity Release
5.3.70	EDI/EDM and IET
5.3.71	EDI/EDM and IET
5.3.72	EDI/EDM and IET
5.4.24	EDI/EDM and IET
5.4.25	EDI/EDM and IET
5.4.26	EDI/EDM and IET
5.4.27	EDI/EDM and IET
10.3.11	EDI/EDM and IET
10.3.14	EDI/EDM and IET
10.3.15	EDI/EDM and IET