

March 28, 2019

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

Re: Trunkline Gas Company, LLC
Docket No. RP19-_____
Compliance with Order No. 587-Y, NAESB Version 3.1

Dear Ms. Bose:

Trunkline Gas Company, LLC (Trunkline) submits herewith for filing with the Federal Energy Regulatory Commission (Commission) the following revised tariff record to its FERC NGA Gas Tariff, Fourth Revised Volume No. 1, proposed to become effective on August 1, 2019.

<u>Version</u>	<u>Description</u>	<u>Title</u>
5.0.0	GT&C Section 25.	Business Practices Standards

STATEMENT OF NATURE, REASONS AND BASIS

The purpose of this filing is to comply with Order No. 587-Y, Final Rule issued on November 15, 2018 in Docket No. RM96-1-041, 165 FERC ¶ 61,109 (2018). The Wholesale Gas Quadrant (WGQ) of the North American Energy Standards Board (NAESB) promulgated new and revised standards which were adopted by the Commission and incorporated by reference in the Commission's Regulations. The revised tariff section included herewith reflects the NAESB standards in Version 3.1. The Version 3.1 business practice standards replace all of the earlier versions of the business practice standards that were previously incorporated by reference in the Commission's regulations.

Trunkline proposes to modify GT&C Section 25 Business Practices Standards to reflect all of the NAESB Version 3.1 gas standards and datasets incorporated by reference in accordance with the recommended format set forth in the Final Rule.

IMPLEMENTATION AND WAIVER REQUEST

Pursuant to Section 154.7(a)(9) of the Commission's Regulations, Trunkline requests that the proposed tariff record be accepted effective August 1, 2019, the implementation date of the NAESB Version 3.1 standards in accordance with Order No. 587-Y.

CONTENTS OF THE FILING

This filing is made in electronic format in compliance with Section 154.4 of the Commission's Regulations. In addition to the proposed tariff record in RTF format with metadata attached, the XML filing package contains:

- . A transmittal letter in PDF format
- . A clean copy of the proposed tariff record in PDF format for publishing in eLibrary
- . A marked version of the proposed tariff changes in PDF format
- . A copy of the complete filing in PDF format for publishing in eLibrary

COMMUNICATIONS, PLEADINGS AND ORDERS

Trunkline requests that all Commission orders and correspondence as well as pleadings and correspondence from other parties concerning this filing be served on each of the following:

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Deborah A. Bradbury^{1 2}

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¹ Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. Trunkline respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow Trunkline to include additional representatives on the official service list.

² Designated as responsible Company official under Section 154.7(a)(2) of the Commission's Regulations.

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In accordance with Section 154.2(d) of the Commission's Regulations, a copy of this filing is available for public inspection during regular business hours at Trunkline's office at 1300 Main Street, Houston, Texas 77002. In addition, copies of this filing are being served electronically on jurisdictional customers and interested state regulatory agencies. Trunkline has posted a copy of this filing on its Internet web site accessible via <http://tgcmessage.energytransfer.com> under Informational Postings, Regulatory.

Pursuant to Section 385.2005(a) of the Commission's Regulations, the undersigned has read this filing and knows its contents, the contents are true as stated, to the best of her knowledge, and belief, and possesses full power and authority to sign such filing.

Respectfully submitted,

TRUNKLINE GAS COMPANY, LLC

/s/ Deborah A. Bradbury

Deborah A. Bradbury
Sr. Director, Regulatory Tariffs & Reporting

GENERAL TERMS AND CONDITIONS

25. BUSINESS PRACTICES STANDARDS

Compliance with 18 CFR, Section 284.12

Trunkline 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 the 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, Trunkline 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 Trunkline includes appropriate citations in the submission.

Trunkline has elected to reproduce only the following Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.1, that are protected by NAESB's copyright. With respect to each reproduced standard, Trunkline incorporates the following: © 1996 – 2017 NAESB, all rights reserved.

NAESB Standard	Tariff Record	Tariff Provision
1.3.2(i-vi)	GT&C Section 3., Nomination and Scheduling of Services	3.1(B), 3.1(C)
1.3.7	GT&C Section 3., Nomination and Scheduling of Services	3.1(B)
2.2.1	GT&C Section 1., Definitions	1.
2.3.14	GT&C Section 16., Statements and Payments	16.4
2.3.16	GT&C Section 3., Nomination and Scheduling of Services	3.5(A)
2.3.18	GT&C Section 3., Nomination and Scheduling of Services	3.5(A)
2.3.26	GT&C Section 16., Statements and Payments	16.4
2.3.40	GT&C Section 5., Transportation Balancing	5.2(B)(2)(b)
2.3.41	GT&C Section 5., Transportation Balancing	5.2(B)(2)(c)
2.3.45	GT&C Section 5., Transportation Balancing	5.2(B)(2)(d)
2.3.47	GT&C Section 5., Transportation Balancing	5.2(B)(2)(e)
3.3.15	GT&C Section 16., Statements and Payments	16.4
5.3.1	GT&C Section 9., Capacity Release	9.4(B)
5.3.2	GT&C Section 9., Capacity Release	9.4(B), 9.3(C)

5.3.4	GT&C Section 9., Capacity Release	9.4(H)
5.3.5	GT&C Section 9., Capacity Release	9.2(A)(9)
5.3.16	GT&C Section 9., Capacity Release	9.2(B)
5.3.55	GT&C Section 9., Capacity Release	9.5(G)

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

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Standards:
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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

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Storage Information

Dataset:
0.4.1

Nominations Related Standards:

Definitions:
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Standards:
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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

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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,
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Standards:

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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

None

Waiver or Extension of Time

None

MARKED VERSION

GENERAL TERMS AND CONDITIONS

25. BUSINESS PRACTICES STANDARDS

Compliance with 18 CFR, Section 284.12

Trunkline has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.01, and the standards revised by Minor Corrections MC15003, MC15004, MC15005, MC15009 and MC15012 all marked with an asterisk [*], 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.

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NAESB Standard	Tariff Record	Tariff Provision
1.3.2(i-vi)	GT&C Section 3., Nomination and Scheduling of Services	3.1(B), 3.1(C)
1.3.7	GT&C Section 3., Nomination and Scheduling of Services	3.1(B)
2.2.1	GT&C Section 1., Definitions	1.
2.3.14	GT&C Section 16., Statements and Payments	16.4
2.3.16	GT&C Section 3., Nomination and Scheduling of Services	3.5(A)
2.3.18	GT&C Section 3., Nomination and Scheduling of Services	3.5(A)
2.3.26	GT&C Section 16., Statements and Payments	16.4
2.3.40	GT&C Section 5., Transportation Balancing	5.2(B)(2)(b)
2.3.41	GT&C Section 5., Transportation Balancing	5.2(B)(2)(c)
2.3.45	GT&C Section 5., Transportation Balancing	5.2(B)(2)(d)
2.3.47	GT&C Section 5., Transportation Balancing	5.2(B)(2)(e)
3.3.15	GT&C Section 16., Statements and Payments	16.4
5.3.1	GT&C Section 9., Capacity Release	9.4(B)

5.3.2	GT&C Section 9., Capacity Release	9.4(B), 9.3(C)
5.3.4	GT&C Section 9., Capacity Release	9.4(H)
5.3.5	GT&C Section 9., Capacity Release	9.2(A)(9)
5.3.16	GT&C Section 9., Capacity Release	9.2(B)
5.3.55	GT&C Section 9., Capacity Release	9.5(G)

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

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, 1.2.6, 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, 1.3.8*, 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:

2.2.2, 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, 2.3.15, 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, 2.3.46, 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

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Datasets:

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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,
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Standards:

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Capacity Release Standards:

Definitions:

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

NAESB Standard

None

Waiver or Extension of Time

None