



**Rockies Express Pipeline LLC**

February 3, 2025

Debbie-Anne A. Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A  
Washington, DC 20426

Re: Rockies Express Pipeline LLC  
NAESB WGQ Standards Version 4.0 Compliance Filing (Order No. 587-AA)  
Docket No. RP25-\_\_\_\_-000

Dear Secretary Bose:

Pursuant to Section 4 of the Natural Gas Act, and in compliance with the Federal Energy Regulatory Commission's ("Commission" or "FERC") Order No. 587-AA,<sup>1</sup> Rockies Express Pipeline LLC ("Rockies Express") hereby submits for filing with FERC to become part of Rockies Express' FERC Gas Tariff, Third Revised Volume No. 1 ("Tariff") the following revised tariff section (the "Proposed Tariff Section") with a requested effective date of August 1, 2025.

<b><u>Section Name</u></b>	<b><u>Section Version</u></b>
Section 32 – Compliance with 18 C.F.R., Section 284.12	14.0.0

Pursuant to Part 154 of the Commission's regulations,<sup>2</sup> the following items are included in this filing:

1. An eTariff XML filing package containing the Proposed Tariff Section in electronic format;
2. A PDF file of the clean Proposed Tariff Section for posting in the Commission's eLibrary;
3. A PDF file of the marked Proposed Tariff Section for posting in the Commission's eLibrary; and
4. This transmittal letter.

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

In Order No. 587-AA, the Commission incorporated into its regulations the most recent version of the NAESB WGQ Standards, Version 4.0, and required natural gas pipelines to: (1) make compliance filings reflecting

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<sup>1</sup> *Standards for Business Practices of Interstate Natural Gas Pipelines*, 189 FERC ¶ 61,135 (2024) (hereinafter, "Order No. 587-AA").

<sup>2</sup> 18 CFR § 154 (2024).

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the changed standards with the Commission by February 3, 2025; and (2) comply with the new standards on and after August 1, 2025.<sup>3</sup>

The instant filing is being made to comply with Order No. 587-AA. Rockies Express herein files to incorporate by reference the latest version of business practice standards applicable to natural gas pipelines.

### **Waivers and Other Motions**

Rockies Express respectfully requests that the Commission grant any waivers which may be deemed necessary to accept this filing. As required by Section 154(a)(9) of the Commission's regulations, Rockies Express hereby moves to place the Proposed Tariff Section into effect as requested herein upon acceptance by the Commission in this proceeding.

In compliance with 18 CFR § 154.204(f), Rockies Express states that it has no other filings pending before the Commission that will significantly affect the Proposed Tariff Section tendered in this proceeding.

### **Communications and Service**

Rockies Express requests that all Commission orders and correspondence, as well as pleadings and correspondence by other parties concerning this filing, be served on each of the following:

L. Drew Cutright  
Vice President, Regulatory Affairs  
Tallgrass Energy, LP  
370 Van Gordon Street  
Lakewood, CO 80228  
303-763-3438  
drew.cutright@tallgrass.com

Stewart J. Merrick  
Assistant General Counsel  
Tallgrass Energy, LP  
370 Van Gordon Street  
Lakewood, CO 80228  
801-230-8442  
stewart.merrick@tallgrass.com

A copy of this filing is being served on Rockies Express' customers and all interested state commissions. A copy of this filing is also available for inspection during regular business hours at Rockies Express' office in Lakewood, Colorado.

### **Certification**

The signature on this filing constitutes a certification that: (1) I have read the filing; (2) to the best of my knowledge and belief, the statements and information contained herein are true and correct; and (3) I possess full power and authority to sign this filing.

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<sup>3</sup> Order No. 587-AA at P 1.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. Drew Cutright". The signature is stylized and cursive.

L. Drew Cutright

Vice President, Regulatory Affairs

Tallgrass Energy, LP

Authorized Representative of Rockies Express Pipeline LLC

## 32. COMPLIANCE WITH 18 C.F.R., SECTION 284.12

32.1 Transporter has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 4.0, which are required by the Commission in 18 CFR Section 284.12(a), as indicated below. Standards without accompanying identifications 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.

### 32.2 Standards not Incorporated by Reference and their Location in Tariff:

<b><u>NAESB Standard</u></b>	<b><u>Tariff record</u></b>
1.3.1	Section 1 – Definitions (see Section 1)
1.3.2 (i-vi)	Section 7 – Nominations, Confirmations (see Section 7.2)
1.3.3	Section 7 – Nominations, Confirmations (see Section 7.2A)
1.3.4	Section 7 – Nominations, Confirmations (see Section 7.1)
1.3.5	Section 7 – Nominations, Confirmations (see Section 7.1A)
1.3.6	Section 7 – Nominations, Confirmations (see Section 7.3B)
1.3.7	Section 7 – Nominations, Confirmations (see Section 7.1A)
1.3.8	Section 7 – Nominations, Confirmations (see Section 7.1C)
1.3.9	Section 7 – Nominations, Confirmations (see Section 7.1B)
1.3.11	Section 7 – Nominations, Confirmations (see Section 7.6H)
1.3.13	Section 7 – Nominations, Confirmations (see Section 7.1B)
1.3.19	Section 7 – Nominations, Confirmations (see Section 7.8)
1.3.22	Section 7 – Nominations, Confirmations (see Section 7.5C)
1.3.23	Section 7 – Nominations, Confirmations (see Section 7.11)
1.3.32	Section 7 – Nominations, Confirmations (see Section 7.6D)
2.3.14	Section 18 – Measurement (see Section 18.11)
2.3.16	Section 8 – Determination of Receipts (see Section 8.2)
3.2.1	Section 1 – Definitions (see Section 1)
5.3.2	Section 15 – Capacity Release (see Section 15.1)
5.3.3	Section 15 – Capacity Release (see Section 15.5A)
5.3.4	Section 15 – Capacity Release (see Section 15.10C)
5.3.5	Section 15 – Capacity Release (see Section 15.13)
5.3.8	Section 15 – Capacity Release (see Section 15.3C)
5.3.11	Section 15 – Capacity Release (see Section 15.11)

5.3.14	Section 15 – Capacity Release (see Section 15.5F)
5.3.15	Section 15 – Capacity Release (see Section 15.8F)
5.3.16	Section 15 – Capacity Release (see Section 15.5F1)
5.3.22	Section 15 – Capacity Release (see Section 15.18)
5.3.24	Section 15 – Capacity Release (see Section 15.7)
5.3.25	Section 15 – Capacity Release (see Section 15.7C)
5.3.26	Section 15 – Capacity Release (see Section 15.3J)
5.3.44	Section 15 – Capacity Release (see Section 15.14B)
5.3.45	Section 15 – Capacity Release (see Section 15.14B)
5.3.46	Section 15 – Capacity Release (see Section 15.14C1)
5.3.47	Section 15 – Capacity Release (see Section 15.14C)
5.3.48	Section 15 – Capacity Release (see Section 15.14B6)
5.3.49	Section 15 – Capacity Release (see Section 15.14C3)
5.3.50, 5.3.51	Section 15 – Capacity Release (see Section 15.14A)
5.3.52	Section 15 – Capacity Release (see Section 15.14C)
5.3.53	Section 15 – Capacity Release (see Section 15.14E)
5.3.55 to 5.3.58	Section 15 – Capacity Release (see Section 15.14D)
5.3.59	Section 15 – Capacity Release (see Section 15.15A)
5.3.73	Section 41 – Advertisements (see Section 41.1)

**32.3 Standards Incorporated by Reference:**

**A. Additional Standards**

General	Definitions:	0.2.5
	Standards:	0.3.1, 0.3.2, 0.3.16, 0.3.17
Creditworthiness	Standards:	0.3.3 to 0.3.10
Gas/Electric Operational Communications	Definitions:	0.2.1 to 0.2.4
Operating Capacity and Unsubscribed	Standards:	0.3.18, 0.3.20 to 0.3.22
	Data Sets:	0.4.2, 0.4.3
Gas/Electric Operational Communications	Standards:	0.3.11 to 0.3.15
Location Data Download	Standards:	0.3.23 to 0.3.29
	Data Sets:	0.4.4
Storage Information	Data Sets:	0.4.1

**B. Nominations** Related Standards

Definitions: 1.2.1 to 1.2.3, 1.2.4 to 1.2.6, 1.2.8 to 1.2.12, 1.2.13 to 1.2.19

Standards: 1.3.14 to 1.3.18, 1.3.20, 1.3.21, 1.3.24 to 1.3.31, 1.3.33 to 1.3.62, 1.3.64 to 1.3.77, 1.3.79 to 1.3.82

Data Sets: 1.4.1 to 1.4.7

**C. Flowing Gas** Related Standards

Definitions: 2.2.1 to 2.2.5

Standards: 2.3.1 to 2.3.13, 2.3.15, 2.3.17 to 2.3.23, 2.3.25 to 2.3.32, and 2.3.40 to 2.3.66

Data Sets: 2.4.1 to 2.4.11, 2.4.17, 2.4.18

**D. Invoicing** Related Standards

Definitions: 3.2.1

Standards: 3.3.3 to 3.3.27

Data Sets: 3.4.1 to 3.4.4

**E. Quadrant Electronic Delivery Mechanisms** Related Standards

Definitions: 4.2.1 to 4.2.18

Standards: 4.3.1 to 4.3.3, 4.3.16 to 4.3.18, 4.3.20, 4.3.22 to 4.3.28, 4.3.30 to 4.3.36, 4.3.38, 4.3.40 to 4.3.48, 4.3.49, 4.3.50, 4.3.52 to 4.3.55, 4.3.57, 4.3.58, 4.3.66 to 4.3.69, 4.3.72, 4.3.75, 4.3.76, 4.3.78 to 4.3.82, 4.3.85 to 4.3.87, 4.3.89 to 4.3.102, 4.3.104 to 4.3.108, and 4.3.110

**F. Capacity Release** Related Standards

Definitions: 5.2.1 to 5.2.5

Standards: 5.3.1, 5.3.7, 5.3.9, 5.3.10, 5.3.12, 5.3.13, 5.3.18 to 5.3.21, 5.3.23, 5.3.28, 5.3.29, 5.3.31 to 5.3.42, 5.3.54, 5.3.60, 5.3.62 to 5.3.72

Data Sets: 5.4.14 to 5.4.17, 5.4.20 to 5.4.27

G. **Cybersecurity** Related Standards

Definitions: 12.2.1 to 12.2.41

Standards: 12.3.1 to 12.3.31

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

**Additional Standards**

N/A

**Nominations** Related Standards

N/A

**Flowing Gas** Related Standards

N/A

**Invoicing** Related Standards

N/A

**Quadrant Electronic Delivery Mechanisms** Related Standards

N/A

**Capacity Release** Related Standards

N/A

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## 32. COMPLIANCE WITH 18 C.F.R., SECTION 284.12

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	Data Sets:	0.4.2, 0.4.3
Gas/Electric Operational Communications	Standards:	0.3.11 to 0.3.15
Location Data Download	Standards:	0.3.23 to 0.3.29
	Data Sets:	0.4.4
Storage Information	Data Sets:	0.4.1

**B. Nominations** Related Standards

Definitions: 1.2.1 to 1.2.3, 1.2.4 to 1.2.6, 1.2.8 to 1.2.12, 1.2.13 to 1.2.19

Standards: 1.3.14 to 1.3.18, 1.3.20, 1.3.21, 1.3.24 to 1.3.31, 1.3.33 to 1.3.62, 1.3.64 to 1.3.77, 1.3.79 to 1.3.82

Data Sets: 1.4.1 to 1.4.7

**C. Flowing Gas** Related Standards

Definitions: 2.2.1 to 2.2.5

Standards: 2.3.1 to 2.3.13, 2.3.15, 2.3.17 to 2.3.23, 2.3.25 to 2.3.32, and 2.3.40 to 2.3.66

Data Sets: 2.4.1 to 2.4.11, 2.4.17, 2.4.18

**D. Invoicing** Related Standards

Definitions: 3.2.1

Standards: 3.3.3 to 3.3.27

Data Sets: 3.4.1 to 3.4.4

**E. Quadrant Electronic Delivery Mechanisms** Related Standards

Definitions: 4.2.1 to ~~4.2.18~~4.2.20

Standards: 4.3.1 to 4.3.3, 4.3.16 to 4.3.18, 4.3.20, 4.3.22 to 4.3.28, 4.3.30 to 4.3.36, 4.3.38, 4.3.40 to 4.3.48, 4.3.49, 4.3.50, 4.3.52 to 4.3.55, 4.3.57, 4.3.58, ~~4.3.60~~, ~~4.3.62~~, 4.3.66 to 4.3.69, 4.3.72, 4.3.75, 4.3.76, 4.3.78 to 4.3.82, ~~4.3.85~~4.3.84 to 4.3.87, 4.3.89 to 4.3.102, ~~4.3.104 to 4.3.108~~, and 4.3.110

**F. Capacity Release** Related Standards

Definitions: 5.2.1 to 5.2.5

Standards: 5.3.1, 5.3.7, 5.3.9, 5.3.10, 5.3.12, 5.3.13, 5.3.18 to 5.3.21, 5.3.23, 5.3.28, 5.3.29, 5.3.31 to 5.3.42, 5.3.54, 5.3.60, 5.3.62 to 5.3.72

Data Sets: 5.4.14 to 5.4.17, 5.4.20 to 5.4.27

G. ~~Internet Electronic Transport~~**Cybersecurity** Related Standards

Definitions: ~~12.2.1 to 12.2.41~~10.2.1 to 10.2.38, 10.2.39

Standards: ~~12.3.1 to 12.3.31~~10.3.1, 10.3.3 to 10.3.12, and 10.3.14  
to 10.3.27 to 10.3.29

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

**Additional Standards**

N/A

**Nominations** Related Standards

N/A

**Flowing Gas** Related Standards

N/A

**Invoicing** Related Standards

N/A

**Quadrant Electronic Delivery Mechanisms** Related Standards

N/A

**Capacity Release** Related Standards

N/A

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