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November 12, 2021

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

Re: Caledonia Energy Partners, L.L.C.
Docket No. RP22-___-000
NAESB Compliance Filing

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act, Part 154 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") regulations, and Commission Order No. 587-Z,[1] Caledonia Energy Partners, L.L.C. ("Caledonia") hereby submits for filing and inclusion in its FERC Gas Tariff ("Tariff"), the following tariff record with a proposed effective date of June 1, 2022:

Section 6.21 North American Energy Standards Board ("NAESB") Standards, Version 9.0.0.

<u>Statement of Nature, Reasons and Basis for the Filing</u>

On July 15, 2021, the Commission issued Order No. 587-Z, a Final Rule regarding Standards for Business Practices of Interstate Natural Gas Pipelines, in Docket No. RM96-1-042 which amended FERC's regulations to incorporate by reference, with limited exceptions,[2] the latest version (Version 3.2) of the business practice standards adopted by the NAESB Wholesale Gas Quadrant applicable to natural gas pipelines, in place of the currently incorporated version (Version 3.1). The revisions made by NAESB in Version 3.2 "are designed to enhance the natural gas industries' system and software security measures and to clarify the processing of certain business transactions."[3] Order No. 587-Z directed interstate natural gas pipelines to make compliance filings required by the Final Rule by November 12, 2021 and required compliance with the associated standards on and after June 1, 2022.

In compliance with Order No. 587-Z, Caledonia hereby submits for filing the above listed Tariff record. Specifically, Caledonia is revising Section 21 of the General Terms and Conditions of its Tariff to incorporate the Version 3.2 NAESB Standards adopted in the Final Rule. The revised Tariff record also removes reference to the optional NAESB Principles, and to Data Set

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[1] Standards for Business Practices of Interstate Natural Gas Pipelines, Order No. 587-Z, 176 FERC ¶ 61,015, RM96-1-042 (July 15, 2021) (*hereinafter* "Final Rule" or "Order No. 587-Z").

[2] The Commission did not incorporate by reference into the Final Rule the optional model contracts and the eTariff-related standards included in Version 3.2.

[3] *Final Rule* at i.

0.3.19, which was inadvertently included in the prior filing for Version 3.1. Finally, the revised Tariff record includes minor housekeeping edits.

Effective Date and Motion

Caledonia requests that the Commission make the proposed Tariff record effective June 1, 2022. Pursuant to Section 154.7(a)(9) of the Commission's regulations,[4] Caledonia files this motion to place the Tariff record into effect at the expiration of any minimal suspension period that may be set by the Commission provided the Tariff record is accepted as filed and without condition. In the event the Tariff record is not accepted as filed and without condition or is suspended for other than a minimal period, Caledonia reserves the right to file a motion at a later date to place such Tariff record into effect.

Contents of Filing

In accordance with Section 154.7(a)(1) of the Commission's regulations, this filing consists of the following:

1. The instant transmittal letter;
2. An electronic tariff record in XML format which reflects the proposed revisions to Caledonia's Tariff;[5]
3. Attachment A, which consists of a red-lined version showing the proposed revisions to Caledonia's Tariff;[6] and
4. Attachment B, which consists of a clean version of the proposed revisions to Caledonia's Tariff.

Posting and Certification of Service

Copies of this filing are being posted in accordance with Section 154.207 of the Commission's regulations.[7] In accordance with Sections 154.2(d), 154.7(b) and 154.208(b) of the Commission's regulations, copies of this Tariff filing are being served upon Caledonia's jurisdictional customers and interested state regulatory commissions. In addition, copies will be available for public inspection during regular business hours in a convenient form and place at Caledonia's business offices at 10375 Richmond Avenue, Suite 1900 Houston, TX 77042.

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[4] 18 C.F.R. § 154.7(a)(9) (2020).

[5] *Id*. § 154.4(c).

[6] *Id*. § 154.201(a).

[7] *Id*. § 154.207.

Communications

All communications regarding this filing should be addressed to the following persons, who also should be included on the Commission's official service list for this proceeding:

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Email: ltonery@orrick.com
Email: mjohnston@orrick.com

Waivers

Caledonia respectfully requests that the Commission grant any waivers that it may deem necessary to accept this filing and place the filed Tariff record into effect as requested herein.

Should you have any questions about the instant filing, please feel free to contact the undersigned at (212) 506-3710.

Respectfully Submitted,

/s/ Lisa M. Tonery
Lisa M. Tonery
Mariah T. Johnston
Attorneys for
Caledonia Energy Partners, L.L.C.

LMT
Enclosures

ATTACHMENT A

Red-lined version showing the proposed revisions to Caledonia's Tariff

21. NORTH AMERICAN ENERGY STANDARDS BOARD ("NAESB") STANDARDS

21.1 Compliance with 18 CFR, Section 284.12

Caledonia has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.2~~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 this FERC Gas Tariff:

NAESB Standard	Incorporated Verbatim in Tariff	Tariff Record (GT&C Section)
1.2.4	6.2.37	Definitions, 2.0.0, "Intraday Nomination"
1.2.6	6.2.53	Definitions, 2.0.0, "Operational Flow Order"
1.2.12	6.2.23	Definitions, 2.0.0, "Elapsed Prorated Scheduled Quantity"
1.2.14	6.2.75	Definitions, 2.0.0, "Title Transfer"
1.3.1	6.2.33	Definitions, 2.0.0, "Gas Day"
1.3.2(i)	6.9.2(a)	Nominations and Scheduling, 5.0.0
1.3.2(ii)	6.9.3(a)	Nominations and Scheduling, 5.0.0
1.3.2(iii)	6.9.3(b)	Nominations and Scheduling, 5.0.0
1.3.2(iv)	6.9.3(c)	Nominations and Scheduling, 5.0.0
1.3.2(v)	6.9.3(d)	Nominations and Scheduling, 5.0.0
1.3.2(vi)	6.9.3 (e)	Nominations and Scheduling, 5.0.0
1.3.5	6.9.1	Nominations and Scheduling, 5.0.0
1.3.6	6.9.3(h)	Nominations and Scheduling, 5.0.0
1.3.9	6.9.2(c)	Nominations and Scheduling, 5.0.0
1.3.11	6.9.2(c)	Nominations and Scheduling, 5.0.0
1.3.13	6.9.2(c)	Nominations and Scheduling, 5.0.0
1.3.19	6.9.1	Nominations and Scheduling, 5.0.0
1.3.21	6.9.2(b)	Nominations and Scheduling, 5.0.0
1.3.26	6.6.5(b)	Priority, Service Interruption, Operational Flow Orders, 2.0.0
1.3.33	6.9.2(c)	Nominations and Scheduling, 5.0.0
3.2.1	6.2.6	Definitions, 2.0.0, "Business Day"
3.3.9	6.14.1	Billing and Payment, 2.0.0
3.3.17	6.14.3	Billing and Payment, 2.0.0
5.2.1	6.2.12	Definitions, 2.0.0, "Critical Notice"
5.2.3	6.2.23	Definitions, 2.0.0, "Elapsed Pro Rata Capacity"
5.3.2	6.5.5	Capacity Release, 3.0.0
5.3.4	6.5.8	Capacity Release, 3.0.0
5.3.7	6.5.14(e)	Capacity Release, 3.0.0
5.3.13	6.5.7	Capacity Release, 3.0.0
5.3.14	6.5.2	Capacity Release, 3.0.0
5.3.15	6.5.7	Capacity Release, 3.0.0
5.3.16	6.5.2	Capacity Release, 3.0.0
5.3.44	6.5.14(f)-(k)	Capacity Release, 3.0.0
5.3.45	6.5.14(l)	Capacity Release, 3.0.0

5.3.47	6.5.14(l)	Capacity Release, 3.0.0
5.3.48	6.5.14(l)	Capacity Release, 3.0.0
5.3.49	6.5.14(l)	Capacity Release, 3.0.0
5.3.53	6.5.16	Capacity Release, 3.0.0
5.3.54	6.5.16	Capacity Release, 3.0.0

Standards Incorporated by Reference:

General:

~~Principles:~~

~~0.1.1, 0.1.2, 0.1.3~~

Definition~~s~~:

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, ~~0.3.19,~~ 0.3.20, 0.3.21, 0.3.22

Data Sets:

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

Data Set:

0.4.4

Storage Information:

Data Set~~s~~:

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, 1.2.5, 1.2.8, 1.2.9, 1.2.10, 1.2.11, 1.2.13, 1.2.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19~~.~~

Standards:

1.3.3, 1.3.4, 1.3.7, 1.3.8, 1.3.14, 1.3.15, 1.3.16, 1.3.17, 1.3.18, 1.3.20, 1.3.22, 1.3.23, 1.3.24, 1.3.25, 1.3.27, 1.3.28, 1.3.29, 1.3.30, 1.3.31, 1.3.32, 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

Data Sets:

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, 5.3.54, 5.3.55, 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

Data Sets:

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, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 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

Data Sets:

3.4.1, 3.4.2, 3.4.3, 3.4.4

Quadrant Electronic Delivery Mechanism Related Standards:

~~Principles:~~

~~4.1.2, 4.13, 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, 4.3.52, 4.3.53, 4.3.54, 4.3.55, 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, 4.3.80, 4.3.81, 4.3.82, ~~4.3.83,~~ 4.3.84, 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:

5.2.2, 5.2.4, 5.2.5

Standards:

5.3.1, 5.3.3, 5.3.5, 5.3.8, 5.3.9, 5.3.10, 5.3.11, 5.3.12, 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, 5.3.46, 5.3.50, 5.3.51, 5.3.52, 5.3.55, 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

Data Sets:

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

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, and 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, 10.3.11, 10.3.12, 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, 10.3.28, 10.3.29

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

NAESB Standards	Waiver or Extension of Time
None	

ATTACHMENT B

A clean version of the proposed revisions to Caledonia's Tariff

21. NORTH AMERICAN ENERGY STANDARDS BOARD ("NAESB") STANDARDS

21.1 Compliance with 18 CFR, Section 284.12

Caledonia has adopted the Business Practices and Electronic Communications Standards, NAESB WGQ Version 3.2, 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 this FERC Gas Tariff:

NAESB Standard	Incorporated Verbatim in Tariff	Tariff Record (GT&C Section)
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1.2.6	6.2.53	Definitions, 2.0.0, "Operational Flow Order"
1.2.12	6.2.23	Definitions, 2.0.0, "Elapsed Prorated Scheduled Quantity"
1.2.14	6.2.75	Definitions, 2.0.0, "Title Transfer"
1.3.1	6.2.33	Definitions, 2.0.0, "Gas Day"
1.3.2(i)	6.9.2(a)	Nominations and Scheduling, 5.0.0
1.3.2(ii)	6.9.3(a)	Nominations and Scheduling, 5.0.0
1.3.2(iii)	6.9.3(b)	Nominations and Scheduling, 5.0.0
1.3.2(iv)	6.9.3(c)	Nominations and Scheduling, 5.0.0
1.3.2(v)	6.9.3(d)	Nominations and Scheduling, 5.0.0
1.3.2(vi)	6.9.3 (e)	Nominations and Scheduling, 5.0.0
1.3.5	6.9.1	Nominations and Scheduling, 5.0.0
1.3.6	6.9.3(h)	Nominations and Scheduling, 5.0.0
1.3.9	6.9.2(c)	Nominations and Scheduling, 5.0.0
1.3.11	6.9.2(c)	Nominations and Scheduling, 5.0.0
1.3.13	6.9.2(c)	Nominations and Scheduling, 5.0.0
1.3.19	6.9.1	Nominations and Scheduling, 5.0.0
1.3.21	6.9.2(b)	Nominations and Scheduling, 5.0.0
1.3.26	6.6.5(b)	Priority, Service Interruption, Operational Flow Orders, 2.0.0
1.3.33	6.9.2(c)	Nominations and Scheduling, 5.0.0
3.2.1	6.2.6	Definitions, 2.0.0, "Business Day"
3.3.9	6.14.1	Billing and Payment, 2.0.0
3.3.17	6.14.3	Billing and Payment, 2.0.0
5.2.1	6.2.12	Definitions, 2.0.0, "Critical Notice"
5.2.3	6.2.23	Definitions, 2.0.0, "Elapsed Pro Rata Capacity"
5.3.2	6.5.5	Capacity Release, 3.0.0
5.3.4	6.5.8	Capacity Release, 3.0.0
5.3.7	6.5.14(e)	Capacity Release, 3.0.0
5.3.13	6.5.7	Capacity Release, 3.0.0
5.3.14	6.5.2	Capacity Release, 3.0.0
5.3.15	6.5.7	Capacity Release, 3.0.0
5.3.16	6.5.2	Capacity Release, 3.0.0
5.3.44	6.5.14(f)-(k)	Capacity Release, 3.0.0
5.3.45	6.5.14(l)	Capacity Release, 3.0.0

5.3.47	6.5.14(l)	Capacity Release, 3.0.0
5.3.48	6.5.14(l)	Capacity Release, 3.0.0
5.3.49	6.5.14(l)	Capacity Release, 3.0.0
5.3.53	6.5.16	Capacity Release, 3.0.0
5.3.54	6.5.16	Capacity Release, 3.0.0

Standards Incorporated by Reference:

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

Data Sets:

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

Data Set:

0.4.4

Storage Information:

Data Set:

0.4.1

Nominations Related Standards:

Definitions:

1.2.1, 1.2.2, 1.2.3, 1.2.5, 1.2.8, 1.2.9, 1.2.10, 1.2.11, 1.2.13, 1.2.15, 1.2.16, 1.2.17, 1.2.18, 1.2.19

Standards:

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

NAESB Standards	Waiver or Extension of Time
None	

Subscription

In accordance with 18 C.F.R. § 154.4 of the Commission's regulations, I hereby certify that I have read this electronic filing and its content, that the contents are true to the best of my knowledge and belief that I possess the full power and authority to sign this filing.

/s/ Todd Cash
Todd Cash
Vice President, Compliance