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January 27, 2025

Ms. Debbie-Anne A Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: *Caledonia Energy Partners, L.L.C.*, Docket No. RP25-__-000
Order No. 587-AA Compliance Filing

Dear Secretary Reese,

Pursuant to Section 4 of the Natural Gas Act,¹ Part 154 of the Federal Energy Regulatory Commission's (the "Commission") regulations,² and Commission Order No. 587-AA,³ 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 August 1, 2025:

Section 6.21 North American Energy Standards Board ("NAESB"), Version 10.0.0.

STATEMENT OF NATURE, REASONS AND BASIS

On November 22, 2024, the Commission issued Order No. 587-AA, a Final Rule regarding Standards for Business Practices of Interstate Natural Gas Pipelines in Docket No. RM96-1-043, which amended FERC's regulations to incorporate by reference, with certain enumerated exceptions,² the latest version (Version 4.0) 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 3.2). The revisions made by NAESB in Version 4.0 "promote greater efficiency and reliability of the natural gas industry's operations and strengthen the cybersecurity protections."⁴ Order No. 587-AA directed interstate natural gas pipelines to make compliance filings by February 3, 2025 and required compliance with the associated standards on and after August 1, 2025.

In compliance with Order No. 587-AA, Caledonia hereby submits for filing the above listed Tariff record. Specifically, Caledonia is revising Section 21 of the General Terms and Conditions

¹ 15 U.S.C. § 717c (2024).

² 18 C.F.R. Pt. 154 (2024).

³ *Standards for Business Practices of Interstate Natural Gas Pipelines*, 189 FERC ¶ 61,135, Docket No. RM96-1-043 (Nov. 22, 2024) ("Order No. 587-AA").

⁴ Order No. 587-AA at P 46.

of its Tariff to incorporate the Version 4.0 NAESB Standards adopted in the Final Rule.

PROPOSED EFFECTIVE DATE AND MOTION

Caledonia requests that the Commission make the proposed Tariff record effective August 1, 2025. Pursuant to Section 154.7(a)(7) of the Commission's regulations,⁵ Caledonia respectfully requests a waiver of the notice requirement contained in Section 154.207 of the Commission's regulations,⁶ and any other waivers that may be required for the Commission to accept the revised tariff record filed herein to become effective as of August 1, 2025. Good cause exists to grant this waiver in order to adhere to the compliance filing deadline of February 3, 2025 as set forth in Order No. 587-AA.

Pursuant to Section 154.7(a)(9) of the Commission's regulations,⁷ 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.

COMPLIANCE WITH REGULATIONS

In compliance with Section 154.4(c) of the Commission's regulations,⁸ all contents of this filing are being submitted as part of an XML filing in conformance with the instructions provided on the Commission's website. The filing contains (i) this transmittal letter; (ii) a clean version of the proposed Tariff record in Word format; and (iii) a marked version of the proposed Tariff record in PDF format showing additions to and deletions from the currently effective Tariff record.

Pursuant to Section 154.201(a) of the Commission's regulations,⁹ Caledonia has included a clean and marked version of the proposed Tariff record reflecting the proposed changes, and pursuant to Sections 154.2(d) and 154.208(b) of the Commission's regulations,¹⁰ Caledonia will send a copy of this filing by electronic mail to each of Caledonia's shippers and affected state commissions. This filing is also available for public inspection during regular business hours in a convenient form and place at Caledonia's offices at 10375 Richmond Avenue, Suite 1900 Houston, TX 77042.

⁵ 18 C.F.R. § 154.7(a)(7) (2024).

⁶ 18 C.F.R. § 154.207 (2024).

⁷ 18 C.F.R. § 154.7(a)(9) (2024).

⁸ 18 C.F.R. § 154.4(c) (2024).

⁹ 18 C.F.R. § 154.201(a) (2024).

¹⁰ 18 C.F.R. §§ 154.2(d), 154.208(b) (2024).

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In compliance with Section 154.204(f) of the Commission's regulations,¹¹ Caledonia states that it has no other Tariff filings pending before the Commission that may significantly impact this filing.

CORRESPONDENCE AND COMMUNICATION

Pursuant to Rule 203(b)(3) of the Commission's Rules of Practice and Procedure,¹² Caledonia respectfully requests that the Commission add the following individuals to the service list in this proceeding:

Jennifer Johnson
General Counsel
Caledonia Energy Partners, L.L.C.
2107 CityWest Blvd, Suite 1500
Houston, TX 77042
Jennifer.Johnson@enstorinc.com

Sabina D. Walia
CBL Energy Law PLLC
1800 West Loop South Suite 1680
Houston, Texas 77027
Phone: (713) 338-3155
swalia@cblenergylaw.com

SUBSCRIPTION

Pursuant to Section 154.4(b) of the Commission's regulations,¹³ the undersigned certifies that: (1) she knows the contents of the filing, (2) the contents are true to the best of her knowledge and belief, and (3) she possesses full power and authority to sign the filing.

Should you have any questions about the instant filing, please contact the undersigned at (713) 338-3155.

Respectfully submitted,

/s/ Sabina D. Walia
Sabina D. Walia
Counsel for Caledonia Energy Partners, L.L.C.

¹¹ 18 C.F.R. § 154.204(f) (2024).

¹² 18 C.F.R. § 385.203(b)(3) (2024).

¹³ 18 C.F.R. § 154.4(b) (2024).

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 4.0, and the standard revised by Minor Correction MC24002 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.

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:

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:

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:

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:

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

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, 4.3.66, 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, 4.3.85, 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, 4.3.104, 4.3.105, 4.3.106, 4.3.107, 4.3.108, 4.3.110

Capacity Release Related Standards:

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

Cybersecurity Related Standards:

Definitions:

12.2.1, 12.2.2, 12.2.3, 12.2.4, 12.2.5, 12.2.6, 12.2.7, 12.2.8, 12.2.9, 12.2.10, 12.2.11, 12.2.12, 12.2.13, 12.2.14, 12.2.15, 12.2.16, 12.2.17, 12.2.18, 12.2.19, 12.2.20, 12.2.21, 12.2.22, 12.2.23, 12.2.24, 12.2.25, 12.2.26, 12.2.27, 12.2.28, 12.2.29, 12.2.30, 12.2.31, 12.2.32, 12.2.33, 12.2.34, 12.2.35, 12.2.36, 12.2.37, 12.2.38, 12.2.39, 12.2.40, 12.2.41

Standards:

12.3.1, 12.3.3, 12.3.4, 12.3.5, 12.3.6, 12.3.7, 12.3.8, 12.3.9, 12.3.10, 12.3.11, 12.3.12, 12.3.14, 12.3.15, 12.3.16, 12.3.17, 12.3.18, 12.3.19, 12.3.20, 12.3.21, 12.3.22, 12.3.23, 12.3.24, 12.3.25, 12.3.26, 12.3.27, 12.3.28, 12.3.29, 12.3.30, 12.3.31

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

NAESB Standards

Waiver or Extension of Time

None

21. NORTH AMERICAN ENERGY STANDARDS BOARD (“NAESB”) STANDARDS

21.1 Compliance with 18 CFR, Section 284.12

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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:

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:

Definitions:

2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5

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