
Compliance

BWMQ's consultants are intimately familiar with FERC Regulations and FERC Compliance matters. BWMQ consultants have worked extensively on FERC Tariff issues and FERC Compliance issues before FERC. BWMQ has a comprehensive FERC Compliance Manual and FERC Compliance Review Processes and Procedures for Interstate Pipelines.

BWMQ provides its clients with the following types of compliance support services:

1. Review of Senior Management Role in FERC Compliance Matters.

2. Part 284 FERC Compliance Review Process including (i) Compliance with NAESB Standards for pipeline business operations and communications, (ii) review currently effective Tariff for compliance with latest FERC policy, (iii) review compliance with capacity release regulations, (iv) review compliance with FERC quarterly and annual reporting requirements, (v) review website compliance, (vi) review filed reports under the Commission's blanket reporting requirements, and (vii) review compliance with Commission reporting requirements for firm, interruptible and negotiated rate transactions and contracts.

3. Part 157 Compliance Review Process including: (i) compliance with Section 157.2 requirements, (ii) review compliance with open season and available capacity requirements, (iii) review compliance with blanket certificate procedures and (iv) review compliance with reporting requirements under 157.2.

4. Standards of Conduct and Compliance Review including: (i) review standards of conduct and application, (ii) review compliance with Part 358 and Section 284.286, (iii) review written procedures on Standards of Conduct, (iv) review independent functioning requirements under Section 358.4, and (v) review compliance with nondiscrimination requirement in Section 358.5.

5. Internal Compliance Training including: (i) review FERC audit procedures, (ii) review readiness for audit, (iii) review pipeline training procedures for FERC regulatory matters, (iv) review how pipeline personnel stay current on FERC rulemakings and key orders impacting pipeline, and (v) review role of Chief Compliance Officer; and

6. Record Retention Policy review and Miscellaneous Compliance Matters including: (i) discuss specific accounting, regulatory and reporting issues or questions, and (ii) discuss rate case-related and previous settlement issues that are still impacting pipeline services.