August 13, 2026

VIA E-FILING

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

Re: *Colorado Interstate Gas Company, L.L.C,* Docket No. RP22-825-___

Dear Secretary Reese:

Pursuant to Rule 207(a)(5) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), Colorado Interstate Gas Company, L.L.C. ("CIG") hereby petitions the Commission to amend the "Stipulation and Agreement" approved in Docket No. RP22-825-000 on June 17, 2022 ("Settlement").[1] As explained below, the amendments will allow the parties to conduct additional settlement discussions to attempt to resolve all the issues involving CIG's upcoming filing for a system-wide rate case under section 4 of the Natural Gas Act. Additionally, CIG requests to shorten the comment period for this Petition to one that the Commission deems appropriate and that the Commission approve this petition no later than one month after filing, by September 14, 2026.

Under section 6.2(a) of the Settlement, CIG is required to file a new system-wide rate case proposing rates no later than September 30, 2026, with an effective date of April 1, 2027, for a rate increase, or an effective date of November 1, 2026, for a rate decrease or to maintain existing rates. On March 4, 2026, CIG convened a settlement conference to discuss the possibility of resolving the issues of its upcoming rate case filing. In the settlement conference, CIG presented a settlement offer to the attendees and has since been providing additional information. At this point, CIG and its participating customers believe that additional discussions would be beneficial and worthwhile to attempt to consensually resolve issues and obviate the need for the filing of the required rate case. To allow time for these additional discussions, CIG seeks to change the deadline for filing a new system-wide rate case from September 30, 2026 to December 31, 2026, and to make the same three-month extension to the current Settlement termination dates: from April 1, 2027, for a rate increase to July 1, 2027, and from November 1, 2026, for a rate decrease or to maintain existing rates to February 1, 2027.

CIG anticipates that this Petition will be unopposed. As a condition to the requested amendment, if CIG and its customers are ultimately unable to reach a settlement and the Commission issues an order after

[1] *Colorado Interstate Gas Co.*, 179 FERC ¶ 61,211 (2022).

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litigation that reduces any of CIG's rates below the currently effective rates, CIG agrees to issue refunds, with interest, to compensate customers for the extension of time to file the section 4 rate case and the corresponding delay in the effective date of each rate ordered by the Commission.

This filing has been served electronically pursuant to 18 C.F.R. § 154.208 on CIG's customers and affected state regulatory commissions as well as upon each person designated on the official service lists in Docket No. RP22-825-000.

For the foregoing reasons and as explained further in the attached Petition, CIG respectfully requests that the Commission authorize the requested amendment of the Settlement, grant the request for a shortened comment period, and approve this petition no later than one month after filing, by September 14, 2026.

Respectfully Submitted,

/s/ Kirk Morgan
Kirk Morgan

Counsel for Colorado Interstate Gas Company, L.L.C.

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Colorado Interstate Gas Company, L.L.C.) Docket No. RP22-825-___

PETITION TO AMEND STIPULATION AND AGREEMENT
AND MOTION FOR SHORTENED ANSWER PERIOD AND EXPEDITED ACTION

Pursuant to Rule 207(a)(5) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"),[1] Colorado Interstate Gas Company, L.L.C. ("CIG") hereby petitions the Commission to amend, as further detailed herein, the Stipulation and Agreement approved by the Commission in Docket No. RP22-825-000 on June 17, 2022 ("Settlement"),[2] and, in conjunction with such amendment, grant to CIG other corresponding procedural requests as stated herein.

The proposed amendment would allow CIG and other interested stakeholders an additional three months to exchange information and negotiate with the goal of reaching a pre-filing settlement in lieu of CIG filing a general rate case under section 4 of the Natural Gas Act ("NGA"). The efforts to reach a settlement without the need to file a rate case are consistent with the well-recognized benefits of pipelines reaching settlements with their shippers.[3] As a condition to the requested amendment, as set forth more specifically in Section I below, if CIG and its customers are ultimately unable to reach a settlement and the Commission issues an order after litigation that

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1 18 C.F.R. § 385.207(a)(5) (2026).

2 *Colorado Interstate Gas Co.*, 179 FERC ¶ 61,211 (2022).

3 *See, e.g., Florida Power & Light Co.*, 175 FERC ¶ 61,024, at P 6 (2021); *Montana Power Co.*, 77 FERC ¶ 61,110, at 61,434 (1996) ("Commission strongly favors settlements, which provide the opportunity to eliminate the need for more lengthy proceedings"); *Pac. Gas Transmission Co.*, 76 FERC ¶ 61,246, at 62,263 & n.18 (1996) (Commission encourages parties to seek the benefits of the settlement process for the expeditious resolution of contested issues noting its long-standing policy favoring settlements to facilitate an outcome to address the needs of the parties while avoiding the cost of litigation).

reduces any of CIG's rates below the currently effective rates, CIG agrees to issue refunds, with interest, to compensate customers for the extension of time to file the section 4 rate case and the corresponding delay in the effective date of each rate ordered by the Commission.

I. Background

Article VI, section 6.1 of the Settlement, CIG's last pre-filing general rate settlement, states that the term of the Settlement shall terminate the earlier of: 1) the date that new rates become effective pursuant to a new general, system-wide rate change submitted by CIG pursuant to section 4 of the NGA;[4] 2) the date that rates become effective pursuant to action taken by the Commission under section 5 of the NGA;[5] or 3) April 1, 2027. Article VI, section 6.2(a) of the Settlement contains a "comeback" provision requiring CIG to file a new system-wide rate case proposing rates no later than September 30, 2026, with an effective date of April 1, 2027, for a rate increase or an effective date of November 1, 2026, for a rate decrease or to maintain existing rates. In anticipation of the upcoming deadline for this required section 4 rate case filing, on March 4, 2026, CIG convened a settlement conference to discuss the possibility of resolving the issues of its upcoming rate case filing.[6] In the settlement conference, CIG presented a settlement offer to the attendees. Since that time, CIG has been providing additional settlement information.

At this point, CIG and its participating customers believe that additional discussions would be beneficial and worthwhile to attempt to consensually resolve issues and obviate the need for the filing of the required rate case. To allow time for these additional discussions, CIG seeks to change the deadline for filing a new system-wide rate case from September 30, 2026, to December

4 *See* 15 U.S.C. § 717c.
5 *See* 15 U.S.C. § 717d.
6 CIG invited interested parties to the meeting by (i) a general notice on its electronic bulletin board, (ii) emails to all parties to Docket No. RP22-825-000, and (iii) to all persons CIG serves its initial filings in Commission proceedings. The meeting was convened in-person, in Denver, Colorado.

31, 2026, and to make the same three-month extension to the current Settlement termination dates of April 1, 2027, for a rate increase, or November 1, 2026, for a rate decrease or to maintain existing rates, extending them to July 1, 2027, and February 1, 2027, respectively. CIG has posted a draft petition to its electronic bulletin board and circulated it: 1) to the entities participating in the March 4, 2026, conference, 2) to the parties in Docket No. RP22-825-000, and 3) to all entities CIG serves its initial filings in a proceeding. No entity has indicated opposition to this petition. Thus, CIG anticipates that this petition will be unopposed.

II. Proposed Amendments

The Commission's long-standing policy favoring settlements provides parties with certainty, reduces litigation costs and permits parties to obtain reasonable compromise for resolving difficult issues.[7] CIG and its shippers have an excellent record of consensually resolving issues related to general system-wide section 4 rate cases by settlement. CIG has filed, and the Commission has approved, four consecutive uncontested pre-filing settlements[8] eliminating the need to file a general system-wide section 4 rate case. If such a settlement can be obtained again, CIG, its shippers, and the Commission would save substantial time, effort and financial resources on the prosecution of such a case. These potential benefits and the history of successful settlements warrant amending the Settlement to provide the additional time to pursue another pre-filing settlement. Moreover, as noted above, CIG believes that parties will either support or not oppose this petition. Accordingly, the requested amendment is fair, reasonable, and in the public interest.[9]

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7 *See supra* note 3.

8 *See Colorado Interstate Gas Co.*, 179 FERC ¶ 61,211 (2022) (letter order approving pre-filing settlement in Docket No. RP22-825-000); *Colorado Interstate Gas Co.*, 156 FERC ¶ 61,085 (2016) (letter order approving pre-filing settlement in Docket No. RP16-1022-000); *Colorado Interstate Gas Co.*, 136 FERC ¶ 61,103 (2011) (letter order approving pre-filing settlement in Docket Nos. RP11-2107-000 and RP06-397-000); *Colorado Interstate Gas Co.*, 116 FERC ¶ 61,126 (2006) (letter order approving pre-filing settlement in Docket Nos. RP06-397-000 and RP01-350-015).

9 *See El Paso Natural Gas Co*., 40 FERC ¶ 61,362, at 62,081 (1987) (proposed amendment to settlement approved as in the "public interest"); *Colorado Interstate Gas Co.*, 114 FERC ¶ 61,173 (2006); *Colorado Interstate*

Specifically, CIG requests section 6.1 of the Settlement be revised to change "April 1, 2027" to "July 1, 2027". CIG also requests that the last three sentences of section 6.2(a) of the Settlement be changed to reflect the requested three-month extension, as indicated below. In addition, as a condition of the extension, CIG has agreed to further amend section 6.2(a), as indicated below, to account for a scenario where the Commission grants the extension of time but CIG and shippers are ultimately unable to reach a pre-filing settlement. If these proposed amendments are accepted, the revised Article VI, section 6.2(a) of the Settlement would read as follows (unchanged first sentence omitted):

> Subject to Article VII, CIG commits to file a Section 4 Rate Case on December 31, 2026. If the December 31, 2026 filing is for a rate increase, CIG will assume a five-month suspension period and request the new rates to be effective July 1, 2027. If the December 31, 2026 filing is for a rate decrease or to maintain existing rates, CIG will request the new rates to be effective February 1, 2027. Furthermore, if CIG and its customers are unable to reach a pre-filing settlement, and CIG files an NGA Section 4 general rate case and the rate case proceeds through litigation and ultimately results in a final Commission decision on the merits that results in any individual rates below CIG's current base tariff rates (the "Reduced Rates"), then CIG agrees, in addition to any Commission ordered refund of amounts collected above CIG's current base tariff rates pursuant to the Commission's rules and regulations, to also refund, on an individual rate basis, the difference in amounts collected between each such Reduced Rate and CIG's corresponding current base tariff rate, both expressed on a daily basis, for the applicable three-month extension period determined by the filing direction of each such individual rate: (i) April 1, 2027 through June 30, 2027, for each Reduced Rate that was filed as a rate increase in the December 31, 2026 rate case filing, and (ii) November 1, 2026 through January 31, 2027, for each Reduced Rate that was filed as a rate decrease in the December 31, 2026 rate case filing, in each case to accommodate the delay in the rate case filing date provided herein, with interest calculated for the applicable three-month period.

This proposed amendment will provide additional time for CIG and its shippers to seek to reach a pre-filing settlement and the refunds will ensure that all signatories to the Settlement get the benefit of their bargain. Significantly, this also will allow the continuation, until the termination or

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Gas Co., 115 FERC ¶ 61,039 (2006); *Colorado Interstate Gas Co.*, 115 FERC ¶ 61,304 (2006); *Colorado Interstate Gas Co.*, 116 FERC ¶ 61,126 (2006); *Mojave Pipeline Co.*, 132 FERC ¶ 61,106 (2010).

expiration of the Settlement, of the crediting of revenues from Qualifying Services as provided in section 3.3 of the Settlement and section 23 of the General Terms and Conditions in the Second Revised Volume No. 1 of CIG's FERC Gas Tariff. No other changes to the Settlement are intended or implied.

III. Motion for Shortened Comment Period

While the petition is pending, CIG intends to engage in further settlement discussions with its shippers. Previously, CIG has been engaging in settlement negotiations and providing information. CIG will very soon be required to focus its efforts on preparing and completing its rate case which will preclude its efforts to continue settlement discussions. Consequently, CIG respectfully requests a ruling on its petition as early as possible and no later than one month after filing, by September 14, 2026[10] to provide the certainty necessary to enable CIG to continue building upon already productive settlement negotiations. To expedite consideration of this petition, CIG also requests a shortened response period that the Commission deems appropriate based on the totality of the circumstances. A shortened time is warranted in light of the extensive circulation of this petition prior to its filing. Parties have had sufficient notice of the filing and time to prepare any response to this limited request. As such, good cause exists to shorten the comment period.[11]

IV. Conclusion

Wherefore, CIG respectfully requests that the Commission (i) amend the Stipulation and Agreement as set forth herein; (ii) shorten the comment period to a length the Commission deems

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10 CIG reserves the unilateral right to withdraw the petition if it is not acted upon by that date.

11 *See, e.g., Colorado Interstate Gas Co.*, 178 FERC ¶ 61,118, at P 4 (2022).

appropriate; and (iii) approve this petition no later than one month after filing, by September 14, 2026.

Respectfully submitted,

COLORADO INTERSTATE GAS COMPANY, L.L.C.

By: *<u>/s/ Kirk Morgan</u>*

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August 13, 2026

<u>**Certificate of Service**</u>

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010, I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Colorado Springs, CO, this 13th day of August, 2026.

<u>*/s/ David R. Cain*</u>

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