



Elba Express
Company, L.L.C.
a Kinder Morgan company

July 29, 2020

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

Re: Elba Express Company, L.L.C.
Interim Update of Fuel Retention Rates
Docket No. RP20-

Dear Ms. Bose:

Elba Express Company, L.L.C. (“EEC”) submits for filing and acceptance by the Federal Energy Regulatory Commission (“Commission”) this interim filing to update its fuel retention rate pertaining to LAUF¹ recovery. EEC submits the following tariff sections to become effective September 1, 2020, as part of its FERC Gas Tariff, First Revised Volume No. 1 (Tariff’).

Section 2.1, Rate Section – FTS, Version 16.0.0
Section 2.2, Rate Section – ITS, Version 15.0.0

Nature, Basis and Reasons For Proposed Tariff Changes

Section 25.2 of the General Terms and Conditions (“GT&C”) of EEC’s Tariff provides that EEC’s fuel retention rates will be determined at EEC’s discretion but no less frequently than annually. EEC submitted its required annual fuel filing on April 20, 2020 (Docket No. RP20-793) to update its fuel retention rates to be effective June 1, 2020 (based on actual data for the twelve months ending February 28, 2020). The FERC approved this filing on May 20, 2020. However, the actual LAUF on the EEC system is now lower than the percentage being retained. Therefore, EEC proposes in this interim filing to decrease its LAUF retention rate from .33% to .00% to be effective September 1, 2020 in order to minimize any cash true-up due to the shippers in 2021 for such over-recovery.

It is important to update the LAUF retention rate since under EEC’s tariff in Section 25.4 of the GT&C, any over-recovery of LAUF in the next true-up period (which will be based on the

¹ LAUF means lost and unaccounted for gas as specified in Section 25 of the GT&C of the EEC Tariff.

March 2020-December 2020 period)² will be credited to EEC's customers in the summer of 2021 as a dollar amount (based on applicable monthly index prices). EEC believes that it is better for EEC to make the adjustment to LAUF now, as proposed in this filing, so that shippers are able to provide gas in kind for LAUF on a timely basis, concurrent with their other business transactions, rather than receiving a refund covering the over-recovery for the entire period in the summer of 2021.

As indicated on Schedule 2 in Appendix B, the current LAUF over-recovery for the March 2020-June 2020 period is \$218,788. As reflected on Schedule 3 in Appendix B, the new proposed LAUF retention rate of .00% proposed to be effective September 1, 2020 will help to mitigate this LAUF over-recovery situation by the end of December 2020 (i.e. the end of the current true-up period).² The .00% proposed LAUF retention rate is projected to result in enough under-recovery from September 2020 through December 2020 to offset most if not all of the over-recovery experienced during the current period.

Procedural Matters

In accordance with the applicable provisions of Part 154.7 of the Commission's regulations, EEC submits the following materials in connection with the filing:

1. An etariff XML filing package containing the proposal in electronic format;
2. A transmittal letter;
3. Appendix A, containing clean and marked versions of the tariff sections in PDF format;
4. Appendix B, containing supporting workpapers.

Pursuant to Section 154.7(a) of the Commission's regulations, EEC hereby moves to place the revised tariff records into effect at the requested effective date or at the expiration of any suspension period set by the Commission. Additionally, pursuant to Section 154.7(a)(7) of the Commission's regulations, EEC respectfully requests that the Commission grant all necessary waivers in order to effectuate this filing.

As required by Section 154.208 of the Commission's regulations, copies of this filing are being made available at EEC's offices in Birmingham, Alabama and electronically mailed to EEC's customers and interested commissions.

² The FERC approved on July 10, 2020 EEC's filing (RP20-941) to change from June 1 to April 1 the effective date of its annual fuel tracker filing. Consequently, the current true-up period ends December 31, 2020.

The names, titles, and mailing addresses of the persons to whom communications concerning this filing are to be addressed and to whom service is to be made are as follows:

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Respectfully submitted,

ELBA EXPRESS COMPANY, L.L.C.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates
Elba Express Company, L.L.C.
Post Office Box 2563
Birmingham, Alabama 35202-2563
(205) 325-3843
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Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all EEC's customers and interested state commissions.

Dated at Birmingham, Alabama this 29th day of July, 2020.

/s/ T. Brooks Henderson

T. Brooks Henderson

Director – Rates

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ELBA EXPRESS COMPANY, L.L.C.

APPENDIX A

CLEAN VERSION OF TARIFF SECTIONS

SECTION 2.1

RATE SECTION
FIRM TRANSPORTATION SERVICES (FTS)

Reservation Charge (Dth)

Maximum: \$8.0776

Minimum: \$0.00

Maximum Daily Volumetric Capacity Release Rates 1/ \$0.2656

Transportation Charge (Dth) 2/

Maximum: \$0.0000

Fuel Retention:

GRO (South-to-North) 0.00%

GRO (North-to-South) 0.78%

GRO (2016 Expansion) 3/ 0.84%

LAUF 0.00%

EPCA: \$0.0000

1/ See Section 20 of the General Terms and Conditions for exceptions to these maximum capacity release rates. This rate is exclusive of all surcharges.

2/ Surcharges applicable to service under Rate Schedule FTS include:

ACA Surcharge: See Section 24 of the General Terms and Conditions.

3/ Applicable to service provided pursuant to the expansion authorized under Docket No. CP14-115-000, et.al. ("2016 Expansion")

SECTION 2.2

RATE SECTION

INTERRUPTIBLE TRANSPORTATION SERVICE (ITS)

Transportation Charge (Dth) 1/ 2/

Maximum: \$0.2656

Minimum: \$0.00

Fuel Retention:

GRO (South-to-North) 0.00%

GRO (North-to-South) 0.78%

LAUF 0.00%

EPCA: \$0.0000

1/ This rate is exclusive of all surcharges.

2/ Surcharges applicable to service under Rate Schedule ITS include:

ACA Surcharge: See Section 24 of the General Terms and Conditions.

ELBA EXPRESS COMPANY, L.L.C.

APPENDIX A

MARKED VERSION OF TARIFF SECTIONS

SECTION 2.1

RATE SECTION
 FIRM TRANSPORTATION SERVICES (FTS)

Reservation Charge (Dth)

 Maximum: \$8.0776

Minimum: \$0.00

Maximum Daily Volumetric Capacity Release Rates 1/ \$0.2656

Transportation Charge (Dth) 2/

 Maximum: \$0.0000

Fuel Retention:

 GRO (South-to-North) 0.00%
 GRO (North-to-South) 0.78%
 GRO (2016 Expansion) 3/ 0.84%
 LAUF 0.3300%
 |

EPCA: \$0.0000

1/ See Section 20 of the General Terms and Conditions for exceptions to these maximum capacity release rates. This rate is exclusive of all surcharges.

2/ Surcharges applicable to service under Rate Schedule FTS include:

ACA Surcharge: See Section 24 of the General Terms and Conditions.

3/ Applicable to service provided pursuant to the expansion authorized under Docket No. CP14-115-000, et.al. ("2016 Expansion")

SECTION 2.2

RATE SECTION

INTERRUPTIBLE TRANSPORTATION SERVICE (ITS)

Transportation Charge (Dth) 1/ 2/

Maximum: \$0.2656

Minimum: \$0.00

Fuel Retention:

GRO (South-to-North) 0.00%
GRO (North-to-South) 0.78%
LAUF 0.3300%

EPCA: \$0.0000

1/ This rate is exclusive of all surcharges.

2/ Surcharges applicable to service under Rate Schedule ITS include:

ACA Surcharge: See Section 24 of the General Terms and Conditions.

ELBA EXPRESS COMPANY, L.L.C.

APPENDIX B

SUPPORTING WORKPAPERS

Elba Express Company, L.L.C.

<u>Line No.</u>	<u>Description</u>	<u>Current Fuel Retention Rates</u>	<u>Proposed Fuel Retention Rates To Be Effective 9/1/20</u>	
1	GRO (South-to-North)	0.00%	0.00%	(no change)
2	GRO (North-to-South)	0.78%	0.78%	(no change)
3	GRO (2016 Expansion)	0.84%	0.84%	(no change)
4	LAUF	0.33%	0.00%	1/

1/ See Schedule 2 and Schedule 3 for support.

Elba Express Company, L.L.C.
Fuel Deferred Account Balance
For LAUF

<u>Line No.</u>	<u>Month</u>	<u>Fuel Retained for LAUF</u> (A) (dth)	<u>Actual LAUF</u> (B) (dth)	<u>(Under) / Over Recovery</u> (C)=(A)-(B) (dth)	<u>Monthly Index Price</u> (D)	<u>Monetary Value of (Under) / Over Recovery</u> (E)=C X D
1	Mar-20	38,498	11,081	27,417	\$1.68	\$ 46,106.26
2	Apr-20	46,382	15,721	30,661	\$1.64	\$ 50,284.04
3	May-20	50,133	(9,442)	59,575	\$1.68	\$ 100,086.00
4	Jun-20	57,004	43,059	13,945	\$1.60	\$ 22,312.00
5	Total	192,017	60,419	131,598		\$ 218,788.30

Elba Express Company, L.L.C.
LAUF Analysis

Line No.		Actuals				Projected 1/					
		<u>3/20</u> (dth)	<u>4/20</u> (dth)	<u>5/20</u> (dth)	<u>6/20</u> (dth)	<u>7/20</u> (dth)	<u>8/20</u> (dth)	<u>9/20</u> (dth)	<u>10/20</u> (dth)	<u>11/20</u> (dth)	<u>12/20</u> (dth)
1	EEC Total Receipt Vols	11,668,239	14,043,986	15,183,397	16,851,142	16,851,142	16,851,142	16,851,142	16,851,142	16,851,142	16,851,142
2	LAUF Tariff Retention Rate	0.33%	0.33%	0.33%	0.33%	0.33%	0.33%	0.00%	0.00%	0.00%	0.00%
3	LAUF Fuel Retained 2/	38,498	46,382	50,133	57,004	57,004	57,004	0	0	0	0
4	Actual LAUF	<u>(11,081)</u>	<u>(15,721)</u>	<u>9,442</u>	<u>(43,059)</u>	<u>(43,059)</u>	<u>(43,059)</u>	<u>(43,059)</u>	<u>(43,059)</u>	<u>(43,059)</u>	<u>(30,311)</u>
5	Net (under-recovery)/over-recovery	27,417	30,661	59,575	13,945	13,945	13,945	(43,059)	(43,059)	(43,059)	(30,311)
6	Cumulative (under-recovery)/over-recovery	27,417	58,078	117,653	131,598	145,543	159,488	116,429	73,370	30,311	0

1/ Used June 2020 actuals for receipt volumes and LAUF amounts since this month represented likely outcome for projected months. The FERC approved on July 10, 2020 EEC's filing (RP20-941) to change from June 1 to April 1 the effective date of its annual fuel tracker filing. Consequently, the current true-up period ends December 31, 2020.

2/ Due to daily rounding, does not exactly equal line 1 x line 2