



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

November 8, 2018

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

Re: Docket No. RP19-___
Elba Express Company, L.L.C.
Filing in Compliance with Order No. 849
Form No. 501-G

Dear Ms. Bose:

In compliance with Order No. 849, the Final Rule in Docket No. RM18-11 (“Final Rule”) and section 260.402 of the Code of Federal Regulations, Elba Express Company, L.L.C. (“Elba Express”) hereby submits its FERC Form No. 501-G (see attached Excel spreadsheet as well as a PDF version in Appendix A).¹ As further detailed below, pursuant to Option 3 of the Final Rule, Elba Express does not believe an adjustment to rates is warranted at this time.

Elba Express reiterates and incorporates by reference the comments filed by the Kinder Morgan Entities including Elba Express to the Commission’s Notice of Proposed Rulemaking and in the Kinder Morgan Entities’ Request for Rehearing. The Commission has broad authority to collect information from regulated interstate pipelines and already has vehicles in place such as the FERC Form Nos. 2 and 3Qs that facilitate such collection. It is inconsistent with the Natural Gas Act to force pipelines to submit the Form 501-G in its current form, structured to result in an indicated cost of service reduction. This shifts the burden established by sections 4 and 5 of the Natural Gas Act and undermines Elba Express’ filed rates, which are deemed to be just and reasonable unless proven otherwise through full evidentiary hearing procedures.

Nevertheless, Elba Express must comply with the Final Rule until the Commission or a reviewing court takes action, and Elba Express therefore is submitting the Form No. 501-G as directed by the Commission. In doing so, Elba Express stresses that the resulting outputs of the form are misleading, have little resemblance to a litigated or settled outcome, and are not indicative of Elba Express’ actual rate of return, actual cost of service, or rates that would result from a rate case initiated under sections 4 or 5 of the Natural Gas Act.

¹ Elba Express’ submission of this compliance filing is without prejudice to Elba Express’ participation in the Request for Rehearing of the Final Rule filed on behalf of the Kinder Morgan Entities as well as any judicial review of any order on rehearing pertaining to the Final Rule.

Elba Express is 100% owned by Kinder Morgan Inc. (“KMI”). Elba Express has no debt of its own. KMI’s capital structure does not qualify per the instructions of the Form 501-G since not all of its debt is publicly traded. Consequently, the hypothetical capital structure is used in Elba Express’ Form 501-G.²

Regarding an income taxes allowance, Elba Express is not a master limited partnership. Elba Express is a partnership owned 100% by KMI, which is a C-corporation and thus subject to income taxes. Elba Express is a pass-through entity all of whose income or losses are consolidated on the federal income tax return of KMI. As explained in paragraph #32 and reiterated in footnote 69 of the Final Rule, a natural gas company organized as a pass-through entity is considered subject to the federal corporate income tax if all of its income or losses are consolidated on the federal income tax return of its corporate parent and thus such a pass-through entity is eligible for a tax allowance. Therefore, since this situation applies to Elba Express, its Form 501-G reflects an income tax allowance.³

Elba Express is filing under Option 3 of the Final Rule. Paragraph #217 of the Final Rule stated that under Option 3 a pipeline may explain why an adjustment in its rates is not warranted. Elba Express does not believe an adjustment in its rates is needed at this time because 99.8% of Elba Express’ 2017 revenues⁴ are derived from negotiated rates under long-term firm transportation agreements.⁵ These negotiated rates are binding on Elba Express’ customers, and therefore any potential adjustment in Elba Express’ tariff rates would not result in an adjustment to their contract rates. Per paragraph #245 of the Final Rule, the FERC noted that it believes that such negotiated rate contracts should be allowed to remain in effect without change.

Based on Elba Express’ individual facts and circumstances as described above, an adjustment to Elba Express’ rates is not warranted at this time. This submission is being made solely to comply with the Final Rule. Nothing in this filing should be construed as being supported or proposed by Elba Express as the appropriate amount or level of costs, or the methodology for functionalizing, classifying or allocating costs, or designing or establishing rates. This filing is without prejudice to any filings made on behalf of Elba Express or the Kinder Morgan Entities in this proceeding, Docket No. RM18-11-000 and Docket No. RP18-415-000, including their Request for Rehearing, as well as any petitions for rehearing, stay, or judicial review of any orders that may be issued in the referenced proceedings or this proceeding.

² Elba Express’ strict adherence to the prescribed Form 501-G capital structure guidance without adjustment through the submission of an Addendum or otherwise is in no way an indication that Elba Express concurs with or supports the use of such capital structure or other cost and revenue inputs reflected in its Form 501-G for ratemaking purposes.

³ Line no. 31 of page 1 of Elba Express’ Form 501-G reflects the amortization of the excess accumulated deferred income taxes (ADIT) associated with Elba Express’ regulatory liability Account No. 254 to reflect the 21% reduced federal income tax rate. Consistent with Commission and IRS normalization requirements and the Form 501-G, Elba Express intends to employ the Reverse South Georgia method to amortize its excess ADIT balance over the estimated weighted average remaining life of its assets as of December 31, 2017.

⁴ Approximately 0.2% of Elba Express’ total revenues are from gas sales of operational gas which is not affected by the change in corporate taxes.

⁵ Such contracts end no sooner than in 2026 and as late as in 2040.

Copies of this filing are being made at Elba Express' offices in Birmingham, Alabama, and electronically mailed to Elba Express' customers and to interested state commissions.

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
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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Elba Express Company, L.L.C.)
)
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Docket No. RP19-

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of Elba Express' customers and interested state commissions.

Dated at Birmingham, Alabama this 8th day of November 2018.

/s/ T. Brooks Henderson
T. Brooks Henderson
Director – Rates and Regulatory
Elba Express Company, L.L.C.
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Elba Express Company, L.L.C.

Appendix A

FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act

Cost of Service

Pipeline
Company
Name

Elba Express Pipeline Company, L.L.C.

Line No.	(A) Description	(B) Form 2 Reference	(C) Calendar Year 2017 Actuals	(D) Net Amort. of Excess/ Deficient ADIT	(E) With Adjusted Tax Allowance
3	CID	C000147			
4	Is the Pipeline a separate income taxpaying entity? Does it conduct business, realize net income or loss, pay income taxes and distribute profits to shareholders?		Yes		
Cost of Service - Non Fuel					
Operating, Maintenance and Administrative & General					
5	Total Production & Gathering	P. 317; L. 30, C. (b)	\$ -		\$ -
6	Total Products Extraction	P. 318; L. 58, C. (b)	-		-
7	Total Natural Gas Storage	P. 322; L. 177, C. (b)	-		-
8	(Less) UG Compressor Station Fuel & Power	P. 320; L. 106, C. (b)	-		-
9	(Less) Other Compressor Station Fuel & Power	P. 321; LL. 131 & 132, C. (b)	-		-
10	(Less) LNG Compressor Station Fuel & Power	P. 322; LL. 157 & 158, C. (b)	-		-
11	Net Storage Costs	L. 7 minus LL. 8-10	-		-
12	Total Transmission	P. 323; L. 201, C. (b)	5,918,949		5,918,949
13	(Less) Gas for Compressor Station Fuel	P. 323; L. 184, C. (b)	4,013,713		4,013,713
14	(Less) Other Fuel & Power for Compressor Stns. (if included in true-up or tracking mechanism)	P. 323; L. 185, C. (b)	-		-
15	Net Transmission Costs	L. 12 minus LL. 13-14	1,905,236		1,905,236
16	Administrative & General	P. 325; L. 270, C. (b)	3,222,175		3,222,175
17	Total Operating, Maintenance and Admin. & Gen.	Sum of LL. 4, 5, 10, 14, 15	\$ 5,127,411		\$ 5,127,411
18	Depreciation, Depletion, and Amortization	Form 2 - P. 337; L. 12, C. (h) Form 2A - P. 114; LL. 6-8, C. (c)	18,206,558		18,206,558
19	Amort. of Plant Acq. Adj. If 'yes' to P. 2; L. 5 of Form 501-G then 0, else P. 114; L. 9, C. (c)		-		-
Credits to Cost of Service					
20	Regulatory Debits (if incl. in a § 4 rate filing)	P. 114; L. 12, C. (c)	-		-
21	(Less) Regulatory Credits (if incl. in a § 4 rate filing)	P. 114; L. 13, C. (c)	-		-
22	Other Taxes	P. 114; L. 14, C. (c)	4,250,638		4,250,638
Return					
23	Long Term Debt	P. 2; L. 27 of Form 501-G	12,656,887		12,668,466
24	Preferred Stock (or equivalent)	P. 2; L. 28 of Form 501-G	-		-
25	Common Equity	P. 2; L. 29 of Form 501-G	35,401,019		35,433,406
26	Total Return		48,057,906		48,101,872
Allowance for Income Taxes					
27	Federal Income Tax Rate	P. 5; L. 3 of Form 501-G	35.00%		21.00%
28	Weighted Average State Income Tax Rate	P. 5; L. 4 of Form 501-G	6.00%		6.00%
29	Composite Income Tax Rate	P. 5; LL. 3-6 of Form 501-G	38.90%		25.74%
30	Income Tax Allowance on Equity Return	[(L. 24+L. 25)*(L. 29/(1-L. 29))]	22,538,456		12,281,927
31	(Less) Net Amort. of Excess(+) and/or Deficient(-) ADIT (Year 1 amortization)		-	538,569	538,569
32	Total Income Tax Allowance	L. 30 minus L. 31	22,538,456		11,743,358
33	Total Cost of Service - Non Fuel	Sum of LL. 17-20, 22, 26, 32 less L. 21	\$ 98,180,969		\$ 87,429,837
34	Indicated Cost of Service Reduction	1 minus [L. 33, C. (E) divided by L. 33, C. (C)]			11.0%

**FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act**

**Rate Base
Elba Express Pipeline Company, L.L.C.**

Line No.	(A) Description	(B) Form 2 Reference	(C) Calendar Year 2017 Actuals	(D) Excess/ Deficient ADIT Adjustment	(E) With Adjusted Tax Allowance
Rate Base					
1	Gas Plant in Service	P. 110; L. 2, C. (c)	\$ 743,954,144		\$ 743,954,144
2	Accumulated Depreciation	P. 110; L. 5, C. (c)	124,292,861		124,292,861
3	Acquisition Adjustment	P. 200; L. 12, C. (b)	-		-
4	(Less) Amort. of Plant Acquisition Adjustment	P. 200; L. 32, C. (b)	-		-
5	No Has the pipeline received permission to include Acq. Adjustment(s) in Rate Base? If no, provide amounts as a reduction to Rate Base.				
6	FERC Order Cite				
7	Net Acquisition Adjustment	If L. 5 is yes, then zero; else L. 3 minus L. 4	-		-
8	Net Plant	L. 1 minus L. 2 minus L. 7	619,661,283		619,661,283
Gas Stored Underground					
9	Base Gas - Account No. 117.1	P. 220; L. 5, C. (b)	-		-
10	System Balancing - Account No. 117.2	P. 220; L. 5, C. (c)	-		-
Working Capital					
11	Prepayments	P. 111; L. 54, C. (c)	51,753		51,753
12	Materials and Supplies	P. 111; L. 45, C. (c)	-		-
ADIT and Regulatory Assets and Liabilities					
13	Accumulated Deferred Income Taxes (IT)	P. 235; L. 3, C. (k)(see footnote)	4,639,552		4,639,552
14	(Less) Accum. Deferred IT - Other Property	P. 275; L. 3, C. (k)(see footnote)	26,139,806		26,139,806
15	(Less) Accum. Deferred IT - Other	P. 277; L. 3, C. (k)(see footnote)	-		-
16	Other Regulatory Assets	P. 232; L. 40, C. (g)	8,520,167	-	8,520,167
17	(Less) Other Regulatory Liabilities	P. 278; L. 45, C. (g)	18,040,522	-	17,501,953
18	Rate Base	Sum of LL. 8 - 13 minus LL. 14-15 plus L. 16 minus L. 17	\$ 588,692,427		\$ 589,230,996

The Commission will apply Opinion No. 414, et al. in reviewing data submitted on page 4. Opinion No. 414, et al. requires that the pipeline's, or the parent's debt if using the parent's capital, must be issued in its name, be publicly traded, and be rated by a rating agency. The pipeline or parent must have a proper capital structure, which for purposes of FERC Form No. 501-G must have an equity ratio less than 65%.

Opinion No. 414, 80 FERC ¶ 61,157 (1997); reh'g denied, Opinion No. 414-A, 84 FERC ¶ 61,084 (1998).

Employing the data provided on Page 4 for capital structure and the component costs of Long Term Debt and Preferred Stock, the Pipeline's cost of capital for purposes of FERC Form No. 501-G will be based upon Case 4 - FERC Hypothetical Capital Structure and Cost of new Corporate Debt.

Summary of Page 4 Capital Structure and Capital Component Costs	Case 1	Case 2	Case 3	Case 4
	Balance Sheet & Income Statement	Page 218a	Parent's SEC Form 10K	Hypothetical
19) 1) Is the debt issued in the entity's name and traded?	No	No	No	
20) 2) Is the debt rated by a rating agency?	No	No	No	
21) 3) Is the equity ratio less than 65%?	No	No	Yes	
22) Each of the three above questions must be answered yes as the basis for using the capital structure and individual capital component cost.	Not using Case 1 per Opinion No. 414 et al	Not using Case 2 per Opinion No. 414 et al	Not using Case 3 per Opinion No. 414 et al	Using Case 4

		Capitalization Ratio	Component Cost	Wtd. Cost of Capital	
23	Long Term Debt	P. 4 of Form 501-G	43.00%	5.00%	2.15%
24	Preferred Stock (or equivalent)	P. 4 of Form 501-G	0.00%	0.00%	0.00%
25	Common Equity	P. 4 of Form 501-G	57.00%	10.55%	6.01%
26	Total Return	Sum of LL. 23 - 25	100.00%		8.16%
27	Return - Long Term Debt	L. 18 times L. 23, C. (E)	\$ 12,656,887	\$	12,668,466
28	Return - Preferred Stock (or equivalent)	L. 18 times L. 24, C. (E)	-		-
29	Return - Common Equity	L. 18 times L. 25, C. (E)	35,401,019		35,433,406
30	Total Return	Sum of LL. 27 - 29	\$ 48,057,906	\$	48,101,872

FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act

Return on Equity
Pre Tax Cut and Pro Forma Post Tax Cut
Elba Express Pipeline Company, L.L.C.

Line No.	(A) Description	(B) Form 2 Reference	(C) Calendar Year 2017 Actuals	(D) With Adjusted Tax Allowance	(E) Rate Moratorium Option 12% ROE Test
Operating Revenue					Indicated Cost of Service Reduction of 11.%
1	Total Operating Revenues	P. 301; L. 21, C. (h)	\$ 136,012,521	\$ 136,012,521	
2	(Less) Sales for Resale (Acct. Nos. 480-484)	P. 301; L. 4, C. (h)	-	-	
3	(Less) Commercial & Industrial Sales	P. 301; L. 2, C. (h)	-	-	
4	(Less) Gas Sales & Other Adj. from Acct. No. 495	P. 308; L. 10, C. (b)	-	-	
5	(Less) Fuel Related Revenues Incl. in Total Revenues per Pipeline		-	-	
6	Total Adjusted Revenue	L. 1 minus sum of LL. 2-5	\$ 136,012,521	\$ 136,012,521	\$ 121,118,712
7	<input checked="" type="checkbox"/> Yes	Enter 'Yes' or 'No' - Does the Pipeline track or true-up fuel retention?			
8	<input checked="" type="checkbox"/> Yes	Enter 'Yes' or 'No' - Does the Pipeline have stated fuel rates?			
Calculation of Return On Equity - Pre Tax Cut and Pro Forma Post Tax Cut					
9	Total Operating, Maintenance and Admin. & Gen.	P. 1; L. 17 of 501-G	\$ 5,127,411	\$ 5,127,411	\$ 5,127,411
10	Depreciation, Depletion, and Amortization	P. 1; L. 18 of 501-G	18,206,558	18,206,558	18,206,558
11	Amort. of Plant Acq. Adj.	P. 1; L. 19 of 501-G	-	-	-
12	Regulatory Debits (if incl. in a § 4 rate filing)	P. 1; L. 20 of 501-G	-	-	-
13	(Less) Regulatory Credits (if incl. in a § 4 rate filing)	P. 1; L. 21 of 501-G	-	-	-
14	Other Taxes	P. 1; L. 22 of 501-G	4,250,638	4,250,638	4,250,638
15	Non-Fuel Operating Cost Excl. Interest and Taxes	Sum of LL. 9-12 minus L. 13 plus L. 14	27,584,607	27,584,607	27,584,607
16	Operating Income	L. 6 minus L. 15	\$ 108,427,914	\$ 108,427,914	\$ 93,534,105
17	Interest Expense	P. 1; L. 23, C. (C) of 501-G	12,656,887	12,668,466	12,668,466
18	Income Before Income Taxes	L. 16 minus L. 17	\$ 95,771,027	\$ 95,759,448	\$ 80,865,639
Allowance for Income Taxes					
19	Composite Income Tax Rate	P. 1; L. 29 of 501-G	38.90%	25.74%	25.74%
20	Income Taxes	L. 18 times L. 19	\$ 37,254,929	\$ 24,648,482	\$ 20,814,815
21	(Less) Net Amort. of Excess(+) and/or Deficient(-) ADIT	P. 1; L. 31 of 501-G	-	538,569	538,569
22	Total Income Tax Allowance	L. 20 minus L. 21	37,254,929	24,109,913	20,276,246
23	Net Income	L. 18 minus L. 22	\$ 58,516,097	\$ 71,649,535	\$ 60,589,392
24	(Less) Preferred Dividends	P. 1; L. 24, C. (C) of 501-G	-	-	-
25	Rate Base	P. 2; L. 18 of 501-G	\$ 588,692,427	\$ 589,230,996	\$ 589,230,996
26	Total Estimated ROE (excluding fuel)	[L. 23 - L. 24] / [L. 25 * P. 2; L. 25 C. (C) of 501-G]	17.4%	21.3%	18.0%

**FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act**

**Capital Structure and Component Costs
Elba Express Pipeline Company, L.L.C.**

Line No.	(A) Description	(B) Form 2 Reference	(C) Capitalization	(D) Capitalization Ratio	(E) Capital Component Cost Rate	(F) Weighted Cost of Capital
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The Commission will use your responses on the following four cases to evaluate your capital structure and capital component costs for Form No. 501-G: Case 1, balance sheet and income statement; Case 2, Page 218a of Form No. 2; Case 3, the parent's financial statements as filed in its SEC Form 10-K; or Case 4, a hypothetical capital structure and capital component costs.

Case 1. Cost of Capital based upon amounts obtained from the Balance Sheet and Income Statement.

Cost of Debt and Preferred Stock						
1	Interest	P. 116; LL. 62-68, C. (c)	\$ -	= 0		
2	Long-Term Debt	P. 112; L. 24, C. (c)	\$ -			
3	Preferred Dividends	P. 120a; L. 68, C. (b)	\$ -	= 0		
4	Preferred Stock (or equivalent)	P. 112; L. 3, C. (c)				
5	Common Equity	P. 112; L. 15, C. (c)	\$ 661,597,842			
6	Cost of Capital					
7	Long-Term Debt	L. 3	\$ -	0.00%	0.00%	0.00%
8	Preferred Stock (or equivalent)	L. 5	\$ -	0.00%	0.00%	0.00%
9	Common Equity	L. 6 minus L. 5	\$ 661,597,842	100.00%	10.55%	10.55%
10	Totals		\$ 661,597,842	100.00%		10.55%
11	<input type="checkbox"/> No	Enter 'Yes' or 'No' - Is all of the debt listed on L. 3 above issued in the pipeline's name and publicly traded?				
12	<input type="checkbox"/> No	Enter 'Yes' or 'No' - Is all the debt listed on L. 3 above rated by a rating agency?				

Case 2. Cost of Capital based upon amounts obtained from Page 218a of the FERC Form No. 2.

	P. 218a	Column (b)	Column (c)	Column (d)		
14	Long-Term Debt	L. 3	\$ -	0.00%	0.00%	
15	Preferred Stock (or equivalent)	L. 4	\$ -	0.00%	0.00%	
16	Common Equity	L. 5	\$ 680,708,537	100.00%	10.55%	
17	Totals		\$ 680,708,537	100.00%	10.55%	
18	<input type="checkbox"/> Yes	Are the Values on P. 218a from the books and records of Elba Express Pipeline Company, L.L.C.?				
19	If no, provide the name and stock symbol of the company for the source of the Page 218a amounts.					
20	Ticker	Company Name				
21	<input type="checkbox"/> No	Enter 'Yes' or 'No' - Is all of the debt listed on L. 15 above issued in the pipeline's name, or, that of the entity on L. 21? and publicly traded?				
22	<input type="checkbox"/> No	Enter 'Yes' or 'No' - Is all of the debt listed on L. 15 above rated by a rating agency?				

Case 3. Cost of Capital based upon Parent's Capital Structure and costs for Long Term Debt and Preferred Stock.

24	Long-Term Debt	SEC - 10K	\$ 34,088,000,000	49.25%	5.25%	2.59%
25	Preferred Stock (or equivalent)	SEC - 10K	-	0.00%	0.00%	0.00%
26	Common Equity	SEC - 10K	\$ 35,124,000,000	50.75%	10.55%	5.35%
27	Totals		\$ 69,212,000,000	100.00%		7.94%
28	Provide the stock symbol(s), the name of the parent company(s), a hyperlink to the parent's SEC Form 10-K, and the associated year:					
29	Ticker(s)	KMI	Company Name(s)	Kinder Morgan, Inc.		
30	Year	2017	10K Hyperlink(s)	https://ir.kindermorgan.com/annual-quarterly-reports		
31	<input type="checkbox"/> No	Enter 'Yes' or 'No' - Is all of the debt listed on L. 24 above publicly traded?				
32	<input type="checkbox"/> No	Enter 'Yes' or 'No' - Is all of the debt listed on L. 24 above rated by a rating agency?				

Case 4. Cost of Capital based upon FERC Hypothetical Capital Structure and Cost of new Corporate Debt.

33	Long-Term Debt			43.00%	5.00%	2.15%
34	Preferred Stock			0.00%	0.00%	0.00%
35	Common Equity			57.00%	10.55%	6.01%
36	Totals			100.00%		8.16%

FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act
Current Composite Income Tax Rate
Elba Express Pipeline Company, L.L.C.

Line No.	(A) Description	(B) Form 2 Reference	(C) Weighting	(D) Marginal Tax Rates	(E) Weighted Average Tax Rates
1	Based on the response to Line 4 on Page 1 of Form No. 501-G, Elba Express Pipeline Company, L.L.C.				
2	is a C Corp subject to the 35% tax rate for 2017. Please fill out lines 6 and 9.				
3	Federal Income Tax Rate (FIT) - Calendar Year 2017:				35.00%
4	State Income Tax Rate (SIT) - Calendar Year 2017:				6.00%
5	Composite Tax Rate - Calendar Year 2017:				38.90%
6	Provide the percentage of federal income tax deductible for state income taxes. = (p)				0.00%
7	Composite Tax Rate equals				
8	[FIT Rate * (1 - SIT Rate) / (1 - SIT Rate * FIT Rate * p)] + [SIT Rate * (1 - FIT Rate * p) / (1 - SIT Rate * FIT Rate * p)]				
<u>Tax Rates for C Corps.</u>					
9	Provide the sum of weighted state tax rate(s)	sum of all rows from P. 263b.; C. (q)			6.00%
<u>Tax Rates for Pass Through Entities */</u>					
Federal Income Tax Rates					
10	Subchapter C	per Pipeline's parents' owners	0.0%	0.0%	0.00%
11	Individuals	per Pipeline's parents' owners	0.0%	0.0%	0.00%
12	Mutual Funds	per Pipeline's parents' owners	0.0%	0.0%	0.00%
13	Pensions, IRAs, Keogh Plans	per Pipeline's parents' owners	0.0%	0.0%	0.00%
14	UBTI Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
15	Non-Taxpaying Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
16	Weighted Average Rate		<u>0.00%</u>		<u>0.00%</u>
State and Local Income Tax Rates					
17	Subchapter C	per Pipeline's parents' owners	0.0%	0.0%	0.00%
18	Individuals	per Pipeline's parents' owners	0.0%	0.0%	0.00%
19	Mutual Funds	per Pipeline's parents' owners	0.0%	0.0%	0.00%
20	Pensions, IRAs, Keogh Plans	per Pipeline's parents' owners	0.0%	0.0%	0.00%
21	UBTI Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
22	Non-Taxpaying Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
23	Weighted Average Rate		<u>0.00%</u>		<u>0.00%</u>
24	Provide the date when the marginal tax rates were determined.			mm/dd/yyyy	

*/ Income tax rates and weighting must be consistent with the Commission's *Policy Statement on Income Tax Allowances*, 111 FERC ¶ 61,139 (2005), and the Commission's *Order on Initial Decision and on Certain Remanded Cost Issues*, 113 FERC ¶ 61,277 (2005).