



December 6, 2018

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: Negotiated Rate Agreement Update;
El Paso Natural Gas Company, L.L.C.;
Docket No. RP19-

Commissioners:

El Paso Natural Gas Company, L.L.C. ("EPNG") hereby tenders for filing and acceptance by the Federal Energy Regulatory Commission ("Commission") the tariff record listed below for inclusion in its FERC Gas Tariff, Third Revised Volume No. 1A ("Tariff"):

Part II: Section 5.14 Tesoro Refining & Marketing #610724-FT1EPNG Version 1.0.0

Proposed with an effective date of December 7, 2018, this tariff record updates EPNG's Tariff to reflect two, separate permanent point redesignations on an existing conforming, negotiated rate transportation service agreement ("TSA") between EPNG and Tesoro Refining & Marketing Company, LLC ("TRMC"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the December 7, 2018 effective date, as discussed below.

Background

On November 29, 2018 in Docket No. RP19-342-000, EPNG submitted four conforming, negotiated rate TSAs for the Commission's review and acceptance ("November Filing"). The TSAs have a proposed effective date corresponding to the in-service date of EPNG's recently completed Permian North facilities.¹ One of the TSAs submitted in that proceeding is TSA No. 610724-FT1EPNG ("TRMC TSA") between TRMC and EPNG. The TRMC TSA provides for firm transportation service between various primary and alternate receipt and delivery points at which the negotiated rate

¹ EPNG placed its Permian North facilities into service on December 5, 2018.

specified in the TSA would apply.² As of the date of this filing, an order in Docket No. RP19-342-000 is pending before the Commission.

Reason for Filing

Permanent Delivery Point Redesignation Request

On December 4, 2018, TRMC submitted a redesignation request to permanently shift all of its delivery point capacity on the TRMC TSA from the primary delivery point of DSCALTOP to the DPG&ETOP delivery point. TRMC requested that the redesignation begin on December 7, 2018 and remain in effect through the term of the TSA.³ EPNG approved this delivery point redesignation request on December 4, 2018.

Permanent Receipt Point Redesignation Request

Also on December 4, 2018, TRMC submitted a second and separate redesignation request to permanently shift all of its receipt point capacity on the TRMC TSA from the primary receipt point of IRAMSEYN to the Keystone receipt point. TRMC requested that this redesignation begin on December 7, 2018 and remain in effect through the term of the TSA.⁴ EPNG approved this receipt point redesignation request on December 4, 2018.

Both permanent redesignation requests were made pursuant to General Terms and Conditions (“GT&C”) Section 8.1(f)(iii) of EPNG’s Tariff, which provides that firm shippers may request to temporarily or permanently redesignate primary point rights to any rate zone subject to certain procedures.⁵

² EPNG has marked the tariff record changes proposed in this proceeding off the pending tariff record submitted in the November Filing. Should the Commission not accept the tariff record proposed in the November Filing, EPNG will resubmit the record for the Commission’s review and acceptance.

³ As indicated on Appendix A herein, 20,000 Dth per day of TRMC’s primary delivery capacity will shift from DSCALTOP to DPG&ETOP effective December 7, 2018 through December 4, 2020. DPG&ETOP is an alternate delivery point on the TRMC TSA at which the current negotiated rate applies.

⁴ As indicated on Appendix B herein, 20,000 Dth per day of TRMC’s primary receipt capacity will shift from IRAMSEYS to KEYSTONE effective December 7, 2018 through December 4, 2020. KEYSTONE is one of the available Permian receipt points (STML PER) on the existing TRMC TSA at which the current negotiated rate applies.

⁵ See Section 8.1(f)(iii)(B) of the GT&C of EPNG’s Tariff. Note that an acceptance of a re-designation request by EPNG constitutes an amendment of the TSA and an executed paper copy is unnecessary to amend the TSA as described in GT&C Section 8.1(f)(iii)(F).

Since TRMC's redesignation requests affect an existing negotiated rate agreement, EPNG is submitting a revised tariff record to reflect the updated primary receipt and delivery point entitlements.⁶ No other changes to the TSA have been made.

Tariff Provisions

EPNG is submitting the following tariff record pursuant to 18 C.F.R. § 154.112(b) and Part 154, Subpart C of the Commission's regulations.

Part II, Section 5.14 is updated to reflect the two permanent redesignations to the new primary receipt and delivery points effective December 7, 2018.

Procedural Matters

Inasmuch as this filing is fully described herein, the statement of the nature, the reasons and the basis for the instant tariff filing required by 18 C.F.R. § 154.7(a)(6) (2018) is omitted.

In accordance with the applicable provisions of Part 154 of the Commission's regulations,⁷ EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter;
- b) Appendix A, a copy of the delivery point redesignation report;
- c) Appendix B, a copy of the receipt point redesignation report; and
- d) clean and marked versions of the tariff record in PDF format.

EPNG respectfully requests the Commission waive the 30-day notice requirement, accept the tendered tariff record for filing, and permit it to become effective December 7, 2018, consistent with the effective dates of the redesignation requests. With respect to any tariff provisions the Commission allows to go into effect without change, EPNG hereby moves to place the tendered tariff provisions into effect at the end of the suspension period.

Additionally, pursuant to 18 C.F.R. § 154.7(a)(7) (2018) of the Commission's regulations, EPNG respectfully requests that the Commission grant all waivers necessary to effectuate this filing.

Correspondence and communications concerning this filing should be directed to:

⁶ The Commission has accepted similar permanent and temporary redesignation requests in Docket Nos. RP18-601-000, RP18-1227-000 and RP18-1228-000.

⁷ 18 C.F.R. § 154.101 *et seq.* (2018).

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing document to be served upon all shippers on EPNG's pipeline system and interested state regulatory commissions, in accordance with the requirements of 18 C.F.R. §§ 154.208 and 385.2010 of the Commission's Rules of Practice and Procedures.

Dated at Colorado Springs, Colorado as of this 6th day of December 2018.

/s/

Francisco Tarin
Director, Regulatory

Post Office Box 1087
Colorado Springs, CO 80944
(719) 667-7517

Primary Receipt and Delivery Point ReDesignation Report

Request # : 84747

Company Name : TRMC

Contract No : 610724-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 1

Submit Date & Time : 12/4/2018 10:48:20AM

Executed Date & time : 12/4/2018 1:02:13PM

Effective Date : 12/07/2018

ReDesignation End Date : 12/04/2020

Customer Comments :

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
Current								
48164	DBMPL/EPNG (IRAMSEYN) RAMSEY NORTH	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	12/07/2018	12/04/2020	20,000
Re-Designation								
48164	DBMPL/EPNG (IRAMSEYN) RAMSEY NORTH	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	12/07/2018	12/04/2020	20,000
Updated TSA Entitlements*								
48164	DBMPL/EPNG (IRAMSEYN) RAMSEY NORTH	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	12/07/2018	12/04/2020	20,000

*Note: The Updated TSA Entitlements represent the TSA entitlements once the re-designations have been approved and executed. These may vary from the original request as provided by the tariff in the GT&C, Section 8.1 (f) (iii) (C). To view the final approved TSA entitlements, log into DART and select Contracts and Amendments.

Primary Receipt and Delivery Point ReDesignation Report

Request # : 84752

Company Name : TRMC

Contract No : 610724-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 2

Submit Date & Time : 12/4/2018 1:25:30PM

Executed Date & time : 12/4/2018 3:01:41PM

Effective Date : 12/07/2018

ReDesignation End Date : 12/04/2020

Customer Comments :

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
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Current

48164	DBMPL/EPNG (IRAMSEYN) RAMSEY NORTH	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	12/07/2018	12/04/2020	20,000
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Re-Designation

302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	12/07/2018	12/04/2020	20,000
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Updated TSA Entitlements*

302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	12/07/2018	12/04/2020	20,000
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*Note: The Updated TSA Entitlements represent the TSA entitlements once the re-designations have been approved and executed. These may vary from the original request as provided by the tariff in the GT&C, Section 8.1 (f) (iii) (C). To view the final approved TSA entitlements, log into DART and select Contracts and Amendments.

Statement of Negotiated Rates
 (Rates per Dth/day)

Rate Schedule FT-1 Shipper Identification	Term of Service	TCD (Dth/d)	Reservation Rate 1/	Usage Rate	Primary Receipt Point(s)	Primary Delivery Point(s)
Tesoro Refining & Marketing Co LLC	12/5/2018 – 12/6/2018	20,000	1a/	1/	IRAMSEYN	DSCALTOP
#610724-FT1EPNG	12/7/2018 – 12/4/2020	20,000	1a/	1/	KEYSTONE	DPG&ETOP
			1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
					STML ANA	DSCALTOP
					STML PER	DPG&ETOP
					STML SJN	DSCALEHR SOCWR KRAMER

- 1/ Unless otherwise agreed by the Parties in writing, the rates for service shall be Transporter's maximum rates, as may be changed from time to time, for service under Rate Schedule FT-1 or other superseding Rate Schedules. The reservation rate shall be payable regardless of quantities transported.
- 1a/ As provided in Section 4.18 of the GT&C of Transporter's Tariff, the parties agree to the following negotiated rate(s) of \$12.3654 per Dekatherm per month which shall not be subject to the applicable maximum or minimum Rate Schedule FT-1 reservation rate for the corresponding rate zone as set forth in Transporter's Tariff and which shall be payable regardless of quantities transported.
- 2/ Fuel and L&U shall be as stated on Transporter's Statement of Rates in the Tariff, as they may be changed from time to time, unless otherwise agreed between the Parties.
- 3/ Surcharges, if applicable: Unless otherwise specified, all applicable surcharges shall be the maximum surcharge rate as stated on the Statement of Rates, as they may be changed from time to time.
 ACA:
 The ACA Surcharge shall be assessed pursuant to Section 17 of the GT&C of the Tariff.
- 4/ This contract does not deviate in any material aspect from the form of service agreement.

Statement of Negotiated Rates
 (Rates per Dth/day)

Rate Schedule FT-1 Shipper Identification	Term of Service	TCD (Dth/d)	Reservation Rate 1/	Usage Rate	Primary Receipt Point(s)	Primary Delivery Point(s)
Tesoro Refining & IRAMSEYN Marketing Co LLC #610724-FT1EPNG	12/5/2018 – 12/6/2018 -DSCALTOP in service date and 12/7/2018 – 12/4/2020 ending twenty four months after the in service date	Beginning on the 20,000	_____ 1a/	_____ 1/	1a/ KEYSTONE	1/ DPG&ETOP
			1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
					STML ANA	DSCALTOP
					STML PER	DPG&ETOP
					STML SJN	DSCALEHR
						SOCWR
						KRAMER

- 1/ Unless otherwise agreed by the Parties in writing, the rates for service shall be Transporter's maximum rates, as may be changed from time to time, for service under Rate Schedule FT-1 or other superseding Rate Schedules. The reservation rate shall be payable regardless of quantities transported.
- 1a/ As provided in Section 4.18 of the GT&C of Transporter's Tariff, the parties agree to the following negotiated rate(s) of \$12.3654 per Dekatherm per month which shall not be subject to the applicable maximum or minimum Rate Schedule FT-1 reservation rate for the corresponding rate zone as set forth in Transporter's Tariff and which shall be payable regardless of quantities transported.
- 2/ Fuel and L&U shall be as stated on Transporter's Statement of Rates in the Tariff, as they may be changed from time to time, unless otherwise agreed between the Parties.
- 3/ Surcharges, if applicable: Unless otherwise specified, all applicable surcharges shall be the maximum surcharge rate as stated on the Statement of Rates, as they may be changed from time to time.
 ACA:
 The ACA Surcharge shall be assessed pursuant to Section 17 of the GT&C of the Tariff.

4/ This contract does not deviate in any material aspect from the form of service agreement.