



December 27, 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 5.13 EOG Resources, Inc. #610720-FT1EPNG Version 1.0.0

Proposed with an effective date of January 1, 2019, this tariff record updates EPNG's Tariff to reflect a permanent point redesignation on an existing conforming, negotiated rate transportation service agreement ("TSA") between EPNG and EOG Resources, Inc. ("EOG"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the January 1, 2019 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. One of the TSAs submitted in that proceeding was TSA No. 610720-FT1EPNG ("EOG TSA") between EOG and EPNG. The EOG TSA provides for firm transportation service between various primary and alternate receipt and delivery points at which the negotiated rate specified in the TSA would apply. The Commission issued an order accepting the tariff records proposed in Docket No. RP19-342-000 on December 18, 2018.

Reason for Filing

On December 20, 2018, EOG submitted a redesignation request to permanently shift all of its delivery point capacity on the EOG TSA from the primary delivery point of DSCALTOP to the DPG&ETOP delivery point. EOG requested that the redesignation begin on January 1, 2019 and remain in effect through the term of the TSA.¹ EPNG approved this delivery point redesignation request on December 20, 2018.

The permanent redesignation request was 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.²

Since EOG’s redesignation request affects an existing negotiated rate agreement, EPNG is submitting a revised tariff record to reflect the updated primary delivery point entitlements.³ 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 5.13 is updated to reflect the permanent redesignation to the new primary delivery point effective January 1, 2019.⁴

¹ As indicated on Appendix A herein, 20,000 Dth per day of EOG’s primary delivery capacity will shift from DSCALTOP to DPG&ETOP effective January 1, 2019 through December 31, 2020. DPG&ETOP is an alternate delivery point on the EOG TSA at which the current negotiated rate applies.

² See Section 8.1(f)(iii)(B) of the GT&C of EPNG’s Tariff. Note that an acceptance of a redesignation 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).

³ The Commission has accepted similar permanent and temporary redesignation requests in Docket Nos. RP18-1227-000 and RP18-1228-000.

⁴ In the originally proposed tariff record submitted as Version 0.0.0 in Docket No. RP19-342-000, EPNG reflected the EOG TSA start date as the in-service date of certain facilities associated with EPNG’s Permian North Project and the TSA end date as two years following the in-service date. The Permian North Project facilities were placed into service on December 5, 2018. As such, EPNG has updated the term on the tariff record proposed herein to reflect a TSA start date of December 5, 2018. While making this update, EPNG noted an inconsistency between the termination date of two years following the in-service date shown on the original tariff record and the executed agreement. The EOG TSA terminates on December 31, 2020. EPNG has modified the tariff record proposed herein to reflect the correct TSA termination date of December 31, 2020.

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,⁵ 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; and
- c) 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 January 1, 2019, consistent with the effective date of the redesignation request. 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:

Mr. Francisco Tarin
Director, Regulatory
El Paso Natural Gas Company, L.L.C.
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Colorado Springs, CO 80944
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These persons have been designated for service in accordance with Rule 203 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.203 (2018)).

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

The undersigned hereby certifies that he has read this filing and knows (i) the contents of such filing and the attachments; (ii) that the contents as stated in the filing and in the attachments are true to the best of his knowledge and belief; and (iii) that he possesses full power and authority to sign this filing.

Respectfully submitted,

EL PASO NATURAL GAS COMPANY, L.L.C.

By: _____ /s/
Francisco Tarin
Director, Regulatory

Enclosures

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 27th day of December 2018.

/s/

Francisco Tarin

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

Appendix A

Primary Receipt and Delivery Point ReDesignation Report

Request # : 84946

Company Name : EOG RESOURCES, INC.

Contract No : 610720-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 1

Submit Date & Time : 12/20/2018 3:00:00PM

Executed Date & time : 12/20/2018 4:43:33PM

Effective Date : 01/01/2019

ReDesignation End Date : 12/31/2020

Customer Comments :

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
Current								
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	01/01/2019	12/31/2020	20,000
Re-Designation								
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	01/01/2019	12/31/2020	20,000
Updated TSA Entitlements*								
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	01/01/2019	12/31/2020	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.

Clean Tariff Section

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)
EOG Resources, Inc. #610720-FT1EPNG	12/5/18 – 12/31/18	20,000	1a/	1/	IROCKDOV	DSCALTOP
	1/1/19 – 12/31/20	20,000	1a/	1/	IROCKDOV	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 \$12.7750 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.

Marked Tariff Section

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)
EOG Resources, Inc. DSCALTOP #610720-FT1EPNG	Beginning on the 12/5/18 – 12/31/18– in service date and ending twenty four months 1/1/19 – 12/31/20 after the in service date	20,000 20,000	20,000 1a/	1a/ 1/	1/ IROCKDOV	IROCKDOV DPG&ETOP
				Alternate Receipt 1a/	Alternate Delivery Point(s)	
				STML ANA -STML PER STML SJN		DSCALTOP DPG&ETOP 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 \$12.7750 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.