



August 31, 2020

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. RP20-

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 records listed below for inclusion in its Third Revised Volume No. 1A FERC Gas Tariff ("Tariff"):

Part VII	Section 27.1	Arizona Public Service #FT39H000 Exh A	Version 33.0.0
Part VII	Section 27.2	Arizona Public Service #FT39H000 Exh B	Version 33.0.0

Proposed with an effective date of September 1, 2020, these tariff records update EPNG's Tariff to reflect a temporary point redesignation on an existing transportation service agreement ("TSA") between EPNG and Arizona Public Service Company ("APS"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the September 1, 2020 effective date, as discussed below.

Background

EPNG's Tariff includes Agreement No. FT39H000-FT1EPNG, a non-conforming, negotiated rate agreement with APS. Among other things, this TSA reflects the application of a negotiated rate at various primary and alternate points. Since the initial acceptance of the tariff records reflecting the TSA,¹ APS has redesignated primary points consistent with EPNG's Tariff. Currently, the tariff records reflecting the subject TSA include a point redesignation that was accepted by the Commission on June 18, 2020.²

¹ *El Paso Natural Gas Co.*, 143 FERC ¶ 61,187 (2013).

² *El Paso Natural Gas Co.*, Docket No. RP20-902-000 (June 18, 2020) (unpublished letter order).

Reason for Filing

Pursuant to General Terms and Conditions ("GT&C") Section 8.1(f)(iii) of EPNG's Tariff, firm shippers may request to temporarily or permanently redesignate primary point rights to any rate zone subject to certain procedures. In the case of a temporary redesignation, a firm shipper may request to redesignate a primary point on its TSA for a period of three months or less and, in the same request, simultaneously redesignate back to the original primary point at the end of the redesignation period.³ 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).

Recently, APS submitted a request to temporarily redesignate capacity on Agreement No. FT39H000-FT1EPNG from the primary delivery point of DAPS YUM (PIN 330458) to DAPS PHX (PIN 300777) for the month of September 2020.⁴ DAPS PHX is currently listed as an alternate delivery point at which the negotiated rate specified in the TSA applies. APS' request was accepted by EPNG and, therefore, Agreement No. FT39H000-FT1EPNG was deemed to be amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.⁵ Given that APS' temporary redesignation request affects a non-conforming negotiated rate agreement, EPNG is proposing tariff records to reflect the delivery point modification and the relevant time period. No other substantive changes to the TSA have been made.⁶

Tariff Provisions

EPNG is submitting the following tariff records pursuant to 18 C.F.R. § 154.112(b) (2020) and Subpart C of the Commission's regulations.⁷

Part VII, Sections 27.1 and 27.2 are updated to reflect the new primary delivery point effective September 1, 2020 through September 30, 2020 for Agreement No. FT39H000-FT1EPNG.

³ See Section 8.1(f)(iii)(B) of the GT&C of EPNG's Tariff.

⁴ As indicated on the attached tariff records, capacity will shift to the Redhawk Delivery Point (Meter No. 314553) within the DAPS PHX D-Code effective September 1, 2020 through September 30, 2020. This temporary redesignation is similar to others recently filed by EPNG and accepted by the Commission in Docket Nos. RP19-1499-000, RP20-838-000 and RP20-902-000.

⁵ See Appendix A for a copy of the redesignation report for Agreement No. FT39H000-FT1EPNG. This report reflects the details regarding APS' redesignation request and EPNG's approval of such request.

⁶ Note that EPNG has updated the formatting in an Exhibit B table to consolidate the Point Identification Number ("PIN") and PIN name for the alternate locations into one column.

⁷ See 18 C.F.R. §§ 154.201 - 154.210 (2020) (Subpart C).

Procedural Matters

In accordance with the applicable provisions of Part 154 of the Commission's regulations,⁸ EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter;
- b) Appendix A, a copy of the redesignation report for Agreement No. FT39H000-FT1EPNG; and
- c) clean and marked versions of each tariff record in PDF format.

EPNG respectfully requests the Commission accept the tendered tariff records for filing and permit them to become effective September 1, 2020, consistent with the effective date of the redesignation request. As such, EPNG requests the Commission grant a waiver of the notice requirements found in 18 C.F.R. § 154.207 (2020) of the Commission's regulations.⁹ With respect to any tariff records the Commission allows to go into effect without change, EPNG hereby moves to place the tendered tariff records in to effect at the end of a minimal suspension period.

Correspondence and communications concerning this filing should be directed to:

Mr. Francisco Tarin
Director, Regulatory
El Paso Natural Gas Company, L.L.C.
Post Office Box 1087
Colorado Springs, CO 80944
Telephone: (719) 667-7517
EPNGRegulatoryAffairs@kindermorgan.com

Mr. David R. Cain
Assistant General Counsel
El Paso Natural Gas Company, L.L.C.
Post Office Box 1087
Colorado Springs, CO 80944
Telephone: (719) 520-4534
David_Cain@kindermorgan.com

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 (2020)).

⁸ 18 C.F.R. §§ 154.101 – 154.603 (2020).

⁹ See, e.g., *Gulfstream Natural Gas System, L.L.C.*, 105 FERC ¶ 61,164, at P 11 (2003).

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 Sections 154.208 and 385.2010 of the Commission's Rules of Practice and Procedures.

Dated at Colorado Springs, Colorado as of this 31st day of August 2020.

/s/

Francisco Tarin

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

Appendix A

Primary Receipt and Delivery Point ReDesignation Report

Request # : 93428	Company Name : ARIZONA PUBLIC SERV. CO.
Contract No : FT39H000-FT1EPNG	Status : EXECUTED
Acquired Capacity Agreement : N	Amendment No : 36
Submit Date & Time : 8/24/2020 1:04:24PM	Executed Date & time : 8/25/2020 4:16:19PM
Effective Date : 09/01/2020	ReDesignation End Date : 09/30/2020
Customer Comments : Note: New point is in a different zone. Re-designation could have billing implications. Contact your account director if you have questions.	

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
Current								
302132	(KEYSTONE) KEYSTONE POOL	330458	APS/EPNG (DAPS YUM) AXIS YUCCA PP Y	SS1	26	09/01/2020	09/30/2020	4,449
Re-Designation								
302132	(KEYSTONE) KEYSTONE POOL	300777	APS/EPNG (DAPS PHX) APS PHX MARICOP	SS1	26	09/01/2020	09/30/2020	4,449
Current								
302404	(WAHA) WAHA POOL	330458	APS/EPNG (DAPS YUM) AXIS YUCCA PP Y	SS1	26	09/01/2020	09/30/2020	26,603
Re-Designation								
302404	(WAHA) WAHA POOL	300777	APS/EPNG (DAPS PHX) APS PHX MARICOP	SS1	26	09/01/2020	09/30/2020	21,103
302404	(WAHA) WAHA POOL	330458	APS/EPNG (DAPS YUM) AXIS YUCCA PP Y	SS1	26	09/01/2020	09/30/2020	5,500
Current								
300724	(BONDAUSI) BONDAU STATION	330458	APS/EPNG (DAPS YUM) AXIS YUCCA PP Y	NS3	26	09/01/2020	09/30/2020	448
Updated TSA Entitlements*								
300724	(BONDAUSI) BONDAU STATION	330458	APS/EPNG (DAPS YUM) AXIS YUCCA PP Y	NS3	26	09/01/2020	09/30/2020	448
302132	(KEYSTONE) KEYSTONE POOL	300777	APS/EPNG (DAPS PHX) APS PHX MARICOP	SS1	26	09/01/2020	09/30/2020	4,449
302404	(WAHA) WAHA POOL	300777	APS/EPNG (DAPS PHX) APS PHX MARICOP	SS1	26	09/01/2020	09/30/2020	21,103
302404	(WAHA) WAHA POOL	330458	APS/EPNG (DAPS YUM) AXIS YUCCA PP Y	SS1	26	09/01/2020	09/30/2020	5,500

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
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*Note: The Updated ISA Entitlements represent the ISA 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 Sections

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
 To The
 Firm Transportation Service Agreement
 Rate Schedule FT-1
 between
 El Paso Natural Gas Company, L.L.C.
 and
 Arizona Public Service Company (Shipper)
 Dated: August 25, 2020

Shipper's Transportation Contract Demand: See ¶11
 Effective Dates: September 1, 2020 – September 30, 2020

Primary Receipt PIN Name	Rec PIN	Primary Delivery PIN Name	Del PIN	Flow Path	Maximum Quantity - D-Code (Dth/d) 1/											
					January	February	March	April	May	June	July	August	September	October	November	December
BONDADST	300724	DAPS YUM	330458	NS3									448			
BONDADST	300724	DAPS PHX	300777	NS3												
KEYSTONE	302132	DAPS YUM	330458	SS1												
KEYSTONE	302132	DAPS PHX	300777	SS1									4,449			
WAHA	302404	DAPS YUM	330458	SS1									5,500			
WAHA	303404	DAPS PHX	300777	SS1									21,103			
TRANSPORTATION CONTRACT DEMAND													31,500			

Ex. A-1

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
 To The
 Firm Transportation Service Agreement
 Rate Schedule FT-1
 between
 El Paso Natural Gas Company, L.L.C.
 and
 Arizona Public Service Company (Shipper)
 Dated: August 25, 2020

Shipper's Transportation Contract Demand: See ¶11
 Effective Dates: October 1, 2020 – December 31, 2024

Primary Receipt PIN Name	Receipt PIN	Primary Delivery PIN Name	Del PIN	Flow Path	Maximum Quantity - D-Code (Dth/d) 1/											
					January	February	March	April	May	June	July	August	September	October	November	December
BONDADST	300724	DAPS YUM	330458	NS3	14,349	16,329	14,194	5,373	9,353	280	151	4,052	448	185	17,651	19,000
KEYSTONE	302132	DAPS YUM	330458	SS1	4,651	2,671		11,089	5,228	1,715	15,300	22,489	4,449	28,815	2,690	
WAHA	302404	DAPS YUM	330458	SS1			4,806	6,038	7,919	25,005	16,049	4,959	26,603		2,659	
TRANSPORTATION CONTRACT DEMAND					19,000	19,000	19,000	22,500	22,500	27,000	31,500	31,500	31,500	29,000	23,000	19,000

Ex. A-2

Issued on: August 31, 2020

Effective on: September 1, 2020

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
 To The
 Firm Transportation Service Agreement
 Rate Schedule FT-1
 between
 El Paso Natural Gas Company, L.L.C.
 and
 Arizona Public Service Company (Shipper)
 Dated: August 25, 2020

Effective Dates: September 1, 2020 – September 30, 2020

Contract Meter Quantity (CMQ(s)) 2/																	
Primary Delivery PIN Name	Del PIN	Meter No.	Description	January	February	March	April	May	June	July	August	September	October	November	December	Delivery Pressure (p.s.i.g.) Not less than 3/	Delivery Pressure (p.s.i.g.) Not greater than 3/
DAPS YUM	330458	330458	APS YUMA									5,948				225	242
DAPS PHX	300777	314553	REDHAWK DELIVERY POINT									25,552				525	
CONTRACT METER QUANTITY (CMQ(s))												31,500					

Ex. A-3

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
To The
Firm Transportation Service Agreement
Rate Schedule FT-1
between
El Paso Natural Gas Company, L.L.C.
and
Arizona Public Service Company (Shipper)
Dated: August 25, 2020

Effective Dates: October 1, 2020 – December 31, 2024

Primary Delivery Pin Name	Del PIN	Meter No.	Description	Delivery Pressure (p.s.i.g.) Not less than 3/	Delivery Pressure (p.s.i.g.) Not greater than 3/
DAPS YUM	330458	330458	APS YUMA	225	242

- 1/ The sum of the Maximum Quantities identified above is equal to Shipper's Transportation Contract Demand for that Month.
- 2/ The sum of the CMQs identified above is equal to Shipper's D-Code Maximum Quantity for that Month.
- 3/ Unless otherwise specified on this Exhibit A, the pressure(s) for the point(s) listed above shall be the pressure existing from time to time at the metering facility; provided, however, Transporter reserves the right to deliver quantities at pressures up to the MAOP of that facility.

Ex. A-4

Agreement No. FT39H000-FT1EPNG

EXHIBIT B
To The
Firm Transportation Service Agreement
Rate Schedule FT-1
between
El Paso Natural Gas Company, L.L.C.
and
Arizona Public Service Company (Shipper)
Dated: August 25, 2020

Primary Receipt Point(s)	Primary Delivery Point(s)	Effective Dates	Reservation Rate 1/	Usage Rate 1/	Fuel 2/	Surcharges 3/
As Listed in Exhibit A	As Listed in Exhibit A	September 1, 2020 – December 31, 2024	(1a)			

Alternate Receipt Point(s)/Location(s)	Alternate Delivery Point(s)/Location(s)	Effective Dates	Reservation Rate 1/	Usage Rate 1/	Fuel 2/	Surcharges 3/
302346 STML PER 302347 STML SJN 300704 ANADARKO	300777 DAPS PHX 330458 DAPS YUM	See ¶9	(1a)			

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, Transporter and Shipper agree the reservation rate for this Agreement shall be a negotiated reservation rate and shall not be subject to the applicable maximum recourse or minimum FT-1 reservation rates as they are set forth in Transporter's Tariff during the entirety of the term of this Agreement. The reservation rate shall be \$12.0146 per Dekatherm per month. If the Federal Energy Regulatory Commission issues a final order that is no longer subject to rehearing or appeal in Docket No. RP10-1398-000 with a lower Non-Article 11.2 applicable maximum recourse FT-1 reservation rate, Shipper will pay that lower rate. The lower rate will become the new negotiated reservation rate (not subject to the applicable maximum or minimum rate). The lower rate shall be effective for the remainder of this Agreement beginning on the same date the lower applicable maximum recourse reservation rate becomes effective for all shippers.

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.

Ex. B-1

Marked Tariff Sections

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
 To The
 Firm Transportation Service Agreement
 Rate Schedule FT-1
 between
 El Paso Natural Gas Company, L.L.C.
 and
 Arizona Public Service Company (Shipper)
 Dated: ~~August 25~~ May 26, 2020

Shipper's Transportation Contract Demand: See ¶11

Effective Dates: ~~September 1, 2020 – June 30, 2020~~

Primary Receipt PIN Name	Rec PIN	Primary Delivery PIN Name	Del PIN	Flow Path	Maximum Quantity - D-Code (Dth/d) 1/											
					January	February	March	April	May	June	July	August	September	October	November	December
BONDADST	300724	DAPS YUM	330458	NS3						280			<u>448</u>			
BONDADST	300724	DAPS PHX	300777	NS3												
KEYSTONE	302132	DAPS YUM	330458	SS1												
KEYSTONE	302132	DAPS PHX	300777	SS1						4,745			<u>4,449</u>			
WAHA	302404	DAPS YUM	330458	SS1						6,500			<u>5,500</u>			
WAHA	303404	DAPS PHX	300777	SS1						40,505			<u>21,103</u>			
TRANSPORTATION CONTRACT DEMAND										27,000			<u>31,500</u>			

Ex. A-1

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
 To The
 Firm Transportation Service Agreement
 Rate Schedule FT-1
 between
 El Paso Natural Gas Company, L.L.C.
 and
 Arizona Public Service Company (Shipper)
 Dated: ~~May 26~~ August 25, 2020

Shipper's Transportation Contract Demand: See ¶11
 Effective Dates: ~~October 1~~ July 1, 2020 – December 31, 2024

Primary Receipt PIN Name	Receipt PIN	Primary Delivery PIN Name	Del PIN	Flow Path	Maximum Quantity - D-Code (Dth/d) 1/											
					January	February	March	April	May	June	July	August	September	October	November	December
BONDADST	300724	DAPS YUM	330458	NS3	14,349	16,329	14,194	5,373	9,353	280	151	4,052	448	185	17,651	19,000
KEYSTONE	302132	DAPS YUM	330458	SS1	4,651	2,671		11,089	5,228	1,715	15,300	22,489	4,449	28,815	2,690	
WAHA	302404	DAPS YUM	330458	SS1			4,806	6,038	7,919	25,005	16,049	4,959	26,603		2,659	
TRANSPORTATION CONTRACT DEMAND					19,000	19,000	19,000	22,500	22,500	27,000	31,500	31,500	31,500	29,000	23,000	19,000

Ex. A-2

Issued on: August 31, 2020

Effective on: September 1, 2020

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
 To The
 Firm Transportation Service Agreement
 Rate Schedule FT-1
 between
 El Paso Natural Gas Company, L.L.C.
 and
 Arizona Public Service Company (Shipper)
 Dated: ~~May 26~~ August 25, 2020

Effective Dates: ~~September 1, 2020~~ – ~~September 30, 2020~~

Contract Meter Quantity (CMQ(s)) 2/																	
Primary Delivery PIN Name	Del PIN	Meter No.	Description	January	February	March	April	May	June	July	August	September	October	November	December	Delivery Pressure (p.s.i.g.) Not less than 3/	Delivery Pressure (p.s.i.g.) Not greater than 3/
DAPS YUM	330458	330458	APS YUMA						5,780			5,948				225	242
DAPS PHX	300777	314553	REDHAWK DELIVERY POINT						21,220			25,552				525	
CONTRACT	METER QUANTITY (CMQ(s))								27,000			31,500					

Ex. A-3

Agreement No. FT39H000-FT1EPNG

EXHIBIT A
To The
Firm Transportation Service Agreement
Rate Schedule FT-1
between
El Paso Natural Gas Company, L.L.C.
and
Arizona Public Service Company (Shipper)
Dated: ~~May 26~~ August 25, 2020

Effective Dates: ~~October~~ July 1, 2020 – December 31, 2024

Primary Delivery Pin Name	Del PIN	Meter No.	Description	Delivery Pressure (p.s.i.g.) Not less than 3/	Delivery Pressure (p.s.i.g.) Not greater than 3/
DAPS YUM	330458	330458	APS YUMA	225	242

- 1/ The sum of the Maximum Quantities identified above is equal to Shipper's Transportation Contract Demand for that Month.
- 2/ The sum of the CMQs identified above is equal to Shipper's D-Code Maximum Quantity for that Month.
- 3/ Unless otherwise specified on this Exhibit A, the pressure(s) for the point(s) listed above shall be the pressure existing from time to time at the metering facility; provided, however, Transporter reserves the right to deliver quantities at pressures up to the MAOP of that facility.

Ex. A-4

Agreement No. FT39H000-FT1EPNG

EXHIBIT B
To The
Firm Transportation Service Agreement
Rate Schedule FT-1
between
El Paso Natural Gas Company, L.L.C.
and
Arizona Public Service Company (Shipper)
Dated: ~~August 25~~^{May 26}, 2020

Primary Receipt Point(s)	Primary Delivery Point(s)	Effective Dates	Reservation Rate 1/	Usage Rate 1/	Fuel 2/	Surcharges 3/
As listed in Exhibit A	As Listed in Exhibit A	September 1 ^{June 1} , 2020 – December 31, 2024	(1a)			

Alternate Receipt Point(s) - Location(s)	Alternate Delivery Point(s) - Location(s)	Effective Dates	Reservation Rate 1/	Usage Rate 1/	Fuel 2/	Surcharges 3/
302346 STML PER 302347 STML SJN 300704 ANADARKO	300777 DAPS PHX 330458 DAPS YUM	See ¶9	(1a)			

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, Transporter and Shipper agree the reservation rate for this Agreement shall be a negotiated reservation rate and shall not be subject to the applicable maximum recourse or minimum FT-1 reservation rates as they are set forth in Transporter's Tariff during the entirety of the term of this Agreement. The reservation rate shall be \$12.0146 per Dekatherm per month. If the Federal Energy Regulatory Commission issues a final order that is no longer subject to rehearing or appeal in Docket No. RP10-1398-000 with a lower Non-Article 11.2 applicable maximum recourse FT-1 reservation rate, Shipper will pay that lower rate. The lower rate will become the new negotiated reservation rate (not subject to the applicable maximum or minimum rate). The lower rate shall be effective for the remainder of this Agreement beginning on the same date the lower applicable maximum recourse reservation rate becomes effective for all shippers.

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.

Ex. B-1