



September 12, 2022

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. RP22-

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 Third Revised Volume No. 1A of the FERC Gas Tariff ("Tariff"):

Part II Section 5.26 Shell Energy North America #615861 Version 2.0.0

Proposed with an effective date of September 13, 2022, this tariff record updates EPNG's Tariff to implement a temporary point redesignation request on an existing transportation service agreement ("TSA") between EPNG and Shell Energy North America (US) L.P. ("Shell"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the September 13, 2022 effective date, as discussed below.

Background

TSA No. 615861-FT1EPNG ("Shell TSA") is a conforming, negotiated rate TSA which is included in EPNG's Tariff.¹ Among other things, this TSA reflects the application of a fixed negotiated rate at various primary and alternate points. Most recently, EPNG submitted tariff records reflecting temporary primary point redesignations for the Commission's review in Docket No. RP22-1124-000.²

¹ See Part II: Stmt. of Rates, Section 5.26 of EPNG's Tariff.

² *El Paso Natural Gas Co.*, Docket No. RP22-1124-000 (Sep. 1, 2022) (unpublished letter order).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 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).

Recently, Shell submitted a request to temporarily redesignate capacity under the Shell TSA. Shell asked to move receipt point capacity from the ILONESTR receipt point to the KEYSTONE POOL receipt point applicable to the DPG&ETOP delivery point. The request is for the period from September 13, 2022 through September 30, 2022. The KEYSTONE POOL receipt point is currently listed as an alternate receipt point at which the negotiated rate specified in the Shell TSA applies. Shell’s request was evaluated and accepted by EPNG and, therefore, the Shell TSA was deemed to be amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.⁴ Given that Shell’s temporary redesignation request affects a negotiated rate agreement, EPNG is submitting an updated tariff record to reflect the location modification and the relevant time period. No other changes have been made to the Shell TSA.

Tariff Provisions

EPNG is submitting the following tariff records pursuant to 18 C.F.R. § 154.112(b) (2021) and Subpart C of the Commission’s regulations.⁵

Part II, Section 5.26 is updated to reflect the requested capacity redesignations effective September 13, 2022 for the Shell TSA.

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

⁴ See Appendix A for a copy of the redesignation report for Agreement No. 615861-FT1EPNG. This report reflects the details regarding Shell’s redesignation request and EPNG’s approval of such requests.

⁵ See 18 C.F.R. §§ 154.201 – 154.210 (2021) (Subpart C).

Procedural Matters

In accordance with the applicable provisions of Part 154 of the Commission's regulations,⁶ 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. 615861-FT1EPNG; and
- c) clean and marked versions of the tariff record in PDF format.

EPNG respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective September 13, 2022, consistent with the effective date of the redesignation request. As such, EPNG requests the Commission grant a waiver of the notice requirements in 18 C.F.R. § 154.207 (2021) of the Commission's regulations.⁷ With respect to any tariff record the Commission allows to go into effect without change, EPNG hereby moves to place the tendered tariff record in to effect at the end of any minimal suspension period established by the Commission.

Correspondence and communications concerning this filing should be directed to:

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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 (2021)).

⁶ See 18 C.F.R. §§ 154.1 – 154.603 (2021) (Part 154).

⁷ See, e.g., *Gulfstream Natural Gas System, L.L.C.*, 105 FERC ¶ 61,164, at P 11 (2003).

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 12th day of September, 2022.

/s/

Francisco Tarin

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

Appendix A

Primary Receipt and Delivery Point ReDesignation Report

Request # : 99658

Company Name : SHELL ENERGY NORTH

Contract No : 615861-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 8

Submit Date & Time : 9/7/2022 3:17:29PM

Executed Date & time : 9/7/2022 5:10:48PM

Effective Date : 09/13/2022

ReDesignation End Date : 09/30/2022

Customer Comments :

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
Current								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	7,300
Re-Designation								
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	1,500
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	5,800

Current								
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	9,239
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	1,572

Updated TSA Entitlements*								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	5,800
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	1,500
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	9,239
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	09/13/2022	09/30/2022	1,572

*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 Sections

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)
Shell Energy North America (US), L.P. #615861-FT1EPNG	9/13/2022 – 9/30/2022	10,739	September	1a/	1/	302132 KEYSTONE	314614 DPG&ETOP
	10/1/2022 – 12/31/2022	9,515	October	1a/	1/	302132 KEYSTONE	314614 DPG&ETOP
		10,811	November				
		9,984	December				
	1/1/2022 – 12/31/2022	2,788	January	1a/	1/	302248 PLAINS	314604 DPG&ETOP
		681	February				
		1,133	March				
		1,223	April				
		1,710	May				
		1,992	June				
		1,835	July				
		1,890	August				
		1,572	September				
1,296		October					
		November					
827		December					
9/13/2022 – 09/30/2022	5,800			1a/	1/	301620 ILONESTR	314604 DPG&ETOP
10/1/2022 – 12/31/2026	7,300			1a/	1/	301620 ILONESTR	314604 DPG&ETOP
1/1/2023 – 12/31/2026	9,942	January	1a/	1/	302132 KEYSTONE	314604 DPG&ETOP	
	10,130	February					
	9,678	March					
	9,588	April					
	9,101	May					
	8,819	June					
	8,976	July					
	8,921	August					
	9,239	September					
	9,515	October					
	10,811	November					
	9,984	December					

1/1/2023 – 12/31/2026	869	January	1a/	1/	302248 PLAINS	314604 DPG&ETOP
	681	February				
	1,133	March				
	1,223	April				
	1,710	May				
	1,992	June				
	1,835	July				
	1,890	August				
	1,572	September				
	1,296	October				
		November				
	827	December				

1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
		302344 STML ANA	301016 DSCALEHR
		302346 STML PER	301693 INORBAJA
		302347 STML SJN	314604 DPG&ETOP
		43886 IRYGULCH	332503 DSCALTOP
		42235 IRXLVRCH	314991 ICPSOUTH
		36100 IGRSWDQP	332554 KRAMER
		40237 IEXMBGRS	332531 SOCWR
		41781 IDRKCNGR	320614 IGRIFFTH
		332569 DAGMOJ	301881 ITCOLBLA
			300716 BLANTRAN
			300726 BONDTRAN
			41781 IDRKCNGR
			42223 DYELJKPS
			42235 IRXLVRCH
			40379 DAHRCNYN
			36106 ITWBLANCO
			332569 DAGMOJ

- 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 \$10.7676 per Dekatherm per Month 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 Sections

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)
Shell Energy North America (US), L.P. #615861-FT1EPNG	8/15/2022 – 8/31/2022 8/15/2022 – 8/31/2022 9/13/2022 – 9/30/2022 314614_DPG&ETOP #615861-FT1EPNG	7,500 3,421 109,7239 9,515 10,811 9,984	August August September October November December	1a/ 1/ 1a/ 1/ 1a/ 1/	302132 KEYSTONE 302132 KEYSTONE <u>302132 KEYSTONE</u> 302248 PLAINS	332503 DSCALTOP 314614 DPG&ETOP 302132 KEYSTONE 314604 DPG&ETOP
	1/1/2022 – 12/31/2022	2,788 681 1,133 1,223 1,710 1,992 1,835 1,890 1,572 1,296 827	January February March April May June July August September October November December	1a/ 1/	302248 PLAINS	314604 DPG&ETOP
	8/15/2022 – 8/31/2022 9/13/2022 – 09/12/30/2022 314604 DPG&ETOP	5,300 57,8300	1a/ 1a/	1/ 1a/ 1/	301620 ILONESTR 301620 ILONESTR	314604 DPG&ETOP 301620 ILONESTR
	10/1/2022 – 12/31/2026	7,300	1a/	1/	301620 ILONESTR	314604 DPG&ETOP
	1/1/2023 – 12/31/2026	9,942 10,130 9,678 9,588 9,101 8,819 8,976 8,921 9,239	January February March April May June July August September	1a/ 1/	302132 KEYSTONE	314604 DPG&ETOP

	9,515	October					
	10,811	November					
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		827	December				
				1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
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						302346 STML PER	301693 INORBAJA
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						41781 IDRKCNGR	320614 IGRIFFTH
						332569 DAGMOJ	301881 ITCOLBLA
							300716 BLANTRAN
							300726 BONDTRAN
							41781 IDRKCNGR
							42223 DYELJKPS
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							40379 DAHRCNYN
							36106 ITWBLANCO
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