



June 29, 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 records listed below for inclusion in Part VII of its FERC Gas Tariff, Third Revised Volume No. 1A ("Tariff"):

Section 108.1	Salt River Project #611550-FT1EPNG Exh A	Version 2.0.0
Section 108.2	Salt River Project #611550-FT1EPNG Exh B	Version 2.0.0

Proposed with an effective date of July 1, 2022, these tariff records update EPNG's Tariff to reflect a temporary point redesignation on an existing transportation service agreement ("TSA") between EPNG and Salt River Project Agricultural Improvement and Power District ("SRP"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the July 1, 2022 effective date, as discussed below.

### **Background**

On May 29, 2020, EPNG submitted a filing that included a non-conforming negotiated rate firm TSA referred to as Agreement No. 611550-FT1EPNG. This TSA reflected various primary and alternate points at which the negotiated rate would apply. On June 16, 2020, the Commission issued a letter order accepting the filing with an effective date of July 1, 2020.<sup>1</sup>

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<sup>1</sup> *El Paso Natural Gas Co.*, Docket No. RP20-919-000 (June 16, 2020) (unpublished letter order).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.<sup>2</sup> 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, SRP submitted a request to temporarily shift some of its capacity from the primary receipt point of KEYSTONE (PIN 302132) to IKEYSTOR (PIN 301595) on Agreement No. 611550-FT1EPNG for the months of July through September 2022, as indicated on the attached tariff records.<sup>3</sup> KEYSTONE is currently listed as a primary receipt point at which the negotiated rate specified in the TSA applies.<sup>4</sup> SRP’s request was accepted by EPNG and, therefore, Agreement No. 611550-FT1EPNG was deemed to be amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.<sup>5</sup> Given that SRP’s temporary redesignation request affects a non-conforming, negotiated rate agreement, EPNG is proposing to update the relevant tariff records to reflect the receipt point modification and the relevant time period. No other changes to the TSA have been made.

### **Tariff Provisions**

EPNG is submitting the following tariff records pursuant to 18 C.F.R. § 154.112(b) (2021) and Subpart C of Part 154 of the Commission’s regulations.<sup>6</sup>

Part VII, Sections 108.1 and 108.2 are updated to reflect the redesignation to the IKEYSTOR receipt point for July 1, 2022 through September 30, 2022 for SRP’s Agreement No. 611550-FT1EPNG.

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<sup>2</sup> See Section 8.1(f)(iii)(B) of the GT&C of EPNG’s Tariff.

<sup>3</sup> This temporary redesignation is similar to other receipt point redesignations, which were filed by EPNG and accepted by the Commission in Docket Nos. RP18-919-000, RP19-1239-000 and RP21-1076-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP21-1076-000 (Sept. 16, 2021) (unpublished letter order).

<sup>4</sup> IKEYSTOR is included within those points identified on Exhibit B of Agreement No. 611550-FT1EPNG at which the negotiated rate applies.

<sup>5</sup> See Appendix A for a copy of the redesignation report for Agreement No. 611550-FT1EPNG. This report reflects the details regarding SRP’s redesignation request and EPNG’s approval of such request.

<sup>6</sup> 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,<sup>7</sup> EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter;
- b) Appendix A, a copy of the temporary redesignation report for Agreement No. 611550-FT1EPNG; and
- c) clean and marked versions of the tariff records in PDF format.

EPNG respectfully requests the Commission accept the tendered tariff records for filing and permit them to become effective July 1, 2022, contemporaneous with the effective date of the point redesignation. As such, EPNG requests the Commission grant a waiver of the notice requirements as permitted by 18 C.F.R. § 154.207 (2021) of the Commission's regulations.<sup>8</sup> 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 a minimal suspension period, if any, established by the Commission.

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 (2021)).

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<sup>7</sup> 18 C.F.R. §§ 154.101 – 154.603 (2021).

<sup>8</sup> 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 29<sup>th</sup> day of June 2022.

/s/

Francisco Tarin

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

## **Appendix A**

**Primary Receipt and Delivery Point ReDesignation Report**

<b>Request # :</b> 98974	<b>Company Name :</b> SALT RIVER PROJECT AGRICULTURA
<b>Contract No :</b> 611550-FT1EPNG	<b>Status :</b> EXECUTED
<b>Acquired Capacity Agreement :</b> N	<b>Amendment No :</b> 4
<b>Submit Date &amp; Time :</b> 6/15/2022 1:35:08PM	<b>Executed Date &amp; time :</b> 6/15/2022 3:27:41PM
<b>Effective Date :</b> 07/01/2022	<b>ReDesignation End Date :</b> 09/30/2022
<b>Customer Comments :</b> We would like to move 9,700 of our rights to be primary at IKEYSTOR for Jul-Sep.	

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
<b>Current</b>								
302132	(KEYSTONE) KEYSTONE POOL	301043	SRP/EPNG (DSRP PHX) MARICOPA	SS1	26	07/01/2022	09/30/2022	50,000
<b>Re-Designation</b>								
301595	KGS/EPNG (IKEYSTOR) UNOCAL KEYSTONE	301043	SRP/EPNG (DSRP PHX) MARICOPA	SS1	26	07/01/2022	09/30/2022	9,700
302132	(KEYSTONE) KEYSTONE POOL	301043	SRP/EPNG (DSRP PHX) MARICOPA	SS1	26	07/01/2022	09/30/2022	40,300

**Updated TSA Entitlements\***

301595	KGS/EPNG (IKEYSTOR) UNOCAL KEYSTONE	301043	SRP/EPNG (DSRP PHX) MARICOPA	SS1	26	07/01/2022	09/30/2022	9,700
302132	(KEYSTONE) KEYSTONE POOL	301043	SRP/EPNG (DSRP PHX) MARICOPA	SS1	26	07/01/2022	09/30/2022	40,300

\*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**



Agreement No. 611550-FT1EPNG

**EXHIBIT A**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT**  
 (Shipper)

Dated: June 15, 2022

Shipper's Transportation Contract Demand: See ¶10  
 Effective Dates: July 1, 2022 – September 30, 2022

					Maximum Quantity-D-Code (Dth/d) 1/											
Primary Receipt PIN Name	Rec PIN	Primary Delivery PIN Name	Del PIN	Flow Path	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
KEYSTONE	302132	DSRP PHX	301043	SS1							40,300	40,300	40,300			
IKEYSTOR	301595	DSRP PHX	301043	SS1							9,700	9,700	9,700			
<b>TRANSPORTATION CONTRACT DEMAND</b>											<b>50,000</b>	<b>50,000</b>	<b>50,000</b>			

Effective Dates: October 1, 2022 – October 31, 2032

					Maximum Quantity-D-Code (Dth/d) 1/											
Primary Receipt PIN Name	Rec PIN	Primary Delivery PIN Name	Del PIN	Flow Path	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
KEYSTONE	302132	DSRP PHX	301043	SS1				50,000	50,000	50,000	50,000	50,000	50,000	50,000		
<b>TRANSPORTATION CONTRACT DEMAND</b>								<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>		

Ex. A-1

Agreement No. 611550-FT1EPNG

**EXHIBIT A  
 (CONT.)**

Effective Dates: July 1, 2022 – October 31, 2032

Primary Delivery PIN Name	Del PIN	Meter No.	Description	Contract Meter Quantity (CMQ(s)) 2/												Delivery Pressure (p.s.i.g) Not less than 3/	Delivery Pressure (p.s.i.g) Not greater than 3/	
				Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec			
DSRP PHX	301043	800924	MESQUITE POWER PLANT BLOCK 1															
DSRP PHX	301043	334851	SNOWBIRD DELIVERY															525
DSRP PHX	301043	334811	KYRENE POWER PLANT TURBINE															525
DSRP PHX	301043	334810	KYRENE POWER PLANT															295
DSRP PHX	301043	331983	SANTAN POWER PLANT				50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000				525
DSRP PHX	301043	331798	AGUA FRIA 1															250
DSRP PHX	301043	55408	AGUA FRIA 4															
DSRP PHX	301043	330250	AGUA FRIA 3															125
DSRP PHX	301043	320557	AGUA FRIA 2															125
DSRP PHX	301043	314978	DESERT BASIN POWER PLANT															525
<b>CONTRACT METER QUANTITY (CMQ(s))</b>							<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>				

Notes:

- 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-2

Agreement No. 611550-FT1EPNG

**EXHIBIT B**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT**  
 (Shipper)  
 Dated: June 15, 2022

<i>Primary Receipt Point(s)</i>	<i>Primary Delivery Point(s)</i>	<i>Effective Dates</i>	<i>Reservation Rate 1/</i>	<i>Usage Rate 1/</i>	<i>Fuel 2/</i>	<i>Surcharges 3/</i>
As listed in Exhibit A	As listed in Exhibit A	July 1, 2022 - October 31, 2032	(1a)			

<i>Primary and Alternate Receipt Point(s) / Location(s)</i>	<i>Point Identification Number (PIN)</i>	<i>Primary and Alternate Delivery Point(s) / Location(s)</i>	<i>Point Identification Number (PIN)</i>	<i>Effective Dates</i>	<i>Reservation Rate 1/</i>	<i>Usage Rate 1/</i>	<i>Fuel 2/</i>	<i>Surcharges 3/</i>
STML PER	302346	DSRP PHX	301043	July 1, 2022 - October 31, 2032	(1a)			
STML SJN	302347	IGILARVR	398668					
STML ANA	302344							

Notes:

- 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 \$ 12.7447 per Dekatherm per month.
- 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. 611550-FT1EPNG

**EXHIBIT A**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1

between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT**  
 (Shipper)

Dated: ~~April 20~~June 15, 2022

Shipper's Transportation Contract Demand: See ¶10  
Effective Dates: July 1, 2022 – September 30, 2022

					<b>Maximum Quantity-D-Code (Dth/d) 1/</b>											
<u>Primary Receipt PIN Name</u>	<u>Rec PIN</u>	<u>Primary Delivery PIN Name</u>	<u>Del PIN</u>	<u>Flow Path</u>	<u>Jan</u>	<u>Feb</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>Aug</u>	<u>Sept</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
<u>KEYSTONE</u>	<u>302132</u>	<u>DSRP PHX</u>	<u>301043</u>	<u>SS1</u>							<u>40,300</u>	<u>40,300</u>	<u>40,300</u>			
<u>IKEYSTOR</u>	<u>301595</u>	<u>DSRP PHX</u>	<u>301043</u>	<u>SS1</u>							<u>9,700</u>	<u>9,700</u>	<u>9,700</u>			
<b><u>TRANSPORTATION CONTRACT DEMAND</u></b>											<b><u>50,000</u></b>	<b><u>50,000</u></b>	<b><u>50,000</u></b>			

Effective Dates: ~~June-October~~ 1, 2022 – October 31, 2032

					<b>Maximum Quantity-D-Code (Dth/d) 1/</b>											
<b>Primary Receipt PIN Name</b>	<b>Rec PIN</b>	<b>Primary Delivery PIN Name</b>	<b>Del PIN</b>	<b>Flow Path</b>	<b>Jan</b>	<b>Feb</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>Aug</b>	<b>Sept</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
KEYSTONE	302132	DSRP PHX	301043	SS1				50,000	50,000	50,000	50,000	50,000	50,000	50,000		
<b>TRANSPORTATION CONTRACT DEMAND</b>								<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>		

Ex. A-1

Agreement No. 611550-FT1EPNG

**EXHIBIT A  
 (CONT.)**

Effective Dates: ~~June~~ July 1, 2022 – October 31, 2032

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				Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec			
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DSRP PHX	301043	331798	AGUA FRIA 1															250
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Notes:

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- 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-2



Agreement No. 611550-FT1EPNG

**EXHIBIT B**  
 To The  
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 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
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 (Shipper)  
 Dated: ~~April 20~~ June 15, 2022

<i>Primary Receipt Point(s)</i>	<i>Primary Delivery Point(s)</i>	<i>Effective Dates</i>	<i>Reservation Rate 1/</i>	<i>Usage Rate 1/</i>	<i>Fuel 2/</i>	<i>Surcharges 3/</i>
As listed in Exhibit A	As listed in Exhibit A	<del>June-July 1, 2022 -</del> October 31, 2032	(1a)			

<i>Primary and Alternate Receipt Point(s) / Location(s)</i>	<i>Point Identification Number (PIN)</i>	<i>Primary and Alternate Delivery Point(s) / Location(s)</i>	<i>Point Identification Number (PIN)</i>	<i>Effective Dates</i>	<i>Reservation Rate 1/</i>	<i>Usage Rate 1/</i>	<i>Fuel 2/</i>	<i>Surcharges 3/</i>
STML PER	302346	DSRP PHX	301043	<del>June-July 1, 2022 -</del> October 31, 2032	(1a)			
STML SJN	302347	IGILARVR	398668					
STML ANA	302344							

Notes:

- 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 \$ 12.7447 per Dekatherm per month.
- 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