



November 29, 2023

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. RP24-

Commissioners:

El Paso Natural 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 Part VII of its FERC Gas Tariff, Third Revised Volume No. 1A ("Tariff"):

Section 33.1 Southern California Gas #615178-FT1EPNG Exh A Version 28.0.0

Proposed with an effective date of December 1, 2023, this tariff record updates EPNG's Tariff to reflect a temporary point redesignation on an existing transportation service agreement ("TSA") between EPNG and Southern California Gas Company ("SoCal"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the December 1, 2023 effective date, as discussed below.

### **Background**

EPNG's Tariff includes Agreement No. 615178-FT1EPNG, a non-conforming, fixed negotiated rate agreement with SoCal. 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,<sup>1</sup> SoCal 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 November 16, 2023.<sup>2</sup>

---

<sup>1</sup> *El Paso Natural Gas Co.*, Docket No. RP21-1107-000 (Oct. 12, 2021) (unpublished letter order).

<sup>2</sup> *El Paso Natural Gas Co.*, Docket No. RP24-101-000 (Nov. 16, 2023) (unpublished letter order).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>3</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, SoCal submitted a request to temporarily shift some of its capacity from the primary receipt point of KEYSTONE (PIN 302132) to IRAMSEYS (PIN 800908) on Agreement No. 615178-FT1EPNG for December 1, 2023 through December 31, 2023, as indicated on the attached tariff record. IRAMSEYS is currently listed as a primary receipt point at which the negotiated rate specified in the TSA applies. SoCal’s request was accepted by EPNG and, therefore, Agreement No. 615178-FT1EPNG was deemed to be amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.<sup>4</sup> Given that SoCal’s temporary redesignation request affects a non-conforming, negotiated rate agreement, EPNG is proposing to update the relevant tariff record to reflect the receipt point modification and the relevant time period.<sup>5</sup> No other changes to the SoCal TSA have been made, including the previously accepted non-conforming provisions of the TSA.

### **Tariff Provisions**

EPNG is submitting the following tariff record pursuant to 18 C.F.R. § 154.112(b) (2022) and Part 154, Subpart C of the Commission’s regulations.<sup>6</sup>

Part VII, Section 33.1 is updated to reflect the redesignation to the IRAMSEYS receipt point for December 1, 2023 through December 31, 2023 for SoCal’s Agreement No. 615178-FT1EPNG.

---

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

<sup>4</sup> See Appendix A for a copy of the redesignation report for Agreement No. 615178-FT1EPNG. This report reflects the details regarding SoCal’s redesignation request and EPNG’s approval of such request.

<sup>5</sup> This temporary redesignation is similar to other receipt point redesignations applicable to Agreement No. 615178-FT1EPNG, which were filed by EPNG and accepted by the Commission in Docket Nos. RP23-817-000, RP23-849-000, RP23-1085-000 and RP24-101-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP24-101-000 (Nov. 16, 2023) (unpublished letter order).

<sup>6</sup> See 18 C.F.R. §§ 154.201 – 154.210 (2022) (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 redesignation report for Agreement No. 615178-FT1EPNG; and
- d) 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 December 1, 2023, contemporaneous with the effective date of the point redesignation. As such, EPNG requests the Commission waive the notice requirements as permitted by 18 C.F.R. § 154.207 (2022) 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 into effect at the end of any minimal suspension period specified by the Commission.

Correspondence and communications concerning this filing should be directed to:

Mr. Ryan Leahy  
Director, Regulatory  
El Paso Natural Gas Company, L.L.C.  
Post Office Box 2563  
Birmingham, AL 35202-2563  
Telephone: (205) 325-7105  
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 (2022)).

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.

---

<sup>7</sup> 18 C.F.R. §§ 154.1 – 154.603 (2022).

<sup>8</sup> See, e.g., *Gulfstream Natural Gas System, L.L.C.*, 105 FERC ¶ 61,164, at P 11 (2003).

Federal Energy  
Regulatory Commission

4

November 29, 2023

Respectfully submitted,

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

By: \_\_\_\_\_/s/  
Ryan Leahy  
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 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 Birmingham, Alabama as of this 29<sup>th</sup> day of November 2023.

/s/

Ryan Leahy

Post Office Box 2563  
Birmingham, AL 35202  
(205) 325-7105

## **Appendix A**

### Primary Receipt and Delivery Point ReDesignation Report

**Request # :** 105163

**Company Name :** SOUTHERN CA. GAS CO.

**Contract No :** 615178-FT1EPNG

**Status :** EXECUTED

**Acquired Capacity Agreement :** N

**Amendment No :** 22

**Submit Date & Time :** 11/27/2023 2:37:24PM

**Executed Date & time :** 11/28/2023 10:26:39AM

**Effective Date :** 12/01/2023

**ReDesignation End Date :** 12/31/2023

**Customer Comments :**

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	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	SS1	27	12/01/2023	12/31/2023	75,000
<b>Re-Designation</b>								
800908	DBMPL/EPNG (IRAMSEYS) RAMSEY SO REC	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	SS1	27	12/01/2023	12/31/2023	10,000
302132	(KEYSTONE) KEYSTONE POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	SS1	27	12/01/2023	12/31/2023	65,000
<b>Current</b>								
300714	(BLANCO) BLANCO POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	CC1	27	12/01/2023	12/31/2023	79,000
300714	(BLANCO) BLANCO POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	NS3	27	12/01/2023	12/31/2023	91,000
300724	(BONDADST) BONDAD STATION	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	CC1	27	12/01/2023	12/31/2023	3,047
300724	(BONDADST) BONDAD STATION	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	NS3	27	12/01/2023	12/31/2023	21,953
302248	(PLAINS) PLAINS POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-NS3	27	12/01/2023	12/31/2023	20,000
800908	DBMPL/EPNG (IRAMSEYS) RAMSEY SO REC	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	SS1	27	12/01/2023	12/31/2023	10,000
<b>Updated TSA Entitlements*</b>								
300714	(BLANCO) BLANCO POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	CC1	27	12/01/2023	12/31/2023	79,000

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
300714	(BLANCO) BLANCO POOL	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	NS3	27	12/01/2023	12/31/2023	91,000
300724	(BONDADST) BONDAD STATION	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	CC1	27	12/01/2023	12/31/2023	3,047
300724	(BONDADST) BONDAD STATION	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	NS3	27	12/01/2023	12/31/2023	21,953
302132	(KEYSTONE) KEYSTONE POOL	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	SS1	27	12/01/2023	12/31/2023	65,000
800908	DBMPL/EPNG (IRAMSEYS) RAMSEY SO REC	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	SS1	27	12/01/2023	12/31/2023	10,000
302248	(PLAINS) PLAINS POOL	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	AN2-NS3	27	12/01/2023	12/31/2023	20,000
800908	DBMPL/EPNG (IRAMSEYS) RAMSEY SO REC	301016	SOCETS/EPNG (DSCALEHR) SOCAL EHRENB	SS1	27	12/01/2023	12/31/2023	10,000

\*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.



Agreement No. 615178-FT1EPNG

**EXHIBIT A**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SOUTHERN CALIFORNIA GAS COMPANY**  
 (Shipper)

Dated: ~~November 28~~October 26, 2023

Shipper's Transportation Contract Demand: See ¶10

Effective Dates: ~~December~~November 1, 2023 through December 31, 2023

					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	Delivery Pressure (p.s.i.g) Not less than 2/	Delivery Pressure (p.s.i.g) Not greater than 2/
BLANCO	300714	DSCALEHR	301016	CC1											<del>98,000</del>	79,000		
BLANCO	300714	DSCALEHR	301016	NS3											<del>72,000</del>	91,000		
BONDADST	300724	DSCALEHR	301016	CC1											<del>2,213</del>	3,047		
BONDADST	300724	DSCALEHR	301016	NS3											<del>22,787</del>	21,953		
KEYSTONE	302132	DSCALEHR	301016	SS1											<del>65,000</del>	<del>675,000</del>		
IRAMSEYS	800908	DSCALEHR	301016	SS1											<del>20,000</del>	<del>210,000</del>		
PLAINS	302248	DSCALEHR	301016	AN2-NS3											<del>20,000</del>	20,000		
TRANSPORTATION CONTRACT DEMAND															<del>300,000</del>	300,000		

Ex. A-1

Agreement No. 615178-FT1EPNG

**EXHIBIT A**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SOUTHERN CALIFORNIA GAS COMPANY**  
 (Shipper)

Dated: ~~November 28~~~~October 26~~, 2023

Shipper's Transportation Contract Demand: See ¶10  
 Effective Dates: January 1, 2024 through October 31, 2031

					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	Delivery Pressure (p.s.i.g) Not less than 2/	Delivery Pressure (p.s.i.g) Not greater than 2/
BLANCO	300714	DSCALEHR	301016	CC1	66,000	83,000	90,000	57,000	54,000	52,000	50,000	50,000	50,000	56,000	98,000	79,000		
BLANCO	300714	DSCALEHR	301016	NS3	104,000	87,000	80,000	113,000	116,000	118,000	120,000	120,000	120,000	114,000	72,000	91,000		
BONDADST	300724	DSCALEHR	301016	CC1	2,773	2,736	2,042	2,965	2,220	1,528	1,309	1,366	2,223	2,995	2,213	3,047		
BONDADST	300724	DSCALEHR	301016	NS3	22,227	22,264	22,958	22,035	22,780	23,472	23,691	23,634	22,777	22,005	22,787	21,953		
KEYSTONE	302132	DSCALEHR	301016	SS1	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000		
IRAMSEYS	800908	DSCALEHR	301016	SS1	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000		
PLAINS	302248	DSCALEHR	301016	AN2-NS3	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000		
<b>TRANSPORTATION CONTRACT DEMAND</b>					<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>		

Notes:

- 1/ The sum of the Maximum Quantities identified above is equal to Shipper's Transportation Contract Demand for that Month.
- 2/ 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. 615178-FT1EPNG

**EXHIBIT A**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SOUTHERN CALIFORNIA GAS COMPANY**  
 (Shipper)

Dated: November 28, 2023

Shipper's Transportation Contract Demand: See ¶10  
 Effective Dates: December 1, 2023 through December 31, 2023

					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	Delivery Pressure (p.s.i.g) Not less than 2/	Delivery Pressure (p.s.i.g) Not greater than 2/
BLANCO	300714	DSCALEHR	301016	CC1												79,000		
BLANCO	300714	DSCALEHR	301016	NS3												91,000		
BONDADST	300724	DSCALEHR	301016	CC1												3,047		
BONDADST	300724	DSCALEHR	301016	NS3												21,953		
KEYSTONE	302132	DSCALEHR	301016	SS1												65,000		
IRAMSEYS	800908	DSCALEHR	301016	SS1												20,000		
PLAINS	302248	DSCALEHR	301016	AN2-NS3												20,000		
<b>TRANSPORTATION CONTRACT DEMAND</b>																<b>300,000</b>		

Ex. A-1

Agreement No. 615178-FT1EPNG

**EXHIBIT A**  
 To The  
 Firm Transportation Service Agreement  
 Rate Schedule FT-1  
 between  
**EL PASO NATURAL GAS COMPANY, L.L.C.**  
 and  
**SOUTHERN CALIFORNIA GAS COMPANY**  
 (Shipper)

Dated: November 28, 2023

Shipper's Transportation Contract Demand: See ¶10  
 Effective Dates: January 1, 2024 through October 31, 2031

					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	Delivery Pressure (p.s.i.g) Not less than 2/	Delivery Pressure (p.s.i.g) Not greater than 2/
BLANCO	300714	DSCALEHR	301016	CC1	66,000	83,000	90,000	57,000	54,000	52,000	50,000	50,000	50,000	56,000	98,000	79,000		
BLANCO	300714	DSCALEHR	301016	NS3	104,000	87,000	80,000	113,000	116,000	118,000	120,000	120,000	120,000	114,000	72,000	91,000		
BONDADST	300724	DSCALEHR	301016	CC1	2,773	2,736	2,042	2,965	2,220	1,528	1,309	1,366	2,223	2,995	2,213	3,047		
BONDADST	300724	DSCALEHR	301016	NS3	22,227	22,264	22,958	22,035	22,780	23,472	23,691	23,634	22,777	22,005	22,787	21,953		
KEYSTONE	302132	DSCALEHR	301016	SS1	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000		
IRAMSEYS	800908	DSCALEHR	301016	SS1	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000		
PLAINS	302248	DSCALEHR	301016	AN2-NS3	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000		
<b>TRANSPORTATION CONTRACT DEMAND</b>					<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>	<b>300,000</b>		

Notes:

- 1/ The sum of the Maximum Quantities identified above is equal to Shipper's Transportation Contract Demand for that Month.
- 2/ 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