



July 1, 2024

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Debbie-Anne A. Reese, Acting Secretary

Re: Negotiated Rate Agreement Update;
El Paso Natural Gas Company, L.L.C.;
Docket No. RP24-

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 5.6 Tenaska Marketing Ventures #618375-FT1EPNG Version 8.0.0

Proposed with an effective date of July 1, 2024, this tariff record updates EPNG's Tariff to reflect a temporary point redesignation on an existing transportation service agreement ("TSA") between EPNG and Tenaska Marketing Ventures ("TMV"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the July 1, 2024 effective date, as discussed below.

Background

EPNG's Tariff includes a tariff record representing Agreement No. 618375-FT1EPNG with TMV, which reflects the application of a fixed negotiated reservation rate at certain primary points. Since the initial acceptance of the tariff record representing the TSA,¹ TMV has redesignated primary points on this TSA consistent with EPNG's Tariff. Currently the tariff record reflecting the TMV TSA includes a point redesignation accepted by the Commission on April 18, 2024 in Docket No. RP24-598-000.²

¹ *El Paso Natural Gas Co.*, Docket No. RP23-471-000 (Mar.16, 2023) (unpublished letter order).

² *El Paso Natural Gas Co.*, Docket No. RP24-598-000 (Apr. 18, 2024) (unpublished letter order).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, TMV submitted a redesignation request for Agreement No. 618375-FT1EPNG to temporarily shift some capacity from the primary receipt point of PLAINS (PIN 302248) to INN26PLA (PIN 300109) for July 1, 2024 through September 30, 2024. TMV’s request was accepted by EPNG and, therefore, Agreement No. 618375-FT1EPNG was deemed to be amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.⁴ Given that TMV’s temporary redesignation request affects a negotiated rate agreement, EPNG is proposing a tariff record to reflect the receipt point modification and the relevant time period.⁵ No other changes to the TMV TSA have been made.

Tariff Provisions

EPNG is submitting the following tariff record pursuant to 18 C.F.R. § 154.112(b) (2023) and Subpart C of the Commission’s regulations.⁶

Part II, Section 5.6 is updated to reflect the TMV point redesignation to the INN26PLA receipt point applicable to July 1, 2024 through September 30, 2024.

Procedural Matters

In accordance with the applicable provisions of Part 154 of the Commission’s regulations,⁷ 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 the TSA; and

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 the TMV TSA. This report reflects the details regarding TMV’s redesignation request and EPNG’s approval of such request.

⁵ This temporary redesignation is similar to other receipt point redesignations, which were filed by EPNG and accepted by the Commission in Docket Nos. RP24-278-000, RP24-361-000, RP24-455-000 and RP24-598-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP24-455-000 (Mar. 14, 2024) (unpublished letter order).

⁶ See 18 C.F.R. §§ 154.201 – 154.210 (2023) (Subpart C).

⁷ See 18 C.F.R. §§ 154.1 – 154.603 (2023) (Part 154).

- c) clean and marked versions of the tariff records in PDF format.

EPNG respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective July 1, 2024, consistent with the effective date of the point redesignations. As such, EPNG requests the Commission grant a waiver of the 30-day notice requirement as permitted by 18 C.F.R. § 154.207 (2023) of the Commission's regulations.⁸ 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 any minimal suspension period established by the Commission.

Correspondence and communications concerning this filing should be directed to:

Ms. Shelly L. Busby
Director, Regulatory
El Paso Natural Gas Company, L.L.C.
Post Office Box 1087
Colorado Springs, CO 80944-1087
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EPNGRegulatoryAffairs@kindermorgan.com

Mr. David Cain
Assistant General Counsel
El Paso Natural Gas Company, L.L.C.
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Colorado Springs, CO 80944-1087
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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 (2023)).

The undersigned hereby certifies that she 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 her knowledge and belief; and (iii) that she possesses full power and authority to sign this filing.

Respectfully submitted,

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

By: _____ /s/
Shelly L. Busby
Director, Regulatory

Enclosures

⁸ 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 1st day of July 2024.

/s/

Shelly L. Busby

Post Office Box 1087
Colorado Springs, CO
(719) 520-4657

Appendix A

Primary Receipt and Delivery Point ReDesignation Report

Request # : 106835

Company Name : TENASKA MKTG. VENTURES

Contract No : 618375-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 6

Submit Date & Time : 6/25/2024 11:01:42AM

Executed Date & time : 6/25/2024 4:03:27PM

Effective Date : 07/01/2024

ReDesignation End Date : 09/30/2024

Customer Comments :

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
Current								
302248	(PLAINS) PLAINS POOL	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	07/01/2024	08/31/2024	16,639
Re-Designation								
300109	NNG/EPNG (INN26PLA) 26 IN HOBBS (01)	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	07/01/2024	08/31/2024	10,000
302248	(PLAINS) PLAINS POOL	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	07/01/2024	08/31/2024	6,639
Current								
302248	(PLAINS) PLAINS POOL	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	09/01/2024	09/30/2024	13,408
Re-Designation								
300109	NNG/EPNG (INN26PLA) 26 IN HOBBS (01)	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	09/01/2024	09/30/2024	10,000
302248	(PLAINS) PLAINS POOL	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	09/01/2024	09/30/2024	3,408
Updated TSA Entitlements*								
300109	NNG/EPNG (INN26PLA) 26 IN HOBBS (01)	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	07/01/2024	08/31/2024	10,000
302248	(PLAINS) PLAINS POOL	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	07/01/2024	08/31/2024	6,639
300109	NNG/EPNG (INN26PLA) 26 IN HOBBS (01)	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	09/01/2024	09/30/2024	10,000
302248	(PLAINS) PLAINS POOL	301797	NMGASCO/EPNG (IRIOPUER) RIO PUERCO	SN2	29	09/01/2024	09/30/2024	3,408

*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 Agreement	TCD (Dth/d)		Reservation Rate 1/	Usage Rate	Primary Receipt Point(s)	Primary Delivery Point(s)
Tenaska Marketing Ventures #618375-FT1EPNG 4/	7/1/24 –8/31/24	6,639	July - Aug 2024	1a/	1/ 2/ 3/	302248 PLAINS 300109 INN26PLA	301797 IRIOPUER 301797 IRIOPUER
		10,000	July - Aug 2024				
	9/1/24 –9/30/24	3,408	Sept 2024	1a/	1/ 2/ 3/	302248 PLAINS 300109 INN26PLA	301797 IRIOPUER 301797 IRIOPUER
		10,000	Sept 2024				
	10/1/24 – 3/31/30	10,177	Oct 2024 – 2029	1a/	1/ 2/ 3/	302248 PLAINS	301797 IRIOPUER
		6,945	Nov 2024 – 2029				
		3,715	Dec 2024 – 2029				
		3,715	Jan 2025 – 2030				
		3,715	Feb 2025 – 2030				
		6,945	Mar 2025 – 2030				
		10,177	Apr 2025 – 2029				
		13,408	May 2025 – 2029				
16,639	June – Aug 2025 - 2029						
13,408	Sept 2025 – 2029						

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 Rates 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 \$8.2034 per Dekatherm per Month which shall not be subject to the applicable maximum or minimum reservation rate 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 Agreement	TCD (Dth/d)	Reservation Rate 1/	Usage Rate	Primary Receipt Point(s)	Primary Delivery Point(s)	
Tenaska Marketing Ventures	7/1/24 – 8/31/24	6,639	July - Aug 2024	1a/	1/ 2/ 3/	302248 PLAINS	301797 IRIOPUER
	4/1/24 – 4/30/24	25,177	Apr 2024	1a/	1/ 2/ 3/	302248 PLAINS	301797 IRIOPUER
#618375-FT1EPNG 4/		10,000	July - Aug 2024			300109 INN26PLA	301797 IRIOPUER
	10,000	Apr 2024		300109 INN26PLA	301797 IRIOPUER		
	5/1/24 – 5/31/24	28,408	May 2024	1a/	1/ 2/ 3/	302248	
	PLAINS	301797 IRIOPUER					
	10,000	May 2024			300109	INN26PLA	
	301797 IRIOPUER						
	6/1/24 – 6/30/24	6,639	Jun 2024	1a/	1/ 2/ 3/	302248	
	PLAINS	301797 IRIOPUER					
	10,000	Jun 2024			300109	INN26PLA	
	301797 IRIOPUER						
	9/1/24 – 9/30/24	3,408	Sept 2024	1a/	1/ 2/ 3/	302248 PLAINS	301797 IRIOPUER
	10,000	Sept 2024				300109 INN26PLA	301797 IRIOPUER
	7/10/1/24 – 3/31/30	16,639	July – Aug 2024 – 2029				
	13,408	Sept 2024 – 2029					
	10,177	Oct 2024 – 2029	1a/	1/ 2/ 3/	302248 PLAINS	301797 IRIOPUER	
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- 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.