



October 30, 2024

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

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

Re: Negotiated Rate Agreement Update;  
El Paso Natural Gas Company, L.L.C.;  
Docket No. RP25-

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

Section 5.13 EOG Resources, Inc. #610720-FT1EPNG Version 5.0.0

Proposed with effective date of November 1, 2024, this tariff record updates EPNG's Tariff to reflect temporary point redesignations on an existing transportation service agreement ("TSA") between EPNG and EOG Resources, Inc. ("EOG"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the proposed effective date, as discussed below.

### **Background**

EPNG's Tariff includes Agreement No. 610720-FT1EPNG, a negotiated rate agreement with EOG ("EOG TSA"). Among other things, this TSA reflects the application of a fixed negotiated rate at various primary and alternate points. Currently, the tariff records reflecting the EOG TSA includes a point redesignation that was accepted by the Commission on January 24, 2024 in Docket No. RP24-259-000.

### **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>1</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, EOG submitted two separate requests to temporarily redesignate capacity rights from the primary receipt point of IROCKDOV (PIN 48279) to the ITIGERRE (PIN 54859) receipt point for the period November 1, 2024 through January 31, 2025. EPNG notes that the ITIGERRE receipt point is currently listed as an alternate receipt location at which the negotiated rate specified in the EOG TSA applies.<sup>2</sup> The EOG requests were evaluated and accepted by EPNG and, therefore, the EOG TSA was deemed to be amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.<sup>3</sup> Given that EOG's temporary redesignation requests affect a negotiated rate agreement, EPNG is submitting an updated tariff record to reflect the temporary modification of primary receipt rights.<sup>4</sup> No other changes have been made to the EOG TSA.

### **Tariff Provisions**

EPNG is submitting the following tariff records pursuant to 18 C.F.R. § 154.112(b) (2024) and Subpart C of the Commission's regulations.<sup>5</sup>

Part II, Section 5.13 is updated to reflect the point redesignation for the relevant time period for the EOG TSA.

### **Procedural Matters**

In accordance with the applicable provisions of Part 154 of the Commission's regulations,<sup>6</sup> EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter;
- b) Appendix A, copies of the redesignation reports for the EOG TSA; 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 November 1, 2024 consistent with the effective

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<sup>1</sup> See Section 8.1(f)(iii)(B) of the GT&C of EPNG's Tariff.

<sup>2</sup> ITIGERRE (PIN 54859) is included within the group of points designated by STML PER (PIN 302346) listed in Exhibit B of the EOG TSA to which the negotiated rate applies.

<sup>3</sup> See Appendix A for copies of the redesignation reports for the EOG TSA. These reports reflect the details regarding EOG's redesignation requests and EPNG's approval of such requests.

<sup>4</sup> These temporary redesignations are similar to a temporary receipt point redesignation applicable to the EOG TSA that was filed by EPNG and accepted by the Commission in Docket No. RP24-259-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP24-259-000 (Jan. 24, 2024) (unpublished letter order) .

<sup>5</sup> See 18 C.F.R. §§ 154.201 – 154.210 (2024) (Subpart C).

<sup>6</sup> See 18 C.F.R. §§ 154.1 – 154.603 (2024) (Part 154).

dates of the point redesignations. As such, EPNG requests the Commission grant a waiver of the 30-day notice requirement found in 18 C.F.R. § 154.207 (2024) of the Commission's regulations.<sup>7</sup> 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  
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Mr. Tony Sala  
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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 (2024)).

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

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<sup>7</sup> 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 30<sup>th</sup> day of October 2024.

*/s/*

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Shelly L. Busby

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

## Appendix A

**Primary Receipt and Delivery Point ReDesignation Report**

Request # : 107728

Company Name : EOG RESOURCES, INC.

Contract No : 610720-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 7

Submit Date & Time : 10/21/2024 3:05:35PM

Executed Date & time : 10/23/2024 12:51:47PM

Effective Date : 11/01/2024

ReDesignation End Date : 01/31/2025

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>								
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	11/01/2024	01/31/2025	10,000
<b>Re-Designation</b>								
54859	DELAWAR/EPNG (ITIGERRE) TIGER RECEI	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	11/01/2024	01/31/2025	10,000
<b>Current</b>								
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	11/01/2024	01/31/2025	10,000
<b>Updated TSA Entitlements*</b>								
54859	DELAWAR/EPNG (ITIGERRE) TIGER RECEI	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	11/01/2024	01/31/2025	10,000
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	11/01/2024	01/31/2025	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.

**Primary Receipt and Delivery Point ReDesignation Report**

Request # : 107827

Company Name : EOG RESOURCES, INC.

Contract No : 610720-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 8

Submit Date & Time : 10/24/2024 8:59:07AM

Executed Date & time : 10/24/2024 10:00:46AM

Effective Date : 11/01/2024

ReDesignation End Date : 01/31/2025

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>								
48279	EFS/EPNG (IROCKDOV) ROCK DOVE REC	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	11/01/2024	01/31/2025	10,000
<b>Re-Designation</b>								
54859	DELAWAR/EPNG (ITIGERRE) TIGER RECEI	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	11/01/2024	01/31/2025	10,000
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54859	DELAWAR/EPNG (ITIGERRE) TIGER RECEI	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	11/01/2024	01/31/2025	10,000
54859	DELAWAR/EPNG (ITIGERRE) TIGER RECEI	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	11/01/2024	01/31/2025	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.

Statement of Negotiated Rates  
 (Rates per Dth/day)

Rate Schedule FT-1 Shipper Identification	Term of Service	TCD (Dth/d)	Reservation Rate 1/ Rate	Usage Rate	Primary Receipt Point(s)	Primary Delivery Point(s)
EOG Resources, Inc. DPG&ETOP #610720-FT1EPNG DSCALTOP	<del>112/1/24 – 19/310/2530</del>	-10,000	-1a/	1/	<del>5485948279 ITIGERREROCKDOV</del>	314604
		10,000			<del>5485948279 ITIGERREROCKDOV</del>	332503
	<u>2/1/25 – 9/30/30</u>		10,000	1a/	1/	48279 IROCKDOV
	<u>314604 DPG&amp;ETOP</u>					
		<u>10,000</u>			<u>48279 IROCKDOV</u>	<u>332503 DSCALTOP</u>
	<u>112/1/24 – 9/30/30</u>		1a/	1/	Primary and Alternate Receipt Point(s)	Primary and Alternate Delivery Point(s)
					302344 STML ANA	332503 DSCALTOP
					302346 STML PER	314604 DPG&ETOP
					302347 STML SJN	301016 DSCALEHR
						332531 SOCWR
						332554 KRAMER

- 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 \$12.1667 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.

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)
EOG Resources, Inc. #610720-FT1EPNG	11/1/24 – 1/31/25	10,000 10,000	1a/	1/	54859 ITIGERRE 54859 ITIGERRE	314604 DPG&ETOP 332503 DSCALTOP
	2/1/25 – 9/30/30	10,000 10,000	1a/	1/	48279 IROCKDOV 48279 IROCKDOV	314604 DPG&ETOP 332503 DSCALTOP
	11/1/24 – 9/30/30		1a/	1/	Primary and Alternate Receipt Point(s) 302344 STML ANA 302346 STML PER 302347 STML SJN	Primary and Alternate Delivery Point(s) 332503 DSCALTOP 314604 DPG&ETOP 301016 DSCALEHR 332531 SOCWR 332554 KRAMER

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- 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.