



December 18, 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 Filing;
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 EPNG's FERC Gas Tariff, Third Revised Volume No. 1A ("Tariff"):

Part II Section 5.28 NRG Business Marketing LLC #615903-FT1EPNG Version 2.0.0

Proposed with an effective date of February 1, 2025, this tariff record updates the Statement of Negotiated Rates in EPNG's Tariff to reflect an amendment to an existing Rate Schedule FT-1 negotiated rate transportation service agreement ("TSA") between EPNG and NRG Business Marketing LLC ("NRG"). EPNG respectfully requests that tariff record become effective on the proposed date of February 1, 2025, consistent with the effective date of the amended TSA.

Reason for Filing

Section 4.18 of the General Terms and Conditions ("GT&C") of the Tariff allows EPNG and a shipper to agree to a service rate that varies as to the form of the rate and/or from the minimum-to-maximum range provided on the Statement of Rates. TSA No. 615903-FT1EPNG ("NRG TSA") is an existing negotiated rate TSA currently included in EPNG's Tariff which was previously reviewed and accepted by the Commission.¹ EPNG has executed an amendment to the NRG TSA updating certain contractual terms, as described below.

¹ This TSA was most recently reviewed by the Commission in Docket No. RP23-1053-000. See *El Paso Natural Gas Co.*, Docket No. RP23-1053-000 (Oct. 12, 2023) (unpublished letter order).

When implementing a negotiated rate TSA, the Commission's policy requires pipelines to file either the TSA or a Statement of Rates tariff record identifying the transaction.² In accordance with this policy, EPNG is submitting a tariff record to reflect the negotiated rates and certain modified contractual terms for the Commission's review and acceptance.

Description of TSA

The NRG TSA was amended to reflect a nine-year term extension through December 31, 2034. Additionally, as shown in the attached marked tariff record, the negotiated rate was updated to reflect a negotiated total reservation rate of \$17.1854 per Dekatherm ("Dth") per month for the full term of the TSA. This negotiated rate TSA continues to apply to the primary receipt and delivery points³ and to certain alternate points specified in the TSA.

Description of Filing

EPNG is submitting the following tariff records pursuant to 18 C.F.R. § 154.112(b) (2024) and Subpart C of Part 154 of the Commission's regulations.⁴

Part II, Section 5.28 reflects the updated terms applicable to the amended negotiated rate TSA as discussed earlier. Additionally, consistent with the Commission's policy, the proposed tariff record includes a statement that the underlying agreement conforms in all material respects with EPNG's Rate Schedule FT-1 pro forma service agreement.

Procedural Matters

In accordance with the applicable provisions of Part 154 of the Commission's regulations,⁵ EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter; and
- b) clean and marked versions of the tariff records in PDF format.

² See *Natural Gas Pipeline Negotiated Rate Policies and Practices; Modification of Negotiated Rate Policy*, 104 FERC ¶ 61,134, at PP 25-33 (2003), *order on reh'g and clarification*, 114 FERC ¶ 61,042 (2006), *reh'g dismissed and clarification denied*, 114 FERC ¶ 61,304 (2006).

³ The TSA's primary receipt points of KEYSTONE (PIN 302132) and PLAINS (PIN 302248), primary delivery point of DPG&ETOP (PIN 314604) and transportation contract demand of 15,000 Dth per day remain unchanged.

⁴ 18 C.F.R. §§ 154.201 – 154.210 (2024) (Subpart C).

⁵ 18 C.F.R. §§ 154.101 – 154.603 (2024).

EPNG respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective on February 1, 2025, which is not less than thirty days nor more than sixty days following the submission of this filing. 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:

Ms. Shelly L. Busby
Director, Regulatory
El Paso Natural Gas Company, L.L.C.
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Colorado Springs, CO 80944-1087
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Mr. David R. Cain
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Post Office Box 1087
Colorado Springs, CO 80944-1087
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 (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

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 18th day of December, 2024.

/s/

Shelly L. Busby

Post Office Box 1087
Colorado Springs, CO 80944
(719) 520-4657

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)
NRG Business Marketing LLC #615903-FT1EPNG	2/1/25 2 – 12/31/34 25	11,756	January	1a/ 1/	302132	KEYSTONE
	314604 DPG&ETOP	11,884	February			
		11,576	March			
		11,514	April			
		11,182	May			
		10,991	June			
		11,097	July			
		11,060	August			
		11,277	September			
		11,465	October			
		12,348	November			
		11,785	December			
	2/1/25 2 – 12/31/34 25	3,244	January	1a/ 1/	302248	PLAINS
	314604 DPG&ETOP	3,116	February			
		3,424	March			
		3,486	April			
		3,818	May			
		4,009	June			
		3,903	July			
		3,940	August			
		3,723	September			
		3,535	October			
		2,652	November			
		3,215	December			

	1a/	Alternate Receipt 1/	Point(s)	Alternate Delivery Point(s)	
			302344 STML ANA	301016 DSCALEHR	
			302346 STML PER	301693 INORBAJA	
			302347 STML SJN	314604 DPG&ETOP	
			43886 IRYGULCH	41781 IDRKCNGR	332503

DSCALTOP

~~ICPSOUTH~~

42235 IRXLVRCH	42223 <u>DYELJKPS</u> 314991
36100 IGRSWDQP	42235 <u>332554</u> <u>IRXLVRCH</u> <u>KRAMER</u>
40237 IEXMBGRS	40379 <u>332531</u> <u>DAHRCNYN</u> <u>SOCWR</u>
41781 IDRKCNGR	320614 <u>IGRIFFTH</u> 332569 <u>DAGMOJ</u> 36106 <u>ITWBLANCO</u> 301881 <u>ITCOLBLA</u>
	300716 <u>BLANTRAN</u>
	300726 <u>BONDTRAN</u>
	41781 <u>IDRKCNGR</u>
	42223 <u>DYELJKPS</u>
	42235 <u>IRXLVRCH</u>
	40379 <u>DAHRCNYN</u>
	36106 <u>ITWBLANCO</u>
	332569 <u>DAGMOJ</u>

<u>Alternate Receipt Point(s)</u>	<u>Alternate Delivery Point(s)</u>
<u>All Receipt Points as they may change from time to time, excluding those requiring incremental rates (e.g., Willcox Lateral Receipt Points) or Third Party Charges pursuant to GT&C Section 4.9 of Transporter's Tariff as that provision may move or change from time to time</u>	<u>All Delivery Points as they may change from time to time, excluding those requiring incremental rates (e.g., Willcox Lateral Delivery Points) or Third Party Charges pursuant to GT&C Section 4.9 of Transporter's Tariff as that provision may move or change from time to time</u>

- 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 \$170.1854653 per Dtherm per Month as the applicable total reservation rate (inclusive of any otherwise applicable reservation charges associated with the Off-System Capacity points listed in this Exhibit B for Transporter's capacity on TransColorado Gas Transmission Company LLC's pipeline system pursuant to Section 4.9 of the GT&C of Transporter's Tariff), which shall not be subject to the applicable maximum or minimum reservation rates 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)

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				1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
						43886 IRYGULCH	41781 IDRKCNGR
						42235 IRXLVRCH	42223 DYELJKPS
						36100 IGRSWDQP	42235 IRXLVRCH
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						41781 IDRKCNGR	36106 ITWBLANCO

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- 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 \$17.1854 per Dth per Month as the applicable total reservation rate (inclusive of any otherwise applicable reservation charges associated with the Off-System Capacity points listed in this Exhibit B for Transporter's capacity on TransColorado Gas Transmission Company LLC's pipeline system pursuant to Section 4.9 of the GT&C of Transporter's Tariff), which shall not be subject to the applicable maximum or minimum reservation rates as set forth in Transporter's Tariff and which shall be payable regardless of quantities transported.
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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.