



December 19, 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 its Third Revised Volume No. 1A of the FERC Gas Tariff ("Tariff"):

Part II Section 5.26 Shell Energy North America #615861-FT1EPNG Version 5.0.0

Proposed with an effective date of February 1, 2025, this tariff record updates EPNG's Tariff to implement temporary point redesignation requests on an existing transportation service agreement ("TSA") between EPNG and Shell Energy North America (US) L.P. ("Shell").

## **Background**

TSA No. 615861-FT1EPNG ("Shell TSA") is a conforming, negotiated rate TSA which is included in EPNG's Tariff.<sup>1</sup> Among other things, this TSA reflects the application of a fixed negotiated rate at various primary and alternate points. Since the initial acceptance of the tariff record reflecting the TSA,<sup>2</sup> Shell has redesignated primary points on this TSA consistent with EPNG's Tariff. Currently, the tariff record reflecting the TSA includes point redesignations accepted by the Commission on October 21, 2024.<sup>3</sup>

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<sup>1</sup> See Part II: Stmt. of Rates, Section 5.26 of EPNG's Tariff.

<sup>2</sup> *El Paso Natural Gas Co.*, Docket No. RP22-386-000 (Dec. 20, 2021) (unpublished letter order).

<sup>3</sup> *El Paso Natural Gas Co.*, Docket No. RP24-1082-000 (Oct. 21, 2024) (unpublished letter order).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.<sup>4</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, Shell submitted two separate requests to temporarily shift primary receipt point capacity. As indicated on the attached tariff record, the first request shifted a portion of capacity at the primary receipt point of ILONESTR (PIN 301620) to the ILONEWA (PIN 301621) receipt point for the period February 1, 2025 through February 28, 2025. The second request shifted all of the primary receipt point capacity from the ILONESTR (PIN 301620) receipt point to the ILONEWA (PIN 301621) receipt point for the period March 1, 2025 through May 31, 2025. The ILONEWA receipt point is currently listed as an alternate receipt point at which the negotiated rate specified in the Shell TSA applies.<sup>5</sup>

Shell’s requests were evaluated and accepted by EPNG and, therefore, the Shell TSA was amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.<sup>6</sup> Given that Shell’s temporary redesignation requests affect a negotiated rate agreement, EPNG is submitting an updated tariff record to reflect the location modifications and the relevant time periods. No other changes have been made to the Shell TSA and the TSA conforms to the *pro forma* FT-1 service agreement contained in the Tariff.

## **Tariff Provisions**

EPNG is submitting the following tariff record pursuant to 18 C.F.R. § 154.112(b) (2024) and Subpart C of the Commission’s regulations.<sup>7</sup>

Part II, Section 5.26 is updated to reflect the requested capacity redesignations applicable to the Shell TSA.

## **Procedural Matters**

In accordance with the applicable provisions of Part 154 of the Commission’s

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<sup>4</sup> See Section 8.1(f)(iii)(B) of the GT&C of EPNG’s Tariff.

<sup>5</sup> As shown on the tariff record submitted herewith, the relevant fixed negotiated rate applies to all receipt points included within STML PER (PIN 302346) on an alternate basis. Specifically, the ILONEWA receipt point is included within STML PER (PIN 302346).

<sup>6</sup> See Appendix A for copies of the redesignation reports for Agreement No. 615861-FT1EPNG. These reports reflect the details regarding Shell’s redesignation requests and EPNG’s approval of such requests.

<sup>7</sup> See 18 C.F.R. §§ 154.201 – 154.210 (2024) (Subpart C).

regulations,<sup>8</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 Agreement No. 615861-FT1EPNG; 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 February 1, 2025, which is not less than thirty days nor more than sixty days following the submission of this filing and contemporaneous with the effective date of the point redesignation. 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.  
Post Office Box 1087  
Colorado Springs, CO 80944  
Telephone: (719) 520-4657  
EPNGRegulatoryAffairs@kindermorgan.com

Mr. Tony Sala  
Vice President and Managing Counsel  
El Paso Natural Gas Company, L.L.C.  
1001 Louisiana Street, Suite 1000  
Houston, TX 77002  
Telephone: (713) 420-6431  
Tony\_Sala@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

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<sup>8</sup> See 18 C.F.R. §§ 154.1 – 154.603 (2024) (Part 154).

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 19<sup>th</sup> day of December 2024.

*/s/*

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Shelly L. Busby

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

## **Appendix A**

**Primary Receipt and Delivery Point ReDesignation Report**

Request # : 108027

Company Name : SHELL ENERGY NORTH

Contract No : 615861-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 17

Submit Date & Time : 11/6/2024 11:17:42AM

Executed Date & time : 11/6/2024 12:00:57PM

Effective Date : 02/01/2025

ReDesignation End Date : 02/28/2025

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>								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	7,300
<b>Re-Designation</b>								
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	2,644
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	4,656
<b>Current</b>								
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	10,130
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	681
<b>Updated TSA Entitlements*</b>								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	4,656
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	2,644
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	10,130
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	02/01/2025	02/28/2025	681

\*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 # : 108164

Company Name : SHELL ENERGY NORTH

Contract No : 615861-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 18

Submit Date & Time : 12/2/2024 12:14:39PM

Executed Date & time : 12/2/2024 4:11:39PM

Effective Date : 03/01/2025

ReDesignation End Date : 05/31/2025

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>								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	7,300
<b>Re-Designation</b>								
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	7,300
<b>Current</b>								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	7,300
<b>Re-Designation</b>								
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	7,300
<b>Current</b>								
301620	ATMOS-TX/EPNG (ILONESTR) SWEETIE PE	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	7,300
<b>Re-Designation</b>								
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	7,300
<b>Current</b>								
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	9,678
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	1,133
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	9,588
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	1,223

Point (Rec)	Point Name (Rec)	Point (Del)	Point Name (Del)	Route	Rate Zone	Begin Date	End Date	MDQ/Dth/D
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	9,101
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	1,710

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**Updated TSA Entitlements\***

301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	7,300
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	9,678
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	03/01/2025	03/31/2025	1,133
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	7,300
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	9,588
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	04/01/2025	04/30/2025	1,223
301621	ATMOS-TX/EPNG (ILONEWA) LONESTAR WA	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	7,300
302132	(KEYSTONE) KEYSTONE POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	9,101
302248	(PLAINS) PLAINS POOL	314604	PACGAS/EPNG (DPG&ETOP) TOPOCK OBA M	SN2	27	05/01/2025	05/31/2025	1,710

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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)
Shell Energy North America (US), L.P. #615861-FT1EPNG ILONESTR	<del>2/10/2025</del> 4 – <del>2/28</del> 11/30/2025 314604 DPG&ETOP	<del>2,644</del> 7,300		1a/	1/	301621 ILONEWA
	<del>2/12/2025</del> 4 – <del>2/28</del> 12/31/2025 314604 DPG&ETOP	<del>4,656</del> 7,300		1a/	1/	301620
	<u>3/1/2025 – 5/31/2025</u>	<u>7,300</u>	<u>1a/</u>	<u>1/</u>	<u>301621 ILONEWA</u>	<u>314604 DPG&amp;ETOP</u>
	<u>6/1/2025 – 12/31/2026</u>	<u>7,300</u>	<u>1a/</u>	<u>1/</u>	<u>301620 ILONESTR</u>	<u>314604 DPG&amp;ETOP</u>
KEYSTONE	<del>2/10/2025</del> 4 – 12/31/2026 314604 DPG&ETOP	9,942	January	1a/	1/	302132
		10,130	February			
		9,678	March			
		9,588	April			
		9,101	May			
		8,819	June			
		8,976	July			
		8,921	August			
		9,239	September			
		9,515	October			
		10,811	November			
		9,984	December			
	<del>2/10/2025</del> 4 – 12/31/2026 314604 DPG&ETOP	869	January	1a/	1/	302248 PLAINS
		681	February			
		1,133	March			
		1,223	April			
		1,710	May			
		1,992	June			
		1,835	July			
		1,890	August			
		1,572	September			
		1,296	October			

827      November  
            December

1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
		302344 STML ANA	301016 DSCALEHR
		302346 STML PER	301693 INORBAJA
		302347 STML SJN	314604 DPG&ETOP
		43886 IRYGULCH	332503 DSCALTOP
		42235 IRXLVRCH	314991 ICPSOUTH
		36100 IGRSWDQP	332554 KRAMER
		40237 IEXMBGRS	332531 SOCWR
		41781 IDRKCNGR	320614 IGRIFTH
		332569 DAGMOJ	301881 ITCOLBLA
			300716 BLANTRAN
			300726 BONDTRAN
			41781 IDRKCNGR
			42223 DYELJKPS
			42235 IRXLVRCH
			40379 DAHRCNYN
			36106 ITWBLANCO
			332569 DAGMOJ

- 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 \$10.7676 per Dekatherm per Month 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)
Shell Energy North America (US), L.P. #615861-FT1EPNG	2/1/2025 – 2/28/2025	2,644		1a/	1/	301621 ILONEWA	314604 DPG&ETOP
	2/1/2025 – 2/28/2025	4,656		1a/	1/	301620 ILONESTR	314604 DPG&ETOP
	3/1/2025 – 5/31/2025	7,300		1a/	1/	301621 ILONEWA	314604 DPG&ETOP
	6/1/2025 – 12/31/2026	7,300		1a/	1/	301620 ILONESTR	314604 DPG&ETOP
	2/1/2025 – 12/31/2026	9,942	January	1a/	1/	302132 KEYSTONE	314604 DPG&ETOP
		10,130	February				
		9,678	March				
		9,588	April				
		9,101	May				
		8,819	June				
		8,976	July				
		8,921	August				
	9,239	September					
	9,515	October					
	10,811	November					
	9,984	December					
	2/1/2025 – 12/31/2026	869	January	1a/	1/	302248 PLAINS	314604 DPG&ETOP
		681	February				
		1,133	March				
		1,223	April				
		1,710	May				
		1,992	June				
		1,835	July				
		1,890	August				
		1,572	September				
		1,296	October				
			November				
		827	December				

1a/	1/	Alternate Receipt Point(s)	Alternate Delivery Point(s)
		302344 STML ANA	301016 DSCALEHR
		302346 STML PER	301693 INORBAJA
		302347 STML SJN	314604 DPG&ETOP
		43886 IRYGULCH	332503 DSCALTOP
		42235 IRXLVRCH	314991 ICPSOUTH
		36100 IGRSWDQP	332554 KRAMER
		40237 IEXMBGRS	332531 SOCWR
		41781 IDRKCNGR	320614 IGRIFFTH
		332569 DAGMOJ	301881 ITCOLBLA
			300716 BLANTRAN
			300726 BONDTRAN
			41781 IDRKCNGR
			42223 DYELJKPS
			42235 IRXLVRCH
			40379 DAHRCNYN
			36106 ITWBLANCO
			332569 DAGMOJ

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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 \$10.7676 per Dekatherm per Month which shall be payable regardless of quantities transported.
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 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.