



January 30, 2025

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

Section 5.49 Sempra Gas & Power Mktg #618975-FT1EPNG Version 6.0.0

Proposed with an effective date of February 1, 2025, this tariff record updates EPNG's Tariff to reflect a temporary point redesignation on an existing transportation service agreement ("TSA") between EPNG and Sempra Gas & Power Marketing ("Sempra"). 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. 618975-FT1EPNG with Sempra which provides for a fixed negotiated reservation rate. Since the initial acceptance of the tariff record reflecting the TSA,¹ Sempra has redesignated primary points on this TSA consistent with EPNG's Tariff. Currently, the tariff record reflecting the Sempra TSA includes a point redesignation that was accepted by the Commission on January 22, 2025.²

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

¹ *El Paso Natural Gas Co.*, Docket No. RP24-182-000 (Dec. 20, 2023) (unpublished letter order).

² *El Paso Natural Gas Co.*, Docket No. RP25-306-000 (Jan. 22, 2025) (unpublished letter order).

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, Sempra submitted a redesignation request for Agreement No. 618975-FT1EPNG to temporarily redesignate capacity rights from the primary receipt point of IMAYFLDR (PIN 50505) to PLAINS (PIN 302248) from February 1, 2025 through February 28, 2025. PLAINS is currently listed as a primary receipt point at which the negotiated rate specified in the TSA applies.⁴ Sempra's request was accepted by EPNG and, therefore, Agreement No. 618975-FT1EPNG was amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.⁵ Given that Sempra's temporary redesignation request affects a negotiated rate agreement, EPNG is proposing a tariff record to reflect the point modification for the relevant time period.⁶ No other changes to the Sempra TSA have been made.

Tariff Provisions

EPNG is submitting the following tariff record pursuant to 18 C.F.R. § 154.112(b) (2024) and Subpart C of Part 154 of the Commission's regulations.⁷

Part II, Section 5.49 is updated to reflect a point redesignation for Sempra's Agreement No. 618975-FT1EPNG applicable to February 1, 2025 through February 28, 2025.

Procedural Matters

In accordance with the applicable provisions of Part 154 of the Commission's regulations,⁸ EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter;
- b) Appendix A, a copy of the Sempra redesignation report; and

³ See Section 8.1(f)(iii)(B) of the GT&C of EPNG's Tariff.

⁴ PLAINS is included within the alternate receipt points identified on Exhibit B of Agreement No. 618975-FT1EPNG at which the negotiated rate applies.

⁵ See Appendix A for a copy of the redesignation report for the Sempra TSA. This report reflects the details regarding Sempra's redesignation request and EPNG's approval of such request.

⁶ This temporary redesignation is similar to other point redesignations, which were filed by EPNG and accepted by the Commission in Docket Nos. RP25-104-000, RP25-222-000 and RP25-306-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP25-222-000 (Dec. 11, 2024) (unpublished letter order).

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

⁸ 18 C.F.R. §§ 154.1 – 154.603 (2024).

- 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 February 1, 2025, contemporaneous with the effective date of the subject point redesignation. As such, EPNG requests the Commission grant a waiver of the notice requirements as permitted by 18 C.F.R. § 154.207 (2024) of the Commission's regulations.⁹ 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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EPNGRegulatoryAffairs@kindermorgan.com

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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

⁹ 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 30th day of January 2025.

/s/

Shelly L. Busby

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

Appendix A

Primary Receipt and Delivery Point ReDesignation Report

Request # : 108506

Company Name : SEMPRA GAS & POWER MARKETING,

Contract No : 618975-FT1EPNG

Status : EXECUTED

Acquired Capacity Agreement : N

Amendment No : 14

Submit Date & Time : 1/27/2025 9:50:09AM

Executed Date & time : 1/27/2025 11:34:14AM

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
Current								
50505	ONEOKGT/EPNG (IMAYFLDR) MAYFIELD RE	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	AN2-NN2	27	02/01/2025	02/28/2025	50,000
Re-Designation								
302248	(PLAINS) PLAINS POOL	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	02/01/2025	02/28/2025	50,000
Updated TSA Entitlements*								
302248	(PLAINS) PLAINS POOL	332503	SOCETS/EPNG (DSCALTOP) TOPOCK SOCAL	SN2	27	02/01/2025	02/28/2025	50,000

*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.

Clean Tariff Section(s)

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)					
Sempra Gas & Power Marketing, LLC #618975-FT1EPNG 4/	2/1/2025 – 2/28/2025		50,000	1a/	1/2/3/	302248 PLAINS	332503 DSCALTOP					
	3/1/2025 – 12/31/2038	January	50,000	1a/	1/2/3/	50505 IMAYFLDR	332503 DSCALTOP					
		February	50,000									
		June	24,053									
		July	20,571									
		August	34,317									
		September	18,855									
		October	3,870									
		November	3,321									
		December	50,000									
		1/1/2039 – 12/31/2048	January					50,000	1/	1/2/3/	50505 IMAYFLDR	332503 DSCALTOP
			February					50,000				
			June					24,053				
July	20,571											
August	34,317											
September	18,855											
October	3,870											
November	3,321											
December	50,000											
3/1/2025 – 12/31/2038	March		50,000	1a/	1/2/3/	50505 IMAYFLDR	301016 DSCALEHR					
	April		50,000									
	May		50,000									
	June	25,947										
	July	29,429										
	August	15,683										
	September	31,145										
	October	46,130										
	November	46,679										
	1/1/2039 – 12/31/2048	March	50,000					1/	1/2/3/	50505 IMAYFLDR	301016 DSCALEHR	
		April	50,000									
May		50,000										
June		25,947										
July		29,429										

August	15,683
September	31,145
October	46,130
November	46,679

				<u>Primary and Alternate Receipt Point(s)</u>	<u>Primary and Alternate Delivery Point(s)</u>
2/1/2025 – 12/31/2038	1a/	1/2/3/		All EPNG Receipt Points except 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	All EPNG Delivery Points except 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

- 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.

Marked Tariff Section(s)

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)
Sempra Gas & Power Marketing, LLC #618975-FT1EPNG 4/	21 /1/2025 – 1312 /28/2025 332503 DSCALTOP		50,000	1a/	1/2/3/	302248 PLAINS
	32 /1/2025 – 12/31/2038	January February June July August September October November December	50,000 50,000 24,053 20,571 34,317 18,855 3,870 3,321 50,000	1a/	1/2/3/	50505 IMAYFLDR 332503 DSCALTOP
	1/1/2039 – 12/31/2048	January February June July August September October November December	50,000 50,000 24,053 20,571 34,317 18,855 3,870 3,321 50,000	1/	1/2/3/	50505 IMAYFLDR 332503 DSCALTOP
	23 /1/2025 – 12/31/2038	March April May June July August September October November	50,000 50,000 50,000 25,947 29,429 15,683 31,145 46,130 46,679	1a/	1/2/3/	50505 IMAYFLDR 301016 DSCALEHR
	1/1/2039 – 12/31/2048	March April May June	50,000 50,000 50,000 25,947	1/	1/2/3/	50505 IMAYFLDR 301016 DSCALEHR

July	29,429
August	15,683
September	31,145
October	46,130
November	46,679

~~2~~1/2025 – 12/31/2038

1a/

1/2/3/

Primary and Alternate Receipt Point(s)	Primary and Alternate Delivery Point(s)
All EPNG Receipt Points except 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	All EPNG Delivery Points except 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

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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.