



February 26, 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 7.0.0

Proposed with an effective date of March 1, 2025, this tariff record updates EPNG's Tariff to reflect two temporary point redesignations on an existing transportation service agreement ("TSA") between EPNG and Sempra Gas & Power Marketing, LLC ("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,<sup>1</sup> 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 February 13, 2025.<sup>2</sup>

### **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

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 *El Paso Natural Gas Co.*, Docket No. RP24-182-000 (Dec. 20, 2023) (unpublished letter order).

<sup>2</sup> *El Paso Natural Gas Co.*, Docket No. RP25-424-000 (Feb. 13, 2025) (unpublished letter order).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.<sup>3</sup> 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 two separate redesignation requests to temporarily redesignate capacity rights from its primary receipt point of IMAYFLDR (PIN 50505) to PLAINS (PIN 302248) from March 1, 2025 through March 31, 2025. PLAINS is currently listed as a primary receipt point at which the negotiated rate specified in the TSA applies.<sup>4</sup> Sempra's requests were accepted by EPNG and, therefore, Agreement No. 618975-FT1EPNG was amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.<sup>5</sup> Given that Sempra's temporary redesignation requests affect a negotiated rate agreement, EPNG is proposing a tariff record to reflect the point modification for the relevant time period.<sup>6</sup> 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.<sup>7</sup>

Part II, Section 5.49 is updated to reflect point redesignations for Sempra's Agreement No. 618975-FT1EPNG applicable to March 1, 2025 through March 31, 2025.

### **Procedural Matters**

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

- a) a transmittal letter;

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

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

<sup>5</sup> See Appendix A for copies of the redesignation reports for the Sempra TSA. These reports reflect the details regarding Sempra's redesignation requests and EPNG's approval of such requests.

<sup>6</sup> These temporary redesignations are similar to other point redesignations, which were filed by EPNG and accepted by the Commission in RP25-222-000, RP25-306-000 and RP25-424-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP25-306-000 (Jan. 22, 2025) (unpublished letter order).

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

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

- b) Appendix A, copies of the Sempra redesignation reports; and
- 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 March 1, 2025, contemporaneous with the effective date of the subject point redesignations. 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.<sup>9</sup> 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 80944-1087  
Telephone: (719) 520-4657  
EPNGRegulatoryAffairs@kindermorgan.com

Mr. David R. Cain  
Assistant General Counsel  
El Paso Natural Gas Company, L.L.C.  
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

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<sup>9</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 26<sup>th</sup> day of February 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 # :** 108641

**Company Name :** SEMPRA GAS & POWER MARKETING,

**Contract No :** 618975-FT1EPNG

**Status :** EXECUTED

**Acquired Capacity Agreement :** N

**Amendment No :** 15

**Submit Date & Time :** 2/7/2025 2:18:58PM

**Executed Date & time :** 2/11/2025 7:23:47AM

**Effective Date :** 03/01/2025

**ReDesignation End Date :** 03/31/2025

**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>								
50505	ONEOKGT/EPNG (IMAYFLDR) MAYFIELD RE	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-NS3	27	03/01/2025	03/31/2025	34,598
<b>Re-Designation</b>								
302248	(PLAINS) PLAINS POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-NS3	27	03/01/2025	03/31/2025	34,598

<b>Current</b>								
50505	ONEOKGT/EPNG (IMAYFLDR) MAYFIELD RE	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-CC1	27	03/01/2025	03/31/2025	15,402

<b>Updated TSA Entitlements*</b>								
50505	ONEOKGT/EPNG (IMAYFLDR) MAYFIELD RE	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-CC1	27	03/01/2025	03/31/2025	15,402
302248	(PLAINS) PLAINS POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-NS3	27	03/01/2025	03/31/2025	34,598

\*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 # :** 108665

**Company Name :** SEMPRA GAS & POWER MARKETING,

**Contract No :** 618975-FT1EPNG

**Status :** EXECUTED

**Acquired Capacity Agreement :** N

**Amendment No :** 16

**Submit Date & Time :** 2/11/2025 2:06:09PM

**Executed Date & time :** 2/11/2025 3:49:38PM

**Effective Date :** 03/01/2025

**ReDesignation End Date :** 03/31/2025

**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>								
50505	ONEOKGT/EPNG (IMAYFLDR) MAYFIELD RE	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-CC1	27	03/01/2025	03/31/2025	15,402
<b>Re-Designation</b>								
302248	(PLAINS) PLAINS POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-CC1	27	03/01/2025	03/31/2025	15,402
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<b>Updated TSA Entitlements*</b>								
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302248	(PLAINS) PLAINS POOL	301016	SOCETS/EPNG (DSCALEHR) SOCIAL EHRENB	AN2-NS3	27	03/01/2025	03/31/2025	34,598

\*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/	3/1/2025 – 3/31/2025	50,000	1a/	1/2/3/	302248 PLAINS	301016 DSCALEHR	
	4/1/2025 – 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				
	February		50,000				
	June		24,053				
July	20,571						
August	34,317						
September	18,855						
October	3,870						
November	3,321						
December	50,000						
4/1/2025 – 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				
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>
3/1/2025 – 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/	<del>23</del> /1/2025 – <del>2/28</del> 3/31/2025		50,000	1a/	1/2/3/	302248 PLAINS
	<del>332503 DSCALTOP</del> 301016 DSCALEHR					
	<del>43</del> /1/2025 – 12/31/2038	January 50,000 February 50,000 June 24,053 July 20,571 August 34,317 September 18,855 October 3,870 November 3,321 December 50,000	1a/	1/2/3/	50505 IMAYFLDR	332503 DSCALTOP
	1/1/2039 – 12/31/2048	January 50,000 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/	1/2/3/	50505 IMAYFLDR	332503 DSCALTOP
	<del>34</del> /1/2025 – 12/31/2038	March 50,000 April 50,000 May 50,000 June 25,947 July 29,429 August 15,683 September 31,145 October 46,130 November 46,679	1a/	1/2/3/	50505 IMAYFLDR	301016 DSCALEHR
	1/1/2039 – 12/31/2048	March 50,000 April 50,000 May 50,000 June 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

23/1/2025 – 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.