



August 21, 2024

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

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

Re: Colorado Interstate Gas Company, L.L.C.;
Docket No. CP24-124-000
Responses to Data Request – Office of Energy Market Regulation

Dear Ms. Reese:

On August 13 2024, Colorado Interstate Gas Company, L.L.C. (“CIG”), received a data request (“Data Request”) in Docket No. CP24-124-000 from the Office of Energy Market Regulation (“OEMR”) seeking information related to CIG’s Totem Enhanced Deliverability Project. CIG is herein filing with the Federal Energy Regulatory Commission (“Commission”) its responses to the Data Request.

Description of Proceeding

On April 8, 2024, CIG filed an application, pursuant to Section 7(c) and (b) of the Natural Gas Act, and Part 157.5, et seq., of the Commission’s Regulations for a certificate of public convenience and necessity and abandonment authorization to modify and enhance its existing Totem storage field located in Adams County, Colorado in order to increase the maximum withdrawal rate by approximately 50 million cubic feet per day. Specifically, CIG proposes to: (1) install six new injection and withdrawal wells; (2) replace and install various sections of storage pipeline; (3) reclassify one existing injection/withdrawal well to an observation well; (4) install various appurtenant and auxiliary facilities; and (5) inject approximately one billion cubic feet of additional base gas into the Totem storage field. The proposed project, is referred to as the “Totem Enhanced Deliverability Project”.

Description of Information Being Filed

CIG is herein submitting its responses to the August 13, 2024 OEMR Data Request.

Filing Information

CIG is e-Filing this letter and attachments with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

Please direct any questions regarding this matter to Francisco Tarin at 719-667-7517 or via email at Francisco_Tarin@kindermorgan.com.

Respectfully submitted,
COLORADO INTERSTATE GAS
COMPANY, L.L.C.

By /s/ Francisco Tarin
Francisco Tarin
Director, Regulatory

Enclosures

Cc. Ms. Marsha K. Palazzi, OEMR

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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Totem Enhanced Deliverability Project

1. In Exhibit N, page 2 of 5, the Accumulated Depreciation and Accumulated Deferred Income Taxes (ADIT) were not factored into the calculation of the Rate Base for the first year. Please provide an explanation of why the Accumulated Depreciation and ADIT were not factored into the calculation of the Rate Base for the first year. If their exclusion was an oversight, please provide an updated calculation for Exhibit N in Microsoft Excel, in the manner provided in the instructions above.

Response:

CIG used the day one Cost of Service convention for the calculation of Rate Base which is why the Accumulated Depreciation and ADIT show \$0 balance in Year 1. CIG utilized the same convention for the calculation of Rate Base that was filed and approved in the original Totem certificate in Docket No. CP08-30-000.

Response prepared by or under the supervision of:

Shelly Busby
Director, Regulatory
719-520-4657

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2. Please confirm what state income tax rate is used in the calculation of the Composite Tax Rate (Exhibit N, page 3 of 5) and if that is the most recent income tax rate established by the state. If needed, please provide an updated calculation for Exhibit N in Microsoft Excel, in the manner provided in the instructions above.

Response:

The Colorado State Income Tax Rate used in the original calculation of the Composite Tax Rate has recently been updated by the State of Colorado. The Colorado 2024 State Income Tax Rate is 4.25%. This update is reflected in the Composite Tax Rate of 24.36% as shown on Attachment 1, Exhibit N Page 3. An updated calculation with the latest Colorado State Income Tax Rate is being provided as Attachment 1.

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3. Part II: Stmt. of Rates, Section 1.3 – Transportation Storage Balancing Rate Schedules reflect the Commodity Withdrawal Rate and the overrun rates at 1,074 British Thermal Units (Btu). Similarly, Part II: Stmt. of Rates, Section 3 – Footnotes reflect the Commodity Delivery Rate and the overrun rates at 1,000 Btu. Please explain how the Commodity Withdrawal Rate, the Commodity Delivery Rate and the overrun rates reflected in both tariff records were calculated. Please provide the requested documentation in Microsoft Excel, in the manner provided in the instructions above.

Response:

Refer to Attachment 1, Exhibit N Page 4 of 5 (Tab Exhibit N-4) for the requested calculation verification.

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4. Please clarify if CIG is proposing an interruptible (IT) rate for shippers that receive service under Rate Schedule ESD-T. If so, please provide the calculation of the IT rate in Microsoft Excel, in the manner provided in the instructions above.

Response:

CIG does not offer an interruptible (IT) rate for its TSB-T service and is not proposing an interruptible (IT) rate for shippers that receive service under Rate Schedule ESD-T.

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5. Please clarify which shippers currently receive service under Rate Schedule FS-T and Rate Schedule TSB-T.

Response:

There's currently one shipper receiving service under Rate Schedule FS-T and Rate Schedule TSB-T.

- Public Service Company of Colorado (PSCO)

Response prepared by or under the supervision of:

Shelly Busby
Director, Regulatory
719-520-4657

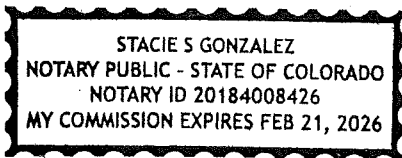
STATE OF COLORADO)
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COUNTY OF EL PASO)

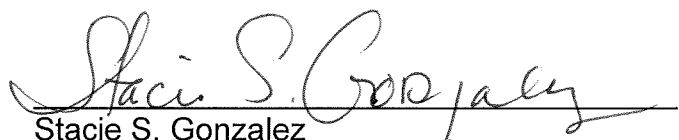
FRANCISCO TARIN, being first duly sworn, on oath, says that he is the Director of the Regulatory Department of Colorado Interstate Gas Company, L.L.C.; that he has read the foregoing Responses to the Office of Energy Market Regulation’s Data Request dated August 13, 2024 in Docket No. CP24-124-000, that as such he is authorized to verify the Responses, that he is familiar with the contents thereof; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief.



Francisco Tarin

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 21st day of August 2024.





Stacie S. Gonzalez
Notary Public, State of Colorado
My Commission Expires: February 21, 2026

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 21st day of August 2024.

/s/

Francisco Tarin

Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517