



**El Paso Natural Gas Company, L.L.C.**  
**Two North Nevada Colorado Springs, CO 80903**  
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Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Colorado Springs, Colorado as of this 29<sup>th</sup> day of May 2025.

/s/

Shelly L. Busby

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



April 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 Company, L.L.C. ("EPNG") hereby tenders for filing and acceptance by the Federal Energy Regulatory Commission ("Commission") the tariff records listed below for inclusion in Part VII of its FERC Gas Tariff, Third Revised Volume No. 1A ("Tariff"):

Section 33.1 Southern California Gas #615178-FT1EPNG Exh A Version 34.0.0  
Section 33.2 Southern California Gas #615178-FT1EPNG Exh B Version 32.0.0

Proposed with an effective date of May 1, 2025, these tariff records update EPNG's Tariff to reflect a temporary point redesignation on an existing transportation service agreement ("TSA") between EPNG and Southern California Gas Company ("SoCal"). EPNG respectfully requests a waiver of the 30-day notice requirement to effectuate the May 1, 2025 effective date, as discussed below.

### **Background**

EPNG's Tariff includes Agreement No. 615178-FT1EPNG, a non-conforming, fixed negotiated rate agreement with SoCal. Among other things, this TSA reflects the application of a negotiated rate at various primary and alternate points. Since the initial acceptance of the tariff records reflecting the TSA,<sup>1</sup> SoCal has redesignated primary points consistent with EPNG's Tariff. Currently, the tariff

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<sup>1</sup> *El Paso Natural Gas Co.*, Docket No. RP21-1107-000 (Oct. 12, 2021) (unpublished letter order).

records reflecting the subject TSA include 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 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 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, SoCal submitted a request to temporarily redesignate capacity rights from its primary receipt point of KEYSTONE (PIN 302132) to IRAMSEYS (PIN 800908) on Agreement No. 615178-FT1EPNG for the period May 1, 2025 through July 31, 2025, as indicated on the attached tariff records. Currently, IRAMSEYS is listed as primary receipt point at which the negotiated rate specified in the TSA applies. SoCal’s request was accepted by EPNG and, therefore, Agreement No. 615178-FT1EPNG was amended pursuant to Section 8.1(f)(iii)(F) of the GT&C.<sup>4</sup> Given that SoCal’s temporary redesignation request affects a non-conforming, negotiated rate agreement, EPNG is proposing to update the relevant tariff records to reflect the receipt point modification and the relevant time period.<sup>5</sup> No other changes to the TSA have been made.

### **Tariff Provisions**

EPNG is submitting the following tariff records pursuant to 18 C.F.R. § 154.112(b) (2024) and Part 154, Subpart C of the Commission’s regulations.<sup>6</sup>

Part VII, Sections 33.1 and 33.2 are updated to reflect a receipt point redesignation from KEYSTONE to IRAMSEYS for the period May 1, 2025 through July 31, 2025 for SoCal’s Agreement No. 615178-FT1EPNG.

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<sup>2</sup> *El Paso Natural Gas Co.*, Docket No. RP25-426-000 (Feb. 13, 2024) (unpublished letter order).

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

<sup>4</sup> See Appendix A for a copy of the redesignation report for Agreement No. 615178-FT1EPNG. This report reflects the details regarding SoCal’s redesignation request and EPNG’s approval of such request.

<sup>5</sup> This temporary redesignation is similar to other receipt point redesignations applicable to Agreement No. 615178-FT1EPNG, which were filed by EPNG and accepted by the Commission in Docket Nos. RP24-939-000, RP25-140-000 and RP25-426-000. See, e.g., *El Paso Natural Gas Co.*, Docket No. RP25-426-000 (Feb. 13, 2025) (unpublished letter order).

<sup>6</sup> See 18 C.F.R. §§ 154.201 – 154.210 (2024) (Subpart C).

**Procedural Matters**

In accordance with the applicable provisions of Part 154 of the Commission's regulations,<sup>7</sup> EPNG is submitting an eTariff XML filing package, which includes the following:

- a) a transmittal letter;
- b) Appendix A, a copy of the redesignation report for Agreement No. 615178-FT1EPNG; and
- d) clean and marked versions of the tariff records in PDF format.

EPNG respectfully requests the Commission accept the tendered tariff records for filing and permit them to become effective May 1, 2025, contemporaneous with the effective date of the point redesignation. As such, EPNG requests the Commission waive the notice requirements as permitted by 18 C.F.R. § 154.207 (2024) of the Commission's regulations.<sup>8</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 into effect at the end of any minimal suspension period specified by the Commission.

Correspondence and communications concerning this filing should be directed to:

Ms. Shelly L. Busby  
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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)).

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<sup>7</sup> 18 C.F.R. §§ 154.1 – 154.603 (2024).

<sup>8</sup> See, e.g., *Gulfstream Natural Gas System, L.L.C.*, 105 FERC ¶ 61,164, at P 11 (2003).

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 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 30<sup>th</sup> day of April 2025.

/s/

Shelly L. Busby

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