



December 6, 2018

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

Attention: Ms. Kimberly D. Bose, Secretary

Re: FERC Form No. 501-G;
Ruby Pipeline, L.L.C.;
Docket No. RP19-

Commissioners:

Pursuant to the requirements recently adopted by the Federal Energy Regulatory Commission ("Commission" or "FERC") in Order No. 849 ("Final Rule")¹ and which will be codified, in part, at 18 C.F.R. § 260.402, Ruby Pipeline, L.L.C. ("Ruby")² hereby submits its FERC Form No. 501-G ("Form 501-G") filing and has elected Option 3 as part of that filing to demonstrate that an adjustment to its rates is not warranted at this time based on its individual facts and circumstances.

Ruby reiterates and incorporates by reference the comments filed by the Kinder Morgan Entities to the Commission's Notice of Proposed Rulemaking³ and in the Kinder Morgan Entities' Request for Rehearing.⁴ Nevertheless, Ruby must comply with the Final Rule which is subject to further Commission or potential court review. In doing so, Ruby stresses that the resulting outputs of the form are misleading, have little resemblance to a litigated or settled outcome, and are not indicative of Ruby's actual rate of return, actual cost of service, or rates that would result from a rate case initiated under sections 4 or 5 of the Natural Gas Act.⁵

¹ *Interstate and Intrastate Natural Gas Pipelines; Rate Changes Relating to Federal Income Tax Rate*, Order No. 849, 83 Fed Reg. 36,672 (July 30, 2018); FERC Stats. & Regs., Regs. Preambles ¶ 31,404 (2018) ("Final Rule").

² Ruby is a limited liability company and is indirectly held by Kinder Morgan, Inc. and a United States subsidiary of Pembina Pipeline Corporation ("Pembina"). All of Ruby's activities are included in the tax returns of owners of Ruby's members which are taxable as C-corporations. For purposes of providing the information for Case 3 as part of determining and deriving a capital structure in the form, the SEC Form 6-K is used as the source of information for Pembina and a weighted capital structure is calculated for Pembina and Kinder Morgan, Inc. Form 501-G, however, selects Case 4 to derive the capital structure used in its calculations.

³ *Interstate and Intrastate Natural Gas Pipelines; Rate Changes Relating to Federal Income Tax Rate*, Notice of Proposed Rulemaking, 83 Fed Reg. 12,888 (Mar. 26, 2018); FERC Stats. & Regs., Proposed Regs. ¶ 32,725 (2018).

⁴ It is inconsistent with the Natural Gas Act to force pipelines to submit the Form 501-G in its current form, structured to result in an indicated cost of service reduction.

⁵ Ruby's submission of the Form 501-G without adjustment through the submission of an Addendum or otherwise is in no way an indication that Ruby concurs with or supports the use of any inputs reflected on its Form 501-G for ratemaking purposes.

No Further Action is Warranted at this Time

In the Final Rule, the Commission required interstate pipelines to make a one-time informational filing, the Form 501-G, for evaluating the impact of the Tax Cuts and Jobs Act on interstate natural gas pipelines' revenue requirements.⁶ The Commission acknowledged in the Final Rule that a rate reduction may not be "justified" for various pipelines at this time:

[d]espite the reduction in the corporate income tax and the change in policy concerning MLP Tax allowances, a rate reduction may not be justified for a significant number of pipelines. For example, the pipeline's existing rates may not fully recover its cost of service or a rate moratorium may prohibit changes at this time. Pipelines may include with their filing of the FERC Form No. 501-G a statement explaining why these or other reasons justify their not changing their rates at this time.⁷

The Form 501-G calculates a Total Estimated ROE with adjusted tax allowance of 5.2% for Ruby. The amount produced by the form is significantly below the indicative rate of 10.55% selected by the Commission to evaluate whether an investigation should be initiated.⁸ This indicates, according to the form, that Ruby is not fully recovering its cost of service. Additionally, as of December 31, 2017, approximately 95% of Ruby's firm transportation agreements include negotiated rates. These agreements are at a fixed negotiated rate that is below the maximum tariff rates. The fixed negotiated rate agreement is binding on Ruby and its customer, and therefore any potential adjustment in Ruby's rates would not result in an adjustment to the contract rates.⁹ Accordingly, based on its facts and circumstances, no adjustment to Ruby's rates is warranted at this time.

Procedural Requirements

Ruby is submitting concurrently its completed, unadjusted Form 501-G in native format with formulas intact.¹⁰ Ruby has attached as Appendix A hereto a PDF version of that form.

⁶ See, e.g., Final Rule at P 63

⁷ *Id.* at P 222 (Emphasis added.).

⁸ See Final Rule at P 103.

⁹ See Final Rule at PP 246-47.

¹⁰ Line no. 31 of page 1 of Ruby's Form 501-G reflects the amortization of the excess accumulated deferred income taxes (ADIT) associated with Ruby's regulatory liability Account No. 254 to reflect the 21% reduced federal income tax rate. Consistent with Commission and IRS normalization requirements and the Form 501-G, Ruby intends to employ the Reverse South Georgia method to amortize its excess ADIT balance over the estimated weighted average remaining life of its assets as of December 31, 2017.

Communications

The names, titles, and mailing addresses of the persons to whom communications concerning this filing are to be addressed and to whom service is to be made are as follows:¹¹

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Conclusion

Based on Ruby's individual facts and circumstances as just described, an adjustment to Ruby's rates is not warranted at this time. This submission is being made solely to comply with the Final Rule. Nothing in this filing should be construed as being supported or proposed by Ruby as the appropriate amount or level of costs, or the methodology for functionalizing, classifying or allocating costs, or designing or establishing rates. This filing is without prejudice to any filings made on behalf of Ruby or the Kinder Morgan Entities in this proceeding, Docket No. RM18-11-000 and Docket No. RP18-415-000, including their Request for Rehearing, as well as any petitions for rehearing, stay, or judicial review of any orders that may be issued in the referenced proceedings or this proceeding.

Respectfully submitted,

RUBY PIPELINE, L.L.C.

By _____ /s/
William D. Wible
Vice President, Regulatory

¹¹ Ruby respectfully requests waiver of the restriction in 18 C.F.R. § 385.203(b)(3) (2018) to allow more than two individuals representing Ruby to be included on the official service list for this proceeding.

Appendix A

FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act

Cost of Service

Pipeline
Company
Name

Ruby Pipeline, L.L.C.

Line No.	(A) Description	(B) Form 2 Reference	(C) Calendar Year 2017 Actuals	(D) Net Amort. of Excess/ Deficient ADIT	(E) With Adjusted Tax Allowance
3	CID	C000986			
4	Is the Pipeline a separate income taxpaying entity? Does it conduct business, realize net income or loss, pay income taxes and distribute profits to shareholders?		Yes		
Cost of Service - Non Fuel					
Operating, Maintenance and Administrative & General					
5	Total Production & Gathering	P. 317; L. 30, C. (b)	\$ -		\$ -
6	Total Products Extraction	P. 318; L. 58, C. (b)	-		-
7	Total Natural Gas Storage	P. 322; L. 177, C. (b)	-		-
8	(Less) UG Compressor Station Fuel & Power	P. 320; L. 106, C. (b)	-		-
9	(Less) Other Compressor Station Fuel & Power	P. 321; LL. 131 & 132, C. (b)	-		-
10	(Less) LNG Compressor Station Fuel & Power	P. 322; LL. 157 & 158, C. (b)	-		-
11	Net Storage Costs	L. 7 minus LL. 8-10	-		-
12	Total Transmission	P. 323; L. 201, C. (b)	8,801,020		8,801,020
13	(Less) Gas for Compressor Station Fuel	P. 323; L. 184, C. (b)	443,588		443,588
14	(Less) Other Fuel & Power for Compressor Stns. (if included in true-up or tracking mechanism)	P. 323; L. 185, C. (b)	10,343,628		10,343,628
15	Net Transmission Costs	L. 12 minus LL. 13-14	(1,986,196)		(1,986,196)
16	Administrative & General	P. 325; L. 270, C. (b)	9,137,774		9,137,774
17	Total Operating, Maintenance and Admin. & Gen.	Sum of LL. 4, 5, 10, 14, 15	\$ 7,151,578		\$ 7,151,578
18	Depreciation, Depletion, and Amortization	Form 2 - P. 337; L. 12, C. (h) Form 2A - P. 114; LL. 6-8, C. (c)	106,736,181		106,736,181
19	Amort. of Plant Acq. Adj. If 'yes' to P. 2; L. 5 of Form 501-G then 0, else P. 114; L. 9, C. (c)		-		-
Credits to Cost of Service					
20	Regulatory Debits (if incl. in a § 4 rate filing)	P. 114; L. 12, C. (c)	-		-
21	(Less) Regulatory Credits (if incl. in a § 4 rate filing)	P. 114; L. 13, C. (c)	-		-
22	Other Taxes	P. 114; L. 14, C. (c)	24,176,208		24,176,208
Return					
23	Long Term Debt	P. 2; L. 27 of Form 501-G	85,853,166		85,908,903
24	Preferred Stock (or equivalent)	P. 2; L. 28 of Form 501-G	-		-
25	Common Equity	P. 2; L. 29 of Form 501-G	196,852,912		196,980,712
26	Total Return		282,706,078		282,889,616
Allowance for Income Taxes					
27	Federal Income Tax Rate	P. 5; L. 3 of Form 501-G	35.00%		21.00%
28	Weighted Average State Income Tax Rate	P. 5; L. 4 of Form 501-G	0.00%		0.00%
29	Composite Income Tax Rate	P. 5; LL. 3-6 of Form 501-G	35.00%		21.00%
30	Income Tax Allowance on Equity Return	[(L. 24+L. 25)*(L. 29/(1-L. 29))]	105,997,722		52,361,961
31	(Less) Net Amort. of Excess(+) and/or Deficient(-) ADIT (Year 1 amortization)		-	1,946,697	1,946,697
32	Total Income Tax Allowance	L. 30 minus L. 31	105,997,722		50,415,265
33	Total Cost of Service - Non Fuel	Sum of LL. 17-20, 22, 26, 32 less L. 21	\$ 526,767,767		\$ 471,368,847
34	Indicated Cost of Service Reduction	1 minus [L. 33, C. (E) divided by L. 33, C. (C)]			10.5%

**FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act**

**Rate Base
Ruby Pipeline, L.L.C.**

Line No.	(A) Description	(B) Form 2 Reference	(C) Calendar Year 2017 Actuals	(D) Excess/ Deficient ADIT Adjustment	(E) With Adjusted Tax Allowance
Rate Base					
1	Gas Plant in Service	P. 110; L. 2, C. (c)	\$ 3,733,483,454		\$ 3,733,483,454
2	Accumulated Depreciation	P. 110; L. 5, C. (c)	678,883,255		678,883,255
3	Acquisition Adjustment	P. 200; L. 12, C. (b)	-		-
4	(Less) Amort. of Plant Acquisition Adjustment	P. 200; L. 32, C. (b)	-		-
5	No Has the pipeline received permission to include Acq. Adjustment(s) in Rate Base? If no, provide amounts as a reduction to Rate Base.				
6	FERC Order Cite				
7	Net Acquisition Adjustment	If L. 5 is yes, then zero; else L. 3 minus L. 4	-		-
8	Net Plant	L. 1 minus L. 2 minus L. 7	3,054,600,199		3,054,600,199
Gas Stored Underground					
9	Base Gas - Account No. 117.1	P. 220; L. 5, C. (b)	-		-
10	System Balancing - Account No. 117.2	P. 220; L. 5, C. (c)	-		-
Working Capital					
11	Prepayments	P. 111; L. 54, C. (c)	-		-
12	Materials and Supplies	P. 111; L. 45, C. (c)	4,346,301		4,346,301
ADIT and Regulatory Assets and Liabilities					
13	Accumulated Deferred Income Taxes (IT)	P. 235; L. 3, C. (k)(see footnote)	12,550,787		12,550,787
14	(Less) Accum. Deferred IT - Other Property	P. 275; L. 3, C. (k)(see footnote)	65,267,919		65,267,919
15	(Less) Accum. Deferred IT - Other	P. 277; L. 3, C. (k)(see footnote)	5,554,054		5,554,054
16	Other Regulatory Assets	P. 232; L. 40, C. (g)	54,076,172	-	54,076,172
17	(Less) Other Regulatory Liabilities	P. 278; L. 45, C. (g)	56,219,586	-	54,272,889
18	Rate Base	Sum of LL. 8 - 13 minus LL. 14-15 plus L. 16 minus L. 17	\$ 2,998,531,900		\$ 3,000,478,597

The Commission will apply Opinion No. 414, et al. in reviewing data submitted on page 4. Opinion No. 414, et al. requires that the pipeline's, or the parent's debt if using the parent's capital, must be issued in its name, be publicly traded, and be rated by a rating agency. The pipeline or parent must have a proper capital structure, which for purposes of FERC Form No. 501-G must have an equity ratio less than 65%.

Opinion No. 414, 80 FERC ¶ 61,157 (1997); reh'g denied, Opinion No. 414-A, 84 FERC ¶ 61,084 (1998).

Employing the data provided on Page 4 for capital structure and the component costs of Long Term Debt and Preferred Stock, the Pipeline's cost of capital for purposes of FERC Form No. 501-G will be based upon Case 2 - amounts obtained from Page 218a of the FERC Form No. 2.

Summary of Page 4 Capital Structure and Capital Component Costs	Case 1	Case 2	Case 3	Case 4
	Balance Sheet & Income Statement	Page 218a	Parent's SEC Form 10K	Hypothetical
19) 1) Is the debt issued in the entity's name and traded?	Yes	Yes	No	
20) 2) Is the debt rated by a rating agency?	Yes	Yes	No	
21) 3) Is the equity ratio less than 65%?	No	Yes	Yes	
22) Each of the three above questions must be answered yes as the basis for using the capital structure and individual capital component cost.	Not using Case 1 per Opinion No. 414 et al	All are 'Yes', using Case 2	Using Case 2	Using Case 2

		<u>Capitalization Ratio</u>	<u>Component Cost</u>	<u>Wtd. Cost of Capital</u>	
23	Long Term Debt	P. 4 of Form 501-G	37.77%	7.58%	2.86%
24	Preferred Stock (or equivalent)	P. 4 of Form 501-G	0.00%	0.00%	0.00%
25	Common Equity	P. 4 of Form 501-G	62.23%	10.55%	6.56%
26	Total Return	Sum of LL. 23 - 25	100.00%		9.43%
27	Return - Long Term Debt	L. 18 times L. 23, C. (E)	\$ 85,853,166	\$	85,908,903
28	Return - Preferred Stock (or equivalent)	L. 18 times L. 24, C. (E)	-		-
29	Return - Common Equity	L. 18 times L. 25, C. (E)	196,852,912		196,980,712
30	Total Return	Sum of LL. 27 - 29	\$ 282,706,078	\$	282,889,616

FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act

Return on Equity
Pre Tax Cut and Pro Forma Post Tax Cut
Ruby Pipeline, L.L.C.

Line No.	(A) Description	(B) Form 2 Reference	(C) Calendar Year 2017 Actuals	(D) With Adjusted Tax Allowance	(E) Rate Moratorium Option 12% ROE Test
Operating Revenue					Indicated Cost of Service Reduction of 10.5%
1	Total Operating Revenues	P. 301; L. 21, C. (h)	\$ 344,539,993	\$ 344,539,993	
2	(Less) Sales for Resale (Acct. Nos. 480-484)	P. 301; L. 4, C. (h)	-	-	
3	(Less) Commercial & Industrial Sales	P. 301; L. 2, C. (h)	-	-	
4	(Less) Gas Sales & Other Adj. from Acct. No. 495	P. 308; L. 10, C. (b)	-	-	
5	(Less) Fuel Related Revenues Incl. in Total Revenues per Pipeline		-	-	
6	Total Adjusted Revenue	L. 1 minus sum of LL. 2-5	\$ 344,539,993	\$ 344,539,993	\$ 308,305,537
7	<input checked="" type="checkbox"/> Yes Enter 'Yes' or 'No' - Does the Pipeline track or true-up fuel retention?				
8	<input checked="" type="checkbox"/> Yes Enter 'Yes' or 'No' - Does the Pipeline have stated fuel rates?				
Calculation of Return On Equity - Pre Tax Cut and Pro Forma Post Tax Cut					
9	Total Operating, Maintenance and Admin. & Gen.	P. 1; L. 17 of 501-G	\$ 7,151,578	\$ 7,151,578	\$ 7,151,578
10	Depreciation, Depletion, and Amortization	P. 1; L. 18 of 501-G	106,736,181	106,736,181	106,736,181
11	Amort. of Plant Acq. Adj.	P. 1; L. 19 of 501-G	-	-	-
12	Regulatory Debits (if incl. in a § 4 rate filing)	P. 1; L. 20 of 501-G	-	-	-
13	(Less) Regulatory Credits (if incl. in a § 4 rate filing)	P. 1; L. 21 of 501-G	-	-	-
14	Other Taxes	P. 1; L. 22 of 501-G	24,176,208	24,176,208	24,176,208
15	Non-Fuel Operating Cost Excl. Interest and Taxes	Sum of LL. 9-12 minus L. 13 plus L. 14	138,063,967	138,063,967	138,063,967
16	Operating Income	L. 6 minus L. 15	\$ 206,476,026	\$ 206,476,026	\$ 170,241,570
17	Interest Expense	P. 1; L. 23, C. (C) of 501-G	85,853,166	85,908,903	85,908,903
18	Income Before Income Taxes	L. 16 minus L. 17	\$ 120,622,860	\$ 120,567,123	\$ 84,332,667
Allowance for Income Taxes					
19	Composite Income Tax Rate	P. 1; L. 29 of 501-G	35.00%	21.00%	21.00%
20	Income Taxes	L. 18 times L. 19	\$ 42,218,001	\$ 25,319,096	\$ 17,709,860
21	(Less) Net Amort. of Excess(+) and/or Deficient(-) ADIT	P. 1; L. 31 of 501-G	-	1,946,697	1,946,697
22	Total Income Tax Allowance	L. 20 minus L. 21	42,218,001	23,372,399	15,763,163
23	Net Income	L. 18 minus L. 22	\$ 78,404,859	\$ 97,194,724	\$ 68,569,504
24	(Less) Preferred Dividends	P. 1; L. 24, C. (C) of 501-G	-	-	-
25	Rate Base	P. 2; L. 18 of 501-G	\$ 2,998,531,900	\$ 3,000,478,597	\$ 3,000,478,597
26	Total Estimated ROE (excluding fuel)	[L. 23 - L. 24] / [L. 25 * P. 2; L. 25 C. (C) of 501-G]	4.2%	5.2%	3.7%

**FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act**

**Capital Structure and Component Costs
Ruby Pipeline, L.L.C.**

Line No.	(A) Description	(B) Form 2 Reference	(C) Capitalization	(D) Capitalization Ratio	(E) Capital Component Cost Rate	(F) Weighted Cost of Capital
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The Commission will use your responses on the following four cases to evaluate your capital structure and capital component costs for Form No. 501-G: Case 1, balance sheet and income statement; Case 2, Page 218a of Form No. 2; Case 3, the parent's financial statements as filed in its SEC Form 10-K; or Case 4, a hypothetical capital structure and capital component costs.

Case 1. Cost of Capital based upon amounts obtained from the Balance Sheet and Income Statement.

Cost of Debt and Preferred Stock						
1	Interest	P. 116; LL. 62-68, C. (c)	\$ 72,694,246	= 7.7%		
2	Long-Term Debt	P. 112; L. 24, C. (c)	\$ 943,750,000			
3	Preferred Dividends	P. 120a; L. 68, C. (b)	\$ -	= 0		
4	Preferred Stock (or equivalent)	P. 112; L. 3, C. (c)				
5	Common Equity	P. 112; L. 15, C. (c)	\$ 2,195,880,229			

Cost of Capital						
6	Long-Term Debt	L. 3	\$ 943,750,000	30.06%	7.70%	2.32%
7	Preferred Stock (or equivalent)	L. 5	\$ -	0.00%	0.00%	0.00%
8	Common Equity	L. 6 minus L. 5	\$ 2,195,880,229	69.94%	10.55%	7.38%
9	Totals		\$ 3,139,630,229	100.00%		9.69%

Yes Enter 'Yes' or 'No' - Is all of the debt listed on L. 3 above issued in the pipeline's name and publicly traded?

Yes Enter 'Yes' or 'No' - Is all the debt listed on L. 3 above rated by a rating agency?

Case 2. Cost of Capital based upon amounts obtained from Page 218a of the FERC Form No. 2.

	P. 218a	Column (b)	Column (c)	Column (d)		
14	Long-Term Debt	L. 3	\$ 1,075,000,000	37.77%	7.58%	2.86%
15	Preferred Stock (or equivalent)	L. 4	\$ -	0.00%	0.00%	0.00%
16	Common Equity	L. 5	\$ 1,770,968,097	62.23%	10.55%	6.56%
17	Totals		\$ 2,845,968,097	100.00%		9.43%

Yes Are the Values on P. 218a from the books and records of Ruby Pipeline, L.L.C.?

If no, provide the name and stock symbol of the company for the source of the Page 218a amounts.

Ticker	Company Name
18	
19	
20	
21	
22	
23	

Yes Enter 'Yes' or 'No' - Is all of the debt listed on L. 15 above issued in the pipeline's name, or, that of the entity on L. 21? and publicly traded?

Yes Enter 'Yes' or 'No' - Is all of the debt listed on L. 15 above rated by a rating agency?

Case 3. Cost of Capital based upon Parent's Capital Structure and costs for Long Term Debt and Preferred Stock.

24	Long-Term Debt	SEC - 10K	\$ 19,952,366,534	45.51%	4.71%	2.14%
25	Preferred Stock (or equivalent)	SEC - 10K	965,737,052	2.20%	5.01%	0.11%
26	Common Equity	SEC - 10K	22,919,370,518	52.28%	10.55%	5.52%
27	Totals		\$ 43,837,474,104	100.00%		7.77%

Provide the stock symbol(s), the name of the parent company(s), a hyperlink to the parent's SEC Form 10-K, and the associated year:

28	Ticker(s)	KMI, PBA	Company Name(s)	See Transmittal Letter (amounts reflect weighted avg. of KMI/PBA debt/equity at 12/31/2017)
29	Year	2017	10K Hyperlink(s)	http://ir.kindermorgan.com/annual-quarterly-reports https://www.sec.gov/Archives/edgar/dat
30				
31				
32				

No Enter 'Yes' or 'No' - Is all of the debt listed on L. 24 above publicly traded?

No Enter 'Yes' or 'No' - Is all of the debt listed on L. 24 above rated by a rating agency?

Case 4. Cost of Capital based upon FERC Hypothetical Capital Structure and Cost of new Corporate Debt.

33	Long-Term Debt			43.00%	5.00%	2.15%
34	Preferred Stock			0.00%	0.00%	0.00%
35	Common Equity			57.00%	10.55%	6.01%
36	Totals			100.00%		8.16%

FERC Form No. 501-G
One-time Report on Rate Effect of the Tax Cuts and Jobs Act
Current Composite Income Tax Rate
Ruby Pipeline, L.L.C.

Line No.	(A) Description	(B) Form 2 Reference	(C) Weighting	(D) Marginal Tax Rates	(E) Weighted Average Tax Rates
1	Based on the response to Line 4 on Page 1 of Form No. 501-G, Ruby Pipeline, L.L.C.				
2	is a C Corp subject to the 35% tax rate for 2017. Please fill out lines 6 and 9.				
3	Federal Income Tax Rate (FIT) - Calendar Year 2017:				35.00%
4	State Income Tax Rate (SIT) - Calendar Year 2017:				0.00%
5	Composite Tax Rate - Calendar Year 2017:				35.00%
6	Provide the percentage of federal income tax deductible for state income taxes. = (p)				0.00%
7	Composite Tax Rate equals				
8	[FIT Rate * (1 - SIT Rate) / (1 - SIT Rate * FIT Rate * p)] + [SIT Rate * (1 - FIT Rate * p) / (1 - SIT Rate * FIT Rate * p)]				
<u>Tax Rates for C Corps.</u>					
9	Provide the sum of weighted state tax rate(s)	sum of all rows from P. 263b.; C. (q)			0.00%
<u>Tax Rates for Pass Through Entities */</u>					
Federal Income Tax Rates					
10	Subchapter C	per Pipeline's parents' owners	0.0%	0.0%	0.00%
11	Individuals	per Pipeline's parents' owners	0.0%	0.0%	0.00%
12	Mutual Funds	per Pipeline's parents' owners	0.0%	0.0%	0.00%
13	Pensions, IRAs, Keogh Plans	per Pipeline's parents' owners	0.0%	0.0%	0.00%
14	UBTI Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
15	Non-Taxpaying Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
16	Weighted Average Rate		<u>0.00%</u>		<u>0.00%</u>
State and Local Income Tax Rates					
17	Subchapter C	per Pipeline's parents' owners	0.0%	0.0%	0.00%
18	Individuals	per Pipeline's parents' owners	0.0%	0.0%	0.00%
19	Mutual Funds	per Pipeline's parents' owners	0.0%	0.0%	0.00%
20	Pensions, IRAs, Keogh Plans	per Pipeline's parents' owners	0.0%	0.0%	0.00%
21	UBTI Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
22	Non-Taxpaying Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
23	Weighted Average Rate		<u>0.00%</u>		<u>0.00%</u>
24	Provide the date when the marginal tax rates were determined.			mm/dd/yyyy	

*/ Income tax rates and weighting must be consistent with the Commission's *Policy Statement on Income Tax Allowances*, 111 FERC ¶ 61,139 (2005), and the Commission's *Order on Initial Decision and on Certain Remanded Cost Issues*, 113 FERC ¶ 61,277 (2005).