

January 28, 2021

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

Attention: Ms. Kimberly Bose, Secretary

Re: Quarterly FL&U Filing,  
Sierrita Gas Pipeline LLC;  
Docket No. RP21-

Commissioners:

Sierrita Gas Pipeline LLC ("Sierrita") tenders for filing and acceptance by the Federal Energy Regulatory Commission ("Commission") revised tariff records for Part II – Section 2 – Version 6.0.0 of its FERC Gas Tariff, Original Volume No. 1 ("Tariff").

Pursuant to the procedures set forth in Section 13 of the General Terms and Conditions ("GT&C") of Sierrita's Tariff, the tariff record is submitted to reflect adjusted fuel and lost and unaccounted-for gas ("FL&U") reimbursement percentages to become effective March 1, 2021.

### **Reason For Filing**

Section 13 of the GT&C of Sierrita's Tariff states that the FL&U reimbursement percentages shall be updated at least every three months. Sierrita previously filed its quarterly FL&U on October 29, 2020 and those FL&U reimbursement percentages were made effective on December 1, 2020 by the Commission.<sup>1</sup> Thus, as just noted, the subject filing updates the FL&U reimbursement percentages proposed to be effective March 1, 2021.

Section 13.5 (a) of the GT&C explains that the data collection period shall be the three-month period ending two calendar months before the filing date of the FL&U filing ("Data Collection Period"). The Data Collection Period in this filing is the three-month period from September 1, 2020 through November 30, 2020.

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<sup>1</sup> *Sierrita Gas Pipeline LLC*, Docket No. RP21-125-000 (Nov. 13, 2020) (unpublished letter order).

Under Sections 13.6(a)(i) and (ii) of the GT&C, the Fuel Gas and L&U Reimbursement Percentages are comprised of two components : 1) the current period percentages (Projected Fuel Gas or L&U Reimbursement Percentages) based on the Fuel Gas or L&U projected by Sierrita that is required to support transportation service and throughput anticipated during the period of March 1, 2021 through May 31, 2021, and 2) the Fuel Gas or L&U True-up Reimbursement Percentages attributable to the over- or under-recovery of quantities during the Data Collection Period. The calculations of the Total FL&U Reimbursement Percentages are detailed in Appendix A, Schedules 1 and 2.

### **Description of Filing**

Pursuant to Subpart C of Part 154 of the Commission's regulations<sup>2</sup> and Sierrita's Tariff, this filing proposes to decrease its Total Fuel Gas Reimbursement Percentage from 4.80% to 1.30% and to maintain its Total L&U Reimbursement Percentage of 0.00%.<sup>3</sup>

Part II: Stmt. Of Rates, Section 2 have been revised to reflect the new Current Period and True-up components along with the resulting new Total Fuel Gas Percentage and Total L&U Percentage with a proposed effective date of March 1, 2021.

### **Current Period and True-up FL&U Reimbursement Percentages**

#### **Current Period Fuel Gas Reimbursement Percentage**

During the months the Projected ("Current Period") Fuel Gas Reimbursement Percentage will be in effect, March 2021 through May 2021, Sierrita anticipates throughput to average 108,424 Dth per day. This is an increase in forecasted average daily throughput relative to the previous filing that included three months of throughput beginning December 1, 2020. On Sierrita, the spring months typically have higher throughput than the winter months. In order to meet its contractual pressure commitments, Sierrita is forecasting average fuel burn to continue at approximately 1,928 Dth per day. Based on the anticipated throughput and forecasted fuel burn, the Current Period Fuel Reimbursement Percentage will decrease from 3.86% to 1.76%.<sup>4</sup>

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<sup>2</sup> 18 C.F.R. §§ 154.201 – 154.210 (2020).

<sup>3</sup> See Appendix A, Schedules 1 and 2.

<sup>4</sup> See Appendix A, Schedule 1, line 11, column (b).

Fuel Gas True-up Reimbursement Percentage

The Fuel Gas True-up Reimbursement Percentage is computed in Appendix A, Schedule 1 using the Data Collection Period of September 1, 2020 through November 31, 2020 as described earlier.<sup>5</sup>

During the Data Collection Period, Sierrita over-collected Fuel Gas quantities of 24,362 Dth<sup>6</sup> and also over-collected Fuel Gas quantities of 1,216 Dth that were expected to be true-up from previous filings.<sup>7</sup> In addition and as discussed below, Sierrita also over-collected L&U quantities due to gains in L&U experienced during the Data Collection Period.<sup>8</sup> Pursuant to Section 13.4 of the GT&C, Sierrita prohibits L&U Reimbursement Percentages less than zero percent.<sup>9</sup> Therefore, the over-collected L&U quantity of 20,309 Dth<sup>10</sup> is included in the computation of the Fuel Gas True-Up Percentage. The over-collected Fuel Gas and over-collected L&U quantities results in a total over-collection of 45,887 Dth.<sup>11</sup> Based on this over-collected amount and the anticipated throughput discussed earlier, Sierrita proposes to return these quantities to its shippers through a Fuel Gas True-up Reimbursement Percentage of negative 0.46%. The sum of the Current and True-up Fuel Gas Reimbursement Percentages results in a Total Fuel Gas Reimbursement Percentage of 1.30% for the period these percentages are in effect.

Current Period L&U Reimbursement Percentage

Sierrita has experienced gains of L&U quantities for many of the past twelve months. Considering the recent experience over the past year and Sierrita's tariff that prohibits an L&U Reimbursement Percentage less than zero percent,<sup>12</sup> Sierrita is forecasting its Current Period L&U Reimbursement Percentage during the period of March 2021 through May 2021 to be 0.00%.

L&U True-up Reimbursement Percentage

The L&U True-up Reimbursement Percentage is computed in Appendix A, Schedule 2 using the Data Collection Period from September 1, 2020 through

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<sup>5</sup> See Section 13.5 (a) of the GT&C.

<sup>6</sup> See Appendix A, Schedule 1, line 3.

<sup>7</sup> See Appendix A, Schedule 1, line 6.

<sup>8</sup> See Appendix B, Schedule 1, line 12, column (k).

<sup>9</sup> See GT&C Section 13.4 – Neither the Fuel Gas Reimbursement Percentage nor the L&U Reimbursement Percentage shall be less than zero. See Appendix A, Schedule 2, line 11, column (b).

<sup>10</sup> See Appendix A, Schedule 1, line 7.

<sup>11</sup> See Appendix A, Schedule 1, line 8.

<sup>12</sup> GT&C Section 13.4 – Neither the Fuel Gas Reimbursement Percentage nor the L&U Reimbursement Percentage shall be less than zero. See Appendix A, Schedule 2, line 11, column (b).

November 30, 2020. As demonstrated on Schedule 2, Sierrita experienced over-collected L&U quantities of 20,309 Dth<sup>13</sup> during the Data Collection Period. Removing the over-collected L&U quantities to include them in the calculation of the Fuel Gas True-Up Percentage calculation as discussed earlier, results in an L&U true-up quantity of zero and an L&U True-up Reimbursement Percentage of zero percent.<sup>14</sup>

Adding the Current and True-up L&U Reimbursement Percentages sums to a Total L&U Reimbursement Percentage of 0.00% for the period these percentages are in effect.

### **18 C.F.R. § 154.204 Discussion**

Pursuant to 18 C.F.R. § 154.204 (2020) of the Commission's regulations, Sierrita states the following:

- a) Sierrita does not anticipate any increase in revenues as a result of this filing.
- b) Sierrita is not aware of any other filings pending before the Commission that may significantly affect this filing.

### **Procedural Matters**

In accordance with the applicable provisions of Part 154 of the Commission's regulations<sup>15</sup> Sierrita is submitting an eTariff filing XML package, which includes the following:

- a) a transmittal letter;
- b) workpapers under Appendices A-C in PDF format; describing the FL&U reimbursement percentages;
- c) the clean and marked versions of each tariff record in PDF format.

Sierrita respectfully requests the Commission accept the tendered tariff records for filing and permit them to become effective on March 1, 2021. With respect to any tariff provisions the Commission allows to go into effect without change, Sierrita hereby moves to place the tendered tariff provisions into effect at the end of any minimal suspension period specified by the Commission. In addition, Sierrita respectfully requests that the Commission grant any necessary waivers in order for the proposed percentages to be accepted.

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<sup>13</sup> See Appendix A, Schedule 2, line 3.

<sup>14</sup> See Appendix A, Schedule 2, lines 8 & 12.

<sup>15</sup> 18 C.F.R. §§ 154.101 – 154.603 (2020).



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 Sierrita's system, and interested state regulatory commissions, in accordance with the requirements of Section 154.208 and 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 28th day of January 2021.

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**Sierrita Gas Pipeline, LLC  
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**Sierrita Gas Pipeline, LLC  
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**Appendix A  
FL&U Reimbursement Percentages**



**Sierrita Gas Pipeline, LLC**  
**Fuel Percentage Calculation**  
(Quantities in Dth unless otherwise noted)

Line No.	Description (a)	(b)
	<b>Fuel</b>	
1	Fuel Burned (September 2020 - November 2020) 1/	177,516
2	Current Period Fuel Retained (September 2020 - November 2020) 2/	201,878
3	Current Period Fuel Deficiency/(Gain) [line 1 - line 2]	(24,362)
4	True-up quantity sought in Docket No. RP20-1052-000 3/	24,011
5	True-up fuel retained (September 2020 - November 2020) 4/	25,227
6	True-up Deficiency/(Gain) [line 4 - line 5]	(1,216)
7	Over-collection of L&U netted against Fuel 5/	(20,309)
8	Total to be trued-up [line 3 + line 6 + line 7]	(45,887)
9	Projected Fuel Requirement (March 2021 - May 2021) 6/	175,431
10	Projected System Receipts (March 2021 - May 2021) 7/	9,975,000
11	Current Period Fuel Reimbursement Percentage [line 9 / line 10]	1.76%
12	Fuel True-Up Reimbursement Percentage [line 8 / line 10]	-0.46%
13	Total Fuel Reimbursement Percentage [line 11 + line 12]	1.30%

## Notes:

- 1/ See Appendix C, Schedule 1, Page 1, Column (b), Line 3.
- 2/ See Appendix C, Schedule 1, Page 1, Column (b), Line 6.
- 3/ See Appendix A, Schedule 1, Page 1, Column (b) Line 8 of Docket No. RP20-1052-000
- 4/ See Appendix C, Schedule 1, Page 1, Column (b), Line 12.
- 5/ As required by Section 13.6 of the General Terms and Conditions of Sierrita's Tariff, Sierrita has netted over-collected quantities of L&U against projected fuel quantities. See Appendix A - Schedule 2, Page 1, line 3,
- 6/ The projected fuel usage based on projected throughput and pressure requirements.
- 7/ Throughput projected for March 2021 through May 2021 averages 108,424 Dth/day.

**Sierrita Gas Pipeline, LLC**  
**L&U Percentage Calculation**  
(Quantities in Dth unless otherwise noted)

Line No.	Description (a)	(b)
	<b>L&amp;U</b>	
1	L&U Experienced (September 2020 - November 2020) 1/	(20,309)
2	Current Period L&U Retained (September, 2020 - November 2020) 2/	-
3	Current Period L&U Deficiency/(Gain) [line 1 - line 2]	(20,309)
4	Quantity expected to be trued-up from previous filings	-
5	True-up L&U retained (September 2020 - November 2020)	-
6	True-up Deficiency/(Gain) [line 4 - line 5]	-
7	Over-collection of L&U to be netted against Fuel 3/	20,309
8	Total to be trued-up [line 3 + line 6 + line 7]	(0)
9	Projected L&U (March 2021 - May 2021) 4/	-
10	Projected System Receipts (March 2021 - May 2021) 5/	9,975,000
11	Current Period L&U Reimbursement Percentage [line 9 / line 10]	0.00%
12	L&U True-up Reimbursement Percentage [line 8 / line 10]	0.00%
13	Total L&U Reimbursement Percentage [line 11 + line 12]	0.00%

## Notes:

- 1/ See Appendix C, Schedule 2, Page 1, Column (b), Line 4.
- 2/ See Appendix C, Schedule 2, Page 1, Column (b), Line 7.
- 3/ As required by Section 13.6 of the General Terms and Conditions of Sierrita's Tariff, Sierrita has netted over-retained quantities of L&U during the collection period against projected fuel.
- 4/ The projected L&U requirement is set at 0.00% based on recent operating experience. Sierrita has experienced L&U gains over many of the past twelve months. As required by Section 13.4 of the GT&C in Sierrita's Tariff, neither the Fuel no L&U Reimbursement Percentages shall be less than zero.
- 5/ Throughput projected for March 2021 through May 2021 averages 108,424 Dth/day.

**Sierrita Gas Pipeline, LLC  
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**Appendix B  
Physical Gas Balance**

**Sierrita Gas Pipeline, LLC  
Physical Gas Balance**

<b>Receipts (Dth's)</b>											
<b>Line No.</b>	<b>Item</b>	L&U Balance 4-12-2020	Apr 13-30, 2020	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Data collection Period Sep 2020 through Nov 2020
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k) (h)+(i)+(j)
1	EPNG/SIERRITA (DSNJQUIN) SAN JOAQUIN		2,169,486	4,593,028	4,661,062	5,386,109	5,643,890	3,820,957	6,583,799	4,373,496	14,778,252
2	SIERRITA/SIERRITA NET LINE PACK LOSS			6,172	3,386	1,536		3,273	4,855	323	8,451
3	<b>Total System Receipts</b>		<b>2,169,486</b>	<b>4,599,200</b>	<b>4,664,449</b>	<b>5,387,645</b>	<b>5,643,890</b>	<b>3,824,231</b>	<b>6,588,654</b>	<b>4,373,818</b>	<b>14,786,703</b>
<b>Deliveries (Dth's)</b>											
4	GASDEAGU/SIERRITA SASABE PIMA		2,123,038	4,551,329	4,617,584	5,334,631	5,594,609	3,774,152	6,536,337	4,319,007	14,629,496
5	SIERRITA/SIERRITA NET LINE PACK GAIN		16,217				2,087				0
6	<b>Total Deliveries</b>		<b>2,139,255</b>	<b>4,551,329</b>	<b>4,617,584</b>	<b>5,334,631</b>	<b>5,596,696</b>	<b>3,774,152</b>	<b>6,536,337</b>	<b>4,319,007</b>	<b>14,629,496</b>
System Fuel:											
7	FERC Account 810 - Compressor Station Fuel		40,433	59,191	56,275	57,001	57,405	56,468	58,676	61,804	176,947
8	FERC Account 812 - Other Utility Operations 1/ Capitalized Fuel		3,009	189	192	189	190	191	189	188	568
9											
10	<b>Total System Fuel</b>		<b>43,442</b>	<b>59,380</b>	<b>56,467</b>	<b>57,190</b>	<b>57,595</b>	<b>56,659</b>	<b>58,865</b>	<b>61,992</b>	<b>177,516</b>
11	<b>Total System Deliveries</b>		<b>2,182,697</b>	<b>4,610,709</b>	<b>4,674,051</b>	<b>5,391,821</b>	<b>5,654,290</b>	<b>3,830,811</b>	<b>6,595,202</b>	<b>4,380,999</b>	<b>14,807,012</b>
12	L&U Loss (Gain)[Line 3 - Line 11]	(8,987)	(13,212)	(11,509)	(9,603)	(4,176)	(10,400)	(6,580)	(6,548)	(7,181)	(20,309)

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**Appendix C  
Fuel Use and Retained Quantities**

**Sierrita Gas Pipeline, LLC**  
**Transportation Fuel Gas**  
(Quantities in Dth)

**Fuel Gas**

Line No.	Month (a)	Sierrita Compressor Station (b)
1	September-20	56,659
2	October-20	58,865
3	November-20	61,992
4	<b>Total Sep - Nov 2020</b>	<b>177,516</b>

**Current Period Fuel Retained**

Line No.	Month (a)	Fuel Retention (b)
5	September-20	51,289
6	October-20	90,162
7	November-20	60,427
8	<b>Total Sep - Nov 2020</b>	<b>201,878</b>

**Volumetric True-up Fuel Retained**

Line No.	Month (a)	Fuel Retention (b)
9	September-20	6,414
10	October-20	11,261
11	November-20	7,552
12	<b>Total Sep - Nov 2020</b>	<b>25,227</b>

13	True-up quantity sought in Docket No. RP20-1052-000 1/	24,011
14	True-up Remaining [line 13 - line 12]	(1,216)

1/ See Appendix A, Schedule 1, Page 1, Column (b) Line 8 of Docket No. RP20-1052-000

**Sierrita Gas Pipeline, LLC****L&U**

(Quantities in Dth)

**L&U Experienced**

Line No.	Month (a)	L&U (b)
1	September-20	(6,580)
2	October-20	(6,548)
3	November-20	(7,181)
4	<b>Total September - November 2020</b>	<b>(20,309)</b>

**Current Period L&U Retained**

Line No.	Month (a)	L&U Retention (b)
5	September-20	-
6	October-20	-
7	November-20	-
8	<b>Total September - November 2020</b>	<b>-</b>

**Volumetric True-up L&U Retained**

Line No.	Month (a)	L&U Retention (b)
9	September-20	-
10	October-20	-
11	November-20	-
12	<b>Total September - November 2020</b>	<b>-</b>
13	True-up quantity sought in Docket No. RP20-1052-000 1/	-
14	True-up Remaining [line 13 - line 12]	-

1/ See Appendix A, Schedule 2, Page 1, Column (b) Line 8 of Docket No. RP20-1052-000

STATEMENT OF RATES

FUEL GAS AND L&U REIMBURSEMENT PERCENTAGES

	<u>Current Period</u>	<u>True-up</u>	<u>Total</u>
Fuel Gas Percentage	1.76%	-0.46%	1.30%
L&U Percentage	0.00%	0.00%	0.00%



STATEMENT OF RATES

FUEL GAS AND L&U REIMBURSEMENT PERCENTAGES

	<u>Current Period</u>	<u>True-up</u>	<u>Total</u>
Fuel Gas Percentage	<del>13.786%</del>	<del>-0.4694%</del>	<del>14.380%</del>
L&U Percentage	0.00%	0.00%	0.00%