



Tennessee Gas Pipeline  
Company, L.L.C.  
a Kinder Morgan company

March 27, 2018

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Tennessee Gas Pipeline Company, L.L.C.  
Amendment to Negotiated Rate Agreement  
Service Package No. 301591  
Docket No. RP18-\_\_\_\_ -000

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act (“NGA”) and Part 154 of the Regulations of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. Part 154, Tennessee Gas Pipeline Company, L.L.C. (“Tennessee”), hereby tenders for filing the attached amended Exhibit A (reflecting certain receipt point amendments) to Service Package No. 301591, between Tennessee and Mex Gas Supply, S.L. (“Mex Gas”) (Service Package No. 301591 shall be referred to herein as the “Mex Gas Service Agreement”).<sup>1</sup>

Tennessee submits the amended Exhibit A for inclusion in Section 4.13.1 of First Revised Volume No. 2 of Tennessee’s FERC Gas Tariff (“Tariff”). The proposed Tariff record is listed on Appendix A.

Tennessee respectfully requests that the Commission accept and approve the amended Exhibit A and the revised Tariff record effective on April 1, 2018.

### **Statement of Nature, Reasons, and Basis for the Filing**

On August 30, 1996, in Docket No. RP96-312-000, the Commission approved, subject to conditions, Tennessee’s July 16, 1996 tariff filing authorizing Tennessee to charge negotiated rates for its transportation and storage services.<sup>2</sup> Tennessee made its negotiated rate filing pursuant to the Commission’s *Policy Statement*, which the Commission issued on January 31,

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<sup>1</sup> The Mex Gas Service Agreement, which contains negotiated rates and non-conforming provisions, was approved by the Commission in Docket Nos. RP16-1306-000 and RP16-1306-001 on October 20, 2016.

<sup>2</sup> *Tennessee Gas Pipeline Co.*, 76 FERC ¶ 61,224, *order on reh’g*, 77 FERC ¶ 61,215 (1996).

1996, and modified on July 25, 2003.<sup>3</sup> Both the *Policy Statement* and the orders approving Tennessee's negotiated rate option require Tennessee, when implementing a negotiated rate contract, to file either the contract or tariff sheets identifying and describing the transaction.<sup>4</sup> The Commission has stated that pipelines' negotiated rate filings must disclose all consideration linked to the agreement.<sup>5</sup> As to the disclosure of consideration, the Commission stated, "in any pipeline filing of a negotiated rate agreement, any other agreement, understanding, negotiation or consideration linked to the agreement must be disclosed in the pipeline's filing."<sup>6</sup>

Pursuant to Section 4.7 of Rate Schedule FT-A and Article XXVI, Section 5.7 of the General Terms and Conditions of Tennessee's Tariff, Mex Gas has submitted a valid request to amend its primary receipt points under the Mex Gas Service Agreement as follows:

<u>Meter Name</u>	<u>Meter Number</u>	<u>Existing TQ</u>	<u>Amended TQ</u>
DCP MIDS/TGP UDP TIJERINA DEHY JIM	412356	30,000 Dth/d	-0- Dth/d
ETP/TGP GILMORE PLANT RESIDUE HIDAL	412458	12,000 Dth/d	42,000 Dth/d

Tennessee has reviewed Mex Gas' request, and has agreed to permit the requested primary receipt point amendments. Tennessee is including herewith a marked copy of Exhibit A showing the amended primary receipt points and associated meter quantities under the Mex Gas Service Agreement. Other than the primary receipt points and associated meter quantities, all other substantive terms of the Mex Gas Service Agreement remain the same as the agreement previously filed in this docket.

### **Materials Enclosed**

In accordance with the applicable provisions of Part 154 of the Commission's regulations, Tennessee provides an eTariff .xml filing package containing:

- (1) A transmittal letter in PDF format with Appendix A attached;
- (2) A revised Tariff record in RTF format with metadata attached;

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<sup>3</sup> Statement of Policy on Alternatives to Traditional Cost-of-Service Ratemaking for Natural Gas Pipelines and Regulation of Negotiated Transportation Services of Natural Gas Pipelines, 74 FERC ¶ 61,076 (1996); Natural Gas Pipeline Negotiated Rate Policies and Practices, 104 FERC ¶ 61,134 (2003) ("*Policy Statement*").

<sup>4</sup> *Tennessee Gas Pipeline Co.*, 77 FERC at 61,877; *Policy Statement*, 74 FERC at 61,241.

<sup>5</sup> *Columbia Gulf Transmission Co.*, 85 FERC ¶ 61,373 (1998).

<sup>6</sup> *Id.* at 62,424.

- (3) A clean and marked version of the Tariff record in PDF format for posting on eLibrary;
- (4) A copy of the entire filing in PDF format for posting on eLibrary.

### **Service and Correspondence**

The undersigned certifies that a copy of this filing has been served electronically pursuant to 18 C.F.R. § 154.208 on Tennessee's customers and affected state regulatory commissions. A paper copy of this filing may only be served if a customer has been granted waiver of electronic service pursuant to 18 C.F.R. Part 390 of the Commission's regulations. In addition, an electronic copy of this filing is available for public inspection during regular business hours in Tennessee's office at 1001 Louisiana Street, Houston, Texas 77002.

Pursuant to 18 C.F.R. § 385.2005 and § 385.2011(c)(5) of the Commission's regulations, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best knowledge and belief of the undersigned.

The names, titles, and mailing addresses of the persons to whom correspondence and communications concerning this filing should be directed are as follows:

\*Todd Piczak  
Assistant General Counsel  
Tennessee Gas Pipeline Company, L.L.C.  
1001 Louisiana Street, Suite 1000  
Houston, Texas 77002  
(713) 420-3822  
Todd\_Piczak@kindermorgan.com

\* Carlos Oblitas  
Director, Rates and Regulatory Affairs  
Tennessee Gas Pipeline Company, L.L.C.  
1001 Louisiana Street, Suite 1000  
Houston, TX 77002  
(713) 420-3297  
Carlos\_Oblitas@kindermorgan.com

\*Persons designated for service in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010. Additionally, service via email is requested in lieu of paper copies.

### **Effective Date and Waiver Request**

Tennessee respectfully requests all waivers that may be necessary, including waiver of the 30-day notice period pursuant to Section 154.207 of the Commission's regulations<sup>7</sup>, for the Commission to accept the Mex Gas amended Exhibit A and the related Tariff record listed in Appendix A to become effective on April 1, 2018.

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<sup>7</sup> The Commission has routinely waived the 30-day notice period for negotiated rate filings. *See Statement of Policy on Alternatives to Traditional Cost-of-Service Ratemaking for Natural Gas Pipelines and Regulation of Negotiated Transportation Services of Natural Gas Pipelines*, 74 FERC ¶ 61,076, at 61,241; *see also, Alliance Pipeline L.P.*, 132 FERC ¶ 61,010, at P 10 (2010); *Texas Eastern Transmission, LP*, 130 FERC ¶ 61,189, at n.20 (2010).

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Pursuant to Section 154.7(a)(9) of the Commission's Regulations, Tennessee hereby moves to place the revised Tariff record into effect at the requested effective date.

Any questions regarding this filing may be directed to the undersigned at (713) 420-5771.

Respectfully submitted,

**TENNESSEE GAS PIPELINE COMPANY, L.L.C.**

/s/ Carlos Oblitas \_\_\_\_\_

Carlos J. Oblitas  
Director, Rates and Regulatory Affairs

Enclosures

## APPENDIX A

### Tennessee Gas Pipeline Company, L.L.C.

#### Negotiated Rate Agreements Filing

Issued: March 27, 2018

Effective: April 1, 2018

#### FERC Gas Tariff First Revised Volume No. 2 Tariff Sections

Description	Title	Version
4.13.1 Gas Trans Agmt	Exhibit A	5.0.0

**CLEAN TARIFF SHEETS / RECORDS**  
**Effective April 1, 2018**

EXHIBIT A  
 AMENDMENT NO. 2  
 TO GAS TRANSPORTATION AGREEMENT  
 DATED October 1, 2016  
 BETWEEN  
 TENNESSEE GAS PIPELINE COMPANY, L.L.C  
 AND  
 MEX GAS SUPPLY, S.L

Amendment Effective Date: April 1, 2018

Service Package: 301591-FTATGP

Service Package TQ: 213,000 Dth

Beginning Date	Ending Date	TO
04/01/2018	09/30/2026	213,000 Dth/day

BEGINNING DATE	ENDING DATE	METER	METER NAME	INTERCONNECT PARTY NAME	COUNTY	ST	ZONE	R/D	LEG	METER-TO
04/01/2018	09/30/2026	405345	POOLING PT-100 LEG-ZN 0-SOUTH	TENNESSEE GAS PIPELINE	WHARTON	TX	0	R	100	75000
04/01/2018	09/30/2026	411306	ENTRPRSE/TGP AGUA DULCE NUECES	ENTERPRISE INTRASTATE L.P.	NUECES	TX	0	R	100	10000
04/01/2018	09/30/2026	412400	LOBO/TGP KING RANCH JIM WELLS	LOBO PIPELINE COMPANY LLC	JIM WELLS	TX	0	R	100	11000
04/01/2018	09/30/2026	412458	ETP/TGP GILMORE PLANT RESIDUE HIDAL	ENTERPRISE TEXAS PIPELINE LLC	HIDALGO	TX	0	R	100	42000
04/01/2018	09/30/2026	420826	POOLING PT-100 LEG-ZN 0-NORTH	TENNESSEE GAS PIPELINE	NATCHITOCHE	LA	0	R	100	75000
04/01/2018	09/30/2026	450261	CENEGAS/TGP PEMEX CHECK DELIV SOUT	CENEGAS	HIDALGO	TX	0	D	100	183000
04/01/2018	09/30/2026	421017	GDR/TGP RIO BRAVO HIDALGO	GASODUCTO DEL RIO SA	HIDALGO	TX	0	D	100	30000

Total Receipt TQ: 213,000 Dth/day  
Total Delivery TQ: 213,000 Dth/day

Number of Receipt Points: 5

Number of Delivery Points: 2

Other Provisions Permitted By Tariff Under the Applicable Rate Schedule and/or General Terms and Conditions and Pursuant to Article XXXVI of the General Terms and Conditions of Tennessee's FERC Gas Tariff:

Note: Exhibit A is a reflection of the contract and all amendments as of the amendment effective date.



# **MARKED TARIFF SHEETS / RECORDS**

EXHIBIT A  
 AMENDMENT NO. ~~24~~  
 TO GAS TRANSPORTATION AGREEMENT  
 DATED October 1, 2016  
 BETWEEN  
 TENNESSEE GAS PIPELINE COMPANY, L.L.C  
 AND  
 MEX GAS SUPPLY, S.L

Amendment Effective Date: ~~April 1, 2018~~ ~~October 6, 2016~~

Service Package: 301591-FTATGP

Service Package TQ: 213,000 Dth

Beginning Date	Ending Date	TO
<del>04/01/2018</del> <del>10/01/2016</del>	09/30/2026	213,000 Dth/day

BEGINNING DATE	ENDING DATE	METER	METER NAME	INTERCONNECT PARTY NAME	COUNTY	ST	ZONE	R/D	LEG	METER-TO
<del>04/01/2018</del> <del>10/06/2016</del>	09/30/2026	405345	POOLING PT-100 LEG-ZN 0-SOUTH	TENNESSEE GAS PIPELINE	WHARTON	TX	0	R	100	75000
<del>04/01/2018</del> <del>10/06/2016</del>	09/30/2026	411306	ENTRPRSE/TGP AGUA DULCE NUECES	ENTERPRISE INTRASTATE L.P.	NUECES	TX	0	R	100	10000
<del>10/06/2016</del>	<del>09/30/2026</del>	<del>412356</del>	<del>DCP MIDS/TGP UDP TIJERINA DEHY JIM</del>	<del>DCP MIDSTREAM, LP</del>	<del>JIM WELLS</del>	<del>TX</del>	<del>0</del>	<del>R</del>	<del>100</del>	<del>30000</del>
<del>04/01/2018</del> <del>10/06/2016</del>	09/30/2026	412400	<del>LOBOHGPC/TGP KING RANCH JIM WELLS</del>	<del>LOBO PIPELINE COMPANY LLCHUMBLE GAS PIPELINE CO.</del>	JIM WELLS	TX	0	R	100	11000
<del>04/01/2018</del> <del>10/06/2016</del>	09/30/2026	412458	ETP/TGP GILMORE PLANT RESIDUE HIDAL	ENTERPRISE TEXAS PIPELINE LLC	HIDALGO	TX	0	R	100	<del>42000</del> <del>42000</del>
<del>04/01/2018</del> <del>10/06/2016</del>	09/30/2026	420826	POOLING PT-100 LEG-ZN 0-NORTH	TENNESSEE GAS PIPELINE	NATCHITOCHE	LA	0	R	100	75000
<del>04/01/2018</del> <del>10/06/2016</del>	09/30/2026	450261	<del>CENEGASPEMEXGPLI/TGP PEMEX CHECK DELIV SOUT</del>	<del>CENEGASPEMEX GAS PIPELINE</del>	HIDALGO	TX	0	D	100	183000

<del>04/01/2018</del> 2016	09/30/2026	421017	GDR/TGP RIO BRAVO HIDALGO	GASODUCTO DEL RIO SA HIDALGO	TX	0	D	100	30000
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Total Receipt TQ: 213,000 Dth/day  
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Number of Receipt Points: ~~5~~ 6

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Note: Exhibit A is a reflection of the contract and all amendments as of the amendment effective date.