

November 29, 2018

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

Attention: Ms. Kimberly D. Bose, Secretary

Re: Annual Fuel Reimbursement Percentage Update Filing;
Young Gas Storage Company, Ltd.;
Docket No. RP19-

Commissioners:

Young Gas Storage Company, Ltd. ("Young") tenders for filing and acceptance by the Federal Energy Regulatory Commission ("Commission") Part II: Statement of Rates, Section 2 – Fuel and L&U Rates, Version 6.0.0 for inclusion in its FERC Gas Tariff First Revised Volume No. 1 ("Tariff").

Pursuant to the procedures set forth in Section 13 of the General Terms and Conditions ("GT&C") of Young's Tariff, the tariff record is submitted to revise Young's Fuel Reimbursement percentage.

Background

GT&C Section 13 of Young's Tariff states that the Fuel Reimbursement percentage shall be computed at least annually using the procedures described in that section.¹ The Fuel Reimbursement percentage was last recomputed effective January 1, 2018 in Docket No. RP18-179-000.² As such, Young must submit a filing to the Commission proposing a recomputed Fuel Reimbursement percentage to become effective January 1, 2019.

Reason for Filing

Fuel Reimbursement Percentage Update

The development of the Fuel Reimbursement percentage involves two computations, in which the current period fuel reimbursement and fuel true-up percentages are calculated. First, the current period fuel reimbursement percentage is derived from available system operations data for a twelve-month data collection

¹ The Fuel Reimbursement Percentage is defined in Young's Tariff in GT&C Section 1.21.

² See *Young Gas Storage Co.*, Docket No. RP18-179-000 (Dec. 14, 2017) (unpublished letter order).

period.³ Accordingly, Young used data booked for the twelve-month period consisting of October 1, 2017 through September 30, 2018 to determine its current period fuel reimbursement percentage. The data used was the actual fuel consumed in operations and gas actually received from Shippers for injection into storage. Based on this calculation, the proposed current period component of the Fuel Reimbursement percentage will decrease from 3.25% to 3.16%.

Second, the fuel true-up percentage⁴ was derived from the fuel retention quantities, fuel true-up quantities sought in the previous fuel filing and gas actually received from Shippers for injection into storage. The comparison of actual fuel used quantities to the actual volumetric fuel retention quantities revealed an over-collection of 3,468 Dth. Also, a comparison of the true-up quantities sought in the past fuel filing to the true-up quantities retained indicates a slight under-collection of 530 Dth. The sum of these components results in an over-collection of 2,938 Dth to be returned to the shippers through a negative 0.05% fuel true-up percentage.

Summing the current period fuel reimbursement percentage and fuel true-up percentage yields the proposed Fuel Reimbursement percentage of 3.11%. Young, therefore, proposes to decrease the Fuel Reimbursement percentage from 3.21% to 3.11%.⁵ Detailed calculations supporting the current fuel reimbursement and fuel true-up percentages are provided in Appendices A and B of this transmittal letter.

Description of Filing

Young is submitting this filing, pursuant to Subpart C of Part 154 of the Commission's regulations⁶ and GT&C Section 13 – Fuel Reimbursement of Young's Tariff, in order to revise its Fuel Reimbursement Percentage.

Part II: Statement of Rates is submitted herein to revise the Fuel Reimbursement Percentage calculated pursuant to Section 13 of the GT&C and to modify the presentation of the Percentage as described above.

Procedural Matters

Inasmuch as this filing is fully described in the transmittal letter and Appendices hereto, the statement of the nature, the reasons and the basis for the instant tariff filing required by 18 C.F.R. §154.7(a)(6)(2018) is omitted.

³ See GT&C Section 13.2 for further detail on the data collection period.

⁴ See GT&C Section 13.3 for additional information on the true-up adjustment mechanism.

⁵ See "Annual Fuel Reimbursement Percentage Update Filing," Docket No. RP18-179-000 (Nov. 21, 2017) (accepted by the Commission in *Young Gas Storage Co.*, Docket No. RP18-179-000 (Dec. 14, 2017)).

⁶ 18 C.F.R. §§ 154.201-154.210 (2018).

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

- a. a transmittal letter;
- b. work papers under Appendices A – B in PDF format;
and
- c. the clean and marked versions of the tariff record in PDF format.

Young respectfully requests the Commission accept the tendered tariff record for filing and permit it to become effective on January 1, 2019, which is not less than 30 days or more than 60 days following the date of this filing. With respect to any tariff provisions the Commission allows to go into effect without change, Young hereby moves to place the tendered tariff provisions into effect at the end of the suspension period, if any, specified by the Commission.

Additionally, pursuant to 18 C.F.R. § 154.7(a)(7)(2018), Young respectfully requests that the Commission grant all waivers necessary to effectuate this filing.

Correspondence and communications concerning this filing should be directed to:

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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.⁸

⁷ 18 C.F.R. §§ 154.1 – 154.603 (2018).

⁸ 18 C.F.R. § 385.203 (2018).

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 that (iii) she possesses full power and authority to sign this filing.

Respectfully submitted,

Young Gas Storage Company, Ltd.
Acting by and through its Operator
Colorado Interstate Gas Company, L.L.C.

By: _____/s/_____
M. Catherine Rezendes
Director, Rates

Enclosures

Young Gas Storage Company, Ltd.

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Appendix A

Fuel Reimbursement Percentage

Young Gas Storage Company, Ltd.
Fuel Reimbursement Percentage Calculation
(Quantities in Dth unless otherwise noted)

Line No.	Description (a)	Oct-2017 thru Sep-2018 (b)
Current Period Fuel Quantities		
1	FERC Acct No. 810 - Storage Compressor /1	139,367
2	FERC Acct Nos. 811 and 812 - Other Fuel /2	40,908
3	Total Current Period Fuel Used Quantity [Line 1 + Line 2]	180,275
4	Current Period Fuel Retention	183,743
Fuel True-up Quantities		
5	Fuel Retention Deficiency/(Gain) [Line 3 - Line 4] /3	(3,468)
6	Prior-Period True-up Quantity Remaining /4	530
7	Net Fuel True-up Deficiency/(Gain) [Line 5 + Line 6]	(2,938)
8	Total Injection Quantities Subject to Fuel /5	5,705,988
Fuel Percentage		
9	Current Period Fuel Reimbursement Percentage [Line 3 / Line 8]	3.16%
10	Fuel True-up Deficiency/(Gain) Percentage [Line 7 / Line 8]	-0.05%
11	Total Fuel Reimbursement Percentage [Line 9 + Line 10] /6	3.11%

Notes:

- 1/ Gas used for compressor station fuel. See Appendix B, Schedule 1, Page 1, Column (f), Line 14.
- 2/ Gas used for processing gas and other utility operations such as domestic fuel and non-measured usage. See Appendix B, Schedule 1, Page 1, Column (e), Line 14.
- 3/ See Appendix B, Schedule 1, Page 1, Column (h), Line 14.
- 4/ See Appendix B, Schedule 1, Page 1, Column (d), Line 30.
- 5/ See Appendix B, Schedule 1, Page 1, Column (c), Line 14.
- 6/ The proposed percentage of 3.11% reflects a decrease of 0.10% compared to the currently effective Fuel Reimbursement percentage of 3.21%. The decrease is attributable to higher injection quantities within the 12 months of the data collection period.

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Appendix B

Actual and Retained Fuel

Young Gas Storage Company, Ltd.
Current Period and Volumetric True-up Quantities
(Quantities in Dth)

Current Period Over/(Under) Collected Quantities

Line No.	Book Month (a)	Flow Month (b)	Young Injections (c)	Current Period Fuel Retained (d)	FERC Acct No. 812 Other Fuel (e)	FERC Acct No. 810 Storage Compressor (f)	Current Period Fuel Used (g) [(e)+ (f)]	Under/(Over) Collected Fuel Quantities (h) [(g)-(d)]
1	Pre October-17	Pre September-17				-	-	-
2	October-17	September-17	866,751	27,451	1,928	14,269	16,197	(11,254)
3	November-17	October-17	700,697	22,195	2,916	12,083	14,999	(7,196)
4	December-17	November-17	510,246	16,176	2,720	12,923	15,643	(533)
5	January-18	December-17	60,494	1,919	4,871	8,026	12,897	10,978
6	February-18	January-18	72,510	2,355	4,507	15,617	20,124	17,769
7	March-18	February-18	99,933	3,248	4,303	14,640	18,943	15,695
8	April-18	March-18	5,313	172	4,156	14,472	18,628	18,456
9	May-18	April-18	109,795	3,574	2,831	7,625	10,456	6,882
10	June-18	May-18	610,934	19,865	4,575	8,911	13,486	(6,379)
11	July-18	June-18	677,000	22,005	696	4,342	5,038	(16,967)
12	August-18	July-18	1,006,016	32,715	3,333	11,527	14,860	(17,855)
13	September-18	August-18	986,299	32,067	4,072	14,932	19,004	(13,063)
14	Total		5,705,988	183,743	40,908	139,367	180,275	(3,468)

True-up Over/(Under) Collected Quantities

	Book Month (a)	Flow Month (b)	True-up Retention Rate (c)	True-up Quantity Retained (d)
15	October-17	September-17	-0.09%	(779)
16	November-17	October-17	-0.09%	(630)
17	December-17	November-17	-0.09%	(459)
18	January-18	December-17	-0.09%	(54)
19	February-18	January-18	-0.04%	(29)
20	March-18	February-18	-0.04%	(40)
21	April-18	March-18	-0.04%	(2)
22	May-18	April-18	-0.04%	(44)
23	June-18	May-18	-0.04%	(244)
24	July-18	June-18	-0.04%	(271)
25	August-18	July-18	-0.04%	(403)
26	September-18	August-18	-0.04%	(395)
27	Total			(3,351)
28	True-up quantity remaining from RP17-190 /1			(1,588)
29	True-up quantity remaining from RP18-179 /2			(1,233)
30	True-up Remaining [Lines (28+29) - Line 27]			<u>530</u>

Notes:

1/ For the Young Fuel Reimbursement Filing in Docket No. RP17-190, Young calculated an over-collection of 4,764 Dths for the fuel true-up quantity. See Docket No. RP17-190, Appendix A, Schedule 1, Page 1, Line 7, Column (b). Young included 8/12ths of that amount for comparison to the true-up quantity in Docket No. RP18-179. This filing reflects the remaining true-up quantities.

2/ For the Young Fuel Reimbursement Filing in Docket No. RP18-179, Young calculated an over-collection of 1,849 Dths for the fuel true-up quantity. See Docket No. RP18-179, Appendix A, Schedule 1, Page 1, Line 7, Column (b). Since only 8 months of the 12-month true-up period are included in this filing, Young is including 8/12ths of the true-up quantity to compare to the quantities true-up during this time period.

FUEL CHARGES

Rate Per Dth

	<u>Current Period</u>	<u>True Up</u>	<u>Total Percentage</u>
Fuel Reimbursement Percentage (Note 2)	3.16%	-0.05%	3.11%

FUEL CHARGES

Rate Per Dth

	<u>Current Period</u>	<u>True Up</u>	<u>Total Percentage</u>
Fuel Reimbursement Percentage (Note 2)	3. 16 ²⁵ %	-0.0 5 ⁴ %	3. 12 ¹ %