

November 24, 2020

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. RP21-

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 8.0.0 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 the Tariff, the tariff record is submitted to revise Young's Fuel Reimbursement Percentage.

Background

Section 13 of the GT&C states that the Fuel Reimbursement Percentage shall be computed at least annually using the procedures described in that section.¹ The previous Fuel Reimbursement Percentage filing was accepted and rates were effective January 1, 2020.² This instant filing seeks rates to be effective January 1, 2021.

Reason for Filing

Fuel Reimbursement Percentage Update

Young develops the Fuel Reimbursement Percentage by calculating and adding the current period fuel reimbursement and fuel true-up percentages. The current period fuel reimbursement percentage is derived from available system operations data for a twelve-month data collection period. For this filing, the data collection period is from October 1, 2019 through September 30, 2020.³ The quantity of fuel actually consumed

¹ The Fuel Reimbursement Percentage is defined in Section 1.21 of the GT&C of the Tariff.

² See *Young Gas Storage Co.*, Docket No. RP20-249-000 (Dec. 16, 2019) (letter order accepting the currently effective Fuel Reimbursement Percentage).

³ As specified in Section 13.3 of the GT&C, the data collection period is the most recent twelve months of information available ending two months before the filing date.

in operations is divided by the quantity of gas actually received from shippers for injection into storage. Based on this calculation, the proposed current period fuel reimbursement percentage component will increase from 3.37% to 3.62%. This increase is attributable to higher amounts of fuel being consumed relative to the higher injection quantities as compared to the previous filing.

For the derivation of the fuel true-up percentage component, the quantity of fuel actually retained is subtracted from the quantity of fuel actually used revealing an under-collection of 17,931 Dth.⁴ Also, a comparison of the true-up quantities sought in the past fuel filing to the true-up quantities retained indicated an over-collection of 89 Dth. The sum of the under-collection with the over-collection results in a remaining under-collection of 17,842 Dth to be collected from the shippers through a 0.32% fuel true-up percentage, as compared to the fuel true-up percentage in the previous filing of 0.18%.

The sum of the current period fuel reimbursement percentage and fuel true-up percentage yields the proposed Fuel Reimbursement Percentage of 3.94%. As such, the Fuel Reimbursement Percentage is proposed to increase from 3.55%⁵ to 3.94%. Detailed calculations supporting these proposed percentages are provided in Appendices A and B submitted herein.

Description of Filing

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

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

Section 154.204 Discussion

Pursuant to 18 C.F.R. § 154.204 (2020), Young states the following:

- (a) Young does not anticipate a significant increase in revenues or costs as a result of the proposed tariff changes; and
- (b) Young is not aware of any other filings pending before the Commission that may significantly affect this filing.

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

⁵ See *Young Gas Storage Co.*, Docket No. RP20-249-000 (Dec. 16, 2019) (letter order accepting the currently effective Fuel Reimbursement Percentage).

⁶ See 18 C.F.R. §§ 154.101 – 154.603 (2020) (Part 154).

Procedural Matters

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, 2021, 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 minimal suspension period, if any, specified by the Commission.

Additionally, pursuant to 18 C.F.R. § 154.7(a)(7) (2020), Young respectfully requests that the Commission grant all waivers necessary to effectuate this filing.

Correspondence and communications concerning this filing should be directed to:

Ms. M. Catherine Rezendes
Director, Rates
Colorado Interstate Gas Company, L.L.C.
Operator for Young Gas Storage Company,
Ltd.
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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 (2020)).

⁷ *Id.*

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

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 Young'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 Procedures.

Dated at Colorado Springs, Colorado as of this 24th day of November, 2020.

/s/

M. Catherine Rezendes

Post Office Box 1087
Colorado Springs, CO 80944
(719) 520-4743

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-2019 thru Sep-2020 (b)
Current Period Fuel Quantities		
1	FERC Acct. No. 810 - Storage Compressor 1/	164,159
2	FERC Acct. Nos. 811 and 812 - Other Fuel 2/	39,768
3	Total Current Period Fuel Used Quantity [Line 1 + Line 2]	203,927
4	Current Period Fuel Retention	185,996
Fuel True-up Quantities		
5	Fuel Retention Deficiency/(Gain) [Line 3 - Line 4] 3/	17,931
6	Prior-Period True-up Quantity Remaining 4/	(89)
7	Net Fuel True-up Deficiency/(Gain) [Line 5 + Line 6]	17,842
8	Total Injection Quantities Subject to Fuel 5/	5,638,211
Fuel Percentage		
9	Current Period Fuel Reimbursement Percentage [Line 3 / Line 8]	3.62%
10	Fuel True-up Deficiency/(Gain) Percentage [Line 7 / Line 8]	0.32%
11	Total Fuel Reimbursement Percentage [Line 9 + Line 10]	3.94%

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.

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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-19	Pre September-19				-	-	-
2	October-19	September-19	571,709	18,067	2,490	20,643	23,133	5,066
3	November-19	October-19	998,730	31,557	5,691	12,346	18,037	(13,520)
4	December-19	November-19	310,438	9,809	3,890	9,562	13,452	3,643
5	January-20	December-19	16,458	519	4,675	13,639	18,314	17,795
6	February-20	January-20	534	18	4,226	8,226	12,452	12,434
7	March-20	February-20	49,830	1,678	3,868	15,063	18,931	17,253
8	April-20	March-20	57,554	1,939	3,898	14,612	18,510	16,571
9	May-20	April-20	569,358	19,189	3,218	18,784	22,002	2,813
10	June-20	May-20	561,100	18,909	3,307	14,022	17,329	(1,580)
11	July-20	June-20	558,850	18,833	1,272	10,055	11,327	(7,506)
12	August-20	July-20	1,008,201	33,959	1,567	10,675	12,242	(21,717)
13	September-20	August-20	935,449	31,519	1,666	16,532	18,198	(13,321)
14	Total		5,638,211	185,996	39,768	164,159	203,927	17,931

True-up Over/(Under) Collected Quantities

	Book Month (a)	Flow Month (b)	True-up Retention Rate (c)	True-up Quantity Retained (d)
15	October-19	September-19	-0.05%	(292)
16	November-19	October-19	-0.05%	(500)
17	December-19	November-19	-0.05%	(154)
18	January-20	December-19	-0.05%	(7)
19	February-20	January-20	0.18%	1
20	March-20	February-20	0.18%	91
21	April-20	March-20	0.18%	104
22	May-20	April-20	0.18%	1,021
23	June-20	May-20	0.18%	1,009
24	July-20	June-20	0.18%	1,004
25	August-20	July-20	0.18%	1,835
26	September-20	August-20	0.18%	1,696
27	Total			5,808

28	True-up quantity remaining from RP19-330 1/	(979)
29	True-up quantity remaining from RP20-249 2/	6,699
30	True-up Remaining [Lines (28+29) - Line 27]	<u>(89)</u>

Notes:

1/ For the Young Fuel Reimbursement Filing in Docket No. RP19-330, Young calculated an over-collection of 2,938 Dths for the fuel true-up quantity. See Docket No. RP19-330, Appendix A, Schedule 1, Page 1, Column (b), Line 7. Young included 8/12ths of that amount for comparison to the true-up quantity in Docket No. RP20-249. This filing reflects the remaining true-up quantities.

2/ For the Young Fuel Reimbursement Filing in Docket No. RP20-249, Young calculated an under-collection of 10,048 Dths for the fuel true-up quantity. See Docket No. RP20-249, Appendix A, Schedule 1, Page 1, Column (b), Line 7. 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)	3.62%	0.32%	3.94%

FUEL CHARGES

Rate Per Dth

	<u>Current Period</u>	<u>True Up</u>	<u>Total Percentage</u>
Fuel Reimbursement Percentage (Note 2)	3. 6237 %	0. 3248 %	3. 9455 %