

November 24, 2020

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

Attention: Ms. Kimberly D. Bose, Secretary

Re: Average Thermal Content Adjustment Filing;  
Young Gas Storage Company, Ltd.;  
Docket No. RP21-

Commissioners:

Young Gas Storage Company, Ltd. (Young") hereby tenders for filing and acceptance by the Federal Energy Regulatory Commission ("Commission") the tariff records listed on the attached Appendix for inclusion in its FERC Gas Tariff, First Revised Volume No. 1 ("Tariff").

Proposed with an effective date of December 1, 2020, these tariff records update Young's Tariff to implement rates for storage services provided under Rate Schedules FS-1, IS-1 and PAL-1 to reflect the recently updated average thermal content ("ATC") of the gas in storage pursuant to the terms of Young's Tariff. Young respectfully requests a waiver of the 30-day notice requirement to effectuate the December 1, 2020 effective date, as discussed below.

### **Background**

Part II: Statement of Rates, Section 3 – Footnotes and Part IV: General Terms and Conditions ("GT&C") Section 1.2 in Young's Tariff describe a storage thermal tracker ("Tracker") mechanism which provides that material changes in the thermal content of the gas in storage do not change the rights and obligations of Young and its customers.<sup>1</sup> The Tracker ensures 1) that customers receive the percentage of Young's storage capabilities for which they have paid, and 2) that the rates for

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<sup>1</sup> Without the Tracker, a significant decrease in the thermal content of gas in storage may result in Young being physically unable to inject, store or withdraw the total volumetric quantity of gas required to satisfy the customer's thermal entitlements. Conversely, a significant increase in thermal content of gas may result in Young being able to inject, store and withdraw additional thermal quantities beyond the customer's entitlements. The Tracker mechanism was accepted by the Commission in *Young Gas Storage Company, Ltd.*, unpublished letter order dated May 30, 1996 in Docket No. RP96-226-000.

service are those approved rates reflecting the current thermal content of the storage gas. Consequently, the Tracker employs a formula to adjust storage contract entitlements and the related rates to account for changes in the ATC of the gas in storage.

Pursuant to GT&C Section 1.2 of Young's Tariff, should the ATC of the gas in storage, as measured on October 31 of each year, change by more than plus or minus 20 Btu per cubic foot, shipper contract entitlements and associated rates are to be adjusted accordingly. Young is required to post on its electronic bulletin board ("EBB") a notice of the ATC change by November 15, with the associated changes to contract entitlements and rates. In addition to the EBB posting, Footnote 5 in the Young Tariff's Statement of Rates requires Young to file any revision to storage rates resulting from a change in the ATC with the Commission within 30 days of the ATC update EBB posting and will have the revised rates effective December 1.<sup>2</sup>

Based on its analysis of natural gas in place in its storage field, Young concluded that the ATC of gas changed by more than 20 Btu. Accordingly, on November 16, 2020, Young posted a notice on its EBB ("November Notice") notifying customers of a change to the currently effective ATC that was greater than 20 Btu per cubic foot and the adjusted contract entitlements and rates.<sup>3</sup> Young is also submitting in the instant filing updates to its rates resulting from this ATC change.

### **Reason for Filing**

Since the ATC of gas in its storage field decreased from 1124 Btu per 1,000 cubic feet<sup>4</sup> to 1101 Btu per 1,000 cubic feet (i.e., greater than 20 Btu), the adjusted contract entitlements, effective December 1, 2020, are being updated as follows:

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<sup>2</sup> See Footnote 5 in Part II: Statement of Rates, Section 3 - Footnotes ("Footnote 5") and Part IV: GT&C, Section 1.2 - Definitions of Young's Tariff.

<sup>3</sup> See non-critical EBB Notice No. 119628, under Tab A. The Tariff specified posting date of November 15 occurred on a weekend. Young posted its notice on the next business day.

<sup>4</sup> The Commission approved the currently effective ATC adjustment in a letter order dated December 23, 2019 in Docket No. RP20-314-000.

<b>Customer</b>	<b>Btu</b>	<b>MAC<sup>5</sup></b>	<b>MDWQ<sup>6</sup></b>	<b>MDIQ<sup>7</sup></b>
Colorado Springs Utilities	@ 1000	579,005	19,966	9,983
	@ 1101	637,484	21,983	10,991
Public Service Company of Colorado	@ 1000	5,211,044	179,691	89,846
	@ 1101	5,737,359	197,839	98,920

The corresponding adjusted storage service rates, effective December 1, 2020, are as follows:

	<b>Minimum Rates</b>		<b>Maximum Rates</b>	
	<b>Prior Rates @1124 Btu</b>	<b>New Rates @1101 Btu</b>	<b>Prior Rates @1124 Btu</b>	<b>New Rates @1101 Btu</b>
<b>Rate Schedule FS-1</b>				
Storage Capacity Rate	\$0.0000	\$0.0000	\$0.0547	\$0.0559
Reservation Rate	\$0.0000	\$0.0000	\$1.4495	\$1.4798
Quantity Injection Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Quantity Withdrawal Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Auth Daily Overrun Rate - Injection	\$0.0372	\$0.0380	\$0.1280	\$0.1307
Auth Daily Overrun Rate - Withdrawal	\$0.0190	\$0.0190	\$0.0190	\$0.0190

<sup>5</sup> "Maximum Available Capacity" ("MAC") shall mean the maximum quantity of Gas (expressed in Dth) that Transporter is required to accept under Rate Schedule FS-1 or the maximum quantity of Gas (expressed in Dth) that Transporter may accept under Rate Schedule IS-1 for injection into storage during the Injection Period on Shipper's behalf. See GT&C Section 1.30 of Young's Tariff.

<sup>6</sup> "Maximum Daily Withdrawal Quantity" ("MDWQ") shall mean the maximum Daily quantity of Gas (expressed in Dth) that Transporter shall be required to withdraw from storage on a firm basis on Shipper's behalf. Shipper's MDWQ shall be equal to 1/29 of Shipper's MAC. See GT&C Section 1.33 of Young's Tariff.

<sup>7</sup> "Maximum Daily Injection Quantity" ("MDIQ") shall mean the maximum quantity of Gas (expressed in Dth) per Day that Transporter shall be required to inject into storage on a firm basis on Shipper's behalf. The MDIQ shall be limited to 1/58 of Shipper's MAC; provided however, during the Month of November the MDIQ shall be limited to some lesser quantity when and to the extent required by storage operational conditions and maintenance.

Auth Capacity Overrun Rate	\$0.0372	\$0.0380	\$0.1309	\$0.1307
<b>Rate Schedule IS-1</b>				
Interruptible Storage Rate	\$0.0000	\$0.0000	\$0.1094	\$0.1117
Quantity Injection Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Quantity Withdrawal Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Auth Daily Overrun Rate Injection	\$0.0372	\$0.0380	\$0.1280	\$0.1307
Auth Daily Overrun Rate - Withdrawal	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Auth Capacity Overrun Rate	\$0.0372	\$0.0380	\$0.1280	\$0.1307

	Minimum Rates		Maximum Rates	
	Prior Rates @1124 Btu	New Rates @1101 Btu	Prior Rates @1124 Btu	New Rates @1101 Btu
<b>Rate Schedule PAL-1</b>				
Initial Rate	\$0.0000	\$0.0000	\$0.1280	\$0.1307
Balance Rate	\$0.0000	\$0.0000	\$0.0640	\$0.0654
Completion Rate	\$0.0000	\$0.0000	\$0.1280	\$0.1307
Authorized Overrun Rate	\$0.0000	\$0.0000	\$0.1280	\$0.1307

**Tariff Provisions**

Young is submitting this filing, pursuant to Subpart C of Part 154 of the Commission's regulations to revise its Tariff.

Part II: Statement of Rates, Section 1- Firm Storage Rates and Section 1 - Interruptible Storage Rates are revised as described herein to reflect the service rates under Rate Schedules FS-1, IS-1 and PAL-1 as adjusted for the October 31,

2020 ATC of 1101 Btu per 1,000 cubic feet. Attached under Tab B is a workpaper detailing the derivation of the new rates.

### **Section 154.204 Discussion**

Pursuant to Section 154.204 of the Commission's Regulations, Young states the following:

- a. Young does not anticipate any changes in net revenues or costs as a result of this revision to service rates. As provided by the Tracker, the result of the change to both contract entitlements and rates is to keep the shipper and Young revenue and cost neutral.
- b. There are no other filings pending with the Commission that may significantly affect this filing.

### **Procedural Matters**

Inasmuch as this filing is fully described herein, the statement of the nature, the reasons and the basis for the instant tariff filing required by Section 154.7(a)(6) (2020) of the Commission's regulations are omitted.

In accordance with the applicable provisions of Part 154 of the Commission's regulations, Young is submitting the following:

- a) an eTariff XML filing package containing the proposal in electronic format;
- b) a transmittal letter;
- c) an Appendix, which includes a list of the proposed tariff records;
- d) Tab A, which includes a copy of Young's November Notice;
- e) Tab B, a workpaper detailing derivation of the new rates; and
- f) clean and marked versions of the tariff records in PDF format.

Young respectfully requests the Commission accept the tendered tariff records for filing and permit them to become effective on December 1, 2020, which is consistent with the terms of Young's Tariff related to the ATC rate adjustments communicated to shippers in Young's November Notice. As such, Young requests the Commission grant waiver of the notice requirement as permitted by 18 C.F.R. § 154.207 (2020) of the Commission's regulations. 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 a minimal suspension period, if any, specified by the Commission.

Correspondence and communications concerning this filing should be directed to:

Mr. Francisco Tarin  
Director, Regulatory Affairs  
Colorado Interstate Gas Company, L.L.C.  
Operator for Young Gas Storage  
Company, Ltd.  
Post Office Box 1087  
Colorado Springs, CO 80944  
Telephone: (719) 667-7517  
YGSRegulatoryAffairs@kindermorgan.com

Ms. Julia Forrester-Sellers  
Assistant General Counsel  
Colorado Interstate Gas Company, L.L.C.  
Operator for Young Gas Storage  
Company, Ltd.  
Post Office Box 1087  
Colorado Springs, CO 80944  
Telephone: (719) 520-4513  
Julia\_Forrester-Sellers@kindermorgan.com

The undersigned hereby certifies that he 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 his knowledge and belief; and (iii) that he possesses full power and authority to sign this filing.

Respectfully submitted,

YOUNG GAS STORAGE COMPANY, LTD.  
By: Colorado Interstate Gas Company, L.L.C.  
Operator for Young Gas Storage Company, Ltd.

By: \_\_\_\_\_ /s/ \_\_\_\_\_  
Francisco Tarin  
Director, Regulatory

Enclosures



YOUNG GAS STORAGE COMPANY, LTD.  
Average Thermal Content Rate Adjustment Filing  
Docket No. RP21-

First Revised Volume No. 1

Part II	Section 1	Firm Storage Rates	Version 9.0.0
Part II	Section 1	Interruptible Storage Rates	Version 10.0.0



**TAB A**

Notice Details

TSP/TSP Name: 876708744-YOUNG GAS STORAGE COMPANY

Critical: N

Notice Type Desc (1): OTHER

Notice Type Desc (2): MISC.

Notice Eff Date/Time: 11/16/2020 8:25:38AM

Notice End Date/Time: 12/31/2049 9:00:00AM

Post Date: 11/16/2020 8:25:38 AM

Notice ID: 119628

Reqrd Rsp: 5

Notice Stat Desc: INITIATE

Prior Notice:

Subject: YOUNG ATC OF GAS STORAGE

Notice Text:

YOUNG GAS STORAGE COMPANY, LTD.  
ANNUAL AVERAGE THERMAL CONTENT OF GAS IN STORAGE POSTING  
FOR 2020 - 2021 SEASON

General Terms and Conditions ("GT&C") Section 1.2 of the Young Gas Storage Company, Ltd. ("Young") FERC Gas Tariff, First Revised Volume No. 1 ("Tariff"), states that Young shall monitor storage injections and withdrawals and calculate the actual Young Average Thermal Content ("ATC") of gas in storage field on October 31 of each year. If the actual Young ATC deviates from the currently effective Young ATC (1124) by more than plus or minus 20 Btu per cubic foot ("Btu"), the actual Young ATC will become the new effective Young ATC and it shall be posted on Young's electronic bulletin board under Information Postings by November 15 of each year, and a corresponding adjustment will be made to Shipper's applicable Maximum Daily Injection Quantity ("MDIQ"), Maximum Daily Withdrawal ("MDWQ") and Maximum Available Capacity ("MAC") entitlements.

Based on a review of storage field gas monitoring data, Young has determined that the ATC has changed by more than 20 Btu's from the currently effective ATC. Therefore, the updated ATC of 1101 Btu shall become the new effective ATC as of December 1, 2020. Accordingly, a revision to the currently effective Young ATC and the related storage entitlements and service rates is necessary.

Based on these ATC changes, Young is updating the related contract entitlements and service rates as described below.

Effective December 1, 2020

Customer		MAC	MDWQ	MDIQ
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FS-1				
COLORADO SPRINGS UTILITIES:				
Contract	@1000	579,005	19,966	9,983
Adjusted Btu	@1101	637,484	21,983	10,991
PUBLIC SERVICE CO. OF COLORADO				
Contract	@1000	5,211,044	179,691	89,846
Adjusted Btu	@1101	5,737,359	197,839	98,920

MAC = Maximum Available Capacity  
MDWQ = Maximum Daily Withdrawal Quantity  
MDIQ = Maximum Daily Injection Quantity

Additionally, this posting includes the adjustment to the service rates applicable to the FS-1, IS-1 and PAL-1 Rate Schedules.

Effective December 1, 2020

Rate Schedule FS-1	Minimum Rates		Maximum Rates	
	Prior Rates @1124 Btu	New Rates @1101 Btu	Prior Rates @1124 Btu	New Rates @1101 Btu
Storage Capacity Rate	\$0.0000	\$0.0000	\$0.0547	\$0.0559
Reservation Rate	\$0.0000	\$0.0000	\$1.4495	\$1.4798
Quantity Injection Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Quantity Withdrawal Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Daily Auth Inj/Wth Overrun Rate	\$0.0372	\$0.0380	\$0.1280	\$0.1307
Auth Storage Capacity Overrun Rate	\$0.0372	\$0.0380	\$0.1280	\$0.1307
<b>Rate Schedule IS-1</b>				
Interruptible Storage Rate	\$0.0000	\$0.0000	\$0.1094	\$0.1117
Quantity Injection Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Quantity Withdrawal Rate	\$0.0186	\$0.0190	\$0.0186	\$0.0190
Daily Auth Inj/Wth Overrun Rate	\$0.0372	\$0.0380	\$0.1280	\$0.1307
Auth Storage Capacity Overrun Rate	\$0.0372	\$0.0380	\$0.1280	\$0.1307

Rate Schedule PAL-1	Minimum Rates		Maximum Rates	
	Prior Rates @1124 Btu	New Rates @1101 Btu	Prior Rates @1124 Btu	New Rates @1101 Btu
Initial Rate	\$0.0000	\$0.0000	\$0.1280	\$0.1307
Park/Loan Balance Rate	\$0.0000	\$0.0000	\$0.0640	\$0.0654
Completion Rate	\$0.0000	\$0.0000	\$0.1280	\$0.1307
Auth Overrun Rate	\$0.0000	\$0.0000	\$0.1280	\$0.1307

**TAB B**

Young Gas Storage Company, Ltd.

Computation of Thermal Rate

Line No.	Particulars	Proposed Effective Rates @ 1101 Btu				
		Minimum Rates @1000 Btu (a)	Maximum Rates @1000 Btu (b)	Btu Conversion Factor 1000/1101 (c)	Minimum Rates @1101 Btu (d)	Maximum Rates @1101 Btu (e)
1	<b>Rate Schedule FS-1</b>					
2	Demand Rate -				(col a x col c)	(col b x col c)
3	Reservation Rate	\$0.0000	\$1.6292	90.83%	\$0.0000	\$1.4798
4	Storage Capacity Rate	\$0.0000	\$0.0615	90.83%	\$0.0000	\$0.0559
5	Quantity Injection Rate	\$0.0209	\$0.0209	90.83%	\$0.0190	\$0.0190
6	Quantity Withdrawal Rate	\$0.0209	\$0.0209	90.83%	\$0.0190	\$0.0190
7	Authorized Daily Overrun Rate - Injection	\$0.0418	\$0.1439	90.83%	\$0.0380	\$0.1307
8	Authorized Daily Overrun Rate - Withdrawal	\$0.0209	\$0.0209	90.83%	\$0.0190	\$0.0190
9	Authorized Capacity Overrun Rate	\$0.0418	\$0.1439	90.83%	\$0.0380	\$0.1307
10	<b>Rate Schedule IS-1</b>					
11	Interruptible Storage Rate	\$0.0000	\$0.1230	90.83%	\$0.0000	\$0.1117
12	Quantity Injection Rate	\$0.0209	\$0.0209	90.83%	\$0.0190	\$0.0190
13	Quantity Withdrawal Rate	\$0.0209	\$0.0209	90.83%	\$0.0190	\$0.0190
14	Authorized Daily Overrun Rate - Injection	\$0.0418	\$0.1439	90.83%	\$0.0380	\$0.1307
15	Authorized Daily Overrun Rate - Withdrawal	\$0.0209	\$0.0209	90.83%	\$0.0190	\$0.0190
16	Authorized Capacity Overrun Rate	\$0.0418	\$0.1439	90.83%	\$0.0380	\$0.1307
17	<b>Rate Schedule PAL-1</b>					
18	Initial Rate	\$0.0000	\$0.1439	90.83%	\$0.0000	\$0.1307
19	Park/Loan Balance Rate	\$0.0000	\$0.0720	90.83%	\$0.0000	\$0.0654
20	Completion Rate	\$0.0000	\$0.1439	90.83%	\$0.0000	\$0.1307
21	Authorized Overrun Rate	\$0.0000	\$0.1439	90.83%	\$0.0000	\$0.1307

<u>Rate Schedule</u>	<u>Rate per Dth</u> <u>(Note 1)</u>	
	<u>Minimum</u>	<u>Maximum</u>
FS-1: (Note 5)		
Reservation Rates (Note 3) -		
Storage Capacity Rate	\$0.0000	\$0.0559
Reservation Rate	\$0.0000	\$1.4798
Quantity Injection Rate	\$0.0190	\$0.0190
Quantity Withdrawal Rate	\$0.0190	\$0.0190
Authorized Daily		
Overrun Rate - Injection	\$0.0380	\$0.1307
Overrun Rate - Withdrawal	\$0.0190	\$0.0190
Authorized Capacity		
Overrun Rate	\$0.0380	\$0.1307

<u>Rate Schedule</u>	<u>Rate per Dth</u> <u>(Note 1)</u>	
	<u>Minimum</u>	<u>Maximum</u>
IS-1: (Note 5)		
Interruptible Storage Rate (Applied monthly to the average daily balance of Gas in storage for Shipper's account during the Month)	\$0.0000	\$0.1117
Quantity Injection Rate	\$0.0190	\$0.0190
Quantity Withdrawal Rate	\$0.0190	\$0.0190
Authorized Daily		
Overrun Rate - Injection	\$0.0380	\$0.1307
Overrun Rate - Withdrawal	\$0.0190	\$0.0190
Authorized Capacity		
Overrun Rate	\$0.0380	\$0.1307
PAL-1: (Note 5)		
Initial Rate	\$0.0000	\$0.1307
Park/Loan Balance Rate	\$0.0000	\$0.0654
Completion Rate	\$0.0000	\$0.1307
Authorized Overrun Rate	\$0.0000	\$0.1307

<u>Rate Schedule</u>	<u>Rate per Dth</u> <u>(Note 1)</u>	
	<u>Minimum</u>	<u>Maximum</u>
FS-1: (Note 5)		
Reservation Rates (Note 3) -		
Storage Capacity Rate	\$0.0000	\$0.05 <del>5947</del>
Reservation Rate	\$0.0000	\$1.4 <del>798495</del>
Quantity Injection Rate	\$0.01 <del>9086</del>	\$0.01 <del>9086</del>
Quantity Withdrawal Rate	\$0.01 <del>9086</del>	\$0.01 <del>9086</del>
Authorized Daily		
Overrun Rate - Injection	\$0.03 <del>8072</del>	\$0.1 <del>307280</del>
Overrun Rate - Withdrawal	\$0.01 <del>9086</del>	\$0.01 <del>9086</del>
Authorized Capacity		
Overrun Rate	\$0.03 <del>8072</del>	\$0.1 <del>307280</del>



<u>Rate Schedule</u>	<u>Rate per Dth</u> <u>(Note 1)</u>	
	<u>Minimum</u>	<u>Maximum</u>
IS-1: (Note 5)		
Interruptible Storage Rate (Applied monthly to the average daily balance of Gas in storage for Shipper's account during the Month)	\$0.0000	\$0.1 <del>117094</del>
Quantity Injection Rate	\$0.01 <del>9086</del>	\$0.01 <del>9086</del>
Quantity Withdrawal Rate	\$0.01 <del>9086</del>	\$0.01 <del>9086</del>
Authorized Daily		
Overrun Rate - Injection	\$0.03 <del>8072</del>	\$0.1 <del>307280</del>
Overrun Rate - Withdrawal	\$0.01 <del>9086</del>	\$0.01 <del>9086</del>
Authorized Capacity		
Overrun Rate	\$0.03 <del>8072</del>	\$0.1 <del>307280</del>
PAL-1: (Note 5)		
Initial Rate	\$0.0000	\$0.1 <del>307280</del>
Park/Loan Balance Rate	\$0.0000	\$0.06 <del>5440</del>
Completion Rate	\$0.0000	\$0.1 <del>307280</del>
Authorized Overrun Rate	\$0.0000	\$0.1 <del>307280</del>