UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Young Gas Storage Company, Ltd.) Docket No. RP22-824-003

PETITION OF YOUNG GAS STORAGE COMPANY, LTD. TO AMEND STIPULATION AND AGREEMENT, AND MOTION FOR EXPEDITED ACTION

Pursuant to Rule 207(a)(5) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"),[1] Young Gas Storage Company, Ltd. ("Young") hereby petitions the Commission to issue an order amending the Stipulation and Agreement approved in Docket No. RP22-824-000 on June 17, 2022,[2] and amended on September 14, 2026 ("Settlement"),[3] by December 4, 2026 due the imminent filing date of December 31, 2026 for a new general, system-wide rate case.

As explained below, Young is petitioning the Commission to amend the Settlement to extend its term for twenty-one (21) months (two years from the original required filing date of September 30, 2026) by changing the date Young is required to file a new general, system-wide rate case from December 31, 2026 to September 30, 2028, and the associated dates described below. This amendment is supported by Public Service Company of Colorado ("PSCo") and Colorado Springs Utilities ("CSU")[4] (together with Young, the "Parties") and is consistent with

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1 18 C.F.R. § 385.207(a)(5) (2026).

2 *Young Gas Storage Co.*, 179 FERC ¶ 61,210, at P 4 (2022).

3 *Young Gas Storage Co.*, 196 FERC ¶ 61,201 (2026).

4 CSU and PSCo are firm storage shippers on Young's system. The only other firm shipper on Young's system is Colorado Interstate Gas Company, L.L.C., an affiliate of Young, which holds firm storage capacity acquired by capacity release to provide services under its tariff. *See Colorado Interstate Gas Co*., 122 FERC ¶ 61,256 at PP 40-41, 66 (2008).

the well-recognized benefits of pipelines reaching settlements with their shippers,[5] this amendment is fair and reasonable, and in the public interest.

I. Background

On April 18, 2022, Young petitioned for approval of the Settlement filed in Docket No. RP22-824-000. On June 17, 2022, the Commission approved as uncontested that Settlement,[6] resolving all issues related to the rates for Young's services during the Settlement's term. Section 5.1 of the Settlement specified the end date for the term of the Settlement. Additionally, under section 5.2(a) of the Settlement, Young was required to file a system-wide base rate case pursuant to section 4 of the Natural Gas Act ("NGA") no later than September 30, 2026. Section 5.2(a) also specified that if the September 30th filing was for a rate increase, Young would assume a five-month suspension period and request new rates to be effective April 1, 2027. Alternatively, if the filing was for a rate decrease or to maintain existing rates, Young would request new rates to be effective November 1, 2026.

On August 13, 2026, Young submitted a petition to the Commission seeking approval of an amendment to postpone the date by which Young must make the section 4 filing by three months to December 31, 2026.[7] Additional language was proposed in the event a settlement was not achieved. The Commission granted Young's petition on September 14, 2026.[8]

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5 *See, e.g., Florida Power & Light Co.*, 175 FERC ¶ 61,024, at P 6 (2021); *Montana Power Co.*, 77 FERC ¶ 61,110, at 61,434 (1996) ("The Commission strongly favors settlements, which provide the opportunity to eliminate the need for more lengthy proceedings"); *Pac. Gas Transmission Co.*, 76 FERC ¶ 61,246, at 62,263 & n.18 (1996) (Commission encourages parties to seek the benefits of the settlement process for the expeditious resolution of contested issues, noting its long-standing policy favoring settlements to facilitate an outcome to address the needs of the parties while avoiding the cost of litigation).

6 *Young Gas Storage Co.,* 179 FERC ¶ 61,210, at P 4 (2022).

7 *See* Petition to Amend Settlement, Docket No. RP22-824-002 (Aug. 13, 2026).

8 *Young Gas Storage Co.,* 196 FERC ¶ 61,201, at PP 1 & 5 (2026).

The Parties, which include *all* of Young's non-affiliated firm shippers, have continued to engage in settlement discussions seeking to resolve the issues underlying the upcoming rate case. The Parties have discussed the benefits of extending the terms of the existing Settlement for an additional twenty-one months. As noted earlier, PSCo and CSU support such an extension of the existing Settlement. During the extension period, the Parties would continue to build on their already productive negotiations.

II. Proposed Amendment

The Commission's long-standing policy favoring settlements provides parties with certainty, reduces litigation costs, and permits parties to obtain reasonable compromises for resolving difficult issues.[9] Young, its shippers, and the Commission would save substantial time, effort, and financial resources on the litigation of the section 4 rate case currently required to be filed on December 31, 2026. The Parties would also benefit from an additional twenty-one months of rate certainty. These benefits warrant amending the Settlement to add twenty-one months to its term.[10] Moreover, as noted above, all Parties support this petition. Accordingly, consistent with section 5.4 of the Settlement, the requested amendment is fair, reasonable, and in the public interest.[11]

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[9] *See, e.g., Florida Power & Light Co.*, 175 FERC ¶ 61,024 at P 6 (2021); *Montana Power Co.*, 77 FERC ¶ 61,110, at 61,434 (1996) ("The Commission strongly favors settlements, which provide the opportunity to eliminate the need for more lengthy proceedings"); *Pac. Gas Transmission Co.*, 76 FERC ¶ 61,246, at 62,263 & n.18 (1996) (Commission encourages parties to seek the benefits of the settlement process for the expeditious resolution of contested issues, noting its long-standing policy favoring settlements to facilitate an outcome to address the needs of the parties while avoiding the cost of litigation).

[10] *See, e.g.*, *Algonquin Gas Transmission, LLC*, 187 FERC ¶ 61,034 (2024) (approving a three-year extension on top of prior four-year and two-year extensions); *Transcon. Gas Pipe Line Co.*, 181 FERC ¶ 61,068 (2022) (approving a one-year extension); *Great Lakes Gas Transmission Ltd.*, 179 FERC ¶ 61,065 (2022) (approving a three-year extension).

[11] *See El Paso Natural Gas Co*., 40 FERC ¶ 61,362, at 62,081 (1987) (proposed amendment to settlement approved as in the "public interest"); *Colorado Interstate Gas Co.*, 114 FERC ¶ 61,173 (2006); *Colorado Interstate Gas Co.*, 115 FERC ¶ 61,039 (2006); *Colorado Interstate Gas Co.*, 115 FERC ¶ 61,304 (2006); *Colorado Interstate Gas Co.*, 116 FERC ¶ 61,126 (2006); *Mojave Pipeline Co.*, 132 FERC ¶ 61,106 (2010).

Specifically, Young requests section 5.1(3) of the Settlement be revised to change "July 1, 2027" to "April 1, 2029". To change the required filing date to September 30, 2028 and the associated dates, Young also requests that section 5.2(a) of the Settlement be deleted in its entirety and replaced with the new section below:

> Subject to Article VI, Young commits to file a Section 4 Rate Case on September 30, 2028. If the September 30, 2028, filing is for a rate increase, Young will assume a five-month suspension period and request the new rates to be effective April 1, 2029. If the September 30, 2028, filing is for a rate decrease or to maintain existing rates, Young will request the new rates to be effective November 1, 2028.

No other changes to the Settlement are intended or implied.

III. Motion for Expedited Commission Order

Young is preparing the NGA section 4 rate case filing to comply with the December 31, 2026 deadline required by the Settlement's existing terms. Given that the instant petition is supported by the Parties and that avoidance of litigation costs is one of the recognized benefits of extending the term of a settlement, Young respectfully requests a ruling on this petition by December 4, 2026, if possible.[12] A Commission ruling by this date will provide the Parties with the certainty necessary to maximize the benefits of an extended Settlement term for all parties.

IV. Conclusion

Wherefore, Young respectfully requests that the Commission approve this petition to amend the Settlement by December 4, 2026, if possible. Young further requests that the

[12] Young reserves the unilateral right to withdraw the petition if it is not acted upon by the later date.

Commission grant any other authorizations or waivers it may deem necessary to approve this petition as proposed.

Respectfully submitted,

YOUNG GAS STORAGE
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November 12, 2026

Certificate of Service

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2026), I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Colorado Springs, CO, this 12th day of November 2026.

/s/ David R. Cain

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