UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

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

PETITION OF YOUNG GAS STORAGE COMPANY, LTD.
TO AMEND STIPULATION AND AGREEMENT,
AND MOTION FOR SHORTENED COMMENT PERIOD AND 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 amend, as further detailed herein, the Stipulation and Agreement approved in Docket No. RP22-824-000 on June 17, 2022 ("Settlement"),[2] and in conjunction with such amendment, grant to Young other corresponding procedural requests stated herein.

As explained below, Young, Public Service Company of Colorado ("PSCo") and Colorado Springs Utilities ("CSU")[3] (all collectively referred to as "Parties") have agreed to amend the Settlement to allow Young and other interested stakeholders an additional three months to exchange information and negotiate with the goal of reaching a pre-filing settlement in lieu of filing a general rate case under section 4 of the Natural Gas Act ("NGA"). These efforts are consistent with the well-recognized benefits of pipelines reaching settlements with their shippers.[4]

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1 18 C.F.R. § 385.207(a)(5) (2025).

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

3 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).

4 *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) ("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).

As a condition to the requested amendment and as set forth more specifically in the Background section below, if Young and its customers are ultimately unable to reach a settlement and the Commission issues an order after litigation that reduces any of Young's rates below the currently effective rates, Young agrees to issue refunds, with interest, to compensate customers for this requested extension of time and the corresponding delay in the effective date of each rate ordered by the Commission. Because this amendment has been agreed to by all of Young's unaffiliated shippers, 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,[5] resolving all issues related to the rates for Young's services during the Settlement's term. Section 5.1 of the Settlement states that the term of the Settlement will end the earlier of: (i) the date new rates become effective pursuant to a new general, system-wide rate change submitted by Young pursuant to section 4 of the NGA;[6] (ii) the date that rates become effective pursuant to action taken by the Commission under section 5 of the NGA;[7] or (iii) April 1, 2027. Additionally, under section 5.2(a) of the Settlement, Young is required to file a system-wide base rate case no later than September 30, 2026, proposing an effective date of April 1, 2027, for a rate increase or an effective date of November 1, 2026, for a rate decrease or to maintain existing rates.

The Parties, which include *all* of Young's non-affiliated firm shippers, have engaged in settlement discussions to explore the possibility of resolving the issues underlying its upcoming rate case filing. The Parties determined it would be beneficial to continue working to consensually

5 *Young Gas Storage Co.*, 179 FERC ¶ 61,210 at P 4 (2022).
6 *See* 15 U.S.C. § 717c (2024).
7 *See* 15 U.S.C. § 717d (2024).

resolve their issues and obviate the need for an adversarial rate case. To allow time for these additional discussions, Young seeks to change the deadline for filing a new system-wide rate case from September 30, 2026, to December 31, 2026, and to make the same three-month extension to the current Settlement termination dates of April 1, 2027, for a rate increase, or November 1, 2026, for a rate decrease or to maintain existing rates, extending them to July 1, 2027, and February 1, 2027, respectively.

Young has posted a draft of this petition to its electronic bulletin board and circulated it: 1) to the parties in Docket Nos. RP22-824-000 and RP22-824-001, and 2) to all the entities Young serves with its initial filings in a Commission proceeding. No entity has indicated opposition to this petition. Thus, Young anticipates that this petition will be unopposed.

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.[8] If a settlement can be reached, 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 by the Settlement. These potential benefits warrant amending the Settlement to provide the additional time to pursue a pre-filing settlement.[9] Moreover, as noted above, Young believes that no party in this proceeding will oppose this petition. Accordingly, consistent with section 5.4 of the Settlement, the requested amendment is fair, reasonable, and in

8 *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) ("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).

9 *See, e.g., Young Gas Storage Co.*, 178 FERC ¶ 61,120 (2022); *Colorado Interstate Gas Co.*, 178 FERC ¶ 61,118 (2022).

the public interest.[10]

Specifically, Young requests that section 5.1(3) of the Settlement be revised to change "April 1, 2027" to "July 1, 2027". Young also requests that the last three sentences of section 5.2(a) of the Settlement be changed to reflect the requested three-month extension, as indicated below. In addition, as a condition of the extension, Young has agreed to further amend section 5.2(a), as indicated below, to account for a scenario where the Commission grants the extension of time but Young and shippers are ultimately unable to reach a pre-filing settlement. If these proposed amendments are accepted, the revised Article V, section 5.2(a) of the Settlement would read as follows (unchanged first sentence omitted):

> Subject to Article VI, Young commits to file a Section 4 Rate Case on December 31, 2026. If the December 31, 2026 filing is for a rate increase, Young will assume a five-month suspension period and request the new rates to be effective July 1, 2027. If the December 31, 2026 filing is for a rate decrease or to maintain existing rates, Young will request the new rates to be effective February 1, 2027. Furthermore, if Young and its customers are unable to reach a pre-filing settlement, and Young files an NGA Section 4 general rate case and the rate case proceeds through litigation and ultimately results in a final Commission decision on the merits that results in any individual rates below Young's current base tariff rates (the "Reduced Rates"), then Young agrees, in addition to any Commission ordered refund of amounts collected above Young's current base tariff rates pursuant to the Commission's rules and regulations, to also refund, on an individual rate basis, the difference in amounts collected between each such Reduced Rate and Young's corresponding current base tariff rate, both expressed on a daily basis, for the applicable three-month extension period determined by the filing direction of each such individual rate: (i) April 1, 2027 through June 30, 2027, for each Reduced Rate that was filed as a rate increase in the December 31, 2026 rate case filing, and (ii) November 1, 2026 through January 31, 2027, for each Reduced Rate that was filed as a rate decrease in the December 31, 2026 rate case filing, in each case to accommodate the delay in the rate case filing date provided herein, with interest calculated for the applicable three-month period.

[10] *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).

This proposed amendment will provide additional time for Young and its shippers to seek to reach a pre-filing settlement and the refunds will ensure that all signatories to the Settlement get the benefit of their bargain. No other changes to the Settlement are intended or implied.

III. Motion for Shortened Comment Period

While the petition is pending, Young intends to engage in further settlement discussions. However, Young will soon be required to refocus its efforts on preparing its rate case which will impair further efforts to continue settlement discussions. Consequently, Young respectfully requests a ruling on this petition as early as possible and no later than one month after the filing date of this petition, by September 14, 2026.[11] A Commission ruling by this date will provide the Parties with the certainty necessary to maximize the benefits of this modest extension of the rate case filing deadline. Furthermore, to expedite consideration of this petition, Young also requests a shortened response period that the Commission deems appropriate based on the totality of the circumstances. A shortened time is warranted, as discussed above, by the extensive circulation of this petition prior to its filing and Young's reasonable expectation that there will be no opposition to this petition. As such, good cause exists to shorten the comment period.[12]

IV. Conclusion

Wherefore, Young respectfully requests that the Commission: (i) amend the Settlement as set forth herein; (ii) grant Young's motion to shorten the comment period to a length the Commission deems appropriate; and (iii) approve this petition no later than one month after filing,

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[11] Young reserves the unilateral right to withdraw the petition if it is not acted upon by that date.
[12] *See Colorado Interstate Gas Co.*, 134 FERC ¶ 61,125 at P 7 (2011).

by September 14, 2026. Young further requests that the Commission grant any other authorizations or waivers it may deem necessary to approve this petition as proposed.

Respectfully submitted,

YOUNG GAS STORAGE
COMPANY, LTD.

By: <u>*/s/ David R. Cain*</u>

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August 13, 2026

<u>Certificate of Service</u>

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010, 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 13th day of August, 2026.

<u>*/s/ David R. Cain*</u>

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