



November 23, 2020

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Gas Transmission Northwest LLC
700 Louisiana Street, Suite 700
Houston, TX 77002-2700

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Re: Gas Transmission Northwest LLC
Annual Fuel Charge Adjustment
Docket No. RP21-____ - _____

Dear Ms. Bose:

Gas Transmission Northwest LLC (“GTN”) submits for filing its annual fuel charge adjustment in compliance with Section 6.38 of the General Terms and Conditions (“GT&C”) of GTN’s FERC Gas Tariff, Fourth Revised Volume No. 1-A (“Tariff”).¹ GTN notes that the workpapers included herein support the restatement of GTN’s current fuel and line loss surcharge of 0.0000% per pipeline mile.²

Correspondence

The names, titles and mailing address of the persons to whom correspondence and communications concerning this filing should be directed are as follows:

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¹ 6.38 – GT&C, Fuel Adjustment Mechanism, v.4.0.0 (“Section 6.38”).

² See Section 4.3(d), Statement of Rates, Footnotes to Statement of Rates and Charges of GTN’s Tariff.

Statement of the Nature, Reasons, and Basis for Filing

Section 6.38 of GTN's GT&C provides a mechanism for GTN to track its fuel and line loss recoveries and establish a new fuel and line loss surcharge for each twelve-month period beginning January 1. GTN proposes that effective January 1, 2021, the fuel and line loss surcharge remain unchanged at 0.0000% per Dth per pipeline mile.

As required by Section 6.38, GTN is filing workpapers detailing the calculation of its fuel and line loss surcharge percentage. As more fully detailed in the attached workpapers (Appendix A, Schedule 1), the proposed surcharge percentage is computed by quantifying GTN's actual fuel and line loss over/under collection position at October 31, 2020, and dividing the result by an estimate of the quantities of gas to be delivered by GTN over the following twelve-month period.

Included herein, as required by paragraph 2(d) of Section 6.38, are workpapers (Appendix A, Schedule 2) showing the derivation of the fuel and line loss percentages in effect for each month of the twelve-month period from November 2019 through October 2020.

Effect on Exiting Rate Schedules

The proposed fuel and line loss surcharge will not change or affect the characteristics of any of GTN's transportation services other than as specifically stated herein.

Other Filings Which May Affect This Proceeding

There are no other filings before the Commission that may significantly affect the changes proposed herein.

Effect on Cost and Revenues

GTN will be kept revenue neutral as a result of this filing.

Contents of Filing

In accordance with Section 154.7 of the Commission's regulations, GTN is submitting the following via its electronic tariff filing:

- 1) This transmittal letter; and
- 2) Workpapers (Appendix A).

Certificate of Service

As required by Sections 154.7(b) and 154.208 of the Commission's regulations, a copy of this filing is being served upon all of GTN's existing customers and interested state regulatory agencies. A copy of this letter, together with any attachments, is available during regular business hours for public inspection at GTN's principal place of business.

Pursuant to Section 385.2005, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of his knowledge and belief. Additionally, the undersigned possesses full power and authority to sign such filing.

Any questions regarding this filing may be directed to Jonathan Scullion at (832) 320-5477.

Respectfully submitted,



John A. Roscher
Director, Rates & Tariffs

Enclosures

Appendix A

Workpapers

Fuel and Line Loss Surcharge Calculation (Volumes in Dth)										
Line No.										
1	Fuel Tracker Position for Twelve Months Ending October 31, 2019 1/									(40,054)
	Actual Compressor Fuel Used	Line Loss & Unaccounted For Gas Gain / (Loss)	Net Fuel Use and Lost & Unaccounted For Gas (a - b)	Retained Compressor Fuel at Posted Rate 2/	Current Fuel Rate as % of Posted Rate 3/	Current Month Fuel Retained (d * e)	Monthly (Over)/Under Position (c-f)	Surcharge Fuel Retained (d-f)	Cumulative (Over)/Under Position (i +g-h)	
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
2	Beginning Balance (Line 1)									(40,054)
3	Nov-19	1,315,917	(18,362)	1,334,279	1,304,402	100.00%	1,304,402	29,877	0	(10,177)
4	Dec-19	1,432,001	103,507	1,328,494	1,396,765	100.00%	1,396,765	(68,271)	0	(78,448)
5	Jan-20	1,397,963	104,549	1,293,414	1,501,643	100.00%	1,501,643	(208,229)	0	(286,677)
6	Feb-20	1,601,885	82,669	1,519,216	1,494,566	100.00%	1,494,566	24,650	0	(262,027)
7	Mar-20	1,717,724	285,699	1,432,025	1,284,215	100.00%	1,284,215	147,810	0	(114,217)
8	Apr-20	629,005	(395,149)	1,024,154	1,068,059	100.00%	1,068,059	(43,905)	0	(158,122)
9	May-20	997,962	(27,111)	1,025,073	976,823	100.00%	976,823	48,250	0	(109,872)
10	Jun-20	1,154,122	(105,699)	1,259,821	906,576	100.00%	906,576	353,245	0	243,373
11	Jul-20	1,276,125	(93,323)	1,369,448	1,148,760	100.00%	1,148,760	220,688	0	464,061
12	Aug-20	1,671,255	55,881	1,615,374	1,410,668	100.00%	1,410,668	204,706	0	668,767
13	Sep-20	1,457,574	48,086	1,409,488	1,505,515	100.00%	1,505,515	(96,027)	0	572,740
14	Oct-20	1,495,048	(30,926)	1,525,974	1,741,228	100.00%	1,741,228	(215,254)	0	357,486
15	Cumulative Balance Using Monthly Tracking Approach For Twelve Months Ending October 31, 2020									357,486
16	Total Annual Dth-mile Throughput									410,151,117,397
17	Fuel Surcharge (Line 15/ Line 16) 4/									0.0001%

1/ Docket No. RP20-258-000, Appendix A, Schedule 1, Page 1, Line 15.

2/ See Schedule 1, Page 2, Column (c) for Posted Rate.

3/ See Schedule 1, Page 2, Column (d) for Current Rate.

4/ If the fuel line and loss surcharge is +/- .0001%, then surcharge is deemed to be zero per Section 6.38.

Effective Fuel and Line Loss percentage is the sum of (1) the **current fuel and line loss percentage** and (2) **fuel and line loss surcharge percentage**.

11/30/19 FERC filing established surcharge of 0.0000% for calendar year 2020

If surcharge is +/- .0001%, then surcharge is deemed to be zero

Current Fuel and Line Loss Percentage is calculated each month and posted on our website

Fuel and Line Loss Surcharges in Effect During Review Period

Line No.	Month	Current Fuel & Line Loss % Per Dth-Mile	Surcharge Fuel & Line Loss % Per Dth-Mile	Effective (Posted) Fuel & Line Loss % (a+b)	Current Rate As % of Posted Rate (a/c)
		(a)	(b)	(c)	(d)
1	Nov-19	0.000039	0.000000	0.000039	100.00%
2	Dec-19	0.000040	0.000000	0.000040	100.00%
3	Jan-20	0.000042	0.000000	0.000042	100.00%
4	Feb-20	0.000041	0.000000	0.000041	100.00%
5	Mar-20	0.000036	0.000000	0.000036	100.00%
6	Apr-20	0.000036	0.000000	0.000036	100.00%
7	May-20	0.000030	0.000000	0.000030	100.00%
8	Jun-20	0.000027	0.000000	0.000027	100.00%
9	Jul-20	0.000032	0.000000	0.000032	100.00%
10	Aug-20	0.000038	0.000000	0.000038	100.00%
11	Sep-20	0.000042	0.000000	0.000042	100.00%
12	Oct-20	0.000047	0.000000	0.000047	100.00%

November Fuel and Line Loss Percentage Calculation (September Production)

1 Monthly estimate of quantity of gas to be delivered:	74,100,000 Dth
2 Projected quantities of compressor fuel:	1,440,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	46,782 Dth
4 Projected quantities of fuel and L&U:	1,393,218 Dth
5 Add projected fuel retention or (return):	3,791 Dth
6 Total fuel to be retained:	1,397,009 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.018853
8 Estimated Average Pipeline Miles	480
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000039

Preceding month (September) results:

10 Actual fuel usage	1,208,668 Dth
11 L&U gain / (loss)	46,782 Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,161,886 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,158,095 Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	3,791 Dth

<u>Fuel Retained</u>	<u>Percentage</u>	<u>Dth</u>
15 Current Month Fuel Retained	0.000037	1,158,095
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000037	1,158,095

December Fuel and Line Loss Percentage Calculation (October production)

1 Monthly estimate of quantity of gas to be delivered:	74,958,000 Dth
2 Projected quantities of compressor fuel:	1,488,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	37,598 Dth
4 Projected quantities of fuel and L&U:	1,450,402 Dth
5 Add projected fuel retention or (return):	(124,825) Dth
6 Total fuel to be retained:	1,325,577 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.017684
8 Estimated Average Pipeline Miles	440
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.00004

Preceding month (October) results:

10 Actual fuel usage	1,070,851 Dth
11 L&U gain / (loss)	<u>37,598 Dth</u>
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,033,253 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	<u>1,158,078 Dth</u>
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	<u>(124,825) Dth</u>

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000036	1,158,078
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	<u>0.000036</u>	<u>1,158,078</u>

January Fuel and Line Loss Percentage Calculation (November production)

1 Monthly estimate of quantity of gas to be delivered:	78,020,800	Dth
2 Projected quantities of compressor fuel:	1,395,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(18,362)	Dth
4 Projected quantities of fuel and L&U:	1,413,362	Dth
5 Add projected fuel retention or (return):	29,877	Dth
6 Total fuel to be retained:	1,443,239	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.018498	
8 Estimated Average Pipeline Miles	440	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000042	

Preceding month (November) results:

10 Actual fuel usage	1,315,917	Dth
11 L&U gain / (loss)	(18,362)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,334,279	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,304,402	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	29,877	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000039	1,304,402
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000039	1,304,402

February Fuel and Line Loss Percentage Calculation (December production)

1 Monthly estimate of quantity of gas to be delivered:	69,160,000	Dth
2 Projected quantities of compressor fuel:	1,428,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	103,507	Dth
4 Projected quantities of fuel and L&U:	1,324,493	Dth
5 Add projected fuel retention or (return):	(68,271)	Dth
6 Total fuel to be retained:	1,256,222	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.018164	
8 Estimated Average Pipeline Miles	440	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000041	

Preceding month (December) results:

10 Actual fuel usage	1,432,001	Dth
11 L&U gain / (loss)	103,507	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,328,494	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,396,765	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(68,271)	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.00004	1,396,765	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.00004	1,396,765	

March Fuel and Line Loss Percentage Calculation (January production)

1 Monthly estimate of quantity of gas to be delivered:	69,316,000	Dth
2 Projected quantities of compressor fuel:	1,581,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	104,549	Dth
4 Projected quantities of fuel and L&U:	1,476,451	Dth
5 Add projected fuel retention or (return):	(208,229)	Dth
6 Total fuel to be retained:	1,268,222	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.018296	
8 Estimated Average Pipeline Miles	515	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000036	

Preceding month (January) results:

10 Actual fuel usage	1,397,963	Dth
11 L&U gain / (loss)	104,549	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,293,414	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,501,643	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(208,229)	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000042	1,501,643	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000042	1,501,643	

April Fuel and Line Loss Percentage Calculation (February production)

1 Monthly estimate of quantity of gas to be delivered:	69,420,000 Dth
2 Projected quantities of compressor fuel:	1,260,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	82,669 Dth
4 Projected quantities of fuel and L&U:	1,177,331 Dth
5 Add projected fuel retention or (return):	24,650 Dth
6 Total fuel to be retained:	1,201,981 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.017315
8 Estimated Average Pipeline Miles	485
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000036

Preceding month (February) results:

10 Actual fuel usage	1,601,885 Dth
11 L&U gain / (loss)	<u>82,669 Dth</u>
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,519,216 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	<u>1,494,566 Dth</u>
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	<u><u>24,650 Dth</u></u>

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000041	1,494,566
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	<u>0.000041</u>	<u>1,494,566</u>

May Fuel and Line Loss Percentage Calculation (March production)

1 Monthly estimate of quantity of gas to be delivered:	69,316,000 Dth
2 Projected quantities of compressor fuel:	1,201,250 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	285,699 Dth
4 Projected quantities of fuel and L&U:	915,551 Dth
5 Add projected fuel retention or (return):	147,810 Dth
6 Total fuel to be retained:	1,063,361 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.015341
8 Estimated Average Pipeline Miles	510
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.00003

Preceding month (March) results:

10 Actual fuel usage	1,717,724 Dth
11 L&U gain / (loss)	<u>285,699 Dth</u>
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,432,025 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	<u>1,284,215 Dth</u>
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	<u><u>147,810 Dth</u></u>

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000036	1,284,215
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	<u>0.000036</u>	<u>1,284,215</u>

June Fuel and Line Loss Percentage Calculation (April production)

1 Monthly estimate of quantity of gas to be delivered:	68,640,000 Dth
2 Projected quantities of compressor fuel:	630,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(395,149) Dth
4 Projected quantities of fuel and L&U:	1,025,149 Dth
5 Add projected fuel retention or (return):	(43,905) Dth
6 Total fuel to be retained:	981,244 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.014296
8 Estimated Average Pipeline Miles	530
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000027

Preceding month (April) results:

10 Actual fuel usage	629,005 Dth
11 L&U gain / (loss)	<u>(395,149) Dth</u>
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,024,154 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	<u>1,068,059 Dth</u>
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	<u>(43,905) Dth</u>

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000036	1,068,059
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	<u>0.000036</u>	<u>1,068,059</u>

July Fuel and Line Loss Percentage Calculation (May production)

1 Monthly estimate of quantity of gas to be delivered:	70,791,600	Dth
2 Projected quantities of compressor fuel:	1,116,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(27,111)	Dth
4 Projected quantities of fuel and L&U:	1,143,111	Dth
5 Add projected fuel retention or (return):	48,250	Dth
6 Total fuel to be retained:	1,191,361	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.016829	
8 Estimated Average Pipeline Miles	530	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000032	

Preceding month (May) results:

10 Actual fuel usage	997,962	Dth
11 L&U gain / (loss)	(27,111)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,025,073	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	976,823	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	48,250	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.00003	976,823
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.00003	976,823

August Fuel and Line Loss Percentage Calculation (June production)

1 Monthly estimate of quantity of gas to be delivered:	74,597,625	Dth
2 Projected quantities of compressor fuel:	1,041,600	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(105,699)	Dth
4 Projected quantities of fuel and L&U:	1,147,299	Dth
5 Add projected fuel retention or (return):	353,245	Dth
6 Total fuel to be retained:	1,500,544	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.020115	
8 Estimated Average Pipeline Miles	525	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000038	

Preceding month (June) results:

10 Actual fuel usage	1,154,122	Dth
11 L&U gain / (loss)	(105,699)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,259,821	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	906,576	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	353,245	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000027	906,576	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000027	906,576	

September Fuel and Line Loss Percentage Calculation (July production)

1 Monthly estimate of quantity of gas to be delivered:	73,179,000	Dth
2 Projected quantities of compressor fuel:	1,440,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(93,323)	Dth
4 Projected quantities of fuel and L&U:	1,533,323	Dth
5 Add projected fuel retention or (return):	220,688	Dth
6 Total fuel to be retained:	1,754,011	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.023969	
8 Estimated Average Pipeline Miles	565	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000042	

Preceding month (July) results:

10 Actual fuel usage	1,276,125	Dth
11 L&U gain / (loss)	(93,323)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,369,448	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,148,760	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	220,688	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000032	1,148,760
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000032	1,148,760

October Fuel and Line Loss Percentage Calculation (August production)

1 Monthly estimate of quantity of gas to be delivered:	77,004,000	Dth
2 Projected quantities of compressor fuel:	1,627,500	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	55,881	Dth
4 Projected quantities of fuel and L&U:	1,571,619	Dth
5 Add projected fuel retention or (return):	204,706	Dth
6 Total fuel to be retained:	1,776,325	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.023068	
8 Estimated Average Pipeline Miles	490	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000047	

Preceding month (August) results:

10 Actual fuel usage	1,671,255	Dth
11 L&U gain / (loss)	55,881	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,615,374	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,410,668	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	204,706	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000038	1,410,668	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000038	1,410,668	