



January 8, 2024

Ms. Debbie-Anne Reese, Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Gas Transmission Northwest LLC**  
700 Louisiana Street, Suite 1300  
Houston, TX 77002-2700

Sorana Linder  
Director, Rates, Tariffs and Modernization

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Re: Gas Transmission Northwest LLC  
Refund Report  
Docket No. RP24- \_\_\_-000

Dear Ms. Reese:

Pursuant to Section 154.501<sup>1</sup> of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations and Section 6.36<sup>2</sup> of the General Terms and Conditions (“GT&C”) of Gas Transmission Northwest LLC’s (“GTN”) FERC Gas Tariff, Fourth Revised Volume No. 1-A (“Tariff”), GTN respectfully submits for filing and acceptance its report of refunds for interruptible transportation (“IT”) revenue on the Coyote Springs Lateral for the twelve-month period ending October 31, 2023 (the “Refund Year”).

### **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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<sup>1</sup> 18 C.F.R. § 154.501 (2024).

<sup>2</sup> Section 6.36 – GT&C, Crediting of IT Revenues on Extensions (“Section 6.36”).

### **Statement of the Nature, Reasons, and Basis for Filing**

GTN's Coyote Springs Lateral extends 18.5 miles from milepost 304.25 on GTN's mainline to two (2) power plants located in Boardman, Oregon. GTN provides firm service on its Coyote Springs Lateral pursuant to a certificate issued in Docket No. CP93-618<sup>3</sup> and GTN's open access Rate Schedule FTS-1(E-3). GTN provides interruptible service on the Coyote Springs Lateral under Rate Schedule ITS-1(E-3), as approved by Commission Letter Order dated October 30, 1995.

Section 6.36 of GTN's Tariff requires GTN to credit "eligible" firm shippers ninety percent (90%) of the interruptible transportation revenues it received on the Coyote Springs Lateral. Specifically, Section 6.36 provides that within forty-five (45) days after November 1<sup>st</sup> of each year, GTN shall determine the total amount of applicable IT revenues received on the Coyote Springs Lateral (exclusive of variable costs and volumetric surcharges) during the previous twelve-month period, and the respective portion of such amount to be credited to each eligible firm shipper.<sup>4</sup>

To the extent GTN is required to provide IT revenue credits, GTN credits the eligible firm shippers through a credit billing adjustment in the next invoice rendered after the determination of the applicable credit amount. In accordance with Section 6.36, GTN refunded \$13,104.83 to eligible shippers through a credit billing adjustment on January 3, 2024. This refund includes interest calculated through the January 3<sup>rd</sup> invoice date.

Workpapers detailing the refund information, as required by Section 154.501(e) of the Commission's regulations, are included in Appendix A, attached hereto. Schedule 1 shows the interruptible revenue collected during each month of the Refund Year, and calculates the credit amount for each month (*i.e.*, 90% of the revenue for each month). For the year ending October 31, 2023, GTN collected interruptible revenues under Rate Schedule ITS-1(E-3) totaling \$13,879.68 (Schedule 1, column h, line 25), of which \$12,491.71 was refunded to eligible shippers (Schedule 1, column i, line 25). Schedule 2 provides a calculation of the interest accrual on a monthly basis, including quarterly compounding. The interest rate used is the average prime rate for the calendar quarter as specified in Section 154.501(d) of the Commission's regulations. As indicated on

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<sup>3</sup> *Pacific Gas Transmission Company*, 70 FERC ¶ 61,016, *reh'g*, 71 FERC ¶ 61,268 (1995).

<sup>4</sup> "Eligible" shippers are defined in Section 6.36(1)(a) of GTN's Tariff as firm shippers under Rate Schedules FTS-1(E-3) and FHS(E-3), excluding shippers receiving service under a Capacity Release Service Agreement.

Schedule 2, column h, line 26, GTN accrued cumulative interest charges of \$613.12 for a total refund amount of \$13,104.83 (Schedule 2, column j, line 26).

Schedule 3 shows the calculation of the proportionate refund amount credited to each shipper. Schedule 3, column b, reflects the total transportation revenue from firm transportation service on the Coyote Springs Lateral under Rate Schedule FTS-1(E-3) during the Refund Year.<sup>5</sup> As reflected on Schedule 3, column b, line 3, GTN collected a total of \$913,090.62 in firm revenue during the Refund Year. The percent of each shipper's contribution to GTN's firm revenue on the Coyote Springs Lateral is calculated by dividing each shipper's net contribution (column b) by the total firm revenue collected (column c), and the resulting percentage is shown in column d, "Customer Allocation Percent." Each shipper's proportionate share of the refund is calculated by multiplying the Customer Allocation Percentage (column d) by the refund revenue (column e) and the refund interest total (column g) and adding the resulting numbers together, as shown on Schedule 2. The resulting refund for each customer is set out in column i.

In accordance with Section 154.501(e)(6)(i) of the Commission's regulations, this filing includes this transmittal letter (including all information required by the Commission's regulations), and workpapers showing the calculation of the refund, attached hereto as Appendix A.

### **Certificate of Service**

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure,<sup>6</sup> a copy of this filing, together with all enclosures, is being served upon all jurisdictional customers and interested state regulatory agencies.

In accordance with Section 154.4 and Rule 2005, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of her knowledge and belief. Additionally, the undersigned possesses full power and authority to sign such filing.

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<sup>5</sup> Pursuant to Section 6.28.10 of GTN's Tariff, GTN invoices releasing shippers for their capacity, but credits the releasing shippers with revenue received from replacement shippers. In those instances where a shipper holds capacity at a rate below GTN's maximum tariff rate and releases capacity to a second shipper at a rate greater than the releasing shipper's as-billed rate, the amount in excess of the releasing shipper's as-billed rate is credited directly to the releasing shipper, and does not constitute revenue received by GTN. As such, the net transportation revenues received from individual customers may not equal the total amount of a shipper's monthly invoice.

<sup>6</sup> 18 C.F.R Part 385 (2024).

Any questions regarding this filing may be directed to Jonathan Scullion at (832) 320-5520.

Respectfully submitted,

GAS TRANSMISSION NORTHWEST LLC

A handwritten signature in black ink, appearing to read "Sorana Linder", with a long horizontal flourish extending to the right.

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Sorana Linder  
Director – Rates, Tariffs & Modernization

Enclosures

# **Appendix A**

To GTN's Refund Report

**Interruptible Revenues Under Rate Schedule ITS-1(E-3)**

Line Number	Invoice Period [a]	Quantity (Dth) [b]	Distance [c]	Non-Mileage Delivery Rate 1/ (per Dth) [d]	Mileage Delivery Rate 1/ (per Dth-mile) [e]	Non-Mileage Revenue [f] (b x d)	Mileage Revenue [g] (b x c x e)	Total Revenue [h] (f + g)	Revenue Credit 2/ [i] (h x 90%)
1	Nov-22	45,657	6.00	0.001168	0.001167	\$ 53.33	\$ 319.69	\$ 373.02	\$ 335.72
2	Nov-22	41,805	18.50	0.001168	0.001167	48.83	902.55	951.38	856.24
3	Dec-22	29,398	6.00	0.001168	0.001167	34.34	205.84	240.18	216.16
4	Dec-22	45,171	18.50	0.001168	0.001167	52.76	975.22	1,027.98	925.18
5	Jan-23	36,327	6.00	0.001168	0.001167	42.43	254.36	296.79	267.11
6	Jan-23	41,003	18.50	0.001168	0.001167	47.89	885.23	933.12	839.81
7	Feb-23	219	6.00	0.001168	0.001167	0.26	1.53	1.79	1.61
8	Feb-23	45,205	18.50	0.001168	0.001167	52.80	975.95	1,028.75	925.88
9	Mar-23	2,693	6.00	0.001168	0.001167	3.15	18.86	22.01	19.81
10	Mar-23	59,620	18.50	0.001168	0.001167	69.64	1,287.17	1,356.81	1,221.13
11	Apr-23	3,694	6.00	0.001168	0.001167	4.31	25.87	30.18	27.16
12	Apr-23	48,384	18.50	0.001168	0.001167	56.51	1,044.59	1,101.10	990.99
13	May-23	-	6.00	0.001168	0.001167	-	-	-	-
14	May-23	49,855	18.50	0.001168	0.001167	58.23	1,076.34	1,134.57	1,021.11
15	Jun-23	750	6.00	0.001168	0.001167	0.88	5.25	6.13	5.52
16	Jun-23	50,200	18.50	0.001168	0.001167	58.63	1,083.79	1,142.42	1,028.18
17	Jul-23	-	6.00	0.001168	0.001167	-	-	-	-
18	Jul-23	30,033	18.50	0.001168	0.001167	35.08	648.40	683.48	615.13
19	Aug-23	12,927	6.00	0.001168	0.001167	15.10	90.51	105.61	95.05
20	Aug-23	43,235	18.50	0.001168	0.001167	50.50	933.42	983.92	885.53
21	Sep-23	33,325	6.00	0.001168	0.001167	38.92	233.34	272.26	245.03
22	Sep-23	39,820	18.50	0.001168	0.001167	46.51	859.69	906.20	815.58
23	Oct-23	42,585	6.00	0.001168	0.001167	49.74	298.18	347.92	313.13
24	Oct-23	41,044	18.50	0.001168	0.001167	47.94	886.12	934.06	840.65
25						\$ 867.78	\$ 13,011.90	\$ 13,879.68	\$ 12,491.71

1/ FERC Gas Tariff, Fourth Revised Volume No. 1-A, Section 4.2, Statement of Rates, ITS-1 Rates.

2/ Per GTN's Tariff (Section 6.36 - GT&C, Crediting of IT Revenues on Extensions) the Crediting Percentage (90%) is applied to interruptible transportation revenues, exclusive of variable costs and surcharges.

Calculation of Interest

Line Number	Invoice Period	Revenue Credit	Start Date 1/	End Date	Days of Interest Accrual	Cumulative Interest Basis	FERC Interest Rate	Interest Amount 2/	Accrued Interest Used for Quarterly Compounding	Total Revenue Credit
[a]	[b]	[c]	[d]	[e]	[f]	[g]	[h]	[i]	[j]	
1	Nov-22	\$ 1,191.96	12/13/2022	12/31/2022	19	\$ 1,191.96	4.91%	\$ 3.05	\$ 3.05	\$ 1,195.01
2	Nov-22		1/1/2023	1/17/2023	17	\$ 1,195.01	6.31%	\$ 3.51		\$ 1,195.01
3	Dec-22	\$ 1,141.34	1/18/2023	1/31/2023	14	\$ 2,336.35	6.31%	\$ 5.65		\$ 2,336.35
4	Dec-22		2/1/2023	2/13/2023	13	\$ 2,336.35	6.31%	\$ 5.25		\$ 2,336.35
5	Jan-23	\$ 1,106.92	2/14/2023	2/28/2023	15	\$ 3,443.27	6.31%	\$ 8.93		\$ 3,443.27
6	Jan-23		3/1/2023	3/13/2023	13	\$ 3,443.27	6.31%	\$ 7.74		\$ 3,443.27
7	Feb-23	\$ 927.49	3/14/2023	3/31/2023	18	\$ 4,370.76	6.31%	\$ 13.60	\$ 44.68	\$ 4,415.44
8	Feb-23		4/1/2023	4/14/2023	14	\$ 4,415.44	7.50%	\$ 12.70		\$ 4,415.44
9	Mar-23	\$ 1,240.94	4/15/2023	4/30/2023	16	\$ 5,656.38	7.50%	\$ 18.60		\$ 5,656.38
10	Mar-23		5/1/2023	5/12/2023	12	\$ 5,656.38	7.50%	\$ 13.95		\$ 5,656.38
11	Apr-23	\$ 1,018.15	5/13/2023	5/31/2023	19	\$ 6,674.53	7.50%	\$ 26.06		\$ 6,674.53
12	Apr-23		6/1/2023	6/12/2023	12	\$ 6,674.53	7.50%	\$ 16.46		\$ 6,674.53
13	May-23	\$ 1,021.11	6/13/2023	6/30/2023	18	\$ 7,695.64	7.50%	\$ 28.46	\$ 116.23	\$ 7,811.87
14	May-23		7/1/2023	7/17/2023	17	\$ 7,811.87	8.02%	\$ 29.18		\$ 7,811.87
15	Jun-23	\$ 1,033.70	7/18/2023	7/31/2023	14	\$ 8,845.57	8.02%	\$ 27.21		\$ 8,845.57
16	Jun-23		8/1/2023	8/14/2023	14	\$ 8,845.57	8.02%	\$ 27.21		\$ 8,845.57
17	Jul-23	\$ 615.13	8/15/2023	8/31/2023	17	\$ 9,460.70	8.02%	\$ 35.34		\$ 9,460.70
18	Jul-23		9/1/2023	9/15/2023	15	\$ 9,460.70	8.02%	\$ 31.18		\$ 9,460.70
19	Aug-23	\$ 980.58	9/16/2023	9/30/2023	15	\$ 10,441.28	8.02%	\$ 34.41	\$ 184.53	\$ 10,625.81
20	Aug-23		10/1/2023	10/13/2023	13	\$ 10,625.81	8.35%	\$ 31.60		\$ 10,625.81
21	Sep-23	\$ 1,060.61	10/14/2023	10/31/2023	18	\$ 11,686.42	8.35%	\$ 48.12		\$ 11,686.42
22	Sep-23		11/1/2023	11/13/2023	13	\$ 11,686.42	8.35%	\$ 34.76		\$ 11,686.42
23	Oct-23	\$ 1,153.78	11/14/2023	11/30/2023	17	\$ 12,840.20	8.35%	\$ 49.94		\$ 12,840.20
24	Oct-23		12/1/2023	12/31/2023	31	\$ 12,840.20	8.35%	\$ 91.06	\$ 255.48	\$ 13,095.68
25			1/1/2024	1/3/2024	3	\$ 13,095.68	8.50%	\$ 9.15	\$ 9.15	\$ 13,104.83
26		\$ 12,491.71						\$ 613.12		\$ 13,104.83

1/ The Start Date for interest calculation is the next day following the invoice due date.

2/ Interest is computed in accordance with Section 154.501 of the Commission's Regulations - the FERC interest rate (column g) times the proration of number of days in the month divided by the number of days in the year times the principle and any applicable compounded interest. Per Section 154.501, interest is compounded quarterly.

## Allocation of Revenue Credit

Line Number	Customer [a]	Net Transportation Revenue Contributed On Coyote Springs Lateral [b]	Total Net Transportation Revenue Contributed On Coyote Springs Lateral (Col. b, Line 3) [c]	Customer Allocation Percent 1/ (Col. b / Col. c) [d]	Refund Rev (Schedule 2, Col. D, Line 26) [e]	Refund Revenue (Col. d x Col.e) [f]	Refund Interest Total (Schedule 2, Col. J, Line 26) [g]	Refund Interest (Col. d x Col.g) [h]	Refund Per Customer (Col. f + Col. h) [i]
1	Avista Corporation	\$ 475,563.02	\$ 913,090.62	52.08%	\$ 12,491.71	\$ 6,506.03	\$ 613.12	\$ 319.33	\$ 6,825.36
2	Portland General Electric Company	437,527.60	913,090.62	47.92%	12,491.71	5,985.68	613.12	293.79	\$ 6,279.47
3	<b>TOTAL</b>	<b>\$ 913,090.62</b>		<b>100.00%</b>		<b>\$ 12,491.71</b>		<b>\$ 613.12</b>	<b>\$ 13,104.83</b>

1/ Percentage rounded to 2 digits for display. Calculation based on 8 decimal places.