



November 26, 2019

Gas Transmission Northwest LLC
700 Louisiana Street, Suite 700
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John A. Roscher
Director, Rates & Tariffs

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
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Re: Gas Transmission Northwest LLC
Annual Fuel Charge Adjustment
Docket No. RP20-____ - _____

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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* Persons designated for official service pursuant to Rule 2010.

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, 2020, 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, 2019, 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 2018 through October 2019.

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).

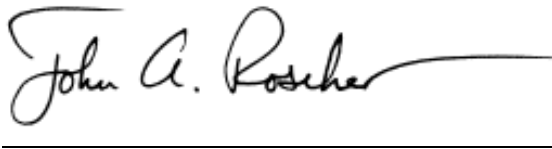
Certificate of Service

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 David A. Alonzo 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, 2018 1/								105,571	
	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)								105,571	
3	Nov-18	1,145,913	82,825	1,063,088	1,495,721	96.00%	1,435,892	(372,804)	59,829	(327,062)
4	Dec-18	1,388,917	220,709	1,168,208	1,500,045	95.65%	1,434,793	(266,585)	65,252	(658,899)
5	Jan-19	1,376,423	166,835	1,209,588	1,220,623	100.00%	1,220,623	(11,035)	0	(669,934)
6	Feb-19	919,407	200,662	718,745	932,154	100.00%	932,154	(213,409)	0	(883,343)
7	Mar-19	1,026,393	116,765	909,628	1,076,769	100.00%	1,076,769	(167,141)	0	(1,050,484)
8	Apr-19	1,186,803	215,003	971,800	935,326	100.00%	935,326	36,474	0	(1,014,010)
9	May-19	1,303,632	131,622	1,172,010	755,250	100.00%	755,250	416,760	0	(597,250)
10	Jun-19	1,619,579	212,991	1,406,588	882,613	100.00%	882,613	523,975	0	(73,275)
11	Jul-19	1,421,080	263,498	1,157,582	961,455	100.00%	961,455	196,127	0	122,852
12	Aug-19	1,508,237	160,599	1,347,638	1,389,510	100.00%	1,389,510	(41,872)	0	80,980
13	Sep-19	1,208,668	46,782	1,161,886	1,158,095	100.00%	1,158,095	3,791	0	84,771
14	Oct-19	1,070,851	37,598	1,033,253	1,158,078	100.00%	1,158,078	(124,825)	0	(40,054)
15	Cumulative Balance Using Monthly Tracking Approach For Twelve Months Ending October 31, 2019								(40,054)	
16	Total Annual Dth-mile Throughput								406,026,914,873	
17	Fuel Surcharge (Line 15/ Line 16) 4/								0.0000%	

1/ Docket No. RP19-314-000, Appendix C, 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.

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-18	0.000048	0.000002	0.000050	96.00%
2	Dec-18	0.000044	0.000002	0.000046	95.65%
3	Jan-19	0.000035	0.000000	0.000035	100.00%
4	Feb-19	0.000034	0.000000	0.000034	100.00%
5	Mar-19	0.000033	0.000000	0.000033	100.00%
6	Apr-19	0.000028	0.000000	0.000028	100.00%
7	May-19	0.000021	0.000000	0.000021	100.00%
8	Jun-19	0.000024	0.000000	0.000024	100.00%
9	Jul-19	0.000028	0.000000	0.000028	100.00%
10	Aug-19	0.000040	0.000000	0.000040	100.00%
11	Sep-19	0.000037	0.000000	0.000037	100.00%
12	Oct-19	0.000036	0.000000	0.000036	100.00%

November Fuel and Line Loss Percentage Calculation (September Production)

1 Monthly estimate of quantity of gas to be delivered:	70,980,000	Dth
2 Projected quantities of compressor fuel:	1,647,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	18,050	Dth
4 Projected quantities of fuel and L&U:	1,628,950	Dth
5 Add projected fuel retention or (return):	79,019	Dth
6 Total fuel to be retained:	1,707,969	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.024063	
8 Estimated Average Pipeline Miles	500	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000048	

Preceding month (September) results:

10 Actual fuel usage	1,676,818	Dth
11 L&U gain / (loss)	18,050	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,658,768	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,579,749	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	79,019	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000044	1,579,749
16 Surcharge Fuel Retained	0.000002	71,844
17 Total Fuel Retained at Posted Rate	0.000046	1,651,593

December Fuel and Line Loss Percentage Calculation (October production)

1 Monthly estimate of quantity of gas to be delivered:	77,376,000 Dth
2 Projected quantities of compressor fuel:	1,860,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	118,640 Dth
4 Projected quantities of fuel and L&U:	1,741,360 Dth
5 Add projected fuel retention or (return):	(251,418) Dth
6 Total fuel to be retained:	1,489,942 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.019256
8 Estimated Average Pipeline Miles	440
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000044

Preceding month (October) results:

10 Actual fuel usage	1,409,151 Dth
11 L&U gain / (loss)	118,640 Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,290,511 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,541,929 Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(251,418) Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000046	1,541,929
16 Surcharge Fuel Retained	0.000002	67,096
17 Total Fuel Retained at Posted Rate	0.000048	1,609,025

January Fuel and Line Loss Percentage Calculation (November production)

1 Monthly estimate of quantity of gas to be delivered:	70,928,000 Dth
2 Projected quantities of compressor fuel:	1,488,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	82,825 Dth
4 Projected quantities of fuel and L&U:	1,405,175 Dth
5 Add projected fuel retention or (return):	(372,804) Dth
6 Total fuel to be retained:	1,032,371 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.014555
8 Estimated Average Pipeline Miles	420
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000035

Preceding month (November) results:

10 Actual fuel usage	1,145,913 Dth
11 L&U gain / (loss)	82,825 Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,063,088 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,435,892 Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(372,804) Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000048	1,435,892
16 Surcharge Fuel Retained	0.000002	59,829
17 Total Fuel Retained at Posted Rate	0.00005	1,495,721

February Fuel and Line Loss Percentage Calculation (December production)

1 Monthly estimate of quantity of gas to be delivered:	66,976,000	Dth
2 Projected quantities of compressor fuel:	1,512,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	220,709	Dth
4 Projected quantities of fuel and L&U:	1,291,291	Dth
5 Add projected fuel retention or (return):	(266,585)	Dth
6 Total fuel to be retained:	1,024,706	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.0153	
8 Estimated Average Pipeline Miles	455	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000034	

Preceding month (December) results:

10 Actual fuel usage	1,388,917	Dth
11 L&U gain / (loss)	220,709	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,168,208	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,434,793	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(266,585)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000044	1,434,793
16 Surcharge Fuel Retained	0.000002	65,252
17 Total Fuel Retained at Posted Rate	0.000046	1,500,045

March Fuel and Line Loss Percentage Calculation (January production)

1 Monthly estimate of quantity of gas to be delivered:	67,704,000	Dth
2 Projected quantities of compressor fuel:	1,302,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	166,835	Dth
4 Projected quantities of fuel and L&U:	1,135,165	Dth
5 Add projected fuel retention or (return):	(11,035)	Dth
6 Total fuel to be retained:	1,124,130	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.016604	
8 Estimated Average Pipeline Miles	505	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000033	

Preceding month (January) results:

10 Actual fuel usage	1,376,423	Dth
11 L&U gain / (loss)	166,835	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,209,588	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,220,623	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(11,035)	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000035	1,220,623	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000035	1,220,623	

April Fuel and Line Loss Percentage Calculation (February production)

1 Monthly estimate of quantity of gas to be delivered:	70,200,000	Dth
2 Projected quantities of compressor fuel:	1,392,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	200,662	Dth
4 Projected quantities of fuel and L&U:	1,191,338	Dth
5 Add projected fuel retention or (return):	(213,409)	Dth
6 Total fuel to be retained:	977,929	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.013931	
8 Estimated Average Pipeline Miles	505	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000028	

Preceding month (February) results:

10 Actual fuel usage	919,407	Dth
11 L&U gain / (loss)	200,662	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	718,745	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	932,154	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(213,409)	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000034	932,154	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000034	932,154	

May Fuel and Line Loss Percentage Calculation (March production)

1 Monthly estimate of quantity of gas to be delivered:	71,734,000	Dth
2 Projected quantities of compressor fuel:	1,116,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	116,765	Dth
4 Projected quantities of fuel and L&U:	999,235	Dth
5 Add projected fuel retention or (return):	(167,141)	Dth
6 Total fuel to be retained:	832,094	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.0116	
8 Estimated Average Pipeline Miles	560	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000021	

Preceding month (March) results:

10 Actual fuel usage	1,026,393	Dth
11 L&U gain / (loss)	116,765	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	909,628	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,076,769	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(167,141)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000033	1,076,769
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000033	1,076,769

June Fuel and Line Loss Percentage Calculation (April production)

1 Monthly estimate of quantity of gas to be delivered:	71,622,000	Dth
2 Projected quantities of compressor fuel:	1,134,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	215,003	Dth
4 Projected quantities of fuel and L&U:	918,997	Dth
5 Add projected fuel retention or (return):	36,474	Dth
6 Total fuel to be retained:	955,471	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.01334	
8 Estimated Average Pipeline Miles	560	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000024	

Preceding month (April) results:

10 Actual fuel usage	1,186,803	Dth
11 L&U gain / (loss)	215,003	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	971,800	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	935,326	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	36,474	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000028	935,326	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000028	935,326	

July Fuel and Line Loss Percentage Calculation (May production)

1 Monthly estimate of quantity of gas to be delivered:	68,029,500	Dth
2 Projected quantities of compressor fuel:	694,400	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	131,622	Dth
4 Projected quantities of fuel and L&U:	562,778	Dth
5 Add projected fuel retention or (return):	416,760	Dth
6 Total fuel to be retained:	979,538	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.014399	
8 Estimated Average Pipeline Miles	510	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000028	

Preceding month (May) results:

10 Actual fuel usage	1,303,632	Dth
11 L&U gain / (loss)	131,622	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,172,010	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	755,250	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	416,760	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000021	755,250	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000021	755,250	

August Fuel and Line Loss Percentage Calculation (June production)

1 Monthly estimate of quantity of gas to be delivered:	72,540,000	Dth
2 Projected quantities of compressor fuel:	1,302,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	212,991	Dth
4 Projected quantities of fuel and L&U:	1,089,009	Dth
5 Add projected fuel retention or (return):	523,975	Dth
6 Total fuel to be retained:	1,612,984	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.022236	
8 Estimated Average Pipeline Miles	560	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.00004	

Preceding month (June) results:

10 Actual fuel usage	1,619,579	Dth
11 L&U gain / (loss)	212,991	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,406,588	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	882,613	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	523,975	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000024	882,613	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000024	882,613	

September Fuel and Line Loss Percentage Calculation (July production)

1 Monthly estimate of quantity of gas to be delivered:	70,200,000	Dth
2 Projected quantities of compressor fuel:	1,440,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	263,498	Dth
4 Projected quantities of fuel and L&U:	1,176,502	Dth
5 Add projected fuel retention or (return):	196,127	Dth
6 Total fuel to be retained:	1,372,629	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.019553	
8 Estimated Average Pipeline Miles	530	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000037	

Preceding month (July) results:

10 Actual fuel usage	1,421,080	Dth
11 L&U gain / (loss)	263,498	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,157,582	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	961,455	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	196,127	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000028	961,455
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000028	961,455

October Fuel and Line Loss Percentage Calculation (August production)

1 Monthly estimate of quantity of gas to be delivered:	71,734,000	Dth
2 Projected quantities of compressor fuel:	1,441,500	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	160,599	Dth
4 Projected quantities of fuel and L&U:	1,280,901	Dth
5 Add projected fuel retention or (return):	(41,872)	Dth
6 Total fuel to be retained:	1,239,029	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.017273	
8 Estimated Average Pipeline Miles	485	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000036	

Preceding month (August) results:

10 Actual fuel usage	1,508,237	Dth
11 L&U gain / (loss)	160,599	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,347,638	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,389,510	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(41,872)	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.00004	1,389,510	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.00004	1,389,510	