



October 14, 2011

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Gas Transmission Northwest LLC**  
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Houston, Texas 77002-2761

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Re: Gas Transmission Northwest LLC  
Compliance Filing  
Docket No. RP10-901-001

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act and Part 154 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations,<sup>1</sup> and in compliance with the Commission order issued August 15, 2011, in Docket No. RP10-901-000 ("August 15 Order"),<sup>2</sup> Gas Transmission Northwest LLC ("GTN")<sup>3</sup> respectfully submits the instant filing to report that it has filed with the Commission to modify its FERC Gas Tariff, Fourth Revised Volume No. 1-A ("Tariff"), consistent with the directive in the Commission's 2011 Order.

### Correspondence

The names, titles, mailing addresses, and telephone numbers of those persons to whom correspondence and communications concerning this filing should be addressed are as follows:

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<sup>1</sup> 18 C.F.R. Part 154 (2011).

<sup>2</sup> *Gas Transmission Northwest Corporation*, 136 FERC ¶ 61,105 (2011).

<sup>3</sup> GTN was formerly known as Gas Transmission Northwest Corporation.

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\* Persons designated for official service pursuant to Rule 2010.

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

On June 29, 2010, in Docket No. RP10-901-000, GTN submitted for Commission review 107 currently effective, potentially non-conforming service agreements, as well as revised tariff sheets listing the agreements, for approval with the Commission. On July 29, 2010, the Commission issued an order accepting the agreements, effective on their respective effective dates subject to further review by the Commission.<sup>4</sup> On August 15, 2011, after completing its review of the subject agreements, the Commission issued its August 15 Order, which accepted GTN's non-conforming agreements to be effective as of their respective effective dates, with the exception of two (2) agreements.

Contract Nos. 179 and 7828 contain minimum delivery pressure commitments, and the Commission noted that neither GTN's Tariff nor its form of service agreement provide for the type of minimum pressure guarantee included in these contracts. The Commission found that these pressure commitments affect the quality of service to be received by the shippers and, therefore, cannot be negotiated unless GTN's Tariff authorizes such negotiation with all its customers.<sup>5</sup> Accordingly, the Commission directed GTN to 1) file an explanation with the Commission detailing the unique operational need for the special pressure commitments in Contract Nos. 179 and 7828; 2) remove the minimum pressure provisions in these agreements; or

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<sup>4</sup> *Gas Transmission Northwest Corporation*, 132 FERC ¶ 61,081 (2010).

<sup>5</sup> August 15 Order at P 22.

3) file to revise its generally applicable Tariff or form of service agreement to clearly allow the negotiation of a minimum pressure obligation by all similarly situated shippers.<sup>6</sup>

On October 11, 2011, in Docket No. RP12-15-000, GTN filed with the Commission a proposed new section to its Tariff that would add pressure commitment provisions. Specifically, in that docket GTN is seeking authorization to offer minimum or maximum receipt or delivery pressure commitments to its shippers on a non-discriminatory basis.<sup>7</sup> Furthermore, GTN is adding an optional pressure commitment provision to its Rate Schedule FTS-1 Form of Service Agreement (“FSA”), including a fill-in-the-blank table in Appendix A of the FSA to accommodate the minimum or maximum receipt or delivery point pressure being agreed to by GTN and its shipper.<sup>8</sup>

As such, GTN is reporting herein that the proposed pressure commitment language filed with the Commission on October 11, 2011, is in compliance with the Commission’s directive to file, within 60 days of the date of the August 15 Order, to revise its generally applicable tariff or form of service agreement to clearly allow the negotiation of a minimum pressure obligation by all similarly situated shippers.

#### Other Filings Which May Affect This Proceeding

On October 11, 2011, in Docket No. RP12-15-000, GTN filed with the Commission to add pressure commitment provisions to its Tariff.

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<sup>6</sup> *Id.* at ordering paragraph.

<sup>7</sup> GTN is proposing to offer pressure commitments by adding new Section 6.42-GT&C, Pressure Commitments to its Tariff.

<sup>8</sup> These proposed revisions are to Section 7.1-Service Agreements, Rate Schedule FTS-1, and Section 7.1.1-Service Agreements, Rate Schedule FTS-1 – Exhibit A, respectively.

### Contents of Filing

In accordance with Commission Order No. 714,<sup>9</sup> GTN is submitting an XML filing package, which includes this transmittal letter.

### Certificate of Service

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

Pursuant to Section 385.2005 and Section 385.2011(c) (5), 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. The undersigned possesses full power and authority to sign such filing.

Any questions regarding this filing may be directed to Joan Collins at (832) 320-5651.

Respectfully submitted,

GAS TRANSMISSION NORTHWEST LLC

A handwritten signature in black ink that reads "John A. Roscher". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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John A. Roscher  
Director, Rates & Tariffs

Enclosures

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<sup>9</sup> *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008) ("Order No. 714").