



November 27, 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

tel 832.320.5209
email sorana_linder@tcenergy.com
web www.tcplus.com/gtn

Re: Gas Transmission Northwest LLC
Annual Fuel Charge Adjustment
Docket No. RP25-____-000

Dear Ms. Reese:

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:

John P. Ryan *
Senior Legal Counsel
Gas Transmission Northwest LLC
700 Louisiana Street, Suite 1300
Houston, Texas 77002-2700
Tel. (832) 320-5879
E-mail: john_ryan@tcenergy.com

Sorana Linder *
Director, Rates, Tariffs & Modernization
Gas Transmission Northwest LLC
700 Louisiana Street, Suite 1300
Houston, Texas 77002-2700
Tel. (832) 320-5209
E-mail: sorana_linder@tcenergy.com

* Persons designated for official service pursuant to Rule 2010.

¹ Part 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 Effective Rates and Charges.

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, 2025, 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 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 on October 31, 2024, 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 2023 through October 2024.

Effect on Existing Rate Schedules

The proposed fuel and line loss surcharge will not change or effect 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 (attached hereto as Appendix A).

Certificate of Service

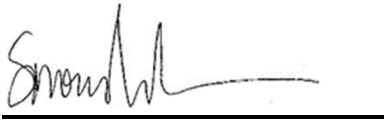
As required by Sections 154.7(b) and 154.208 of the Commission’s regulations, a copy of this filing is being served upon all of GTN’s existing customers and interested state regulatory agencies. A copy of this letter, together with any attachments, is available during regular business hours for public 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 her knowledge and belief. Additionally, the undersigned possesses full power and authority to sign such filing.

Any questions regarding this filing may be directed to Sorana Linder at (832) 320-5209.

Respectfully submitted,

Gas Transmission Northwest LLC

A handwritten signature in black ink, appearing to read "Sorana Linder", is written over a solid black horizontal line.

Sorana Linder
Director – Rates, Tariffs & Modernization

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, 2023 1/								227,079	
	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)								227,079	
3	Nov-23	1,429,895	29,845	1,400,050	1,729,782	100.00%	1,729,782	(329,732)	0	(102,653)
4	Dec-23	1,898,869	36,432	1,862,437	2,024,867	100.00%	2,024,867	(162,430)	0	(265,083)
5	Jan-24	1,668,722	(7,843)	1,676,565	1,747,689	100.00%	1,747,689	(71,124)	0	(336,207)
6	Feb-24	1,865,710	70,365	1,795,345	1,726,612	100.00%	1,726,612	68,733	0	(267,474)
7	Mar-24	1,641,161	(47,220)	1,688,381	1,793,279	100.00%	1,793,279	(104,898)	0	(372,372)
8	Apr-24	1,342,335	23,997	1,318,338	1,321,297	100.00%	1,321,297	(2,959)	0	(375,331)
9	May-24	1,422,004	89,266	1,332,738	1,483,108	100.00%	1,483,108	(150,370)	0	(525,701)
10	Jun-24	1,311,042	(227,172)	1,538,214	1,392,941	100.00%	1,392,941	145,273	0	(380,428)
11	Jul-24	2,218,304	70,492	2,147,812	992,763	100.00%	992,763	1,155,049	0	774,621
12	Aug-24	1,723,743	(45,089)	1,768,832	1,887,881	100.00%	1,887,881	(119,049)	0	655,572
13	Sep-24	2,070,149	568,816	1,501,333	2,071,493	100.00%	2,071,493	(570,160)	0	85,412
14	Oct-24	1,816,559	132,970	1,683,589	1,922,164	100.00%	1,922,164	(238,575)	0	(153,163)
15	Cumulative Balance Using Monthly Tracking Approach For Twelve Months Ending October 31, 2024								(153,163)	
16	Total Annual Dth-mile Throughput								467,767,448,483	
17	Fuel Surcharge (Line 15/ Line 16) 4/								0.0000%	

1/ Docket No. RP24-215-000, 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.
11/30/23 FERC filing established surcharge of 0.0000% for calendar year 2024
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-23	0.000048	0.000000	0.000048	100.00%
2	Dec-23	0.000048	0.000000	0.000048	100.00%
3	Jan-24	0.000044	0.000000	0.000044	100.00%
4	Feb-24	0.000043	0.000000	0.000043	100.00%
5	Mar-24	0.000045	0.000000	0.000045	100.00%
6	Apr-24	0.000037	0.000000	0.000037	100.00%
7	May-24	0.000040	0.000000	0.000040	100.00%
8	Jun-24	0.000038	0.000000	0.000038	100.00%
9	Jul-24	0.000025	0.000000	0.000025	100.00%
10	Aug-24	0.000048	0.000000	0.000048	100.00%
11	Sep-24	0.000050	0.000000	0.000050	100.00%
12	Oct-24	0.000048	0.000000	0.000048	100.00%

November Fuel and Line Loss Percentage Calculation (September production)

1 Monthly estimate of quantity of gas to be delivered:	83,956,800 Dth
2 Projected quantities of compressor fuel:	1,981,200 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(40,168) Dth
4 Projected quantities of fuel and L&U:	2,021,368 Dth
5 Add projected fuel retention or (return):	182,647 Dth
6 Total fuel to be retained:	2,204,015 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.026252
8 Estimated Average Pipeline Miles	550
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000048

Preceding month (September) results:

10 Actual fuel usage	2,023,629 Dth
11 L&U gain / (loss)	(40,168) Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	2,063,797 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,881,150 Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	182,647 Dth

<u>Fuel Retained</u>	<u>Percentage</u>	<u>Dth</u>
15 Current Month Fuel Retained	0.000046	1,881,150
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000046	1,881,150

December Fuel and Line Loss Percentage Calculation (October production)

1 Monthly estimate of quantity of gas to be delivered:	88,660,000	Dth
2 Projected quantities of compressor fuel:	2,395,600	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	22,597	Dth
4 Projected quantities of fuel and L&U:	2,373,003	Dth
5 Add projected fuel retention or (return):		Dth
6 Total fuel to be retained:	2,373,003	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.026765	
8 Estimated Average Pipeline Miles	560	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000048	

Preceding month (October) results:

10 Actual fuel usage	1,430,152	Dth
11 L&U gain / (loss)	22,597	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,407,555	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,671,960	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(264,405)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000047	1,671,960
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000047	1,671,960

January Fuel and Line Loss Percentage Calculation (November production)

1 Monthly estimate of quantity of gas to be delivered:	89,054,000 Dth
2 Projected quantities of compressor fuel:	2,243,000 Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	29,845 Dth
4 Projected quantities of fuel and L&U:	2,213,155 Dth
5 Add projected fuel retention or (return):	(75,000) Dth
6 Total fuel to be retained:	2,138,155 Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.02401
8 Estimated Average Pipeline Miles	540
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000044

Preceding month (November) results:

10 Actual fuel usage	1,429,895 Dth
11 L&U gain / (loss)	29,845 Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,400,050 Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,729,782 Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(329,732) Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000048	1,729,782
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000048	1,729,782

February Fuel and Line Loss Percentage Calculation (December production)

1 Monthly estimate of quantity of gas to be delivered:	82,728,900	Dth
2 Projected quantities of compressor fuel:	2,080,708	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	36,432	Dth
4 Projected quantities of fuel and L&U:	2,044,276	Dth
5 Add projected fuel retention or (return):	(120,000)	Dth
6 Total fuel to be retained:	1,924,276	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.02326	
8 Estimated Average Pipeline Miles	540	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000043	

Preceding month (December) results:

10 Actual fuel usage	1,898,869	Dth
11 L&U gain / (loss)	36,432	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,862,437	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	2,024,867	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(162,430)	Dth

<u>Fuel Retained</u>	<u>Percentage</u>	<u>Dth</u>
15 Current Month Fuel Retained	0.000048	2,024,867
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000048	2,024,867

March Fuel and Line Loss Percentage Calculation (January production)

1 Monthly estimate of quantity of gas to be delivered:	89,284,650	Dth
2 Projected quantities of compressor fuel:	2,031,120	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(7,843)	Dth
4 Projected quantities of fuel and L&U:	2,038,963	Dth
5 Add projected fuel retention or (return):	40,000	Dth
6 Total fuel to be retained:	2,078,963	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.023285	
8 Estimated Average Pipeline Miles	515	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000045	

Preceding month (January) results:

10 Actual fuel usage	1,668,722	Dth
11 L&U gain / (loss)	(7,843)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,676,565	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,747,689	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(71,124)	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000044	1,747,689	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000044	1,747,689	

April Fuel and Line Loss Percentage Calculation (February production)

1 Monthly estimate of quantity of gas to be delivered:	76,152,960	Dth
2 Projected quantities of compressor fuel:	1,545,960	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	70,365	Dth
4 Projected quantities of fuel and L&U:	1,475,595	Dth
5 Add projected fuel retention or (return):		Dth
6 Total fuel to be retained:	1,475,595	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.019377	
8 Estimated Average Pipeline Miles	520	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000037	

Preceding month (February) results:

10 Actual fuel usage	1,865,710	Dth
11 L&U gain / (loss)	70,365	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,795,345	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,726,612	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	68,733	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000043	1,726,612
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000043	1,726,612

May Fuel and Line Loss Percentage Calculation (March production)

1 Monthly estimate of quantity of gas to be delivered:	79,632,800	Dth
2 Projected quantities of compressor fuel:	1,644,240	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(47,220)	Dth
4 Projected quantities of fuel and L&U:	1,691,460	Dth
5 Add projected fuel retention or (return):		Dth
6 Total fuel to be retained:	1,691,460	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.021241	
8 Estimated Average Pipeline Miles	525	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.00004	

Preceding month (March) results:

10 Actual fuel usage	1,641,161	Dth
11 L&U gain / (loss)	(47,220)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,688,381	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,793,279	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(104,898)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000045	1,793,279
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000045	1,793,279

June Fuel and Line Loss Percentage Calculation (April production)

1 Monthly estimate of quantity of gas to be delivered:	81,744,000	Dth
2 Projected quantities of compressor fuel:	1,900,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	23,997	Dth
4 Projected quantities of fuel and L&U:	1,876,003	Dth
5 Add projected fuel retention or (return):	(105,000)	Dth
6 Total fuel to be retained:	1,771,003	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.021665	
8 Estimated Average Pipeline Miles	575	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000038	

Preceding month (April) results:

10 Actual fuel usage	1,342,335	Dth
11 L&U gain / (loss)	23,997	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,318,338	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,321,297	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(2,959)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000037	1,321,297
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000037	1,321,297

July Fuel and Line Loss Percentage Calculation (May production)

1 Monthly estimate of quantity of gas to be delivered:	70,928,000	Dth
2 Projected quantities of compressor fuel:	1,300,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	89,266	Dth
4 Projected quantities of fuel and L&U:	1,210,734	Dth
5 Add projected fuel retention or (return):	(253,329)	Dth
6 Total fuel to be retained:	957,405	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.013498	
8 Estimated Average Pipeline Miles	550	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000025	

Preceding month (May) results:

10 Actual fuel usage	1,422,004	Dth
11 L&U gain / (loss)	89,266	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,332,738	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,483,108	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(150,370)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.00004	1,483,108
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.00004	1,483,108

August Fuel and Line Loss Percentage Calculation (June production)

1 Monthly estimate of quantity of gas to be delivered:	81,227,000	Dth
2 Projected quantities of compressor fuel:	1,800,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(227,172)	Dth
4 Projected quantities of fuel and L&U:	2,027,172	Dth
5 Add projected fuel retention or (return):		Dth
6 Total fuel to be retained:	2,027,172	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.024957	
8 Estimated Average Pipeline Miles	520	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000048	

Preceding month (June) results:

10 Actual fuel usage	1,311,042	Dth
11 L&U gain / (loss)	(227,172)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,538,214	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,392,941	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	145,273	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000038	1,392,941
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000038	1,392,941

September Fuel and Line Loss Percentage Calculation (July production)

1 Monthly estimate of quantity of gas to be delivered:	78,127,000	Dth
2 Projected quantities of compressor fuel:	2,075,000	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	70,492	Dth
4 Projected quantities of fuel and L&U:	2,004,508	Dth
5 Add projected fuel retention or (return):		Dth
6 Total fuel to be retained:	2,004,508	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.025657	
8 Estimated Average Pipeline Miles	515	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.00005	

Preceding month (July) results:

10 Actual fuel usage	2,218,304	Dth
11 L&U gain / (loss)	70,492	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	2,147,812	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	992,763	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	1,155,049	Dth

	Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000025	992,763	
16 Surcharge Fuel Retained	0.000000	-	
17 Total Fuel Retained at Posted Rate	0.000025	992,763	

October Fuel and Line Loss Percentage Calculation (August production)

1 Monthly estimate of quantity of gas to be delivered:	84,630,000	Dth
2 Projected quantities of compressor fuel:	1,934,400	Dth
3 Less Previous month unaccounted for gain or (loss) from line 11:	(45,089)	Dth
4 Projected quantities of fuel and L&U:	1,979,489	Dth
5 Add projected fuel retention or (return):	100,000	Dth
6 Total fuel to be retained:	2,079,489	Dth
7 Fuel rate per Dth (Ln 6 / Ln 1)	0.024572	
8 Estimated Average Pipeline Miles	515	
9 Calculated Current Fuel & Line Loss Rate per Dth-mile	0.000048	

Preceding month (August) results:

10 Actual fuel usage	1,723,743	Dth
11 L&U gain / (loss)	(45,089)	Dth
12 Net Fuel Usage and L&U (Ln 10 - Ln 11)	1,768,832	Dth
13 Retained quantities - Current Fuel & Line Loss (line 15)	1,887,881	Dth
14 Preceding month (over)/under fuel retention (Ln 12 - Ln 13)	(119,049)	Dth

Fuel Retained	Percentage	Dth
15 Current Month Fuel Retained	0.000048	1,887,881
16 Surcharge Fuel Retained	0.000000	-
17 Total Fuel Retained at Posted Rate	0.000048	1,887,881