

**UNITED STATES OF AMERICA BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Gas Transmission Northwest LLC

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Docket No. RP23-1099-\_\_

**UNOPPOSED PETITION TO AMEND SETTLEMENT AGREEMENT  
TO EXTEND MANDATORY FILING DATE BY THREE MONTHS  
AND REQUEST FOR EXPEDITED ACTION  
BY JULY 10, 2026**

Pursuant to Rule 207(a)(5) of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.207(a)(5), Gas Transmission Northwest LLC (“GTN”) submits this unopposed petition for approval of the agreement between GTN and the Settling Parties<sup>1</sup> to extend by three months GTN’s rate filing requirement under the prior rate settlement in this docket. This petition reflects the agreement between GTN and the Settling Parties to continue negotiations toward pre-filing terms in lieu of GTN submitting a general rate case under section 4 of the Natural Gas Act (“NGA”), 15 U.S.C. § 717c. Absent the agreement to extend GTN’s filing requirement, GTN would be required to file a general section 4 rate case so that rates, with notice and suspension, may become effective no later than April 1, 2027 (i.e., rates would be filed by September 30, 2026). GTN and the Settling Parties have agreed to amend GTN’s filing obligation to extend the effective date for rates to July 1, 2027 (assuming a pre-filing settlement would be made by September 30, 2026), which will allow GTN and the Settling Parties additional time to negotiate, memorialize, and file the pre-filing settlement. Absent the parties reaching a pre-filing settlement, GTN and the Settling Parties agree that GTN’s filing obligation will extend the effective date for rates to July 1, 2027 (i.e., rates would be filed by December 31, 2026). The parties request expedited Commission action on this petition by July 10, 2026, given the

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<sup>1</sup> “Settling Parties” include (1) those parties identified in Appendix A which include all parties to the 2024 Settlement that established GTN’s current rates and filing requirement, and (2) other firm shippers on GTN’s system not expressly identified in Appendix A that (i) expressly support, or (ii) do not oppose the Amendment.

need to prepare the filing by the filing date contemplated by the settlement. In support hereof, GTN shows as follows:

## **I. BACKGROUND**

On October 21, 2024, in Docket Nos. RP23-1099-000, RP23-1099-001, and RP23-1099-004, the Commission approved the Stipulation and Agreement of Settlement (“2024 Settlement”),<sup>2</sup> which GTN submitted for approval on August 9, 2024 and amended August 12, 2024. The 2024 Settlement, among other things, set forth settlement rates and established a filing requirement under which GTN must file a general section 4 rate case “within sufficient time to accommodate any Commission-imposed suspension period” with rates to be effective no later than April 1, 2027.<sup>3</sup> Thus, to be compliant with the filing requirement, and to accommodate a five-month suspension period, GTN must file its rate case by September 30, 2026.

To avoid the time and expense of litigation, GTN engaged in pre-filing settlement discussions with its customers and other stakeholders in order to reach an agreeable settlement in lieu of filing a general section 4 rate case to satisfy the filing requirement.

## **II. PETITION FOR APPROVAL**

GTN and the Settling Parties have agreed to amend Article V.B of the 2024 Settlement to replace “April 1, 2027” with “July 1, 2027.” This amendment extends GTN’s filing date to December 31, 2026, which will provide additional time for the parties to negotiate, memorialize, and file a pre-filing settlement in lieu of GTN filing a general rate case. Accordingly, GTN, with the support or non-opposition of the Settling Parties, petitions the Commission for approval of this amendment.

The Commission has encouraged natural gas companies and their customers to resolve differences

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<sup>2</sup> *Gas Transmission Northwest LLC*, 189 FERC ¶ 61,055 (2024).

<sup>3</sup> 2024 Settlement at Article V.B.

over rates before making any filing with the Commission,<sup>4</sup> because it enables the quick processing of a rate change “without the expense of a hearing and lengthy litigation.”<sup>5</sup> A pre-filing settlement in principle successfully resolves issues that may have been in dispute in a practical and carefully constructed fashion, eliminating the need for testimony, discovery, hearing, and briefing of the matters resolved. The avoidance of litigation and resulting better use of resources is a valuable outcome, benefiting the participants, the Commission and the public interest. Therefore, GTN submits that extending the date of the rate case filing requirement by three months is in the public interest.

### **III. REQUEST FOR EXPEDITED ACTION BY JULY 10, 2026, AND FOR SHORTENED COMMENT PERIOD**

GTN, with the support or non-opposition of the Settling Parties, requests that the Commission establish a shortened comment period and take expedited action on this petition by July 10, 2026. Expedited action is appropriate, as it will allow GTN and the Settling Parties to focus on achieving a pre-filing settlement rather than preparing for a rate case proceeding. A shortened comment period is appropriate, given that this petition is unopposed by the Settling Parties, who include (1) those parties identified in Appendix A which include all parties to the 2024 Settlement that established GTN’s current rates and filing requirement, and (2) other firm shippers on GTN’s system not expressly identified in Appendix A that (i) expressly support, or (ii) do not oppose the Amendment. Accordingly, the Commission should establish a shortened comment period so as to allow the Commission to grant the relief requested herein by July 10, 2026.

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<sup>4</sup> See *Dominion Transmission, Inc.*, 111 FERC ¶ 61,285, at P 30 (2005).

<sup>5</sup> 111 FERC ¶ 61,285 at P 30.

**IV.**  
**CORRESPONDENCE AND COMMUNICATION**

All correspondence and communications regarding this filing should be addressed to the following:

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

**V.  
CONCLUSION**

**WHEREFORE**, GTN respectfully requests that the Commission establish a shortened comment period and grant this petition by July 10, 2026, which will approve the agreement by GTN and the Settling Parties to extend by three months GTN's filing requirement under the prior settlements in this docket. GTN further requests that the Commission grant any other authorizations or waivers that may be necessary to grant, and allow GTN to implement, the relief requested herein.

Respectfully submitted,

/s/ John Ryan

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**ATTORNEYS FOR GAS TRANSMISSION NORTHWEST LLC**

June 25, 2026

## **APPENDIX A**

### **Settling Parties**

## **SETTLING PARTIES**

The entities listed below have either received the petition prior to filing and did not state their opposition prior to filing, or otherwise expressly authorized GTN to state that they either support or do not oppose the foregoing Amendment to the Settlement.

Alliance of Western Energy Consumers  
Avista Corporation  
BP Energy Company  
California Public Utilities Commission  
Calpine Energy Services LP  
Canadian Association of Petroleum Producers  
Cascade Natural Gas Corporation  
Castleton Commodities Merchant Trading LP  
Cenovus Energy Marketing Services Ltd.  
Chevron U.S.A. Inc.  
Concord Energy LLC  
Husky Marketing & Supply Company  
IGI Resources, Inc.  
Intermountain Gas Company  
Mercuria Commodities Canada Corporation  
Northwest Natural Gas Company  
NRG Business Marketing LLC  
Ovintiv Marketing Inc.  
Pacific Gas & Electric Company  
Portland General Electric Company  
Puget Sound Energy, Inc.  
Shell Energy North America (US), L.P.  
Sierra Pacific Power Company d/b/a NV Energy  
Tenaska Marketing Ventures  
Tourmaline Oil Marketing Corp.  
Turlock Irrigation District

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Houston, Texas this 25th day of June 2026.

/s/ Erin Bullard  
Erin Bullard