



December 6, 2018

**Great Lakes Gas Transmission Limited Partnership**  
700 Louisiana Street, Suite 700  
Houston, TX 77072-2700

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

John A. Roscher  
Director, Rates & Tariffs

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Re: Great Lakes Gas Transmission Limited Partnership  
Limited Section 4 Income Tax Rate Reduction Filing  
Docket No. RP19-\_\_\_\_-000

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act, 15 U.S.C. § 717c, Section 154.404 of the regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. § 154.404 (2018), and the Final Rule issued by the Commission in Docket No. RM18-11-000 on July 18, 2018,<sup>1</sup> Great Lakes Gas Transmission Limited Partnership (“Great Lakes”) submits for filing the tariff sections included as Appendix A-1. This tariff filing is being submitted to reduce Great Lakes’ tariff rates to reflect a 2.0 percent rate reduction, as explained in Great Lakes’ Form No. 501-G submittal that is being filed contemporaneously herewith. Great Lakes respectfully requests that the Commission accept the tariff sections included as Appendix A-1 to become effective February 1, 2019.

### **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> *Interstate and Intrastate Natural Gas Pipelines; Rate Changes Relating to Federal Income Tax Rate*, Order No. 849, 83 Fed. Reg. 36,672 (Jul. 30, 2018) (“Final Rule”).

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

### **Statement of Nature, Reasons and Basis for Proposed Changes**

In the Final Rule, the Commission identified four options for each interstate natural gas pipeline in connection with the filing of Form No. 501-G. Option 1 is to file a limited NGA section 4 rate filing to implement a rate reduction as indicated on the pipeline's Form No. 501-G.<sup>2</sup> As Great Lakes stated in the transmittal letter to its Form No. 501-G, it has elected Option 1.

The tariff sheets included as Appendix A-1 hereto reflect a 2.0 percent rate reduction, as reflected in Great Lakes' Form No. 501-G submittal. While Great Lakes' unadjusted Form No. 501-G reflects a 1.8 rate increase, Great Lakes is proposing to reduce its reservation rates for firm service, and its one-part rates that reflect fixed costs, by 2.0 percent.<sup>3</sup> Great Lakes notes that Great Lakes is a pass-through entity, and therefore this limited section 4 filing eliminates Great Lakes' income tax allowance and associated accumulated deferred income taxes from its rates and general ledger, consistent with Commission policy.<sup>4</sup>

### **Motion to Place Tariff Sections into Effect**

Great Lakes respectfully requests that the proposed tariff sections included as Appendix A-1 be accepted without addition, modification or deletion and become effective on February 1, 2019. Apart from the foregoing, Great Lakes reserves its right under Section 154.7(a) to file a motion to place the proposed revised tariff sections into effect at the end of any suspension period ordered by the Commission.

### **Other Filings Which May Affect this Proceeding**

There are no other filings before the Commission that may significantly affect the changes proposed herein.

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<sup>2</sup> *Id.* at P 198.

<sup>3</sup> The rate schedules affected by this reduction are: FT, LFT, EFT, and PAL.

<sup>4</sup> *See Inquiry Regarding the Commission's Policy for Recovery of Income Tax Costs*, Revised Policy Statement on Treatment of Income Taxes, 162 FERC ¶ 61,227 (2018), *order on reh'g*, 164 FERC ¶ 61,030 (2018).

## **Materials Enclosed**

In accordance with Section 154.7(a)(1) of the Commission's regulations, Great Lakes is submitting the following XML filing package, which includes:

- 1) This transmittal letter;
- 2) The clean tariff sections (Appendix A-1); and
- 3) A marked version of the tariff sections (Appendix A-2).

## **Certificate of Service**

As required by Section 154.7(b) and 154.208 of the Commission's regulations, copies of this filing are being served on all of Great Lakes' existing customers and upon interested state regulatory agencies. A copy of this letter, together with attachments, is available during regular business hours for public inspection at Great Lakes' 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 David Brown at (832) 320-5512.

Respectfully submitted,



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John A. Roscher  
Director, Rates & Tariffs

Enclosures

# Appendix A-1

***Great Lakes Gas Transmission Limited Partnership  
FERC Gas Tariff, Third Revised Volume No. 1***

## **Clean Tariff**

<b>Tariff Sections</b>	<b>Version</b>
4.1 – Statement of Rates, Rate Schedules FT, LFT, & EFT	v.8.0.0
4.4 – Statement of Rates, Rate Schedule MC	v.6.0.0

GREAT LAKES GAS TRANSMISSION LIMITED PARTNERSHIP

Open Access Rates  
 Firm Transportation Service  
 Rate Schedule FT 6/

	Western Zone 1/ 2/ 3/ Deliveries	Central Zone 1/ 2/ 3/ Deliveries	Eastern Zone 1/ 2/ 3/ Deliveries
Receipts in Western Zone - -----	(Rates per Dth)	(Rates per Dth)	(Rates per Dth)
Reservation Fee	\$2.754	\$4.586	\$8.186
Utilization Fee	0.00288	0.00544	0.00954
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.09054	0.15079	0.26913
Receipts in Central Zone - -----			
Reservation Fee	\$4.586	\$2.366	\$5.965
Utilization Fee	0.00544	0.00256	0.00666
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.15079	0.07778	0.19612
Receipts in Eastern Zone - -----			
Reservation Fee	\$8.186	\$5.965	\$4.133
Utilization Fee	0.00954	0.00666	0.00410
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.26913	0.19612	0.13587

Limited Firm Transportation Service  
 Rate Schedule LFT 1/ 2/ 3/ 4/ 5/ 6/

The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule LFT except that the maximum Reservation Fee shall be adjusted to reflect the appropriate number of Days that Service shall be available utilizing the following formula, rounded to 3 decimal places:  $LFT = FT \times ((TD - UD)/TD)$  where:

- LFT = LFT Reservation Fee
- FT = Applicable FT Reservation Fee
- TD = Number of Days during Agreement Term
- UD = Number of Unavailable Days

Expedited Firm Transportation Service  
Rate Schedule EFT 1/ 2/ 3/ 4/ 5/ 6/  
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The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule EFT except that the maximum Reservation Fee shall be adjusted to reflect the applicable expedited period of gas flow (EPF) utilizing the following formula, rounded to 3 decimal places:  $EFT = FT \times (24/EPF)$  where:

EFT = EFT Reservation Fee  
FT = Applicable FT Reservation Fee  
24 = Number of Hours in a Gas Day  
EPF = MDQ/MHQ

- 
- 1/ Pursuant to Section 5.1.5 paragraph 2 of Rate Schedules FT, Section 5.2.5 paragraph 2 of Rate Schedule EFT, and Section 5.3.5 paragraph 2 of Rate Schedule LFT, Shipper shall pay, in addition to the rate specified for this service, an ACA charge set forth in Section 4.6 of this FERC Gas Tariff.
  - 2/ The minimum charge for Reservation Fees, backhauls and/or exchange transportation shall be \$0.00 per Dth.
  - 3/ In addition, Shipper shall pay the 100% load factor rate for the service outside the zones for which a Reservation Fee or Volumetric Rate is paid.
  - 4/ In addition to the Volumetric Rate, the Utilization Fee is applicable to all services.
  - 5/ 100% load factor rate is calculated as:  $(\text{Reservation Fee} \times 12)/365$ , rounded to 5 decimal places.
  - 6/ Seasonal recourse rates apply to short-term firm (“STF”) service (i.e., firm service that has a term of less than one year and that does not include multiple-year seasonal service) under Rate Schedule FT and rate schedules that are based upon Rate Schedule FT rates, in addition to interruptible transportation service under Rate Schedule IT. On or before February 15 of each year, Great Lakes shall identify the number of peak months (from zero to five) for the upcoming 12-month period beginning April 1, identify the months to which peak rates apply; and set the peak rate multiplier from one up to a maximum of 1.4. Peak rates will be set by multiplying the applicable firm reservation charge (or reservation component) by the peak multiplier. The remaining off-peak months will have a multiplier equal to  $1-(P/O) \times (M-1)$  where:

P=Peak Months

O=Off-Peak Months (Equal to 12-P)

M=Multiplier for Peak Months

Transporter’s seasonal recourse rate elections and resulting peak and off-peak rates shall be posted under the Informational Postings section of Transporter’s Internet Website.

GREAT LAKES GAS TRANSMISSION LIMITED PARTNERSHIP  
Open Access Rates  
Park and Loan Services  
Rate Schedule PAL (Rates Per Dth) 1/  
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	Maximum -----	Minimum -----
PARK and LOAN		
First Day Fee	\$0.27867	\$0.00000
Subsequent Day Fee	\$0.05573	\$0.00000

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1/ An ACA charge set forth in Section 4.6 of this FERC Gas Tariff shall not be assessed on any transaction under Rate Schedule PAL.

# Appendix A-2

***Great Lakes Gas Transmission Limited Partnership  
FERC Gas Tariff, Third Revised Volume No. 1***

## **Marked Tariff**

<b>Tariff Sections</b>	<b>Version</b>
4.1 – Statement of Rates, Rate Schedules FT, LFT, & EFT	v.8.0.0
4.4 – Statement of Rates, Rate Schedule MC	v.6.0.0



GREAT LAKES GAS TRANSMISSION LIMITED PARTNERSHIP  
 Open Access Rates  
 Firm Transportation Service  
 Rate Schedule FT 6/

	Western Zone 1/ 2/ 3/ Deliveries ----- (Rates per Dth)	Central Zone 1/ 2/ 3/ Deliveries ----- (Rates per Dth)	Eastern Zone 1/ 2/ 3/ Deliveries ----- (Rates per Dth)
Receipts in Western Zone - -----			
Reservation Fee	<del>\$2.810</del> <u>2.754</u>	<del>\$4.680</del> <u>4.586</u>	<del>\$8.353</del> <u>8.186</u>
Utilization Fee	0.00288	0.00544	0.00954
Max. Volumetric Rate at 100% L.F. 4/ 5/	<del>0.09238</del> <u>0.09054</u>	<del>0.15386</del> <u>0.15079</u>	<del>0.27462</del> <u>0.26913</u>
Receipts in Central Zone - -----			
Reservation Fee	<del>\$4.680</del> <u>4.586</u>	<del>\$2.414</del> <u>2.366</u>	<del>\$6.087</del> <u>5.965</u>
Utilization Fee	0.00544	0.00256	0.00666
Max. Volumetric Rate at 100% L.F. 4/ 5/	<del>0.15386</del> <u>0.15079</u>	<del>0.07936</del> <u>0.07778</u>	<del>0.20012</del> <u>0.19612</u>
Receipts in Eastern Zone - -----			
Reservation Fee	<del>\$8.353</del> <u>8.186</u>	<del>\$6.087</del> <u>5.965</u>	<del>\$4.217</del> <u>4.133</u>
Utilization Fee	0.00954	0.00666	0.00410
Max. Volumetric Rate at 100% L.F. 4/ 5/	<del>0.27462</del> <u>0.26913</u>	<del>0.20012</del> <u>0.19612</u>	<del>0.13864</del> <u>0.13587</u>

Limited Firm Transportation Service  
 Rate Schedule LFT 1/ 2/ 3/ 4/ 5/ 6/

The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule LFT except that the maximum Reservation Fee shall be adjusted to reflect the appropriate number of Days that Service shall be available utilizing the following formula, rounded to 3 decimal places:  $LFT = FT \times ((TD - UD)/TD)$  where:

- LFT = LFT Reservation Fee
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- TD = Number of Days during Agreement Term
- UD = Number of Unavailable Days

Expedited Firm Transportation Service  
Rate Schedule EFT 1/ 2/ 3/ 4/ 5/ 6/  
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EFT = EFT Reservation Fee  
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- 
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P=Peak Months

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M=Multiplier for Peak Months

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GREAT LAKES GAS TRANSMISSION LIMITED PARTNERSHIP  
Open Access Rates  
Park and Loan Services  
Rate Schedule PAL (Rates Per Dth) 1/  
-----

	Maximum -----	Minimum -----
PARK and LOAN		
First Day Fee	<del>\$0.28415</del> <u>0.27867</u>	\$0.00000
Subsequent Day Fee	<del>\$0.05683</del> <u>0.05573</u>	\$0.00000

-----  
1/ An ACA charge set forth in Section 4.6 of this FERC Gas Tariff shall not be assessed on any transaction under Rate Schedule PAL.