



May 31, 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

Jonathan Scullion
Manager, Tariffs

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Re: Gas Transmission Northwest LLC
Negotiated Rate Agreements
Docket No. RP24- ___-000

Dear Ms. Reese:

Pursuant to Section 4 of the Natural Gas Act (“NGA”), and Part 154 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,¹ Gas Transmission Northwest LLC (“GTN”) hereby respectfully submits for filing and acceptance certain revised tariff sections² to be part of its FERC Gas Tariff, Third Revised Volume No. 1 (“Tariff”). The revised tariff sections are being submitted to report two (2) new negotiated rate service agreements under Rate Schedule FTS-1 (“FTS-1”) that GTN has each entered into with NRG Business Marketing LLC (“NRG”) (collectively, the “Agreements”) as further described herein. GTN respectfully requests that the Commission accept the proposed tariff sections, included herein as Appendix A, to become effective June 1, 2024.

Correspondence

The names, titles and mailing address of the persons to whom correspondence and communications concerning this filing should be directed are as follows:

Sorana Linder
Director, Rates, Tariffs & Modernization
Jonathan Scullion *
Manager, Tariffs
Gas Transmission Northwest LLC

John P. Ryan *
Senior Legal Counsel
Gas Transmission Northwest LLC
700 Louisiana Street, Suite 1300
Houston, Texas 77002-2700

¹ 18 C.F.R. § 154.501 (2024).

² Specifically, Part 4.6 – Statement of Rates, Negotiated Rate Agreements – FTS-1 and LFS-1 (“Section 4.6”); and Part 4.7 – Statement of Rates, Footnotes for Negotiated Rates – FTS-1 and LFS-1 (“Section 4.7”).

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Houston, Texas 77002-2700
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* Persons designated for official service pursuant to Rule 2010.

Statement of the Nature, Reasons, and Basis for Filing

This filing is being submitted to update GTN's reporting of negotiated rate transactions initiated in accordance with the Commission's October 28, 1999 Order in Docket No. RP99-518-000.³ Section 4.6 of GTN's Tariff lists each negotiated rate agreement under Rate Schedules FTS-1 and LFS-1, identifying (1) the name of the shipper; (2) the term of the contract; (3) the rate schedule; (4) the contract quantity; (5) the receipt and delivery points; and (6) the footnote where an explanation of the negotiated rate can be found. Section 4.7 lists the corresponding explanatory footnotes that provide further detail for each negotiated rate agreement listed in Section 4.6.

By the instant filing, GTN is proposing to modify Sections 4.6 and 4.7 to reflect the addition of two (2) new FTS-1 negotiated rate service agreements with NRG. Service under the Agreements will commence on June 1, 2024.

GTN advises that no undisclosed agreements, etc., are linked to the Agreements, and the Agreements do not contain any provisions that deviate in any material respect from GTN's FTS-1 Form of Service Agreement in its Tariff.

Request for Waiver and Effective Date

GTN respectfully requests that the Commission grant all waivers of its regulations, including Section 154.207, necessary to accept the proposed tariff sections included as Appendix A to become effective June 1, 2024.⁴

Other Filings Which May Affect This Proceeding

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

³ *PG&E Gas Transmission, Northwest Corporation*, 89 FERC ¶ 61,114 (1999).

⁴ See *Alternatives to Traditional Cost-of-Service Ratemaking for Natural Gas Pipelines*, 74 ¶ 61,076 at 61, 241-242 (1996) (indicating that the Commission will "readily grant requests to waive the 30-day requirement").

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;
2. The clean tariff sections (Appendix A); and
3. The marked tariff sections (Appendix B).

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 of the Commission’s regulations, 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 Jonathan Scullion at (832) 320-5520.

Respectfully submitted,

GAS TRANSMISSION NORTHWEST LLC



Jonathan Scullion
Manager, Tariffs

Enclosures

Appendix A

Clean Tariff Sections

Gas Transmission Northwest LLC

<u>Tariff Sections</u>	<u>Version</u>
4.6 Statement of Rates, Negotiated Rate Agreements - FTS-1 and LFS-1	v.13.0.0
4.7 Statement of Rates, Footnotes for Negotiated Rates – FTS-1 and LFS-1	v.14.0.0

STATEMENT OF EFFECTIVE RATES AND CHARGES
 FOR TRANSPORTATION OF NATURAL GAS

NEGOTIATED RATE AGREEMENTS UNDER RATE SCHEDULES FTS-1 AND LFS-1

<u>SHIPPER</u>	<u>TERM OF CONTRACT</u>	<u>RATE SCHEDULE</u>	<u>DTH/D</u>	<u>PRIMARY RECEIPT POINT</u>	<u>PRIMARY DELIVERY POINT</u>	<u>RATE /2 /3</u>
Avista Corporation /1	11/1/01 - 10/31/25	FTS-1	20,000	Medford	Medford Ext. Meter	/7
Powerex Corp./1	04/01/16 - 10/31/16	FTS-1	20,000	Kingsgate	Malin	/5
Mercuria Commodities Canada Corporation /1	04/01/18 03/31/24	FTS-1	60,000	Kingsgate	Malin	/4
Avangrid Renewables, LLC /1	06/03/01 10/31/25	FTS-1	80,000	Medford	Klamath Cogeneration	/6
Seven Generations Energy (US) Corp.	06/01/20 05/31/35	FTS-1	66,020	Kingsgate	Malin	/8
CanNat Energy Inc	07/01/20 06/30/35	FTS-1	54,658	Kingsgate	Malin	/9
CIMA Energy, LP	07/01/20 06/30/36	FTS-1	5,000	Kingsgate	Malin	/9
Murphy Canada, Ltd.	07/01/20 06/30/35	FTS-1	52,760	Kingsgate	Malin	/9
ARC Resources Ltd.	07/01/20 06/30/35	FTS-1	23,000	Kingsgate	Malin	/9
Crescent Point Resources Partnership	07/01/20 03/31/36	FTS-1	7,600	Kingsgate	Malin	/10
Seven Generations Energy (US) Corp.	11/1/2019 10/31/2034	FTS-1	11,063	Kingsgate	Malin	/11
Intermountain Gas Company	11/01/20 05/31/35	FTS-1	15,109	Kingsgate	Malin	/12
Tourmaline Oil Marketing Corp.	03/17/23 03/16/57	FTS-1	100,000	Kingsgate	Malin	/13

NRG Business	06/01/24	FTS-1	5,000	Kingsgate	Malin	/14
Marketing LLC /1	06/30/24					
NRG Business	06/01/24	FTS-1	5,000	Kingsgate	Malin	/15
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FOR TRANSPORTATION OF NATURAL GAS

Negotiated Rate Agreements Under Rate Schedules FTS-1 and LFS-1

Explanatory Footnotes for Negotiated Rates
under Rate Schedules FTS-1 and LFS-1

- /1 This contract does not deviate in any material aspect from the Form of Service Agreement in this Tariff.
- /2 Unless otherwise noted, all Shippers pay GTN's maximum Reservation Charge, Delivery Charge, ACA, and contribute fuel in-kind in accordance with this Tariff.
- /3 Index Price References: Unless otherwise noted, references to "Daily Index Price" shall mean the price survey midpoint for the specified point as published in Gas Daily for the day of gas flow. Weekend and holiday prices will be determined using the next available Gas Daily publication. Unless otherwise noted, the references to the "NGI FOM" for a specified point shall mean Natural Gas Intelligence's First of Month Bid Week Survey (Supplement to NGI's Weekly Gas Index) Spot Gas Price for the specified point.
- /4 a. GTN and Shipper have agreed to a fixed reservation reservation charge of \$.2565 along with applicable surcharges for all quantities on the Kingsgate to Malin path.
- b. Effective the earlier of January 1, 2022, or the termination of the Amended Settlement in Docket No. RP15-904-001, the Rate Reduction shall expire and the negotiated rate shall revert to \$.27 along with applicable surcharges for all quantities on the Kingsgate to Malin path.
- /5 GTN and Shipper have agreed to a Fixed Reservation Rate Charge of \$0.26300 inclusive of the mileage and non-mileage components, which shall be applicable to the Primary Receipt and Delivery Points as well as secondary points, as follows:
- Secondary Receipt Points: All points on GTN's system
Secondary Delivery Points: All points on GTN's system
- In addition, Shipper shall pay all applicable charges and surcharges in accordance with GTN's FERC Gas Tariff.
- /6 a. For the period January 1, 2019, to December 31, 2021, GTN and Shipper have agreed that the negotiated rate shall be \$0.085821 for the Monthly Reservation Charge for the Initial Quantity set forth in Exhibit B of the agreement, and \$0.033703 for the Monthly Reservation Charge for the Option Quantity set forth in Exhibit B of the agreement along with applicable surcharges.

b. Effective the earlier of January 1, 2022, or the termination of the Amended Settlement in Docket No. RP15-904-001, the rate reduction described in a., above, shall expire and the negotiated rate shall revert to \$0.090338 per dekatherm per mile for the Monthly Reservation Charge for the Initial Quantity set forth in Exhibit B of the agreement, and \$0.035477 for the Monthly Reservation Charge for the Option Quantity set forth in Exhibit B of the agreement along with applicable surcharges.

/7 The Reservation charge shall be equal to the rate set forth in GTN's FERC Gas Tariff identified as FTS-1 E-2 (WWP), or its successor, multiplied by the appropriate Effective Period Percentage as shown in the following table.

Effective Period	Percentage
11/1/01-10/31/02	75%
11/1/02-10/31/03	80%
11/1/03-10/31/04	85%
11/1/04-10/31/05	90%
11/1/05-10/31/06	95%
11/1/06-10/31/25	100%

The Daily Delivery Charge shall be equal to the 100% load factor equivalent of the FTS-1 E-2 rate, or its successor, and shall be multiplied by the positive difference between (a) volumes delivered and (b) the contract MDQ times the appropriate Effective Period Percentage.

Daily Delivery Charge = [Dth Delivered - (MDQ * Effective Period %)] * 100% Load Factor Equivalent FTS-1 E-2

/8 Effective November 1, 2020 continuing until May 31, 2035, GTN and Shipper have agreed to a fixed reservation charge of \$0.2500 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

/9 a. GTN and Shipper have agreed to a fixed reservation charge of \$0.2375 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

b. Effective the earlier of January 1, 2022, or the termination of the Amended Settlement in Docket No. RP15-904-001, the negotiated rate for all quantities on the Kingsgate to Malin path shall be a fixed Reservation Charge of \$0.2500 along with applicable surcharges.

/10 a. GTN and Shipper have agreed to a fixed Reservation Charge of \$0.2470 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

b. Effective the earlier of January 1, 2022, or the termination of the Amended Settlement in Docket No. RP15-904-001, the negotiated rate for all quantities on the Kingsgate to Malin path shall be a fixed Reservation Charge of \$0.2600 along with applicable surcharges.

/11 a. Effective November 1, 2019 continuing until December 31, 2021, GTN and Shipper have agreed to a fixed reservation charge of \$0.2375 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

b. Effective the earlier of January 1, 2022, or the termination of the Amended Settlement in Docket No. RP15-904-001, the negotiated rate for all quantities on the Kingsgate to Malin path shall be a fixed Reservation Charge of \$0.2500 along with applicable surcharges.

/12 a. Effective November 1, 2020 continuing until December 31, 2021, GTN and Shipper have agreed to a fixed reservation charge of \$0.2375 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

b. Effective January 1, 2022 and continuing until May 31, 2035, the negotiated rate for all quantities on the Kingsgate to Malin path shall be a fixed Reservation Charge of \$0.2500 along with applicable surcharges.

/13 Effective March 17, 2023 and continuing until March 16, 2057, GTN and Shipper have agreed to a fixed reservation charge of \$0.2800 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

/14 Effective June 1, 2024 and continuing until June 30, 2024, GTN and Shipper have agreed to a fixed reservation charge of \$0.35000 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

/15 Effective June 1, 2024 and continuing until June 30, 2024, GTN and Shipper have agreed to a fixed reservation charge of \$0.40000 along with applicable surcharges for all quantities on the Kingsgate to Malin path.

/16 Reserved

/17 Reserved

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Appendix B

Marked Tariff Sections

Gas Transmission Northwest LLC

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