

137 FERC ¶ 61,094
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

October 31, 2011

In Reply Refer To:
Colorado Interstate Gas Company
Docket No. RP11-2631-000

Colorado Interstate Gas Company, L.L.C.
P.O. Box 1087
Colorado Springs, CO 80944

Attention: Ms. Susan Stires, Director, Regulatory Affairs

Reference: Update Totem Storage Available Daily Withdrawal Quantity Curve

Ladies and Gentlemen:

1. On September 30, 2011, Colorado Interstate Gas Company, L.L.C. (CIG) filed revised tariff records¹ with the Commission to update the Totem Storage Available Daily Withdrawal Quantity (ADWQ) curve, related tariff references, and to correct a typographical error in the available daily injection quantity table. As discussed below, the Commission accepts the revised tariff records, subject to certain reporting requirements, effective November 1, 2011.

2. In 2008, the Commission authorized CIG to develop, construct and operate the Totem Storage Facility (Totem Storage) in Docket No. CP08-30-000.² The certificate order projected the Totem Storage field once completed would have a working capacity of 7.0 Bcf, an injection rate of 100 MMcf/d, and a withdrawal rate of 200 MMcf/d.

3. CIG states it has continually evaluated Totem Storage's operating performance and its ability to meet design conditions since storage operations commenced in June 2009. CIG states that its evaluation has determined that Totem Storage's performance differs from the original projected performance parameters outline in Docket No. CP08-30-000. CIG has observed that at inventory levels lower than 2.5 Bcf, the field cannot

¹ Part IV: GT&C, Section 8 - Operating Provisions, 3.0.0 and Part VI: Illustrations, Section 8 - Totem Daily Withdrawal Quantity, 2.0.0 to CIG Tariff, FERC NGA Gas Tariff.

² See *Colorado Interstate Gas Company*, 123 FERC ¶ 61,099 (2008).

sustain the relationship of the maximum daily withdrawal rate to the percent of working gas inventory as predicted in Docket No. CP08-30-000.

4. In light of these findings, CIG made this filing to change its ADWQ curve and the associated tariff references to reflect the updated predicted reservoir performance. CIG states it has evaluated the proposed changes in the ADWQ curve and has determined that the changes will not affect shippers' available daily injection quantities, total storage capacity, pressure and maximum injection, and withdrawal capacity.

5. Public notice of the filing was issued on October 3, 2011. Interventions and protests were due as provided in section 154.210 of the Commission's regulations, (18 C.F.R. § 154.210 (2011)). Pursuant to Rule 214, (18 C.F.R. § 385.214 (2011)), all timely filed motions to intervene and any unopposed motions to intervene out-of-time filed before the issuance date of this order are granted. Granting late intervention at this stage of the proceeding will not disrupt the proceeding or place additional burdens on existing parties. On October 12, 2011, Public Service Company of Colorado (PSCo) filed a motion to intervene and submitted comments, discussed further below. No protests were filed.

6. PSCo states it relies on CIG's Rate Schedule TSB-T for essential service and has a vested interest in ensuring that service is proved on a reliable basis. PSCo states that CIG's ability to provide service under Rate Schedule TSB-T is based on, and limited to, available capacity in Totem Storage. PSCo states the reduction in Totem Storage deliverability at inventory levels below 2.5 Bcf is an operational concern to PSCo because it relies on Totem Storage for gas to support its electric operations and to manage gas swings to integrate the renewable generation in its generation portfolio. PSCo states it does not oppose the acceptance of the revised tariff records, but requests that the Commission direct CIG to submit reports to the Commission and the Totem Storage customers within two months following the end of the 2012-2013 and 2014-2015 storage seasons as to any changes in withdrawal performance. The Commission finds that such reports will allow all interested parties to monitor Totem Storage performance and determine whether changes to the ADWQ curve are appropriate should performance improve.

7. Accordingly, we accept CIG's revised tariff records subject to CIG's filing reports with the Commission and Totem Storage's customers within two months following the 2012-2013 and 2014 -2015 storage seasons indicating any changes in withdrawal performance of the Totem Storage field.

By direction of the Commission. Commissioner Spitzer is not participating.

Nathaniel J. Davis, Sr.,
Deputy Secretary.