

133 FERC ¶ 61,057
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Marc Spitzer, Philip D. Moeller,
John R. Norris, and Cheryl A. LaFleur.

Southern Star Central Gas Pipeline, Inc.

Docket No. CP10-2-001

ORDER AMENDING CERTIFICATE

(Issued October 21, 2010)

1. On July 2, 2010, Southern Star Central Gas Pipeline, Inc. (Southern Star) filed an application under section 7(c) of the Natural Gas Act (NGA) to amend the certificate issued in *Southern Star Central Gas Pipeline, Inc.*, 131 FERC ¶ 61,154 (2010) (May 20 Order). That order authorized Southern Star to increase the total and working gas capacity of the Elk City storage field in Kansas, to construct and operate a compressor unit, and to charge market-based rates under section 4(f) of the NGA for its related services. In its amended application, Southern Star proposes, among other things, to convert an additional 1.4 billion cubic feet (Bcf) of base gas capacity to working gas capacity at the Elk City storage field and to provide storage service utilizing the additional 1.4 Bcf of capacity at market-based rates pursuant to section 4(f). As discussed below, this order amends the previous certificate authorization and grants Southern Star's request for market-based rate authority, subject to conditions.

I. Background

2. Southern Star is a natural gas company subject to the Commission's jurisdiction and transports and stores natural gas in interstate commerce for various customers. Southern Star operates seven storage fields in Kansas and one in Oklahoma.

3. The Elk City storage field is located in Elk, Chautauqua, and Montgomery Counties, Kansas.¹ Currently, the storage field contains approximately 60

¹ The Elk City storage field was originally a natural gas production reservoir depleted in the early 1920s and converted to gas storage in 1945 by Union Gas System,

(continued...)

injection/withdrawal wells and seven observation wells that access the Burgess Sandstone, a storage formation, at an average depth of approximately 1,350 feet. As currently certificated, the Elk City storage field has a maximum storage capacity of 33.3 Bcf, comprising 10.4 Bcf of working gas and 22.9 Bcf of base gas. The storage field's certificated maximum shut-in wellhead pressure is 595 pounds per square inch gauge (psig), and the maximum certificated withdrawal capacity is 269,000 thousand cubic feet (Mcf) per day.

4. In the May 20 Order, the Commission authorized Southern Star to increase the total and working gas capacity of the Elk City storage field by 2.6 Bcf because the actual capacity of the storage field was 2.6 Bcf greater than the certificated maximum capacity. The order also authorized Southern Star to increase the maximum daily withdrawal rate by 40,000 Mcf per day. In order to increase the maximum daily withdrawal rate, the Commission authorized Southern Star to construct one 6,283 horsepower (hp) compressor unit. The Commission denied Southern Star's request to convert 1.4 Bcf of base gas to working gas because Southern Star failed to provide sufficient technical justification showing that the requested conversion would not have long-term adverse effects on the operations of the storage field. The Commission noted that because the Elk City storage field is supported by an aquifer, storage capacity may be lost to the aquifer when the storage field is operating at the minimum pressure.² The Commission stated, however, that Southern Star could amend its certificate to convert the base gas so long as Southern Star provided "technical justification, such as a reservoir simulation model, that reflects how the storage field must be operated in order to prevent the loss of storage capacity" after converting the base gas.³ Finally, the May 20 Order authorized Southern Star to provide firm and interruptible storage service under market-based rates.

Inc. By order issued September 24, 1959, Cities Service Gas Company (a predecessor to Southern Star) was authorized to acquire and operate the storage field in *Cities Service Co.*, 20 FPC 390 (1958). Further development of the Elk City storage field was authorized in *Williams Natural Gas Co.*, 75 FERC ¶ 61,159 (1996); *Williams Natural Gas Co.*, 77 FERC ¶ 61,150 (1996); *Williams Natural Gas Pipelines Central, Inc.*, 83 FERC ¶ 61,120 (1998); *Williams Natural Gas Pipelines Central, Inc.*, 85 FERC ¶ 61,184 (1998); *Southern Star Central Gas Pipeline, Inc.*, 131 FERC ¶ 61,154 (2010).

² Storage capacity losses occur in storage fields that are in pressure communication with an aquifer when the average daily reservoir pressure is not sufficient to prevent a net influx of water from the aquifer.

³ May 20 Order, 131 FERC ¶ 61,154 at P 29.

II. Proposals

5. As contemplated by the May 20 Order, Southern Star proposes to increase Elk City storage field's working gas capacity by converting 1.4 Bcf of base gas to working gas. In support of the conversion, Southern Star has filed a study by Netherland, Sewell & Associates, Inc. (NSAI Study) that concludes that Southern Star can convert 1.4 Bcf of base gas to working gas without a loss of storage capacity, if the storage field's injections and withdrawals are properly managed. The NSAI Study provides multiple reservoir simulation models under a variety of conditions that show Southern Star can operate the Elk City storage field in a way that prevents the long-term loss of storage capacity. In order to provide the requested storage services, Southern Star proposes to sell the 1.4 Bcf of base gas and retain the proceeds from the sale.

6. In addition, Southern Star seeks authorization to use the 6,283 hp compressor unit approved in the May 20 Order to provide storage services for both the increased 2.6 Bcf of working gas capacity approved in that order and the 1.4 Bcf of working gas capacity requested in this certificate application. Further, Southern Star seeks to clarify a statement in the May 20 Order that indicates that the maximum withdrawal rate from the Elk City storage field shall not exceed 269,000 Mcf per day. Specifically, Southern Star states that the maximum withdrawal capacity of 269,000 Mcf per day is the maximum contractual withdrawal rate. Southern Star has filed an updated operational plan that indicates that the maximum withdrawal rate at minimum storage inventory is 257,000 Mcf per day and the maximum withdrawal rate possible at maximum storage levels is 470,000 Mcf per day.

7. Southern Star requests expansion of the market-based rate authority granted in the May 20 Order to include the additional 1.4 Bcf of storage capacity. Southern Star proposes firm and interruptible market-based storage service under Rate Schedules FS1 (Firm Storage Service with Market-Based Rates) and IS1 (Interruptible Storage Service with Market-Based Rates), respectively, for the additional storage capacity. Southern Star also proposes several changes to its tariff, as described below.

III. Procedural Matters

8. Notice of Southern Star's application was published in the *Federal Register* on July 14, 2010 (75 Fed. Reg. 40,802). Kansas Gas Service (Kansas Gas) filed a timely, unopposed motion to intervene that included comments. The timely, unopposed motion to intervene is granted by Rule 214 of the Commission's regulations.⁴ The Missouri Public Service Commission and the Kansas Corporation Commission (KCC) filed notices

⁴ 18 C.F.R. § 385.214(c) (2010).

of intervention. KCC's motion included a protest.⁵ On August 11, 2010, Southern Star filed an answer to Kansas Gas' comments and to KCC's protest.⁶ Kansas Gas' comments, KCC's protest, and Southern Star's answer are addressed below.

IV. Discussion

9. Since the operation of the proposed facilities would involve the transportation of natural gas in interstate commerce, the proposals are subject to the jurisdiction of the Commission under section 7(c) of the NGA.

A. Certificate Policy Statement

10. The Certificate Policy Statement provides guidance for evaluating proposals to certificate new construction.⁷ The Certificate Policy Statement established criteria for determining whether there is a need for a proposed project and whether the proposed project will serve the public interest. The Certificate Policy Statement explained that in deciding whether to authorize the expansion of natural gas facilities, the Commission balances the public benefits against the potential adverse consequences. The Commission's goal is to give appropriate consideration to the enhancement of competitive transportation alternatives, the possibility of overbuilding, subsidization by existing customers, the applicant's responsibility for unsubscribed capacity, the avoidance of unnecessary disruptions of the environment, and the unneeded exercise of eminent domain in evaluating new pipeline construction.

11. Under this policy, the threshold requirement for pipelines proposing new projects is that the pipeline must be prepared to financially support the project without relying on subsidization from its existing customers. The next step is to determine whether the applicant has made efforts to eliminate or minimize any adverse effects the project might have on the applicant's existing customers, existing pipelines in the market and their captive customers, or landowners and communities affected by the proposal. If residual

⁵ 18 C.F.R. § 385.214(a)(2) (2010).

⁶ Although answers to protests are not permitted by Rule 213(a)(2), 18 C.F.R. § 385.213(a)(2) (2010), the Commission finds good cause to waive the rule and to permit Southern Star's answer because it provided information that aided the Commission in the disposition of the issues discussed in the filing.

⁷ *Certification of New Interstate Natural Gas Pipeline Facilities*, 88 FERC ¶ 61,227 (1999), *order on clarification*, 90 FERC ¶ 61,128, *order on clarification*, 92 FERC ¶ 61,094 (2000) (Certificate Policy Statement).

adverse effects on these interest groups are identified after efforts have been made to minimize them, the Commission will evaluate the project by balancing the evidence of public benefits to be achieved against the residual adverse effects. This is essentially an economic test. Only when the benefits outweigh the adverse effects on economic interests will the Commission proceed to complete the environmental analysis where other interests are considered.

12. As discussed in the May 20 Order, current customers will not subsidize the storage services since the new services will be provided on an incremental basis and none of the costs associated with the requested expansion will be allocated to existing customers. The proposed project will have no adverse effect on other pipelines in the area or on their captive customers. Further, Southern Star's proposal consists only of a conversion of base gas to working gas. Therefore, the impact on landowners will be minimal. Lastly, as discussed below, the requested conversion of base gas will not result in any adverse operational effects on existing Southern Star customers.

13. Thus, based on the benefits Southern Star's project will provide to the market and the minimal adverse effects on existing customers, other pipelines, landowners, or communities, the Commission finds, consistent with the Certificate Policy Statement and section 7 of the NGA, that the public convenience and necessity requires approval of Southern Star's proposal to convert 1.4 Bcf of base gas to working gas at the Elk City storage field.⁸

B. Engineering Analysis

14. In the May 20 Order, the Commission denied Southern Star's proposal to convert 1.4 Bcf of base gas to working gas because the geologic information Southern Star submitted indicated that the conversion of base gas to working gas would result in a long-term loss of storage capacity. However, the Commission stated that it would reevaluate Southern Star's proposal if Southern Star provided proper technical justification, such as

⁸ Approval of Southern Star's request to reduce its certificated base gas level will correspondingly increase its certificated level of working gas, thus increasing the amount of storage service that Southern Star can provide from the facility without changing the facility's total capacity. Thus, while Southern Star needs amended certificate authority to permit this operational change, it does not need abandonment authorization under section 7(b) of the NGA to reduce the amount of capacity used for the storage of base gas at Elk City. *Compare Pan Gas Storage, LLC d/b/a Southwest Gas Storage Company* (Southwest), 120 FERC ¶ 61,223, at Ordering Paragraph (A) (2007) (*Southwest*) (Unlike Southern Star, Southwest needed abandonment authority to reduce a storage facility's certificated working gas capacity and to reduce the facility's total capacity.).

a reservoir simulation study, that showed no capacity would be lost as a result of the conversion of base gas to working gas. In this proceeding, Southern Star has filed updated engineering information (NSAI Study) to support its proposal.

15. Commission staff analyzed Southern Star's proposal to convert 1.4 Bcf of base gas to working gas. The NSAI Study provides multiple reservoir simulations and demonstrates that the proposal will not result in any loss of capacity. The NSAI Study shows that, even when the entire volume of working gas is cycled, the Elk City storage field will maintain its total storage capacity, as long as Southern Star appropriately alters the injection profile. For example, Southern Star's application in Docket No. CP10-2-000 included a reservoir simulation study that showed that the Elk City field would experience a long-term loss of capacity when gas was injected at a constant rate throughout the injection season. However, the NSAI Study submitted in this proceeding included reservoir simulation models showing that front loading the injections (injecting gas at a higher rate in the early part of the injection season) would not adversely impact the storage capacity at Elk City. Front loading the injection of gas in a storage field prevents the loss of storage capacity by increasing the average reservoir pressure throughout the storage cycle, preventing water encroachment. Southern Star states that it has the ability to alter its system operations to ensure that the storage field is operated in a manner to prevent capacity loss at Elk City. In support of this assertion, Southern Star provided data regarding the total amount of gas available to be injected into the Elk City storage field. This information shows that Southern Star has adequate system capacity to alter the injection profile as necessary at the Elk City storage field. Therefore, the Commission concludes that Southern Star has provided sufficient technical justification to show that its requested conversion of working gas to base gas will not result in a long-term reduction in storage capacity.

16. In addition, Southern Star seeks to clarify a statement in the May 20 Order about the maximum withdrawal rate at the Elk City storage field. The Commission finds that the currently-approved facilities at Elk City are appropriately designed to provide a maximum daily withdrawal rate of 470,000 Mcf per day. Lastly, Southern Star submitted for approval a revised operational plan, containing the new maximum withdrawal rate and additional monitoring procedures. The additional monitoring procedures will help ensure that the Elk City storage field is operated in a manner that prevents the loss of storage capacity. Therefore, the revised operating plan is approved.

C. Rates

1. Market-Based Rates under Section 4(f)

17. The May 20 Order authorized Southern Star to charge market-based storage rates for service under section 4(f) of the NGA.⁹ In Order No. 678, the Commission promulgated regulations implementing section 4(f), permitting underground natural gas storage service providers that are unable to show that they lack market power to nevertheless provide service at market-based rates.¹⁰ Specifically, Order No. 678 requires that underground natural gas storage providers meet the following criteria in order to negotiate market-based rates: (1) the capacity providing the storage service must relate to a “specific facility” requiring certification placed in service after August 8, 2005, the date of the Energy Policy Act of 2005, be it a new storage cavern or a facility that expands capacity at an existing cavern or reservoir;¹¹ (2) market-based rates must be in the public interest and necessary to encourage the construction of storage capacity in an area needing storage services;¹² and (3) customers must be adequately protected from the potential exercise of market power.¹³

18. The May 20 Order determined that Southern Star met the requirements of Order No. 678, finding that (1) the new compressor facility necessary to provide the expanded storage service will be placed into service after August 8, 2005; (2) market-based rates are necessary to encourage the construction of the proposed storage capacity because while expressions of customer interest demonstrated the need for natural gas storage in the area to be served, when Southern Star held three binding open seasons for storage capacity, customers were not willing to enter into long-term contracts at cost-based rates sufficient to support the project; and (3) customers will be adequately protected because Southern Star proposed an open and transparent auction process for selling unsubscribed firm and interruptible capacity and establishing a reserve price at the auction, as well as allocating costs of the expansion facilities to ensure that existing customers will not

⁹ May 20 Order, 131 FERC ¶ 61,154 at PP 34-47 and Ordering Paragraph D.

¹⁰ *Rate Regulation of Certain Natural Gas Storage Facilities*, Order No. 678, FERC Stats. & Regs., Regulations Preambles 2006-2007 ¶ 31,220 (2006), Order No. 678-A, *order on clarification and reh’g*, 117 FERC ¶ 61,190 (2006).

¹¹ Order No. 678, FERC Stats. & Regs. ¶ 31,220 at P 115.

¹² *Id.* P 125-132.

¹³ *Id.* P 153-159.

subsidize the cost of the facilities. Thus, the May 20 Order approved Southern Star's proposal to charge market-based rates. The capacity at issue in this proceeding was part of the expansion considered by the Commission in its May 20 Order. Southern Star's application here merely served to address operational concerns raised by the Commission with respect to a portion of the original proposal. Thus, the Commission finds that Southern Star should be permitted to charge market-based storage rates under section 4(f) for the additional 1.4 Bcf of working gas capacity approved here, subject to the conditions in the May 20 Order.

2. Proceeds from the Sale of 1.4 Bcf of Base Gas

19. Southern Star proposes to convert 1.4 Bcf of base gas capacity at the Elk City storage field to working gas capacity, sell the gas, and retain the proceeds.¹⁴ Southern Star asserts that it paid for the base gas in the Elk City storage field, reporting such volumes in its FERC Form 2. It states that the total value recorded in Account No. 117.1 (Gas Stored-Base Gas) for all of its storage fields, including the Elk City storage field, is \$9,084,020, with a total volume of 97,139,734 Dth.

20. In its protest, KCC contends that Southern Star has not demonstrated that it is entitled to retain revenues from the sale of the base gas consistent with Commission policy.¹⁵ KCC asserts that Commission policy requires a storage provider to show that: (1) customers did not pay for the subject base gas; (2) the storage provider owns the base gas; (3) the historic cost of the base gas is included in the storage provider's rate base for cost-of-service purposes; and (4) the storage provider recorded the cost as a fixed asset in Account No. 117.1.¹⁶ KCC contends that Southern Star's Form 2 does not demonstrate the original value or the current volume of base gas for the Elk City storage field, but only the aggregate value and volume for all of Southern Star's storage fields. KCC recognizes that Southern Star submitted a separate page that reflects the volume of base gas in the Elk City storage field in Exhibit Z-6 of the application, but contends that Southern Star has not provided any accounting testimony to verify the information's accuracy. Further, KCC indicates that Southern Star has not provided evidence of the original cost of the base gas.

¹⁴ Southern Star October 9, 2009 Application in Docket No. CP10-2-000 at 8, as adopted in the July 2, 2010 Application in this docket.

¹⁵ KCC Protest at 3 (citing *Natural Gas Pipeline Co. of America*, 101 FERC ¶ 61,125 (2002)).

¹⁶ *Id.* at 4.

21. In its comments, Kansas Gas requests that the Commission examine the proposed accounting treatment to ensure that customers are not harmed as a result of the sale of the base gas. Kansas Gas also states that in the future, should Southern Star purchase additional base gas in order to continue providing the same level of service to existing customers, the Commission should limit the cost to be recovered for injecting such gas.¹⁷

22. On September 9, 2010, Commission staff sent Southern Star a data request asking for records and accounting testimony to demonstrate the current volume and cost of the base gas in the Elk City Storage Field, the historic cost of the Elk City storage field base gas included in Southern Star's rate base for cost-of-service purposes, and the proposed accounting treatment for the removal of 1.4 Bcf of base gas from the storage field. In its response to the data request and its answer to the protest, Southern Star contends that page 220 of its 2008 Form 2 indicates that it owned and recorded the Elk City storage field's base gas as a capital asset in Account 117.1.¹⁸ Southern Star provides additional support in the form of an affidavit by Susanne W. Harris, Southern Star's Vice President, CFO and Treasurer, attesting to: (1) Southern Star's ownership of the base gas in its storage fields; (2) an original cost of the base gas for the Elk City storage field of \$1,774,186.91; and (3) the historic rate treatment of the base gas.¹⁹ Southern Star states that when the Elk City storage field's base gas is sold, it would remove the cost of the gas from Account 117.1. Further, Southern Star states that the reduction in storage rate base will be reflected in its filings in its next section 4 rate case.²⁰

23. Southern Star also requests that the Commission dismiss Kansas Gas' request for a limit on the cost at which Southern Star can re-inject gas if it is necessary to re-inject base gas for operational purposes. Southern Star states that the issue raised by Kansas Gas is "hypothetical" and premature. Southern Star does not anticipate needing to re-inject base gas and contends that it has provided the required reservoir simulation models and technical justification to support its proposal to reduce the present level of base gas in the Elk City storage field.²¹ In any event, Southern Star states that cost recovery for any

¹⁷ Kansas Gas Protest at 3. Specifically, Kansas Gas asks the Commission to require that such gas be injected at a cost that is the lesser of the cost of gas purchased for re-injection or the current book value cost of the 1.4 Bcf Southern Star proposes to sell.

¹⁸ Southern Star September 15, 2010 Data Response at 4 and August 11, 2010 Answer at 4.

¹⁹ Southern Star Answer at 5 and Affidavit of Susanne W. Harris.

²⁰ Southern Star Answer at 5.

²¹ *Id.*

re-injection of base gas necessary to ensure proper operation should be discussed in a subsequent rate proceeding.

24. The Commission concludes that Southern Star has adequately addressed the concerns raised by Kansas Gas and KCC, providing the accounting treatment and other information that demonstrates that Southern Star paid for and owns the base gas in the Elk City storage field. Thus, the Commission finds that Southern Star is authorized to sell its base gas and entitled to retain the proceeds from the sale of the base gas.²²

25. Finally, the Commission finds that in the event the re-injection of base gas becomes necessary, the issue of the cost Southern Star should be permitted to include in rate base to account for the additional injections of base gas should be addressed at that time. Thus, the Commission will deny Kansas Gas' request for a condition on the authorization granted in this order to place a limit on Southern Star's recovery of the costs of any re-injected gas that Southern Star will be allowed to include in its cost-of-service. If Southern Star files in the future to seek recovery costs for base gas re-injected into the Elk City storage field, parties will have the opportunity to raise their respective cost issues and arguments at such time.

²² *Southwest*, 120 FERC ¶ 61,223, at P 23, 24 (2007) (In *Southwest*, the Commission authorized Southwest to increase the authorized level of base gas in its storage facility by 3 Bcf by purchasing additional base gas, but the Commission emphasized that while it was finding the proposed purchase price of the gas to be appropriate for purposes of the certificate proceeding, it was not finding that the proposed cost of additional base gas was appropriate for purposes of establishing just and reasonable rates under section 4 or 5 of the NGA. Therefore, the Commission stated that its grant of certificate authorization for Southwest's purchase of additional base gas in no way would prejudice the ability of the protestors to challenge the level of costs incurred by Southwest to acquire additional base gas in the then-pending section 5 proceeding regarding Southwest's rates.) Here, granting Southern Star's request for authorization to convert existing storage capacity from base gas capacity to working gas capacity and to sell the unneeded base gas will not result in Southern Star's incurrence of costs. Further, the Commission has found in this proceeding that the record supports Southern Star's claim that it owns the base gas that it plans to sell, is entitled to retain the revenues from the sale, and has proposed appropriate accounting procedures. Thus, the Commission finds that there are no issues present here that need be deferred to a future rate proceeding.

D. Pro Forma Tariff Sheets

26. Southern Star provides firm and interruptible market-based rate storage services on an open-access basis. Southern Star proposes several changes to its tariff (the pro forma tariff sheets are attached as Exhibit P to its application) which would allow it to issue Operational Flow Orders (OFO) for any reason it deems necessary to protect the integrity of its pipeline system. Specifically, Southern Star indicates that the tariff modifications allow an OFO to be issued if additional gas is needed for injection into the Elk City storage field to protect the integrity of its reservoir capacity. The Commission finds Southern Star's proposed tariff revisions to be reasonable. The Commission will require Southern Star to file revised actual tariff sheets at least 30 days, and no more than 60 days, prior to the commencement of service.²³

E. Request for Waivers

27. Since it is proposing market-based rates, Southern Star requests a waiver of the filing requirement contained in section 157.14(a) of the Commission's regulations, namely, Exhibit N (Revenues Expenses and Income). The request for waiver of this requirement is granted.

V. Environmental Analysis

28. Southern Star's proposal to convert base gas capacity to working gas capacity does not require the installation of any additional facilities. Thus, no changes need to be made to the Environmental Assessment issued by the Commission on March 30, 2010, in Docket No. CP10-2-000. The proposed action qualifies as a categorical exclusion under section 380.4(a)(27).

29. At a hearing held on October 21, 2010, the Commission on its own motion received and made a part of the record in this proceeding all evidence, including the application and exhibits thereto, submitted in support of the authorizations sought herein, and upon consideration of the record,

²³ Southern Star also notes that Ordering Paragraph (E) of the May 20 Order directs it to submit actual tariff sheets and construction cost data for 2.6 Bcf of storage capacity, revised cost-of-service data, and a revised reserve rate consistent with the body of that order 60 days prior to the date of service. Since this order authorizes an additional 1.4 Bcf of working gas capacity, the Commission clarifies that the conditions of Ordering Paragraph (E) of the May 20 Order are superseded by those imposed in Ordering Paragraph (E) of this order .

The Commission orders:

(A) Southern Star's certificate issued on May 20, 2010, is amended as described more fully in the application and in the body of this order. In all other respects, the May 20 Order shall remain in full force and effect.

(B) The maximum inventory of natural gas stored in the Elk City storage field shall not exceed the certificated levels of 33.3 Bcf (11.8 Bcf working gas and 21.5 Bcf base gas) at 14.73 psia and 60 degrees Fahrenheit. The maximum daily withdrawal rate from the Elk City storage field shall not exceed 470,000 Mcf per day. Southern Star shall continue to comply with all other engineering and environmental conditions in the May 20 order.

(C) Southern Star shall make the facilities authorized herein available for service within one year from the date this order is issued, pursuant to paragraph (b) of section 157.20 of the Commission's regulations.

(D) Southern Star's request to charge market-based rates for firm and interruptible storage service under section 4(f) is approved for the incremental 1.4 Bcf of storage.

(E) Southern Star must submit actual tariff sheets and construction cost data for 4.0 Bcf of storage capacity with the requirements contained in the body of this order no more than 60 days, and no less than 30 days, prior to the date of service.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.