

149 FERC ¶ 61,173
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
and Norman C. Bay.

Gulf South Pipeline Company, LP

Docket No. RP15-65-000

ORDER ACCEPTING AND SUSPENDING TARIFF RECORDS SUBJECT TO
REFUND AND CONDITIONS, AND ESTABLISHING HEARING PROCEDURES

(Issued November 26, 2014)

1. On October 24, 2014, Gulf South Pipeline Company, LP (Gulf South) filed pursuant to section 4 of the Natural Gas Act (NGA) to implement a general rate increase (Rate Filing). In its Rate Filing, Gulf South submitted two sets of proposed tariff records¹ for consideration by the Commission in order to address the pending consolidation of Petal Gas Storage, L.L.C.'s (Petal) jurisdictional facilities into Gulf South's existing interstate natural gas operations in Docket Nos. CP14-473-000, RP14-822-000, and RP14-823-000. Option A tariff records apply if the Commission approves the application and include the Petal facilities as part of Gulf South's system, and Option B tariff records apply if the Commission rejects the application and does not incorporate the Petal facilities into Gulf South's system. Gulf South proposes an effective date of December 1, 2014 for either the Option A or Option B rates and tariff sections listed in the Appendix.
2. As discussed below, the Commission accepts and suspends the Option A tariff records to be effective May 1, 2015, subject to refund and the outcome of a hearing, and subject to the conditions required by the Commission's order in Docket Nos. CP14-473-000, RP14-822-000, and RP14-823-000 addressing the pending Gulf South-Petal merger, which is being issued concurrently. The Commission also rejects the Option B tariff records, as moot.

¹ See Appendix.

I. Background

3. Gulf South owns and operates approximately 7,241 miles of pipeline facilities that extend from Texas through Louisiana, Mississippi, Alabama, and Florida. Gulf South states that since its last NGA general section 4 rate case in 1997, it has invested approximately \$2.9 billion in new facilities and has incurred more than \$1 billion in operation and maintenance expenses to maintain its system. Gulf South states that the facilities it has constructed since the last rate case are providing Gulf South with the ability to supply the system and react to market changes, such as changing natural gas production from the Marcellus and Utica Shales now being delivered into Gulf South and competing for its Gulf Coast markets.

II. Details of the Filing

A. Rate Proposal

4. Gulf South's rate case proposal reflects a rate increase. Gulf South states that it has an annual cost of service of approximately \$475 million, a significant increase over the settled cost of service of \$188 million in its last general section 4 rate case. Gulf South proposes to roll into its rates its 2008 Expansion Facilities, Mobile Bay facilities, and Bastian Bay facilities. Gulf South contends these expansions "have been fully integrated into Gulf South's Mainline system, providing ...enhanced reliability and flexibility."² Gulf South's proposed rates are based on its actual capital structure of 35.53 percent debt and 64.47 percent equity and reflect the projected merger of Petal into Gulf South and the debt related to that merger issued during the test period.³ Gulf South proposes a return on equity of 14.0 percent. In addition, Gulf South is proposing a discount adjustment for all of its discounted contracts and a discount-type adjustment for the negotiated rate Firm Transportation Service (FTS) agreements for the 2008 Expansion Facilities and other negotiated Enhanced Firm Transportation Service and FTS agreements and Interruptible Transportation Service agreements.

5. Gulf South also proposes to reduce its current zone-gate design from five zones to three zones. The proposed zones are the Mainline Zone, the Local Zone, and the Lake Charles Zone. Gulf South states that the Mainline Zone facilities are larger-diameter, higher-pressure lines that deliver natural gas to Gulf South's large industrials, local distribution companies (LDCs), power generators, and other pipelines and include almost all of the system's compressor facilities. Gulf South states that the Local Zone facilities

² Gulf South Transmittal at 48.

³ The base period covers the period July 1, 2013, through June 30, 2014, and the test period will end on March 31, 2015. *Id.* at 8.

are older, lower-pressure pipelines that primarily move natural gas from local production or from the Mainline facilities to serve smaller communities and industrials. According to Gulf South, “[t]he Lake Charles Zone includes only the high-pressure pipeline assets that serve the Lake Charles, Louisiana area ... [that] are physically isolated and non-contiguous from the remainder of the Mainline facilities.”⁴ Gulf South contends that the rates for these proposed zones will be based on the allocation of direct and indirect costs related to that proposed zone and recognizes that the customers that actually use specific facilities should pay the costs associated with those facilities.

B. Fuel

6. Gulf South proposes continuing its use of a fixed, postage-stamp fuel rate and to reduce its fuel and company-used rate from 1.6 percent to 1.52 percent for all transportation customers except those in the proposed Lake Charles Zone. Gulf South states the Lake Charles facilities will continue to qualify as a “no fuel” haul under Gulf South’s Tariff.

C. Changes to Gulf South’s Rate Schedules

7. Gulf South proposes several changes to No-Notice Service (NNS), including: (1) requiring NNS customers to point-pair⁵ their contracts because they will no longer be provided service under a postage-stamp rate but their rates will be based upon the proposed zones for their service; (2) assigning storage capacity based on which Capacity Allocation Area the majority of a customer’s delivery points are located; and (3) clarifying that NNS customers will not have a contractual right to take deliveries at hourly flows greater than 1/20 of their daily contract entitlement, and during Operational Flow Orders may be reduced to 1/24 of their daily contract entitlement.

8. Gulf South also proposes to tighten the eligibility requirements for its Small Customer Option (SCO) shippers to continue to receive their service.⁶ Gulf South proposes that if an SCO shipper is connected to another pipeline, that customer will lose its eligibility to receive SCO service and its SCO contract will automatically convert to a

⁴ *Id.* at 10.

⁵ Gulf South does not define a point-pair in its tariff or transmittal, but explains it as requiring shippers to match each specific Primary Receipt Point to a specific Primary Delivery Point, in order to determine the contract path. *Id.* at 66.

⁶ Under our regulations, “*Small customer* is a customer that purchases gas from a pipeline under the pipeline’s one-part imputed load factor rate schedule on the effective date of the blanket certificate.” 18 C.F.R. § 284.282(d) (2014).

standard contract with a two-part rate under the equivalent rate schedule.⁷ Gulf South also proposes a Minimum Contribution to Fix Costs (MCFC) that would require all SCO customers in a delivery zone to flow at least 33 percent of their annual MDQ in the aggregate or pay an additional charge equal to the difference between what they flowed and 33 percent of their annual MDQ.

9. Gulf South proposes to present each NNS and SCO customer with proposed point-pairings and designated storage facilities on or before November 17, 2014, with contracts ultimately revised and commencing on May 1, 2015.

10. Gulf South proposes two changes to its pooling service under Rate Schedule PS. First, Gulf South proposes to add a new Pooling Area for each new Capacity Allocation Area established as a result of its Southeast Market Expansion (SEME) Project, the Petal-Gulf South merger, and the new Lake Charles Zone. Gulf South claims its proposal is consistent with its historical practice of having one pooling area with its associated pooling point for each Capacity Allocation Area. Second, Gulf South proposes to remove the Zone location for the pooling points as it is no longer relevant.⁸

11. Gulf South proposes several changes to its GT&C and *pro forma* agreements, including: (1) changing the term “As Practicable” to “as possible” with respect to Uniform Hourly Rates of Flow;⁹ (2) modifying the maximum applicable supplemental charge calculation; (3) modifying scheduling priorities for interruptible transportation services; (4) incorporating the Jackson Storage Facility into its tariff; and (5) ministerial conforming changes.

III. Notice of Filing and Responsive Pleadings

12. Public notice of Gulf South’s filing was issued on October 27, 2014. Interventions and protests were due November 5, 2014.¹⁰ Pursuant to Rule 214,¹¹ all timely-filed motions to intervene and any unopposed motions to intervene filed out-of-time 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.

⁷ Gulf South transmittal at 14-15.

⁸ *Id.* at 79.

⁹ *Id.* at 81.

¹⁰ *See* 18 C.F.R. § 154.210 (2014).

¹¹ 18 C.F.R. § 385.214 (2014).

13. The following parties filed protests challenging numerous aspects of Gulf South's filing: Texla Energy Management Company; Indicated Shippers;¹² Atmos Energy Marketing, LLC and Trans Louisiana Gas Pipeline, Inc.; Atmos Energy Corporation; United Municipal Distributors Group (UMDG);¹³ Mainline Shipper Group;¹⁴ the Distributor Coalition;¹⁵ QEP Energy Company; the Mississippi Public Service Commission; M21K, LLC; Chesapeake Energy Marketing, Inc.; Louisiana Municipal Gas Authority; Southern Company Services, Inc.; Georgia-Pacific LLC; and Koch Energy Services, LLC.

14. In general, the protesting parties object to many of the issues related to Gulf South's new rates, including, but not limited to, the elements of Gulf South's proposed cost of service, capital structure, cost of equity, the roll-in of certain expansion projects, the proposed discount adjustments for negotiated rate transactions, and Gulf South's proposed new rate design. A number of the parties protest the changes proposed by Gulf South to its No-Notice and Small Customer Services. Parties also take issue with the lack of full segmentation capability between the different zones in Gulf South's new rate design. Texla suggests that any reconfigured services ultimately approved by the Commission or in settlement should be subject to a phase-in period in order to mitigate the shock from these major rate changes. Protestors in general contend that the filing should be suspended for the maximum five-month period, subject to refund, and set for investigation and hearing.

15. Several parties object to Gulf South's continued use of a fixed fuel rate. However, the Mainline Shipper Group and Indicated Shippers both request that Commission implement Gulf South's proposed fuel retention percentage, which is lower than their

¹² Indicated Shippers are: Andarko Energy Services Company, BP Energy Company, ExxonMobil Gas & Power Marketing Company, Shell Energy North America (US), L.P., and Shell Offshore Inc.

¹³ UMDG are: City of Bay Springs, MS; City of Brewton, AL; Canton Municipal Utilities, MS; Chickasawhay Natural Gas District, MS; Town of Century, FL; Utilities Board of the Town of Citronelle, AL; City of Fairhope, AL; Utilities Board of the City of Foley, AL; City of Moss Point, MS; the Municipal Gas Authority of MS; North Baldwin Utilities, AL; Okaloosa Gas District, FL; City of Pascagoula, MS; City of Pensacola, FL; and South Alabama Gas District, AL.

¹⁴ The Mainline Shipper Group are: EnCana Marketing (USA) Inc., J-W Operating Company, Sequent Energy Management, L.P., and Talisman Energy USA Inc.

¹⁵ The Distributor Coalition are: CenterPoint Energy Resources Corp.; Mobile Gas Service Corporation; Willmut Gas Company; and the City of Vicksburg, Mississippi.

currently-effective fuel retention percentage immediately. Indicated Shippers argue that the “Commission should require Gulf South to implement a fuel tracker mechanism to ensure that Gulf South does not over-recover its fuel costs.”¹⁶ In the alternative, Indicated Shippers argue that “the Commission should allow Gulf South to make its proposed fuel rate of 1.52 percent effective immediately, with no suspension period, subject to the outcome this proceeding.”¹⁷ Similarly, Mainline Shipper Group, even though it argues that Gulf South’s fuel rate is unsupported, asks that it not be suspended.¹⁸

16. Indicated Shippers, UMDG, and the Distributor Coalition protest Gulf South’s proposal to have Rate Schedule NNS customers modify the primary point pairs of their contracts by January 15, 2015, four-and-a-half months prior to the end of the suspension period of Gulf South’s proposed rate and tariff changes. They ask the Commission to make clear that any change to NNS service agreements cannot be implemented prior to a Commission determination that the proposed tariff changes are just and reasonable. Indicated Shippers also object to Gulf South’s proposal to require shippers to revise their discount agreements to account for Gulf South’s shift from a five rate-zone system to a three rate-zone system.

17. UMDG states that Gulf South’s proposed Minimum Contribution to Fixed Costs (MCFC) surcharge imposed on NNS and SCO customers violates sections 284.7(e) and 284.10(c)(1) of the Commission’s regulations and requires summary rejection. UMDG states these regulations provide that the only type of provision that has the effect of guaranteeing revenue that is permissible is a reservation fee or charge and the MCFC is not such a reservation fee or charge. Accordingly, UMDG requests that the Commission summarily reject the proposed MCFC surcharge pursuant to Rule 217 of the Commission’s regulations.

18. On November 13, 2014, Gulf South filed a Motion for Leave to Answer and Answer in response to the protests. On November 17, 2014, Indicated Shippers, UMDG, and the Distributor Coalition filed Motions to Answer and Answers in Opposition to Gulf South’s Motion for Leave to Answer. While the Commission’s regulations generally prohibit answers to protests, the Commission will accept these answers because they contain additional information that provides the Commission with a more complete record on which to base its decision.

¹⁶ Indicated Shippers Protest at 11.

¹⁷ *Id.* at 11-12.

¹⁸ Mainline Shipper Group Protest at 5-7.

19. In its answer, Gulf South states that the arguments made by protestors generally rely on incorrect factual statements and mischaracterizations or are without justification. Gulf South defends the contested aspects of its Rate Filing and supports the Commission suspending and setting for hearing all matters associated with the Rate Filing.

20. In addition, Gulf South asks that the Commission reject the requests by several parties to summarily reject certain aspects of Gulf South's Rate Filing, as the protestors have not demonstrated that any part merits summary rejection. Gulf South also asks that, contrary to requests from several protestors, the Commission should allow for the proposed contract modifications for No-Notice customers to proceed. Gulf South argues that such modifications would only become effective upon the effectiveness of the new rates and that delaying the point-pairing changes could potentially disrupt Gulf South's planned NNS changes.

IV. Discussion

21. Gulf South's filing raises contested issues that warrant further investigation. Accordingly, as many of the matters raised in the filing are interrelated, the Commission will establish a hearing to explore all issues raised by Gulf South's filing, and the issues set forth in the protests including but not limited to cost of service, rate design, the roll-in of expansion projects, discount adjustments, fuel and other rate-related issues. In addition, because Gulf South's proposed changes to its tariff and rate schedules are inextricably linked to the rate design changes proposed by Gulf South, all of the issues pertaining to those changes are to be addressed in the hearing as well.

22. Parties request that the Commission summarily dispose of several substantive matters before hearing. We decline to do so, because the parties have not established that there are no genuine issues of fact material to the decision, nor that there are any proposals so patently deficient that they do not warrant inclusion in the administrative hearing.¹⁹

23. We reject the request of Mainline Shipper Group and Indicated Shippers that we make Gulf South's proposed fuel retention percentage subject to refund but nevertheless accept it with no suspension or a nominal suspension. In the narrow circumstance where incremental rates for a particular, severable service have decreased, it may be appropriate to accept those rates separately. Here, however, as in the recent *Tennessee* case:

This is a situation where, since the settlement of [Gulf South's] last rate case, some components of the cost of

¹⁹ See, e.g., *Mun. Elec. Utilities Ass'n of New York*, 148 FERC ¶ 61,175, at P 36 (2014); *Tennessee Gas Pipeline Co.*, 133 FERC ¶ 61,266, at P 18 (2010) (*Tennessee*).

service allocated among all services have gone up, while other components have gone down by a lesser amount. In such circumstances, it is appropriate that all such changes in the cost of service be reflected in [Gulf South's] rates at the same time.²⁰

24. In its Rate Filing, Gulf South also proposes modifications to its current contracts to take effect prior to the Commission order in order to add point pairing for its revised NNS service. Gulf South states that any modifications would become effective only upon the effectiveness of the new rates.²¹ The Commission has not yet made a determination that the changes Gulf South is proposing to its NNS service are just and reasonable, and has suspended Gulf South's proposed tariff records until May 1, 2015. Therefore, no contract modifications can become effective before May 1, 2015. Furthermore, we note that neither Gulf South nor any of its customers may compel the other to waive its rights to fully contest the instant proceeding.

V. Suspension

25. Based on a review of the filing, the Commission finds that Gulf South's proposed tariff records have not been shown to be just and reasonable, and may be unjust, unreasonable, unduly discriminatory, or otherwise unlawful. Accordingly, the Commission will accept and suspend the effectiveness of the Option A tariff records proposed to be effective May 1, 2015, subject to refund, the outcome of a hearing, the conditions set forth in this order, and the conditions set forth in the Gulf South-Petal merger order being issued concurrently.

26. The Commission's policy regarding suspension is that tariff filings generally should be suspended for the maximum period permitted by statute where preliminary study leads the Commission to believe that the filing may be unjust, unreasonable, or inconsistent with other statutory standards.²² It is recognized, however, that shorter suspensions may be warranted in circumstances where suspension for the maximum

²⁰ *Tennessee*, 133 FERC ¶ 61,266 at P 34. Furthermore, as in *Tennessee*, Gulf South has not filed a motion to move its rates into effect immediately. Therefore, in order to require Gulf South to implement its fuel rate immediately, the Commission would have to accept the relevant tariff records without suspension, despite the fact protesters have contested certain aspects of the proposed fuel rate. *Id.* P 35.

²¹ Gulf South Answer at 59.

²² See *Great Lakes Gas Transmission Co.*, 12 FERC ¶ 61,293 (1980) (five-month suspension).

period may lead to harsh and inequitable results.²³ The Commission does not find such results here where the pipeline has proposed an NGA general section 4 rate case. Therefore, the Commission shall accept and suspend for the maximum period of five months the proposed tariff records in Option A, to be effective May 1, 2015, subject to refund, and the outcome of the hearing proceeding ordered herein. The tariff records in Option B are rejected as moot.

27. Gulf South must adhere to section 154.303(c)(2) of the Commission's regulations which provides that at the end of the test period, the pipeline must remove from its rates costs associated with any facility that is not in service or for which certificate authority is required but has not been granted.

The Commission orders:

(A) The proposed tariff records listed as Option A in the Appendix are accepted and suspended, to be effective May 1, 2015, subject to refund, and to the outcome of the hearing established in this order, and subject to the conditions required by the Commission's order addressing the pending Gulf South-Petal merger, which is being issued concurrently.

(B) The alternate Option B tariff records in the Appendix are rejected as moot.

(C) Gulf South must file its revised rates to reflect the removal of the costs of any facilities not in service at the close of the test period.

(D) Pursuant to the authority of the Natural Gas Act, particularly sections 4, 5, 8, 9, and 15 thereof, and the Commission's rules and regulations, a public hearing shall be held in Docket No. RP15-65-000 concerning the lawfulness of Gulf South's proposed rates.

(E) A Presiding Administrative Law Judge, to be designated by the Chief Administrative Law Judge for that purpose pursuant to 18 C.F.R. § 375.304, shall convene a prehearing conference in this proceeding to be held within 20 days after issuance of this order, in a hearing or conference room of the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426. The prehearing conference

²³ See *Valley Gas Transmission, Inc.*, 12 FERC ¶ 61,197 (1980) (one-day suspension).

is for the purpose of clarification of the positions of the participants and consideration by the presiding judge of any procedural issues and discovery dates necessary for the hearing.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

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**Gulf South Pipeline Company, LP
FERC NGA Gas Tariff
Tariffs**

Option A

Tariff records accepted and suspended to be effective May 1, 2015, subject to refund and conditions.

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Option B

Tariff records rejected, as moot.

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