

151 FERC ¶ 61,283
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

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

Gulf South Pipeline Company, LP

Docket No. RP15-65-002

ORDER GRANTING MOTION TO PLACE TARIFF RECORDS INTO EFFECT

(Issued June 30, 2015)

1. On April 29, 2015, Gulf South Pipeline Company, LP (Gulf South) filed a motion to replace tariff records which the Commission accepted and suspended on November 26, 2014,¹ and to place into effect on May 1, 2015, the tariff records listed in Appendix A. As discussed below, the Commission grants Gulf South's motion as a matter of right. Therefore, the referenced tariff records in Appendix A are effective May 1, 2015. Consistent with the November 26 Order, these records are accepted for filing, subject to refund and subject to the outcome of the hearing to be held in this proceeding. The underlying tariff records listed in Appendix B are rejected as moot.

Background and Filing

2. On October 24, 2014, Gulf South filed two sets of tariff records pursuant to the Natural Gas Act (NGA) section 4 and Part 154 of the Commission's regulations proposing to change Gulf South's rates, as well as other terms and conditions of service. The Option A tariff records would apply if the Commission approved a pending certificate and abandonment application in Docket Nos. CP14-473-000 to merge the jurisdictional facilities of Petal Gas Storage, L.L.C. (Petal) into Gulf South's existing interstate natural gas operations, together with related tariff records filed in Docket Nos. RP14-822-000 and RP14-823-000 modifying Gulf South's rate schedules and General Terms and Conditions (GT&C) to implement the proposed merger. The Option B tariff records would apply if the Commission did not approve the merger. In the November 26 Order, the Commission accepted for filing and suspended the Option A

¹ *Gulf South Pipeline Co., LP*, 149 FERC ¶ 61,173 (2014) (November 26 Order).

tariff records to be effective May 1, 2015, subject to refund and to the outcome of a hearing. On the same day, the Commission granted the application to merge Petal's facilities into the Gulf South system, but required various changes in the tariff records proposed to implement the merger.² Accordingly, the November 26 Order made the acceptance of the Option A tariff records subject to the conditions required by the Petal Order. The November 26 Order also required Gulf South to remove from its revised rates the costs of any facilities not in service at the close of the test period.

3. In the instant filing Gulf South moves, pursuant to section 154.206(a) of the Commission's regulations,³ to replace the suspended tariff records with the tariff records listed on Appendix A in order to reflect changes ordered by the Commission or modifications approved by the Commission during the suspension period. Gulf South states that the Appendix A tariff records reflect the changes required by the Commission in the Petal Order and are consistent with the tariff records it filed to comply with the Petal Order, which the Commission approved in a delegated order issued February 12, 2015. Gulf South states that it has also revised the section in its Tariff containing system maps in order to capture the changes pending in Docket No. RP15-818-000, which were submitted in compliance with Order No. 801⁴ and are also effective May 1, 2015. Gulf South also states that Appendix A includes replacement tariff records correcting certain typographical errors from the October 24 Filing. In addition, as an administrative matter, Gulf South is cancelling FERC Record ID 554, which is an inadvertent duplicate of another tariff record contained in this filing.

Notice of Filing and Responsive Pleadings

4. Public notice of the filing was issued on April 30, 2015. Interventions and protests were due as provided in section 154.210 of the Commission's regulations.⁵ Pursuant to Rule 214,⁶ all timely filed motions to intervene and any unopposed motion 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

² *Gulf South Pipeline Co., LP*, 149 FERC ¶ 61,174 (2014) (Petal Order).

³ 18 C.F.R. § 154.206(a) (2014).

⁴ *Natural Gas Act Pipeline Maps*, Order No. 801, 149 FERC ¶ 61,133, 79 Fed. Reg. 75,047 (2014).

⁵ 18 C.F.R. § 154.210 (2014).

⁶ 18 C.F.R. § 385.214 (2014).

additional burdens on existing parties. The Indicated Shippers⁷; Atmos⁸; the United Municipal Distributors Group (UMDG)⁹; and the Distributor Coalition¹⁰ filed answers in opposition to Gulf South's April 29, 2015 Motion to Replace Suspended Tariff Records and Move Into Effect. Gulf South filed an answer to the answers in opposition on May 8, 2015. The Commission's regulations prohibit answers to protests unless otherwise ordered.¹¹ The Commission will accept Gulf South's answer since it assists the Commission in understanding the issues raised.

5. Indicated Shippers, Atmos, UMDG, and the Distributor Coalition request that the Commission deny the Gulf South motion because Gulf South has not yet completed development of the systems capable of providing preliminary invoices to its customers. Indicated Shippers state that customers rely on preliminary invoices to determine whether any extended delivery charges and overrun charges may be assessed on volumes that flow during a month. Parties state that given the new rate structure that Gulf South has imposed on its system, it is imperative that customers have preliminary invoices in order to verify that Gulf South is charging contracts correctly and in a manner consistent with shippers' view and interpretation of these charges. Indicated Shippers and Atmos request that if the Commission does not deny Gulf South's motion, then Gulf South should be

⁷ For the purposes of this proceeding, the Indicated Shippers consist of BP Energy Company, Chesapeake Energy Marketing, LLC, ExxonMobil Gas & Power Marketing Company, a division of Exxon Mobil Corporation, Petrohawk Energy Corporation, Shell Energy North America (US), L.P., and Shell Offshore Inc.

⁸ For the purposes of this proceeding, Atmos refers to the following affiliates: Atmos Energy Corporation, Atmos Energy Marketing, LLC, and Trans Louisiana Gas Pipeline, Inc.

⁹ UMDG consists of the following municipal-distributor customers of Gulf South: 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.

¹⁰ The Distributor Coalition consists of CenterPoint Energy Resources Corp., Mobile Gas Service Corporation, Willmut Gas Company, and the City of Vicksburg, Mississippi.

¹¹ 18 C.F.R. § 385.213(a)(2) (2014).

required to waive any extended delivery charges or additional charges that result from Gulf South's failure to provide preliminary invoice information.¹²

6. UMDG also states that Gulf South projected \$24.4 million in test-period plant additions to be placed into service during the test period in its initial rate filing. UMDG states that the rates submitted in the motion rate filing are the same as those that Gulf South initially submitted in its rate case, but there is nothing in the motion rate filing to show that the projected plant was placed in service. UMDG requests the Commission to require Gulf South to either affirm that the projected test-period additions to plant were placed into service before the end of the test period, or, if that is not the case, to revise the motion rates to exclude costs related to the plant that was not placed into service before March 31, 2015.

7. In its Answer, Gulf South states that the Commission should reject the requests that it deny Gulf South's motion to move into effect its suspended tariff records. Gulf South states that the requested relief is directly contrary to section 4 of the NGA, and the answers are merely another attempt to postpone Gulf South's rate increase and circumvent the statutory requirements of the NGA. Gulf South further asserts that section 4 of the NGA states that, on motion by the pipeline, proposed rates and tariff changes that have been set for hearing will go into effect, subject to refund, after a maximum suspension period of five months and prior to the Commission's ultimate determination as to whether those changes are just and reasonable.

8. In response to the comments by answering parties regarding preliminary invoices, Gulf South states that it has implemented its suspended rates and is conducting its day-to-day business as usual, with customers nominating and transporting gas on its system. Gulf South states that neither its tariff nor Commission regulations require the use of preliminary invoices and that it provides preliminary invoices as a courtesy for the convenience of its customers and will continue to do so as soon as is practicable. Regardless of the availability of preliminary invoices, Gulf South states that it continues to provide its customers with sufficient information to manage their business and that customers are able to determine any supplemental charges by viewing the applicable rate sheets or contacting Gulf South's customer service representatives.

¹² UMDG and Distributor Coalition state that Gulf South's delays in providing revised contract information to shippers and changes to its No-Notice Service have resulted in customers being unable to accurately purchase and schedule gas, which can result in imbalances and additional transportation charges.

9. Gulf South states that it has fully complied with the November 26 Order, which required that it 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. Gulf South states that the \$24.4 million in plant additions included in its proposed rates were placed into service on or before March 31, 2015, prior to the end of the test period and the effective date of Gulf South's motion rates. Gulf South states that its Test Period Update (filed May 8, 2015) demonstrates that the plant additions exceed the \$24.4 million in plant projected in Gulf South's rate case filing.

Discussion

10. Section 4(e) of the Natural Gas Act reads, in relevant part:

[T]he Commission... may suspend the operation of such schedule and defer the use of such rate, charge, classification, or service, but not for a longer period than five months beyond the time when it would otherwise go into effect... If the proceeding has not been concluded and an order made at the expiration of the suspension period, on motion of the natural-gas company making the filing, the proposed change of rate, charge, classification, or service shall go into effect.¹³

11. Pursuant to the statute, the Commission lacks that authority to suspend a rate for longer than five months. The phrase "shall go into effect" means that after five months, the Commission has no further discretion to prevent a suspended rate from going into effect upon motion of the pipeline to place the suspended tariff records into effect. If, at the conclusion of the proceeding, the Commission ultimately rejects a tariff record as unjust or unreasonable, section 4(e) authorizes the Commission "to order such natural-gas company to refund, with interest, the portion of such increased rates or charges by its decision found not justified."¹⁴ In the meantime, the pipeline has a statutory right to

¹³ 15 U.S.C. § 717c(e) (2012). Section 154.206 of the Commission's regulations regarding motions to place suspended rates into effect, is designed to be a straightforward and literal implementation of section 4(e) of the NGA. *Filing and Reporting Requirements for Interstate Natural Gas Company Rate Schedules and Tariffs*, Order No. 582, 60 Fed. Reg. 52960, FERC Stats & Regs. ¶ 31,025 (1995), on reh'g, Order No. 582-A, 61 Fed. Reg. 38,565, FERC Stats & Regs. ¶ 31,037 (1996).

¹⁴ 15 U.S.C. § 717c(e) (2012).

proceed, and the Commission lacks the legal authority to delay the effectiveness of the proposed rates, regardless of the policy or equity arguments that parties may raise.¹⁵

12. Accordingly, when a pipeline exercises its section 4(e) right to move suspended tariff records into effect, the Commission cannot consider the underlying justness and reasonableness of the proposal, nor may it consider extrinsic evidence of how the proposed tariff is being applied, such as it would in a section 5 complaint proceeding. Rather, the only question before the Commission is whether the section 154.206 motion has been properly filed, or determining whether the tariff records accompanying the motion “reflect[] any changes ordered by the Commission or modifications approved by the Commission during the suspension period.”¹⁶

13. The Commission finds that Gulf South’s filing, as described above, complies with the November 26 Order in this proceeding and that there is no merit to the objections posed to the motion filing. Regarding the preliminary invoices, Gulf South is not required under the Commission’s regulations, Gulf South’s tariff, or any other policy to provide this service to its customers. Gulf South states that it is conducting its day-to-day business as usual, and customers are able to obtain supplemental charge information through a variety of mechanisms. Gulf South states that it will continue to provide preliminary invoices as a courtesy as soon as it is practicable. The Commission does not find any basis for the requests to deny Gulf South’s motion based on the status of its preliminary invoice system. In response to UMDG’s concern, Gulf South’s Test Period Update filed on May 8, 2015 demonstrates that the plant additions referenced by UMDG have been placed in service prior to the end of the test period. Therefore, Gulf South’s motion rates comply with all of the conditions established by the November 26 Order, and the Commission must permit Gulf South to place those rates into effect subject to refund.

14. The updated tariff records are therefore accepted for filing effective May 1, 2015, subject to refund, and subject to the outcome of the hearing in this proceeding.

¹⁵ *Portland Natural Gas Transmission System*, 99 FERC ¶ 61,151, at 61,153 (2002).

¹⁶ 18 C.F.R. § 154.206(a) (2014).

The Commission orders:

(A) Gulf South's motion to place the tariff records listed in Appendix A into effect on May 1, 2015, is granted, subject to refund and to the outcome of the hearing in this proceeding.

(B) The records that were previously on file, listed below in Appendix B, are rejected, as moot.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

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[Section 7.16, Reserved, 1.0.0](#)
[Section 7.17, Reserved, 1.0.0](#)
[Section 7.17.1, Reserved, 1.0.0](#)
[Section 7.4.1, Form\(s\) of Service Agreements - FSS-P - Exhibit A, 0.0.0](#)
[Section 7.6, Form\(s\) of Service Agreements - ISS-P, 3.0.0](#)
[Section 7.6.1, Form\(s\) of Service Agreements - ISS-P - Exhibit A, 2.0.0](#)
[Section 7.7, Form\(s\) of Service Agreements - PAL/AVS/PKS, 3.0.0](#)
[Section 7.7.1, Form\(s\) of Service Agreements - PAL/AVS/PKS - Exhibit A, 2.0.0](#)
[Section 7.8, Form\(s\) of Service Agreements - GS, 7.0.0](#)
[Section 7.8.1, Form\(s\) of Service Agreements - GS - Exhibit A, 5.0.0](#)
[Section 7.8.2, Reserved, 5.0.0](#)
[Section 7.8.3, Reserved, 5.0.0](#)
[Section 7.9, NNS/NNS-A/FTS/EFT/ENS/FSS-P Discounted Rate Letter Agmt, 3.0.0](#)
[Section 7.9.1, NNS/NNS-A/FTS/EFT/ENS/FSS-P Disc Rate Letter Agmt- Exhibit A, 3.0.0](#)
[Section 7.9.2, NNS/NNS-A/FTS/EFT/ENS/FSS-P Disc Rate Letter Agmt- Exhibit B, 0.0.0](#)
[Section 7.9.3, NNS/NNS-A/FTS/EFT/ENS/FSS-P Disc Rate Letter Agmt- Exhibit C, 0.0.0](#)
[Section 7.10, Form\(s\) of Agmts - ITS/PXS/ISS-P Discounted Rate Letter Agmt, 6.0.0](#)
[Section 7.10.1, Form\(s\) of Agmts - ITS/PXS/ISS-P Discounted Rate - Exhibit A, 4.0.0](#)
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[Section 7.10.4, Reserved, 2.0.0](#)

[Section 7.11, Form\(s\) of Agmts - NNS/NNS-A/FTS/EFT/FSS-P Neg Rate Ltr Agmt, 2.0.0](#)

[Section 7.11.1, NNS/NNS-A/FTS/EFT/FSS-P Neg Rate Agmt - Exhibit A, 2.0.0](#)

[Section 7.11.2, NNS/FTS Neg Rate Agmt - Exhibit B, 0.0.0](#)

[Section 7.11.3, NNS/FTS Neg Rate Agmt - Exhibit C, 0.0.0](#)

[Section 7.11.4, NNS Neg Rate Agmt - Exhibit D, 0.0.0](#)

[Section 7.12, Internet Website Customer Agreement, 3.0.0](#)

[Section 7.12.1, Internet Website Customer Agreement - Exhibit A, 0.0.0](#)

[Section 7.13, Form\(s\) of Service Agreements - PS, 3.0.0](#)

[Section 7.14, Form\(s\) of Service Agmt - ATS, 2.0.0](#)

[Section 7.15, Form\(s\) of Service Agmt - Umbrella Firm Transportation, 1.0.0](#)

[Section 7.16, Form\(s\) of Agmt - Addendum to Service Agreement - ENS, 0.0.0](#)

[Section 7.17, Form\(s\) of Agmt - Addendum to Service Agreement - ISS-P, 0.0.0](#)

[Section 7.17.1, Form\(s\) of Agmt - Addendum to Service Agmt - ISS-P - Ex A, 0.0.0](#)