

134 FERC ¶ 61,076
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

February 1, 2011

In Reply Refer To:
Bobcat Gas Storage
Docket No. RP11-1599-000

Bobcat Gas Storage
P.O. Box 1642
Houston, TX 77251-1642

Attention: Janice K. Devers, General Manager
Tariffs and Commercial Development

Reference: Tariff Modifications

Dear Ms. Devers:

1. On December 7, 2010, Bobcat Gas Storage (Bobcat) filed several revised tariff records¹ in order to reflect modifications to its tariff. The purpose of the tariff modifications is to align Bobcat's tariff with the tariffs of other pipelines owned by Spectra Energy Corp (Spectra), who recently purchased Bobcat. The filing primarily implements Spectra's LINK Customer Interface System (LINK System), which replaces the electronic bulletin board system Bobcat had previously been using. Bobcat proposes that the tariff records become effective March 1, 2011. However, Bobcat is requesting that the Commission issue an order accepting the proposed tariff records by February 1, 2011, to allow Bobcat and its customers the time necessary to ensure a smooth transition to the LINK System. Bobcat also requests a waiver of certain North American Energy Standards Board (NAESB) Wholesale Gas Quality (WGQ) standards and waiver of the 60-day notice requirement in section 154.207 of the Commission's regulations² so that

¹ See Appendix.

² 18 C.F.R. § 154.207 (2010).

the revised tariff records may become effective on March 1, 2011. The Commission grants the requested waivers and accepts the revised tariff records filed by Bobcat effective March 1, 2011, as proposed.

2. Spectra purchased Bobcat on August 30, 2010, after which Bobcat began operating as an entity of Spectra. Bobcat states that, during this time, its customers have continued to conduct their daily business activities using an electronic bulletin board system provided and maintained by a third-party vendor pursuant to a third-party agreement. Bobcat states that Spectra has worked on modifications in order for Bobcat to implement Spectra's LINK System. Bobcat states that it has terminated the agreement with its third-party vendor, and effective March 1, 2011, all Bobcat's daily business activities that are conducted electronically will be conducted via Spectra's LINK System.

3. Bobcat asserts that the revised tariff records filed by Bobcat in this filing reflect the implementation of the LINK System but also make other changes as well. Bobcat contends that these changes include: formalizing the interruptible park, wheeling and loan services currently provided by adding new Rate Schedules IPS, IWS and ILS; modifying the creditworthiness provisions to include the calculations of financial assurances for the new rate schedules; and making changes to forms of service agreements so that they conform with those of Spectra's other entities. All the changes to the tariff proposed by Bobcat, including the implementation of the LINK System, are meant to align Bobcat's tariff with the tariffs of Spectra's other entities.

4. Public notice of Bobcat's filing was issued on December 7, 2010. Interventions and protests were due as provided in section 154.210 of the Commission's regulations (18 C.F.R. § 154.210 (2010)). Pursuant to Rule 214, 18 C.F.R. § 385.214 (2010), all timely filed motions to intervene and any 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 this proceeding or place additional burdens on existing parties. No party filed a protest or adverse comments.

5. In addition to the proposed changes to the tariff records, Bobcat makes two requests related to the NAESB WGQ standards. First, Bobcat requests an exemption from the requirement contained in section 284.12(b)(2)(ii) of the Commission's regulations to provide for the netting and trading of imbalances. Bobcat further states that, in the Commission's Order Granting Clarification³ issued on September 28, 2000, the Commission clarified that pipelines and storage companies do not need to implement

³ *Standards for Business Practices of Interstate Natural Gas Pipelines, order granting clarification*, 92 FERC ¶ 61,266 (2000). See, e.g., *Bluewater Gas Storage, LLC*, 117 FERC ¶ 61,122, at P 52 (2006) (the Commission granted such an exemption for an independent gas storage operator).

imbalance trading on their systems if their shippers do not incur imbalances and are not subject to imbalance penalties. Bobcat states that it has entered into operational balancing agreements (OBAs) with each of its interconnected pipelines, so Bobcat's customers never have imbalances because the OBAs allocate any imbalances to the interconnected pipelines. As a result, Bobcat states that its customers do not incur imbalances or imbalance penalties and do not need to trade imbalances to avoid imbalance penalties. Bobcat's request for a waiver of the netting and trading of imbalances requirement in section 284.12(b)(2)(ii) of the Commission's regulations is granted since it is a storage company, whose customers have OBAs and do not incur imbalances or imbalance penalties.

6. Bobcat also requests a continuation of the extension of time, originally accepted in a letter order dated August 18, 2009 in Docket No. RP09-859-000, of NAESB's EDI/EDM and FF/EDM standards.⁴ The extension of time allows Bobcat to postpone implementation of such standards until 90 days following receipt of a customer's request to send information via EDI/EDM. Bobcat states that the data sets are currently unutilized and that it has, to date, received no requests from any customer or third party to implement any of the other data sets. Bobcat states that its tariff incorporates by reference, NAESB Standards 5.4.13 through 5.4.16, and that it supports these standards. Bobcat's continuation of the extension of time, to implement the EDI/EDM and FF/EDM requirements within 90 days of the receipt of a request for implementation, is granted.

7. Finally, Bobcat requests waiver of 60-day notice requirement in section 154.207 of the Commission's regulations, which requires that proposed changes in tariffs be filed and posted with the Commission no more than 60 days prior to the proposed effective date.⁵ Bobcat requests approval of its proposed tariff amendments effective March 1, 2011. Bobcat requests the February 1, 2011 approval by the Commission in order for Bobcat and its customers to have the time necessary to effectuate the transition from the existing third-party software to the LINK System. The Commission finds good cause to grant the requested waiver of the notice requirements in section 154.207 of the Commission's regulations. Bobcat's proposed tariff revisions will help it create consistency with the tariffs of Spectra's other entities. These revisions also further help

⁴ *Bobcat Gas Storage*, Docket No. RP09-859-000 (August 18, 2009) (unpublished letter order).

⁵ 18 C.F.R. § 154.207 (2010).

to enhance and clarify the services offered to Bobcat's customers. The tariff revisions proposed by Bobcat in this filing will benefit its current customers as well as potential future customers.

By direction of the Commission.

Kimberly D. Bose,
Secretary.

Appendix

Bobcat Gas Storage
Bobcat Database 1, FERC NGA Gas Tariff

Accepted Effective March 1, 2011

- Part 1, Table of Contents, 1.0.0
- Part 2, Preliminary Statement, 1.0.0
- Part 4, Statements of Rates, 1.0.0
- 5., Rate Schedule IPS Charges, 0.0.0
- 6., Rate Schedule IWS Charges, 0.0.0
- 7., Rate Schedule ILS Charges, 0.0.0
- Part 5, Rate Schedules, 1.0.0
 - 1., Rate Schedule FSS, 1.0.0
 - 5., Rate Schedule IPS, 0.0.0
 - 6., Rate Schedule IWS, 0.0.0
 - 7., Rate Schedule ILS, 0.0.0
- Part 6, General Terms and Conditions, 1.0.0
 - 1., Introductory Statement, 1.0.0
 - 2., Definitions, 1.0.0
 - 3., Contracting for Service, 1.0.0
 - 4., Capacity Release, 1.0.0
 - 5., Scheduling, Curtailment, Action Alerts and OFOs, 2.0.0
 - 6., Storage and Wheeling Operations, 1.0.0
 - 7., Nominations, 1.0.0
 - 8., Points of Receipt and Points of Delivery, 1.0.0
 - 10., Pressure and Injection and Withdrawal Rates, 1.0.0
 - 11., Title and Risk of Loss, 1.0.0
 - 13., Billings and Payments, 1.0.0
 - 14., Taxes, 1.0.0
 - 16., Force Majeure, 1.0.0
 - 17., Notices, 1.0.0
 - 18., Fuel Reimbursement, 1.0.0
 - 19., Gas Title Transfers, 1.0.0
 - 22., Reserved for Future Use, 1.0.0
 - 24.1, Joint Obligations, 1.0.0
 - 24.2, Nondiscriminatory Waiver of Tariff Provisions, 1.0.0
 - 24.3, Modification, 1.0.0
 - 24.4, Successors-in-Interest, 1.0.0
 - 24.5, Default and Termination, 1.0.0
 - 24.6, Fees and Construction of Facilities, 1.0.0
 - 24.7, Creditworthiness, 1.0.0

- 25., Electronic Communications, 0.0.0
 - Part 7, Form of Service Agreements, 1.0.0
 - 1., Firm Storage Service Agreement, 1.0.0
 - 1.1, Exhibit A to the Firm Storage Service Agreement, 2.0.0
 - 1.2, Exhibit B to the Firm Storage Service Agreement, 1.0.0
 - 1.3, Exhibit C to the Firm Storage Service Agreement, 0.0.0
 - 1.4, Exhibit D to the Firm Storage Service Agreement, 0.0.0
 - 2., Interruptible Storage Service Agreement, 1.0.0
 - 2.1, Exhibit A to the Interruptible Storage Service Agreement, 1.0.0
 - 3., Hub Services Agreement, 0.0.0
 - 3.1, Exhibit A to the Hub Services Agreement, 0.0.0
 - 3.2, Exhibit B to the Hub Services Agreement, 0.0.0
 - 4., Capacity Release Umbrella Agreement, 0.0.0
 - 4.1, Addendum to Capacity Release Umbrella Agreement, 0.0.0
 - 5., LINK System Agreement, 0.0.0