

167 FERC ¶ 61,276
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;
Cheryl A. LaFleur, Richard Glick,
and Bernard L. McNamee.

Paiute Pipeline Company

Docket Nos. RP19-385-000
RP19-1291-000

ORDER ACCEPTING AND REJECTING TARIFF RECORDS, ACCEPTING AND
SUSPENDING TARIFF RECORDS SUBJECT TO REFUND, CONDITION, AND
HEARING PROCEDURES, AND TERMINATING FERC FORM NO. 501-G
PROCEEDING

(Issued June 28, 2019)

1. On May 31, 2019, Paiute Pipeline Company (Paiute) filed in Docket No. RP19-1291-000 a general Natural Gas Act (NGA) section 4 rate case to fulfill its obligations under the settlement resolving its prior rate proceeding.¹ To implement its proposed rate and tariff changes, Paiute filed two sets of tariff records reflecting its primary and alternate cases, to be effective July 1, 2019.² As discussed below, the Commission (a) accepts certain tariff records addressing primarily administrative matters, as requested; (b) accepts and suspends for 5 months the rate increases reflected in Paiute's filing, subject to refund and hearing procedures, (c) accepts, without suspension, certain rate decreases,³ subject to hearing, and directs Paiute to file a revised tariff record to be effective during the suspension period that retains the rate decreases, but replaces the suspended rate increases with currently-effective rates, and (d) rejects the alternate tariff records as moot. With the filing of this rate case, the Commission terminates Paiute's FERC Form No. 501-G proceeding in Docket No. RP19-385-000.

¹ See *Paiute Pipeline Co.*, 150 FERC ¶ 61,078 (2015) (Settlement Order).

² See Appendices A and B, listing the primary and alternate tariff records, respectively.

³ *E.g.*, rate schedule and tariff changes to reflect reductions to the Incremental Facilities Surcharges for Elko and the 2010 and 2015 Elko Area Expansions.

I. Background

2. Paiute states that its system consists of pipeline facilities that begin at an interconnection with Northwest Pipeline LLC at the Idaho-Nevada border and extend in a southwestern direction for about 300 miles to the California-Nevada border at the northern and southern ends of Lake Tahoe, where Paiute delivers natural gas to Southwest Gas-Northern California.

3. On February 6, 2015, the Commission approved a settlement agreement to resolve all issues in Paiute's prior NGA section 4 rate case in Docket No. RP14-540-000,⁴ which established its currently effective rates. The terms of the settlement required that Paiute will not file a general change in its jurisdictional rates pursuant to section 4 of the NGA prior to May 31, 2016, but must file no later than May 31, 2019.

4. Order No. 849 required interstate natural gas pipeline companies to file a FERC Form No. 501-G containing an abbreviated cost and revenue study primarily using data in the pipelines' 2017 FERC Form Nos. 2 and 2-A.⁵ On December 6, 2018 in Docket No. RP19-385-000, Paiute filed its FERC Form No. 501-G and elected Option 3 (statement explaining why no rate adjustment is needed) because of the terms of its settlement requiring it to file a general NGA section 4 rate case no later than May 31, 2019. Paiute's FERC Form No. 501-G indicated that it is a separate income taxpaying entity. Therefore, its FERC Form No. 501-G included a reduced tax allowance reflecting the reduced corporate income tax provided by the Tax Cuts and Jobs Act of 2017.⁶ Paiute's FERC Form No. 501-G showed a Total Estimated ROE [Return on Equity] of 16.4 percent. Paiute also filed an Addendum indicating that it is a separate income taxpaying entity and calculating an estimated ROE of 15.6 percent. Paiute's FERC Form No. 501-G filing was protested, with protestors citing concerns about Paiute's capital structure and accumulated deferred income taxes.

⁴ Settlement Order, 150 FERC ¶ 61,078.

⁵ *Interstate and Intrastate Natural Gas Pipelines; Rate Changes Relating to Federal Income Tax Rate*, Order No. 849, 83 Fed. Reg. 36,672 (July 30, 2018), 164 FERC ¶ 61,031), *reh'g denied*, Order No. 849-A, 167 FERC ¶ 61,051 (2019).

⁶ An Act to provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018, Pub. L. No. 115-97, 131 Stat. 2054 (2017).

II. Proposal

A. Rate Changes

5. Paiute's primary case reflects the continued use of term-differentiated rates (TDR). Paiute's primary case proposes to continue the use of TDR for two categories of remaining contract term: less than five years (Category 1) and more than five years of transportation service (Category 2).⁷ For storage service and firm transportation agreements associated with storage service, Paiute proposes to continue TDR rates for two categories of remaining primary contract term. However, Paiute proposes to change the remaining contract term threshold to 10 years (i.e., remaining primary contract term of less than 10 years for Category 1 and more than 10 years for Category 2). In the event the Commission rejects the continued use of TDR in its primary case, Paiute also filed an alternate case that proposes the same cost of service as its primary case but removes term-differentiation from its rate design and the associated TDR tariff language.

6. Paiute proposes rates that are based on a total cost of service of \$50,936,758 and a rate base of \$136,612,397. Under its existing rates, Paiute projects an annual revenue deficiency of \$7,079,426, which it states is primarily due to (1) increases in plant and related items; (2) increases in depreciation expenses due to plant additions and changes in depreciation rates; (3) increases in labor and labor-related costs; (4) increases in various other Operation and Maintenance (O&M) expenses and in Administrative and General (A&G) expenses; and (5) increases in the required rate of return and related income taxes, all as related to Paiute's transmission and storage functions. Paiute states that the test period in its proposal is comprised of a base period of twelve consecutive months of actual experience ended on February 28, 2019, as adjusted for known and measurable changes to occur during the succeeding nine months ending November 30, 2019.⁸

7. Paiute states that the cost of service reflects an overall claimed rate of return (ROR) of 10.60 percent, with a return on common equity (ROE) of 15.20 percent for contracts eligible for Category 1 rates, and an overall claimed ROR of 10.04 percent, with an ROE of 14.20 percent for contracts eligible for Category 2 rates. Paiute asserts that the revenue deficiency is based on a blended ROR of 10.40 percent using the contract mix at the end of the test year, with a blended ROE of 14.84 percent. Paiute further asserts that the ROR is based on the market value capital structures of the proxy

⁷ See, e.g., proposed Rate Schedule FT-1, section 3.1 (applying Category 1 rates to contracts that have a remaining primary term of less than 5 years, or are in evergreen status, and Category 2 rates to contracts that have a remaining primary term of at least 5 years).

⁸ Transmittal at 4.

companies used in the discounted cash flow (DCF) methodology, the average percentage used in pipeline companies' FERC Form No. 501-G filings, and the capital structures approved by the Commission in recent decisions. Paiute states that both its primary and alternate cases incorporate a risk premium to the requested ROE to reflect its lower average remaining contract life compared to the proxy companies.⁹

8. Paiute proposes to apply the straight fixed-variable (SFV) method of rate design, cost classification, and cost allocation for firm transportation rates previously applied in Docket No. RP14-540-000 to establish its currently effective transportation rates. Moreover, Paiute proposes to change the allocation of its transmission O&M expenses between system-wide transportation and incrementally priced transportation. Paiute also proposes to use the method of commodity classification in its proposed firm transportation rates.

9. Paiute is seeking to roll-in the costs associated with a 2003 Expansion Project with the costs used to derive Paiute's system-wide rates under Rate Schedule FT-1. Paiute asserts that its existing shippers would not subsidize the costs associated with the project because the roll-in of the project related costs and additional billing determinants would result in a slight reduction to its system-wide Rate Schedule FT-1 rate. Additionally, Paiute states that existing shippers would benefit from the additional flexibility and reliability provided by the project.

10. Paiute also proposes to continue to use the SFV rate design for its firm LNG storage service under Rate Schedule LGS-1, as it previously used in Docket No. RP14-540-000 to derive the currently established LNG storage service rates. Paiute proposes to use a 100 percent load factor equivalent of the firm LNG storage rates to calculate its interruptible LNG storage service rates.

B. Tariff Changes

11. Paiute proposes a variety of changes to its Rate Schedules as well as the General Terms and Conditions (GT&C) of its tariff in both its primary and alternate cases. In its primary case, Paiute proposes to amend its Statement of Rates to reflect the necessary changes to rates and its proposal to continue the use of TDRs and to amend its tariff to update language regarding eligibility for rate categories under the TDR proposal. Conversely, Paiute's alternate case reflects revisions to remove the language regarding TDR.

12. In both the primary and alternate tariff records, Paiute proposes to modify its Form of Service Agreement for Rate Schedule FT-1, and Rate Schedules LGS-1 and LGS-2,

⁹ *Id.* at 4-5.

and to create a new Form of Amended Service Agreement for the same aforementioned Rate Schedules. Finally, Paiute proposes ministerial changes to its overall tariff.

III. Notice of Filing, Interventions, and Protests

13. Public notice of Paiute's filings in Docket Nos. RP19-385-000 and RP19-1291-000 was issued December 6, 2018 and June 3, 2019, respectively. Interventions and protests were due as provided in section 154.210 of the Commission's regulations.¹⁰ Pursuant to Rule 214,¹¹ all timely 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 this proceeding or place additional burdens on existing parties.

14. Sierra Pacific Power Company d/b/a NV Energy, Inc. (NV Energy) and Southwest Gas Corporation (Southwest) submitted protests to Paiute's FERC Form No. 501-G filing, raising rate issues and objecting to the lack of a rate adjustment proposal in that proceeding. Northern Nevada Industrial Gas Users (NNIGU), the Office of the Nevada Attorney General, Bureau of Consumer Protection (BCP), Southwest, and NV Energy filed timely protests in response to the rate change filing.

15. On June 18, 2019, Paiute filed a motion for leave to answer and answer to the protests of NV Energy and BCP. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2018), prohibits an answer to a protest unless otherwise ordered by the decisional authority. The Commission accepts Paiute's answer because it has provided information that assisted the Commission in its decision-making process.

16. NNIGU asserts that the rates Paiute proposes have not been proven to be just and reasonable and may be unduly discriminatory or preferential under section 4 of the NGA. NNIGU believes that many of the components of Paiute's proposal require further exploration in a hearing or settlement. NNIGU requests a full suspension period to allow the parties to fully explore all of the issues raised by Paiute's proposal.

17. Southwest Gas states that it does not believe Paiute has provided sufficient information to the Commission to determine whether Paiute's proposed rates are just and reasonable. Southwest Gas asks the Commission to provide all parties the opportunity to

¹⁰ 18 C.F.R. § 154.210 (2018).

¹¹ 18 C.F.R. § 385.214 (2018).

thoroughly review and investigate Paiute's proposal prior to any determination as to the justness and reasonableness of the proposed rates.

18. NV Energy protests Paiute's filing with regard to the proposed TDR and the overall rate increases. NV Energy asserts that Paiute has not adequately supported the TDR categories, and has not shown that its proposal comports with Commission policy, Order No. 637,¹² or subsequent orders. NV Energy also claims that Paiute's risk assessment is misleading. NV Energy questions the validity of some underlying cost-of-service elements, such as O&M expenses and increased labor costs. NV Energy also argues that Paiute does not illustrate that the lowered income tax allowance justifies a higher equity percentage for the company. In addition, NV Energy believes that factual issues are raised by Paiute's claim that existing shippers would not subsidize the project costs associated with the 2003 Expansion Incremental Project but would benefit from the reduction in the system-wide rate due to the roll-in of the project costs.

19. BCP protests Paiute's proposed rate increases and believes Paiute has not demonstrated the rate increases to be just and reasonable. In addition, BCP notes that Paiute's substantial rate increase comes only five years after its last rate increase. BCP protests Paiute's proposed capital structure and the overall ROR allowance, cost of equity, proposed ROE, estimated cost of debt, and Paiute's capital investment structure. BCP also protests Paiute's rate design and the request to roll-in the costs from the 2003 Expansion Incremental Project. BCP further protests the revenue requirement calculations, including plant-related costs, O&M and A&G costs, labor-related costs, and rate case expenses.

20. All protestors request that the Commission suspend Paiute's rate proposal for the maximum period of five months subject to refund and a full evidentiary hearing.

21. In its answer to NV Energy, Paiute argues that its TDR rate proposal is not unduly discriminatory, and that NV Energy misstates its testimony and the Commission's depreciation policies. Paiute states the Commission should give no weight to NV Energy's arguments. In its answer to BCP, Paiute argues that its proposed rate increase is fully supported by its testimony and exhibits, and BCP's argument is without merit and should be given no weight.

¹² *Regulation of Short-Term Natural Gas Transportation Services*, Order No. 637, FERC Stats. & Regs. ¶ 31,091, at 31,301-04 (cross-referenced at 90 FERC ¶ 61,109), *order on reh'g*, Order No. 637-A, FERC Stats. & Regs. ¶ 31,099, at 31,590-96 (cross-referenced at 91 FERC ¶ 61,169), *order denying reh'g*, Order No. 637-B, 92 FERC ¶ 61,062 (2000).

IV. Discussion

22. Paiute's filing raises many typical rate case issues that warrant further investigation. The Commission finds that there are material issues of fact in dispute concerning, among other things, cost of service, functionalization, cost allocation and rate design. Accordingly, the Commission will establish a hearing before an Administrative Law Judge to explore the issues arising from the filing, including, but not limited to, those summarized above and set forth in the protests.

23. As discussed below, the Commission accepts certain tariff records reflecting primarily administrative changes. In addition, the Commission accepts and suspends Paiute's primary tariff records reflecting rate increases for its services, so that the proposed changes may be reviewed at hearing. However, one of the primary tariff records also reflects rate decreases. Consistent with Commission policy, the Commission will accept the rate decreases without suspension to be effective July 1, 2019, through the compliance requirement discussed below.

24. In its primary case, Paiute proposes a variety of changes to its Rate Schedules as well as the GT&C. Paiute proposes to (1) amend its Statement of Rates to reflect the necessary changes to rates and its proposal to continue the use of TDRs, (2) update language regarding eligibility for rate categories under the TDR proposal, and (3) modify its Form of Service Agreement for Rate Schedules FT-1, LGS-1 and LGS-2, and create a new Form of Amended Service Agreement for the same aforementioned Rate Schedules. The Commission accepts Paiute's primary tariff records, as referenced in Appendix A, implementing the aforementioned tariff changes, effective July 1, 2019. Because we are accepting Paiute's proposed primary tariff records, we dismiss the alternate tariff records as moot.

25. Consistent with Commission policy, the Commission accepts the rate reductions proposed in Paiute's primary tariff record, Statement of Rates, page 1, that implement reduced Incremental Facilities Surcharges, to be effective July 1, 2019 without suspension, and sets the rate reductions for hearing along with the remainder of Paiute's rate case. Pursuant to NGA section 4(e), the Commission may only require pipelines to order refunds of proposed rate increases above the level of the pipeline's prior rates. It follows that, where the pipeline proposes a rate decrease for a service, the Commission cannot order refunds, and no point would be served by a rate suspension.¹³ Accordingly, the Commission's ordinary practice is to accept rate decreases without suspension in

¹³ *Transcontinental Gas Pipe Line Co., LLC*, 140 FERC ¶ 61,251, at P 30 (2012).

order to assure that the rate decrease goes into effect as soon as possible.¹⁴ The Commission intends that the rate reductions become effective without a five-month suspension.

26. Because this same tariff record contains rate increases that are being suspended, along with the accepted rate decreases, the Commission will accept and suspend the filed version of this tariff record for five months, to be effective December 1, 2019, and subject to refund and hearing, as discussed below. To reflect our decision to accept the proposed rate decreases, the Commission directs Paiute to make a compliance filing, discussed below, consisting of a tariff record which reflects the proposed rate decreases (to be effective July 1, 2019) but replaces the suspended rate increases (which are subject to maximum suspension, to be effective December 1, 2019) with currently effective rates. Upon the expiration of the suspension period, Paiute may move the suspended, original primary tariff records into effect, as they will reflect both the accepted rate decreases and increases.

27. Paiute proposes additional rate increases in the proposed primary tariff record, Statement of Rates, page 2. This tariff record is also accepted and suspended to be effective December 1, 2019, subject to refund and the hearing procedures established herein.

A. Hearing Process

28. Paiute 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.¹⁵

B. Suspension

29. Based upon review of the filing, the Commission finds that Paiute's proposed rate increases in its primary case have not been shown to be just and reasonable and may be unjust, unreasonable and unduly discriminatory or otherwise unlawful. Accordingly and as described in this order, the Commission shall accept such tariff records for filing and

¹⁴ *Filing and Reporting Requirements for Interstate Natural Gas Company Rate Schedules and Tariffs*, Order No. 582-A, FERC Stats. & Regs. ¶ 31,034, at 31,562 (1996) (cross-referenced at 74 FERC ¶ 61,224).

¹⁵ 18 C.F.R. § 154.303(c)(2) (2018).

suspend their effectiveness for five months, to be effective December 1, 2019, subject to refund and condition, and the outcome of the hearing proceedings ordered herein.

30. 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.¹⁶ It is recognized, however, that shorter suspensions may be warranted in circumstances where suspension for the maximum period may lead to harsh and inequitable results.¹⁷ Such circumstances do not exist here, except for the rate reductions and various ministerial changes. Therefore, the Commission will suspend for the maximum period of five months the proposed tariff records that implement rate increases listed in Appendix A, to be effective December 1, 2019, subject to refund and condition, and the outcome of the hearing ordered herein.

C. Motion and Compliance

31. In its primary case, Paiute proposes rate changes, including both rate reductions and rate increases in a single tariff record. While the Commission accepts the proposed rate decreases, effective July 1, 2019, and sets them for hearing, the Commission accepts and suspends Paiute's proposed rate increases to be effective no earlier than December 1, 2019 (along with the rate increases in the remaining tariff record). Accordingly, the Commission directs Paiute to file a revised version of the proposed primary tariff record, Pg 1, Statement of Rates that reflects the proposed lower Incremental Facilities Surcharges but replaces the remaining suspended rate changes with currently effective rates, to be effective July 1, 2019. Paiute is directed to make this compliance filing within 15 days of the date of this order.

D. FERC Form No. 501-G

32. Order No. 849 required all interstate natural gas companies with cost-based stated rates to file the FERC Form No. 501-G.¹⁸ Because Paiute has now filed a general rate case under NGA section 4, the justness and reasonableness of its rates can be investigated in that proceeding. Therefore, the Commission terminates Paiute's FERC Form No. 501-G proceeding.

¹⁶ See *Great Lakes Gas Transmission Co.*, 12 FERC ¶ 61,293 (1980) (five-month suspension).

¹⁷ See *Valley Gas Transmission, Inc.*, 12 FERC ¶ 61,197 (1980) (one-day suspension).

¹⁸ See Order No. 849, 164 FERC ¶ 61,031 at P 30.

The Commission orders:

(A) The primary tariff records reflecting rate increases, identified in Appendix A, are accepted and suspended, to be effective upon motion December 1, 2019, subject to refund and condition, and the outcome of the hearing established herein, as discussed in the body of this order.

(B) The other primary tariff records, as identified in Appendix A, are accepted, effective July 1, 2019, as discussed in the body of this order.

(C) The alternate tariff records, identified in Appendix B, are rejected as moot, as discussed in the body of this order.

(D) Within 15 days of the date of this order, Paiute is directed to file a revised tariff record that includes its currently effective rates and the proposed lower Incremental Facilitates Surcharges to be effective July 1, 2019, as discussed in the body of this order.

(E) Upon its motion to place suspended rates into effect, Paiute must remove facilities not placed in service before the effective date.

(F) The captioned FERC Form No. 501-G proceeding is terminated, as discussed in the body of this order.

(G) Pursuant to the authority contained in and subject to the jurisdiction conferred upon the Federal Energy Regulatory Commission by section 402(a) of the Department of Energy Organization Act and the NGA, particularly sections 4, 5, 8, 9, and 15 thereof, and pursuant to the Commission's Rules of Practice and Procedure and the regulations under the NGA (18 C.F.R. Chapter I), a public hearing shall be held concerning the justness and reasonableness of Paiute's proposed tariff records, as discussed in the body of this order.

(H) 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 (2018), must convene a prehearing conference in this proceeding to be held within twenty (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 shall be held for the purpose of clarifying the positions of the participants and establishing any procedural dates necessary for the hearing. The Presiding

Administrative Law Judge is authorized to conduct further proceedings in accordance with this order and the Commission's Rules of Practice and Procedure.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

**Appendix A
Primary Tariff Records**

Paiute Pipeline Company
FERC NGA Gas Tariff
Paiute Pipeline Company

Tariff Records Accepted and Suspended, to be Effective December 1, 2019, Subject to Refund and Condition, and to the Outcome of Hearing Procedures

[Pg 1, Statement of Rates, 9.0.0 A](#)

[Pg 2, Statement of Rates, 6.0.0 A](#)

Tariff Records Accepted to be Effective July 1, 2019

[Cover Page, Cover Page, 3.0.0 A](#)

[Pg. 2 Section 2.1 - 3.1, FT-1 Transportation Svc, 5.0.0 A](#)

[Pg. 3 Section 3.1 - 3.2, FT-1 Transportation Svc, 6.0.0 A](#)

[Pg 4 - Sections 3.2 - 3.3, FT-1 Transportation Svc, 9.0.0 A](#)

[Pg. 3 Section 3.1 - 3.2, Rate Schedule LGS-1, 5.0.0 A](#)

[Pg 4 - Sections 3 - 5.3, Rate Schedule LGS-2, 3.0.0 A](#)

[Definitions 1.9 to 1.15, GTC - Definitions, 3.0.0 A](#)

[Definitions 1.16 to 1.26, GTC - Definitions, 4.0.0 A](#)

[Definitions 1.27 to 1.34, GTC - Definitions, 4.0.0 A](#)

[Definitions 1.35 to 1.44, GTC - Definitions, 3.0.0 A](#)

[Pg. 5 Section 4.2, GTC - Operating Procedures, 5.0.0 A](#)

[Pg. 7 Section 4.2, GTC - Operating Procedures, 6.0.0 A](#)

[Pg 1, GTC - NAESB WGQ Standards, 5.0.0 A](#)

[Pg 2, GTC - NAESB WGQ Standards, 5.0.0 A](#)

[Pg. 1 - Article I-II, FT-1 Service Agreement Form, 3.0.0 A](#)

[Pg. 2 - Article III-V, FT-1 Service Agreement Form, 3.0.0 A](#)

[Pg. 3 - Article VI-IX, FT-1 Service Agreement Form, 3.0.0 A](#)

[Pg 1, FT-1 Service Agreement Form - Exhibit A, 4.0.0 A](#)

[Pg 2, FT-1 Service Agreement Form - Exhibit A, 4.0.0 A](#)

[Pg. 1 - Article I, LGS-1 and LGS-2 Service Agreement Form, 3.0.0 A](#)

[Pg. 2 - Article II-IV, LGS-1 and LGS-2 Service Agreement Form, 3.0.0 A](#)

[Pg. 3 - Article V-VII, LGS-1 and LGS-2 Service Agreement Form, 3.0.0 A](#)

[Pg. 1, FT-1 Amended Service Agreement Form, 3.0.0 A](#)

[Pg 2, FT-1 Amended Service Agreement Form, 0.0.0 A](#)

[Pg 1, LGS-1 and LGS-2 Amended Svc Agree Form, 2.0.0 A](#)

[Pg 2, LGS-1 and LGS-2 Amended Svc Agree Form, 0.0.0 A](#)

**Appendix B
Alternate Tariff Records**

Paiute Pipeline Company
FERC NGA Gas Tariff
Paiute Pipeline Company

Tariff Records Rejected as Moot

[Cover Page, Cover Page, 3.0.0 B](#)
[Pg 1, Statement of Rates, 9.0.0 B](#)
[Pg 2, Statement of Rates, 6.0.0 B](#)
[Pg. 2 Section 2.1 - 2.2, FT-1 Transportation Svc, 5.0.0 B](#)
[Pg 3 Section 3.1, FT-1 Transportation Svc, 6.0.0 B](#)
[Pg 4 - Sections 3.1 - 3.2, FT-1 Transportation Svc, 9.0.0 B](#)
[Pg 2 Section 2, LGS-2 - Interruptible LNG Storage Service, 5.0.0 B](#)
[Pg 3 Section 3.1-3.2, LGS-2 - Interruptible LNG Storage Service, 5.0.0 B](#)
[Pg 4, LGS-2 - Interruptible LNG Storage Service, 5.0.0 B](#)
[Pg 4 - Sections 3 - 5.3, LGS-2 - Interruptible LNG Storage Service, 3.0.0 B](#)
[Definitions 1.9 to 1.15, GTC - Definitions, 3.0.0 B](#)
[Definitions 1.16 to 1.26, GTC - Definitions, 4.0.0 B](#)
[Definitions 1.27 to 1.34, GTC - Definitions, 4.0.0 B](#)
[Definitions 1.35 to 1.44, GTC - Definitions, 3.0.0 B](#)
[Pg. 5 Section 4.2, GTC - Operating Procedures, 5.0.0 B](#)
[Pg. 7 Section 4.2, GTC - Operating Procedures, 6.0.0 B](#)
[Pg. 1, GTC - NAESB WGQ Standards, 5.0.0 B](#)
[Pg 2, GTC - NAESB WGQ Standards, 5.0.0 B](#)
[Pg. 1 - Article I-II, FT-1 Service Agreement Form, 3.0.0 B](#)
[Pg. 2 - Article III-V, FT-1 Service Agreement Form, 3.0.0 B](#)
[Pg. 3 - Article VI-IX, FT-1 Service Agreement Form, 3.0.0 B](#)
[Pg 1, FT-1 Service Agreement Form - Exhibit A, 4.0.0 B](#)
[Pg 2, FT-1 Service Agreement Form - Exhibit A, 4.0.0 B](#)
[Pg. 1 - Article I, LGS-1 and LGS-2 Amended Svc Agree Form, 3.0.0 B](#)
[Pg. 2 - Article II-IV, LGS-1 and LGS-2 Service Agreement Form, 3.0.0 B](#)
[Pg. 3 - Article V-VII, LGS-1 and LGS-2 Service Agreement Form, 3.0.0 B](#)
[Pg 1, FT-1 Amended Service Agreement Form, 3.0.0 B](#)
[Pg 2, FT-1 Amended Service Agreement Form, 0.0.0 B](#)
[Pg 1, LGS-1 and LGS-2 Amended Svc Agree Form, 2.0.0 B](#)
[Pg 2, LGS-1 and LGS-2 Amended Svc Agree Form, 0.0.0 B](#)