

170 FERC ¶ 61,161
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

February 27, 2020

In Reply Refer To:
Cameron Interstate Pipeline, LLC
Docket Nos. RP20-460-000
RP20-460-001

Cameron Interstate Pipeline, LLC
c/o Sempra LNG
488 8th Avenue
San Diego, CA 92101

Attention: Jerrod L. Harrison, Sr. Counsel

Dear Mr. Harrison:

1. On January 29, 2020, as amended on January 30, 2020,¹ Cameron Interstate Pipeline, LLC (Cameron) filed tariff records² to implement a new interruptible parking and lending (PAL) service, to clarify certain tariff provisions consistent with current Commission policy, and to make housekeeping changes to correct typographical and reference errors in its FERC Gas Tariff, as well as a request for waiver of the provisions of section 154.202(a)(1)(viii) of the Commission's regulations.³ As discussed below, for good cause shown we grant the waiver and accept the proposed tariff records, effective March 1, 2020.
2. Cameron asserts that it is able to provide a limited amount of parking and lending service on an interruptible basis without affecting the quality of its existing services.⁴ Accordingly, Cameron proposes a new interruptible PAL service to provide flexibility on

¹ On January 30, 2020, Cameron filed to correct three tariff records which had contained unintentional tracked changes markings.

² See Appendix.

³ 18 C.F.R. § 154.202(a)(1)(viii) (2019).

⁴ Cameron Transmittal Sheet at 2.

its system and to advance the Commission's policy objectives.⁵ Specifically, Cameron states that its proposal will allow its customers to park or lend natural gas at points specified on its system pursuant to an individual transaction confirmation (PAL transaction).⁶ Additionally, Cameron asserts that its proposed PAL service will provide customers with the flexibility to delay receipts or deliveries of gas, borrow gas short-term to meet market needs, and aid in balancing customer nominations to avoid imbalances.⁷

3. Cameron asserts that its interruptible PAL service proposal will not affect existing firm service because the new service will be scheduled after all requests for firm transportation service have been scheduled. Additionally, Cameron argues that because its proposed PAL service is not a transportation service, gas that is parked or loaned must be withdrawn or returned at the same point that the initial PAL transaction occurred or transported under another rate schedule. Cameron also asserts that given the size and nature of its system, it may limit the quantity and duration of the proposed PAL service and thus, the amount of PAL service to be offered will be evaluated based on the operating conditions of the pipeline because the amount of service it can provide depends on line pack in its system.⁸

4. Cameron points out that its proposal is similar to other services that the Commission has approved.⁹ Cameron proposes a three-part rate for this service, which includes: (1) an Initial Charge that is the product of the Initial Rate multiplied by each unit of gas tendered for park or taken for loan during that month; (2) a PAL Balance Charge that is the product of the PAL Balance Rate multiplied by the daily account balance of gas in the shipper's PAL account, reflecting the aggregate amount of parked or loaned gas outstanding; and (3) a Completion Charge that is the product of the Completion Rate multiplied by each unit of gas returned to Cameron upon completion (payback) of a loan or received by a shipper upon completion (unpark) of a park that month. Cameron also states that the proposed service will be scheduled with other

⁵ *Id.*

⁶ *Id.* Cameron states that under its proposal, a shipper may enter into a number of PAL Transactions that will be governed by the shipper's master PAL agreement.

⁷ *Id.*

⁸ *Id.* at 3.

⁹ *Id.* (citing Rockies Express Pipeline LLC, Tariffs, RATE SCHEDULE PALS, Rate Schedule PALS, 3.0.0; Tallgrass Interstate Gas Transmission, LLC, Tariffs, Rate Schedules, Rate Schedule PALS, 0.0.0; Trailblazer Pipeline Company LLC, Tariffs, Rate Schedules, Rate Schedule PALS, 1.0.0.).

interruptible services on an economic basis with those paying a higher rate being scheduled first.¹⁰

5. Cameron states that the proposed PAL service will be made available from north-to-south flows on its Expansion Facilities, and therefore it proposes to set the maximum daily rate for its new PAL service using the current maximum interruptible transportation rate under its currently approved Rate Schedule Interruptible Transportation (IT) service. Cameron asserts that the Commission supports the use of rates for parking and lending service that are consistent with the pipeline's maximum interruptible transportation service rates.¹¹

6. Cameron requests waiver of 18 C.F.R. § 154.202(a)(1)(viii), which requires Cameron to estimate revenues for the newly proposed service. In support of this request, Cameron contends that the new service is optional and interruptible making it difficult for Cameron to precisely forecast the revenues at this time.¹² However, Cameron points out that the Commission has granted waiver of the requirement when the rates of the new service are derived from the rates for transportation under existing rate schedules, such as in the instant case.¹³ Additionally, Cameron states that any rate or cost allocation issues related to the new PAL service can be appropriately addressed in its next general rate case after it has accumulated a reasonable amount of operating experience. Cameron also proposes to file a report with the Commission within 45 days following the first year of operation of the new service describing the activity under the new schedule.¹⁴

7. Cameron also proposes several housekeeping and clarifying changes to its tariff. Cameron states that certain textual changes are necessary to ensure clarity and consistency with current Commission policies and best practices within the industry.

¹⁰ *Id.*

¹¹ *Id.* (citing *Tenn. Gas Pipeline Co.*, 87 FERC ¶ 61,375, at 62,399 (1999)).

¹² *Id.* at 4.

¹³ *Id.* (citing *Trailblazer Pipeline Co.*, 156 FERC ¶ 61,117, at P 9 (2016); *Gulf South Pipeline Co.*, 136 FERC ¶ 61,086, at P 23 (2011); *CenterPoint Energy Gas Transmission Co.*, 125 FERC ¶ 61,334, at P 14 (2008); and *Great Lakes Gas Transmission Ltd P'ship.*, 120 FERC ¶ 61,105, at PP 8-10 (2007)).

¹⁴ *Id.*

8. Public notice of the initial filing was issued on January 30, 2020. Public notice of the supplemental filing was issued on February 4, 2020. Interventions and protests were due as provided in section 154.210 of the Commission's regulations.¹⁵ Pursuant to Rule 214,¹⁶ 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 additional burdens on existing parties. No protests or adverse comments were filed.

9. The Commission has previously permitted pipelines to establish PAL services and utilize rates that are consistent with the pipeline's maximum interruptible transportation service rates.¹⁷ Accordingly, we find that Cameron's proposed Rate Schedule PAL is just and reasonable and will accept the proposed tariff records.

10. We also grant waiver of the requirement in section 154.202(a)(1)(viii) of the Commission's regulations that a pipeline seeking to initiate a new service must include workpapers showing the estimated effect on revenues and costs over a 12 month period commencing on the effective date of the instant tariff records. The Commission has previously granted waiver of the same requirement when approving new rate schedules for innovative services derived from the rates for existing firm transportation services rather than via cost allocation methods.¹⁸ Accordingly, we find good cause to grant the unopposed request for waiver.

11. Cameron proposes to file a report with the Commission within 45 days following the first year of operation of the new service describing the activity under Rate Schedule PAL. The Commission has previously required such action under circumstances where the pipeline finds it difficult to provide a reliable projection of possible revenues or costs related to the new service.¹⁹ Accordingly, we will accept Cameron's proposal to file a report detailing (1) the date service was rendered for each transaction, (2) the volume parked or loaned for each day by transaction, (3) monthly volumes parked and

¹⁵ 18 C.F.R. § 154.210 (2019).

¹⁶ 18 C.F.R. § 385.214 (2019).

¹⁷ See e.g. *Trailblazer Pipeline Co. LLC*, 156 FERC ¶ 61,117.

¹⁸ *Trailblazer Pipeline Company LLC*, 156 FERC ¶ 61,117 at P 9; *Gulf South Pipeline Co., LP*, 136 FERC ¶ 61,086 at P 23; *CenterPoint Energy Gas Transmission Co.*, 125 FERC ¶ 61,334 at P 14; *Great Lakes Gas Transmission Ltd. P'ship*, 120 FERC ¶ 61,105 at PP 8-10.

¹⁹ See *Northwest Pipeline Corp.*, 100 FERC ¶ 61,336, at PP 9, 12 (2002); *Gulf South Pipeline Co., LP*, 136 FERC ¶ 61,086 at P 24.

loaned, (4) the name of the PAL shipper, (5) whether the shipper is an affiliate of Cameron, and (6) the rate charged for each transaction.

12. Accordingly, we accept the tariff records referenced in the Appendix to this letter order, effective March 1, 2020. Further, Cameron shall file an activity report within 45 days after the conclusion of Rate Schedule PAL's first year of implementation, as discussed above.

By direction of the Commission.

Kimberly D. Bose,
Secretary.

Appendix

Cameron Interstate Pipeline, LLC

FERC NGA Gas Tariff

Cameron Interstate Pipeline, LLC FERC Gas Tariff

Tariff Records Accepted Effective March 1, 2020:

[Title and TOC, Title and Table of Contents, Section 1.0, 19.0.0](#)
[Rates and Charges, Summary of Rates and Charges, Section 4.0, 31.1.0](#)
[Rate Schedule FT, Rate Schedule Firm Transportation \(FT\), Section 5.0, 15.0.0](#)
[Rate Schedule IT, Rate Schedule Interruptible Transportation \(IT\), Section 6.0, 15.0.0](#)
[Rate Schedule Parking and Lending \(PAL\) Service, Section 7.0, 16.0.0](#)
[Section 8.1 - GTC, Definitions, 5.0.0](#)
[Section 8.2 - GTC, Service Requests, 2.0.0](#)
[Section 8.4 - GTC, Allocations of Firm Capacity and ROFR, 2.1.0](#)
[Section 8.5 - GTC, Nomination Procedure, 4.0.0](#)
[Section 8.6 - GTC, Scheduling Procedure, 4.0.0](#)
[Section 8.7 - GTC, Operational Balancing Agreement, 2.0.0](#)
[Section 8.8 - GTC, Daily Maximums, 2.0.0](#)
[Section 8.9 - GTC, Operational Flow Orders, 2.0.0](#)
[Section 8.10 - GTC, Curtailment, 5.0.0](#)
[Section 8.11 - GTC, Capacity Release, 10.0.0](#)
[Section 8.12 - GTC, Resolution of Imbalances, 2.0.0](#)
[Section 8.14 - GTC, Quality of Gas, 2.0.0](#)
[Section 8.15 - GTC, Pressure of Gas, 2.0.0](#)
[Section 8.18 - GTC, Warranty of Title to Gas, 2.0.0](#)
[Section 8.19 - GTC, Billing and Payments, 2.0.0](#)
[Section 8.21 - GTC, Force Majeure, 3.0.0](#)
[Section 8.22 - GTC, Fuel Retainage Percentage, 3.0.0](#)
[Section 8.26 - GTC, IT Revenue Sharing, 2.1.0](#)
[Section 8.27 - GTC, Negotiated Rates, 3.0.0](#)
[Section 8.28 - GTC, Discounts, 2.0.0](#)
[Section 8.31 - GTC, Discretionary Waiver, 3.0.0](#)
[Section 8.32 - GTC, Descriptive Headings, 3.0.0](#)
[Section 8.33 - GTC, Governmental Regulation, 3.0.0](#)
[Section 8.34 - GTC, Reports with Respect to Tariff, 3.0.0](#)
[Section 8.35 - GTC, Electronic Communications, 3.0.0](#)
[Section 8.36 - GTC, Incorporation, 3.0.0](#)

[Section 8.38 - GTC, Agency Service, 3.0.0](#)

[Section 8.39 - GTC, Standards of Conduct, 3.0.0](#)

[Section 8.40 - GTC, Dispute Resolution, 3.0.0](#)

[Section 8.41 - GTC, Termination of Long-term Service, 2.0.0](#)

[Section 8.42 - GTC, Non-Conforming Service Agreements, 4.0.0](#)

[Section 8.43 - GTC, Off-System Capacity, 2.0.0](#)

[Section 8.44 - GTC, Operational Transactions, 1.0.0](#)

[Section 9.0 - Service Agreement for Rate Schedule FT, 11.0.0](#)

[Section 10.0 - Service Agreement for Rate Schedule IT, 8.0.0](#)

[Section 11.0 - Capacity Release Umbrella Agreement, 2.0.0](#)

[Section 12.0 - Service Agreement for Rate Schedule PAL, 1.0.0](#)