

104 FERC ¶61,300
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Pat Wood, III, Chairman;
William L. Massey, and Nora Mead Brownell.

The Toca Producers

Docket No. RP03-484-000

v.

Southern Natural Gas Company

and

Amoco Production Company,
BP Exploration & Oil, Inc.,
Chevron U.S.A. Inc.,
Exxon/Mobil Gas Marketing Company, and
Shell Offshore, Inc.

Docket No. RP01-208-000
(not consolidated)

ORDER DISMISSING COMPLAINT AND DISMISSING PETITION
SUBJECT TO CONDITIONS

(Issued September 16, 2003)

1. On May 28, 2003, the Toca Producers¹ filed a complaint against Southern Natural Gas Company (Southern) under Sections 4 and 5 of the Natural Gas Act, requesting an evidentiary hearing in order to establish, among other things, just and reasonable natural gas hydrocarbon dewpoint (HDP)² quality specifications in Southern's tariff. The Toca Producers also move to hold a pending case in abeyance during the litigation of this complaint.³ We will dismiss the complaint, deny the request to hold in abeyance the

¹ The Toca Producers (or Producers) are comprised of: BP America Production Company (successor to Amoco Production Company), Chevron U.S.A. Inc., ExxonMobil Gas & Power Marketing Company, and Shell Offshore, Inc.

² The hydrocarbon dewpoint is the temperature at which gas flow begins to change from a single gaseous phase to a dual gas and liquid phase, *i.e.*, when liquids begin to fall out from the gas stream.

³ Amoco Production Company, *et al.*, Docket No. RP01-208-000.

proceeding in Docket No. RP01-208-000 and dismiss Docket No. RP01-208-000 as set forth below. Our action here permits Southern to maintain system integrity and operate its system in a safe manner.

Notice, Interventions and Protests

2. Notice of the complaint was issued on June 5, 2003. Timely interventions were filed by the parties listed in the Appendix. Notices of intervention and unopposed timely filed motions to intervene are granted pursuant to Rule 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.214 (2003)).
3. ProLiance Energy, LLC filed an out-of-time motion to intervene. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214(d) (2003), the motion to intervene out-of-time is granted for good cause shown. Granting late intervention at this stage of the proceeding will not disrupt the proceeding or place additional burdens on existing parties.
4. Southern and the Southern Customers⁴ filed answers to the Toca Producers' complaint. South Carolina Pipeline Corporation (SCPC) filed comments that the Toca Producers' complaint should be dismissed, and that the request to stay Docket No. RP01-208-000 should be denied.
5. On July 2, 2003, the Toca Producers moved to file a rebuttal to the answers to the complaint. On July 16, 2003, both Southern and the Southern Customers filed responses to the motion asserting that Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2003), does not permit replies to answers, unless the moving party has demonstrated good cause for the Commission to waive its rules, which they contend Toca Producers have not done.

⁴ Each member of the Southern Customers filed a separate intervention in this docket and is an intervenor in Docket No. RP01-208-000. The Southern Customers consist of: Alabama Gas Corporation, Alabama Municipal Distributors Group and each of its member gas distribution systems: Austell Gas System, Chattanooga Gas Company, Municipal Gas Authority of Georgia, Southeast Alabama Gas District, South Carolina Pipeline Corporation (SCPC), and Southern Company Services, Inc.

Background

A. Docket No. RP01-208-000

6. On January 5, 2001, the Toca Producers filed a Petition for a Temporary Restraining Order and Request for an Emergency Technical Conference (Petition). Producers requested that the Commission issue an immediate temporary restraining order to prevent Southern from shutting in natural gas supply upstream of the Toca processing plants, located in Louisiana. Producers also requested that the Commission schedule an emergency technical conference. Southern filed an answer and a motion to dismiss the petition, and the Producers subsequently filed an answer to Southern's motion.

7. Producers stated that their production is processed at three processing plants at Toca, Louisiana, which remove liquefiable hydrocarbons from the natural gas stream.⁵ When operators of the Toca plant notified Southern that they intended to shut down plant operations, Southern notified its customers that if the Toca plant did not process the gas, then Southern would not accept the unprocessed gas into its pipeline for reasons of operational safety.

8. Producers asserted that the commingled gas streams, both upstream and immediately downstream of the Toca processing plants, comply with Southern's quality specifications. They also stated that it is their understanding that Southern is unduly discriminating by accepting gas at other interconnects that far exceeds the gas quality standard in the tariff. As a result, the Producers requested that the Commission require Southern to accept their unprocessed gas, and convene a technical conference to explore the issue.

9. Southern asserted in its answer that it has an obligation to its downstream, market-area customers to ensure that the integrity of gas quality on its system will not deteriorate to a point that will cause damage to their facilities or systems. Southern stated that Section 3.1(b) of its tariff provides that gas delivered for transportation "shall not have more than 0.3 gallons of isopentane and heavier hydrocarbons per Mcf." Southern clarified that for production upstream of the Toca plant, it typically waives this specification if the gas will be processed at the plant and the heavier liquids will be stripped out during processing. When the Toca plant is fully operational, approximately 92 percent of the heavier hydrocarbons are typically stripped from the gas stream so the stream leaving the plant poses no danger to the system. Southern contended that unless the entire gas stream was processed, it could not continue to waive the specification, and allow the out-of-spec gas containing the heavier hydrocarbons to be delivered into the

⁵ The three plants will at times be referred to as the Toca plant.

system.⁶ Southern referred to events in previous years where liquid in the stream caused damage and problems for both Southern and its customers.

10. Southern stated that although the Toca plant had not been in operation, Southern began operating an emergency dehydration plant to process some of the gas while an attempt was made to resolve the dispute, and no gas had been shut in. However, this was only an emergency operation because the dehydration plant could not operate on a permanent basis. Southern stated that it had received a commitment from the Toca plant operators that operations at the plant would be resumed, so Southern's contemplated action of shutting in production would not be necessary.

11. Producers' answer to the motion to dismiss differed from Southern's representation in many areas. Because of the differing assertions made by the parties, the Commission issued an order scheduling a technical conference.⁷ A technical conference was held on January 21, 2001. The parties then engaged in numerous settlement discussions, including the assistance of the Commission's Dispute Resolution Service. Although the parties reported that an understanding had been reached on certain issues, an overall settlement was not achieved, and the Toca Producers requested another technical conference.

12. On May 14, 2003, the Commission issued an Order on Further Proceedings.⁸ The order noted that there had been no quantifications of natural gas production shut-in, if any, as a result of Southern's conduct, nor was there any indication that the events that preceded the filing of the Petition were likely to reoccur soon. The Commission directed the parties to identify which issues, if any, remained outstanding, and to set forth the parties' position on each of these issues in sufficient detail to enable the Commission to make a decision on the merits.

13. In their response to that order, the Toca Producers detailed the prior proceedings, and stated that they were filing a complaint with respect to the matter at issue. The Toca Producers then filed the instant complaint against Southern. Southern, and Southern Customers filed responses to the May 14 Order.

⁶ A number of Southern's customers supported Southern's position.

⁷ Amoco Production Company, *et al.*, 94 FERC ¶ 61,026 (2001).

⁸ Amoco Production Company, *et al.*, 103 FERC ¶ 61,175 (2003).

B. The Toca Producers' May 28, 2003 Complaint

14. The Toca Producers complain about the lack of objective and nondiscriminatory liquefiable hydrocarbon gas quality standards to measure the HDP of natural gas entering Southern's system after natural gas has been processed at the Toca Plant. Toca Producers assert that the lack of standards in the tariff permitted Southern to require Toca Producers to process the natural gas to a greater degree than other producers, or be shut-in, without any evidence that the level of processing required by Southern was necessary to protect the system integrity, and to discriminate unduly among suppliers of natural gas into Southern's system. Additionally, they contend (1) that there is a lack of certainty regarding the gas quality requirements for natural gas supplies flowing into Southern's system, (2) that increased price volatility resulting from the lack of assured gas flow, (3) that Southern conducts unnecessary reductions in Btu content of the gas stream at a time when natural gas demand is the highest, by requiring more processing than is otherwise necessary for operational and safety reasons, and (4) that there is discriminatory financial injury to those suppliers who are required to process more than other suppliers.

15. The Producers state that the incentive not to process any more liquefiabiles from the natural gas stream than is necessary for safe system operations can occur at any time. This incentive depends on many variables, including the relative value between natural gas and hydrocarbon liquids. However, Producers state that it is most likely to occur in the winter when the demand for natural gas is the highest, and the price of natural gas is high relative to the price of the extracted hydrocarbon liquids. Thus, the Producers request that the Commission address this matter so suppliers can have assurance of their ability to have their gas transported on the Southern system.

16. The complaint refers to the events in December 2000 and January 2001, described in the Petition. The Toca Producers claim that as a result of Southern's conduct at that time, the Producers agreed to process all of their production, even though the natural gas stream entering the Toca Plant was well below the gas quality receipt point standard of the tariff. Toca Producers contend that Southern permitted, and continues to permit, gas at other receipt points, with a higher liquefiable content than the liquefiable content of gas entering the Toca Plant, to enter its system without any processing.

17. The Toca Producers assert that Southern's tariff fails to specify an HDP gas quality standard, which when such a standard is met will insure that gas will flow on

Southern's system (a "safe harbor" provision).⁹ They assert that although Southern's tariff sets forth a standard of 0.3 gallons per Mcf for isopentane and heavier hydrocarbons in Section 3.1(b) of the GT&C, Southern has waived that provision on a regular basis at its sole discretion.

18. The Toca Producers contend that Southern's tariff is inconsistent with the liquefiable hydrocarbon gas quality requirements order by the Commission in Natural, and in other cases as well.¹⁰ The Toca Producers request that Southern's tariff be modified to adopt a three-part structure to address liquefiable hydrocarbon gas quality, similar to that set forth in Natural, which included: (1) a "safe harbor" HDP standard stated in the tariff, which when met would guarantee gas flow, (2) the requirement that gas supply be aggregated and blended such that an HDP standard would not be applied unless necessary, and only in the location, and for the duration where necessary, and (3) the requirement that Southern post on its website, the gas quality data at receipt points and line segments upstream of the Toca plant, where it is experiencing a problem. Specifically, the Producers request that when Southern specifies an HDP requirement on a portion of its system, it must post on its internet website the following: (1) every receipt point HDP value upstream of where the problem is occurring, along with the method and assumptions by which the HDP was calculated, and (2) every blended HDP and blended Btu value that Southern calculates or determines on a line segment of its system on or upstream of where there is a problem, within 24 hours of completion of such calculations.

19. The Toca Producers request the Commission to set this complaint for an evidentiary hearing because there are genuine issues of contested fact. They also request the Commission to hold the related proceeding in Docket No. RP01-208-000 in abeyance, while this complaint is being litigated.

⁹ The Toca Producers state that the Commission has defined a "safe harbor" dewpoint as "a minimum systemwide dewpoint for the gas tendered to Natural, that guarantees that any gas with a dewpoint that does not exceed the safe harbor dewpoint will be allowed to flow on Natural's system, regardless of changing conditions in Natural's own market areas, and/or what Btu and/or dewpoint limits are in place on the deliveries Natural makes to interconnecting downstream pipelines." Natural Gas Pipeline Company of America, 102 FERC ¶ 61,058 at P 43 (2003)(Natural).

¹⁰ Toca Producers cite to Colorado Interstate Gas Co., 103 FERC ¶ 61,058 (2003) (CIG), and Enogex, Inc., 103 FERC ¶ 61,161 (2003) (Enogex).

C. Southern's Answer

20. Southern asserts that the Toca Producers seek a modification to its FERC Gas Tariff with respect to the quality specification applicable to liquefiable hydrocarbons, and the Toca Producers have failed to carry the burden of proof of a party seeking to change an approved tariff. Accordingly, it requests the Commission to dismiss the complaint. Moreover, Southern asserts that there is no basis for the motion to hold the proceeding in Docket No. RP01-208-000 in abeyance, and it should likewise be dismissed.

21. Southern essentially repeats the same arguments it asserted in response to the Petition in Docket No. RP01-208-000. Southern states that it has an objective and specific quality specification in Section 3.1(b) of the GT&C of its FERC Gas Tariff that provides that gas delivered to Southern shall not contain more than 0.30 gallons per Mcf of isopentane and heavier hydrocarbons. That section operates in conjunction with Section 3.1(a)¹¹ to ensure that liquefiable hydrocarbons do not threaten the operational integrity of Southern's pipeline system as well as the facilities of interconnected pipelines, distributors, and end users. Southern states that excessive levels of liquefiable hydrocarbons in a natural gas stream pose a serious safety concern to all natural gas consumers, and in fact have caused serious problems on its system in the past.

22. Southern further states that natural gas produced in South Louisiana and offshore in the Gulf of Mexico typically has a high level of liquefiable hydrocarbons, and the Toca plants has been relied upon to reduce the amount of liquefiable hydrocarbons in the gas stream to a safe level. Normally, the gas processed at the Toca plant constitutes more than 50 percent of the gas flowing into Southern's system.

23. As long as the plants operate, Southern states it has not been necessary for it to restrict the amount of liquefiable hydrocarbons in the gas stream at the receipt points upstream of the plants.

24. Southern reiterates that in December 2000, when it was advised that the Toca plant might not be in operation, it threatened not to accept gas upstream of the Toca plant. Southern states that its action was consistent with its policy that it will permit a producer at a receipt point upstream of the processing plant to exceed that specification when the

¹¹ Section 3.1(a) provides that gas delivered to Southern shall be free of objectionable liquids and solids and be commercial free from dust, gums, gum-forming constituents, or other liquid or matter which might become separated from the gas in the course of transportation through the pipeline.

processing plant is operating, but that it will enforce the tariff specification at such receipt point when the gas will not be processed downstream of the receipt point.

25. Southern asserts that in the discussions between the parties seeking to resolve this matter, agreement was reached on many matters. However, the parties were unable to reach agreement on certain critical elements of an aggregation methodology, such as: (1) the numerical value of the HDP standard that would be applied at the aggregation points, (2) whether the HDP standard should be stated in the tariff or simply posted on Southern's website, (3) the language regarding standards, conditions, and procedures that would apply in an emergency situation, and (4) the hydrocarbon quality specification that would be applied at the individual receipt points, and/or the conditions for applying it.

26. Southern further states that none of Toca Producers' gas production has been shut in by Southern. Moreover, Southern states that in its June 3, 2003 response in Docket No. RP01-208-000, Southern represented that as a condition to the dismissal of the Petition, it would make a voluntary NGA Section 4 tariff filing to modify its tariff to include an aggregation methodology, including the flexible HDP standard described in Natural.

27. Southern argues that its tariff contains objective and specific quality specifications applicable to liquefiable hydrocarbons which are applicable at the receipt point where gas first enters Southern's system. These specifications have been in Southern's tariff for many years. In fact, Southern asserts that the specific numerical value in Section 3.1(b) of the GT&C, namely the 0.3 gallon per Mcf of isopentane and heavier hydrocarbons, is consistent with general industry practices, and in fact is somewhat less restrictive, (i.e. permitting more gas to qualify) than the specification recommended by the American Gas Association's Gas Measurement Committee Report No. 4A, "Natural Gas Contract Measurement and Quality Clauses." Thus, Southern argues, in December 2000 and January 2001, Southern was merely seeking to enforce its existing tariff provisions.

28. In summary, Southern asserts that its policy is that at receipt points upstream of processing plants, producers are permitted to deliver gas with a liquefiable hydrocarbon content above the quality specification as long as that gas will be processed at the plant before entering the common stream. At all receipt points, Southern uniformly enforces its liquefiable hydrocarbon quality specification. The fact that the liquefiable hydrocarbon content of the blended gas stream at one point on Southern's system is different from that at another point is not evidence of discriminatory conduct since all the gas meets the 0.3 gallons per Mcf tariff standard.

29. Southern asserts that since it has not proposed any tariff change, relief is warranted only under NGA Section 5. Section 5 authorizes changes to Southern's tariff only if the

Toca Producers prove that Southern's currently effective tariff is unjust and unreasonable, and that the proposed change is just and reasonable. Southern argues that the complaint satisfies neither part of the Section 5 burden.

30. Accordingly, Southern argues, the Commission should deny the Toca Producers' requested relief. Moreover, the Commission should deny the Toca Producers' request that the Commission hold the related proceeding in Docket No. RP01-208-000 in abeyance while their complaint is being litigated. Rather, Southern asserts, the Commission can, and should, promptly dismiss the Toca Producers' Petition. However, Southern reaffirms its willingness to accept a conditional dismissal set forth above.¹²

D. Southern Customers' Answer

31. Southern Customers assert that there is no merit to any of the claims in the complaint for substantially the same reasons set forth by Southern in its answer. However, Southern Customers state that "all legitimate concerns of the Toca Producers can and should be resolved based on the pleadings filed in response to the May 14 Order in Docket No. RP01-208." Southern Customers state that they have consistently endorsed an immediate remedy to the concern raised by the Toca Producers in Docket No. RP01-208, which is that Southern's tariff should be revised to ensure that Southern cannot unduly discriminate in its imposition of gas quality standards for heavy hydrocarbons. To implement that remedy, Southern Customers had requested that the Commission direct Southern to submit a compliance filing in that proceeding, and Southern has agreed to make such a filing in its June 3, 2003 reply comments.

32. Southern Customers state that the complaint seeks a three-part remedy, similar to in the Natural order. Southern Customers contend that Southern has basically agreed to the first two parts, (1) the aggregation/blending concept, and (2) the posting of gas quality data at certain points on Southern's system through a compliance filing in Docket No. RP01-208-000. However, Southern Customers object to the third part of the proposed remedy, the adoption of the safe harbor standard. They contend that the standard has nothing to do with protecting against undue discrimination. Indeed, they argue that in Natural, the Commission rejected the argument that the adoption of a fixed standard for heavy hydrocarbons was necessary or appropriate to prevent undue discrimination.

¹² Southern also contends that the Petition, which sought a temporary restraining order to prevent the shutting-in of gas in January 2001, is obviously moot since in the more than two years since the petition was filed no gas has ever been shut in.

33. The Southern Customers state that the Toca Producers' assertion that Commission precedent supports imposition of a safe harbor standard is erroneous. They contend that the Commission imposed a safe harbor standard in only one of the orders, and that the Natural order was the sole instance where the Commission has ever imposed a safe harbor standard on any interstate pipeline. Moreover, Southern Customers assert that Natural is completely inapposite because the Southern system is substantially different from Natural's system. However, Southern Customers state that if the Commission were to consider the application of a safe harbor standard on Southern, it must provide for an evidentiary hearing to allow for a full exploration of the relevant issues.

34. The Toca Producers filed a motion to file rebuttal to the answers. Rule 213 of the Rules of Practice and Procedure do not permit rebuttal to answers unless there is a showing of good cause. Upon review of the proffered rebuttal we find that the Toca Producers have presented no new arguments or information in the rebuttal that could not have been presented at the time of their complaint, and therefore, have not demonstrated good cause to waive Rule 213. Accordingly, we deny the motion to file the rebuttal.¹³

Discussion

35. In general, the allegations in the complaint do not differ significantly from the allegation in the January 5, 2001 Petition, except that Toca Producers have provided an update of the events that occurred from that time, and reference certain recent proceedings at the Commission as support for their contentions. Although Toca Producers assert that there are contested issues of fact,¹⁴ these are not genuine issues of material fact relevant to whether Southern's existing tariff is unjust or unreasonable or unduly discriminatory. Rather they are conclusory matters, and the Toca Producers in effect request the Commission to establish an evidentiary hearing and create a new forum for it to solicit information through discovery, which might justify their proposal for a safe harbor standard on Southern's system.

36. Toca Producers' request would require Southern to create a fail safe ceiling for heavy hydrocarbon content gas despite the fact that Southern has no hard data that will guarantee that imposition of such a ceiling will protect the Southern systems and its downstream customers from liquid fallout. The arbitrary imposition of such a standard

¹³ Algonquin Gas Transmission Co., 93 FERC ¶ 61,163 (2000), and Shell Pipeline Co., 104 FERC ¶ 61,021 at P 4 (2003).

¹⁴ See pages 33-34 of the complaint.

would imperil the efficient and safe operation of Southern and its customers. We find that there is no need for an evidentiary hearing as requested in this complaint. Further, Southern has agreed to make a Section 4 filing in a new proceeding that will include an aggregation/blending approach and the imposition of reporting requirements for certain heavy hydrocarbon dew points on certain points on the Southern system. Issues as to the adequacy of that filing can be examined in that proceeding.

37. The complaint alleges that Southern is violating the undue discrimination provisions of Sections 4 and 5 of the NGA. Under NGA Section 5, changes to Southern's tariff can only be made if it is shown that the currently effective tariff is unjust and unreasonable, and that the proposed change is just and reasonable. The Toca Producers carry a substantial burden under NGA Section 5 in seeking to modify Southern's approved tariff. Section 3.1 of the GT&C is not a new tariff provision, but one that has been in Southern's tariff for many years. Southern states that it has also uniformly enforced the specification at all receipt points, except for those receipt points located upstream of a processing plant. In the case of the receipt points upstream of the Toca plant, Southern states it has never limited the amount of liquefiable hydrocarbons in the gas stream as long as the processing plant has been operating and the necessary gas quality is maintained on its system, because the upstream facilities were specifically designed to accommodate a higher level of liquefiable hydrocarbons in the gas stream in order to simplify producers' offshore production operations. Moreover, Southern states its policy is that it does not connect new receipt points downstream of the Toca plant that do not meet its quality specification, and if supply is connected, the supply through those receipt points is monitored for continued compliance with quality specifications. In the event that Southern determines the gas is out-of-specification, it promptly notifies the producer or interconnecting pipeline and requires the submittal of a plan to bring the gas into compliance within a reasonable time, and it has done so both before and after the instant proceedings. The Toca Producers have not provided any evidence to refute Southern's assertions.

38. Section 4 applies to changes initiated by Southern. Since Southern has proposed no changes to the quality standards in its tariff, Section 4 is not applicable here. Further, the Toca Producers cite to CIG, Enogex and Natural for the proposition that Commission policy is to require pipelines to include a safe harbor standard in their tariffs, and argue that that policy is applicable to Southern. We disagree. In each of these cases the gas quality standard was proposed by the applicant for its own pipeline. The Commission addressed these proposals as pipeline specific proposals, not as proposals applicable to Southern, much less the industry.

39. The Toca Producers have failed to meet the statutory prerequisites for modifying an approved tariff, and therefore, the Commission cannot grant the relief sought by the

complainant. Accordingly, we will dismiss the complaint and the request for an evidentiary hearing.

40. In Docket No. RP01-208-000, the Toca Producers sought a temporary restraining order to prevent their gas from being shut in. No gas has been shut in on the Southern System in the more than two years since the Petition was filed. Nevertheless, in the discussions following the January 21, 2001 technical conference, the parties had reached an understanding on a number of issues, but could not reach a final settlement. In its June 3, 2003 response in Docket No. RP01-208-000, Southern stated it was willing to make a filing that would incorporate at least the understanding reached by the parties in their discussions. Thus, Southern stated that, as a condition to the Commission's dismissing the Petition, it would make a filing pursuant to NGA Section 4 "to modify its Tariff to include an aggregation methodology substantially as agreed to by the parties as indicated in the status report filed with the Commission Staff on June 14, 2002,¹⁵ and including the flexible hydrocarbon dewpoint standard adopted in the Natural proceeding."¹⁶

41. We dismiss Docket No. RP01-208-000 with the condition that Southern makes the filing that it offered to make in its June 3, 2003 response.

The Commission orders:

(A) The complaint filed in Docket No. RP03-484-000 is dismissed.

¹⁵ The status report was in response to Staff's letter requesting the parties to identify the issues which had been resolved and those that remained. The Toca Producers and Southern filed a joint response.

¹⁶ June 3, 2003 response at 8.

(B) The petition for a temporary restraining order filed in Docket No. RP01-208-000 is dismissed, subject to Southern filing, within 45 days of the date this order, to modify its tariff in a separate NGA Section 4 filing, as it offered in its June 3, 2003 response.

By the Commission.

(S E A L)

Magalie R. Salas,
Secretary.

**The Toca Producers v. Southern Natural Gas Company
Docket No. RP03-484-000**

Interventions and Protests

Atlanta Gas Light Company and Chattanooga Gas Company
Alabama Gas Corporation
Alabama Municipal Distributors Group
Austell Gas System
BG LNG Services, LLC
Calhoun Power Company I, LLC
Duke Energy Trading and Marketing, L.L.C. and Duke Energy Fuels, L.P.
Enbridge Pipelines (Louisiana Intrastate) L.L.C.
Enterprise Gas Processing, LLC
Marathon Oil Company
Municipal Gas Authority of Georgia
ProLiance Energy LLC
South Carolina Pipeline Corporation
Southeast Alabama Gas District
Southern Cities
Southern Company Services, Inc.