



February 28, 2022

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Enable Gas Transmission, LLC*
Docket No. RP22-625-000
Fuel Exemption Filing

Dear Ms. Bose:

I. Introduction.

Pursuant to Section 4 of the Natural Gas Act,¹ and Part 154 of the regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”),² Enable Gas Transmission, LLC (“EGT”) hereby submits for filing the tariff records listed in Appendix A hereto to be included in First Revised Volume No. 1 of its FERC Gas Tariff (“Tariff”), effective April 1, 2022.

II. Statement of Nature, Reasons, and Basis for Filing.

When assessing fuel use and lost and unaccounted for gas (“LUFG”) charges, EGT has one set of charges (a fuel charge and a LUFG charge) that applies to the majority of its system, which is referred to as the “core system,” and a separate set of fuel and LUFG charges for an expansion project, known as “Line CP.” Traditionally, EGT would assess both the core system and Line CP fuel and LUFG charges to transactions flowing between Line CP and the core system. Recently, however, EGT abandoned a receipt point from a gathering system serving the South Shreveport area and has added or modified certain interconnections between the core system and Line CP. These modifications allow gas to flow from Line CP onto certain portions of the core system near Shreveport, Louisiana for delivery to a local gas distribution company and certain directly connected industrial customers.

As a result of these system modifications, certain portions of EGT’s core system can now only receive gas that flows from Line CP and cannot receive gas from the remainder of the core system. Deliveries from receipt points on Line CP to delivery points on these portions of the core system do not utilize core system compression. These deliveries are accomplished entirely through flows from and compression on Line CP. Accordingly, EGT proposes to exempt nominated receipts from Line CP points to certain delivery points from paying the core system fuel charge.

Attached as Appendix C is a diagram showing the relevant portion of the EGT system.³ The two new or expanded interconnections between Line CP and the core system are at EGT Shreveport NT-2 and EGT Shreveport LIM-1. As shown on the diagram, gas moves from the

¹ 15 U.S.C. § 717c (2018).

² 18 C.F.R. Pt. 154 (2021).

³ Certain small delivery laterals have been omitted from the diagram.

EGT Shreveport NT-2 point into Line NT-2 and then onto Line ST-1 (16”), Line N, Line NT-1, Line R-1-N, and Line R (off of Line R-1-N). From the EGT Shreveport LIM-1 point, gas flows onto Line LIM-1, Line LIT-2, and Line LIT-1.⁴ The portions of Line R labelled “Line R North” and “Line R South” on the diagram receive gas solely from Line F and not from Line N. Due to differences in pressure, gas cannot physically flow from this portion of Line R onto Line N; gas delivered to points along Line N can only come from the Line CP interconnections.

EGT is submitting this filing to add language to its Tariff exempting those transportation transactions with receipt points on Line CP and delivery points on the appropriate portions of the core system from the core system fuel charge. The Commission permits pipelines to exempt certain transportation transactions from fuel charges if no fuel is consumed in those transactions.⁵ In such instances, the Commission requires pipelines to specifically identify fuel exemptions in their tariffs to ensure non-discriminatory treatment and to prevent cost shifting.⁶ EGT’s proposed fuel exemption satisfies these requirements because the transactions can only be performed via gas flows from Line CP.

EGT proposes to assess only the Line CP Fuel Use percentage and both the Line CP and core system LUFG percentages, and to not assess any non-Line CP Fuel use percentages, for those transactions that do not utilize compression on EGT’s core system and where gas cannot flow from the core system to those points. These transactions have receipt points located in the Line CP Pooling Area and delivery points located on the following lines, and any lateral lines directly connected thereto that receive gas only from such lines: D-2-N, LIT-1, LIT-2, LIT-9, LIT-19, LIM-1, N, NM-3, NM-4, NM-7, NT-1, NT-2, ST-1 (16-inch portion), R-1-N, R (the portion connected to Line R-1-N only). These receipt and delivery combinations will flow from Line CP to delivery points on the specified lines, along routes where no core system compression, and thus no core system fuel, would be used to make the relevant deliveries. Therefore, these paths will only utilize compression from Line CP. Because these transactions will not utilize core system fuel, they should be exempt from such fuel charges, consistent with Commission policy.

The language in proposed General Terms and Conditions (“GT&C”) Section 27.9 specifies that transactions with receipt points on Line CP and deliveries to only the listed lines will pay the Line CP fuel and LUFG percentage and the core system LUFG percentage. The proposed Tariff section satisfies the Commission’s requirement to specifically identify fuel exemptions and should be accepted.

⁴ EGT is converting Line LIT-1 from a non-jurisdictional gathering line to a jurisdictional transmission line pursuant to its blanket authority.

⁵ See, e.g., *Columbia Gulf Transmission, LLC*, 169 FERC ¶ 61,183 at P 37 (2019); *Texas Eastern Transmission, LP*, 144 FERC ¶ 61,039 at P 37 (2013); *El Paso Natural Gas Co.*, 129 FERC ¶ 61,280 at P 25-28 (2009); *Colorado Interstate Gas Company*, 113 FERC ¶ 61,225 (2005). *Northern Natural Gas Co.*, 82 FERC ¶ 61,270, p. 62,062 (1998); *NorAm Gas Transmission Co.*, 84 FERC ¶ 61,006, p. 61,021 (1998); *Williams Natural Gas Co.*, 75 FERC ¶ 61,023, p. 61,075 (1996).

⁶ *Columbia Gulf Transmission, LLC*, 169 FERC ¶ 61,183 at P 37 (2019)

III. Motion to Place Tariff Records into Effect.

EGT respectfully requests that if the Commission determines suspension to be in order, only the minimum suspension be imposed. Pursuant to Section 154.7(a)(9) of the Commission's regulations,⁷ EGT hereby moves to place the proposed Tariff records into effect at the end of the minimum suspension period, provided that they are approved as filed and without condition. EGT, however, reserves the right to file a later motion to place the proposed Tariff records into effect at the end of the suspension period if the Commission orders any change to the Tariff records or imposes conditions on the implementation of the proposed records.

IX. Components of the Filing.

Pursuant to Order No. 714⁸ and in accordance with Section 154.7(a)(1) of the Commission's regulations,⁹ EGT includes with this filing an eTariff XML filing package containing this transmittal letter and all components of the filing, filed as a zip (compressed) file, as listed below:

Appendix A – Clean version of the Tariff records;

Appendix B – Marked versions of the Tariff records; and

Appendix C – Diagram of EGT South Shreveport Area.

X. Communications.

Pursuant to Section 385.203(b)(3) of the Commission's regulations, EGT requests that all Commission orders, communications and correspondence, as well as pleadings and correspondence from other persons, concerning this filing be served upon the following and that each be included on the Commission's official service list for this filing:

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⁷ 18 C.F.R. § 154.7(a)(9).

⁸ *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008).

⁹ 18 C.F.R. § 154.7(a)(1).

XI. Subscription, Posting and Certification of Service.

In accordance with Sections 385.2005 and 385.2011(c)(5) of the regulations,¹⁰ the undersigned states that she has read this filing and knows its contents and to her best knowledge and belief, the statements and information contained in the tariff records attached hereto are true and the electronic media accompanying this filing contains the same information as that available for public inspection.

Pursuant to Sections 154.2(d), 154.7(b) and 154.208(b) of the Commission's regulations, a copy of this tariff filing is being sent by electronic mail to each of EGT's customers and interested State Commissions. Copies of this filing are being posted in accordance with Section 154.207 of the Commission's regulations.¹¹ This tariff filing is also available for public inspection during regular business hours in a convenient form and place at EGT's offices at 910 Louisiana Street, Houston, Texas 77002, and on its website at <http://pipelines.enablemidstream.com>.

XII. Waivers.

EGT respectfully requests that, should the Commission determine that any waivers are required, the Commission grant such waivers as are necessary to effectuate this filing as requested.

If there are any questions concerning this filing, please contact the undersigned at (346) 701-2539.

Respectfully submitted,

Enable Gas Transmission, LLC

/s/ Lisa Yoho

Lisa Yoho

Sr. Director, Regulatory Affairs

Enclosures

¹⁰ 18 C.F.R. §§ 385.2005, 385.2011(c)(5).

¹¹ 18 C.F.R. § 154.207.

APPENDIX A

GENERAL TERMS & CONDITIONS
(continued)

27. FUEL PERCENTAGES (continued)

27.8 Transporter will assess the applicable non-Line CP Fuel Use and LUFG percentages, as well as the Line CP Fuel Use and LUFG percentages as described in Section 27.7 above, for transactions which consist of physical deliveries or flows directly from Transporter's non-Line CP Pooling Area transmission lines into Line CP and for further transport and delivery to delivery points located on Line CP, lines directly connected thereto, or Delivery Points that are Perryville Hub Delivery Points.

27.9 Transporter will assess the Line CP Fuel Use percentage, the Line CP LUFG percentage and the non-Line CP LUFG percentage, and Transporter will not assess any non-Line CP Fuel use, for transactions utilizing the receipt and delivery combinations listed below:

Receipt Points: Receipt Points and Pools located in the Line CP Pooling Area.

Delivery Points: Delivery Points located on the following of Transporter's lines, and any lateral lines directly connected thereto that receive gas only from such lines:

D-2-N
LIT-1
LIT-2
LIT-9
LIT-19
LIM-1
N
NM-3
NM-4
NM-7
NT-1
NT-2
ST-1 (16-inch portion only)
R (only such portion of Line R that connects to Line R-1-N)
R-1-N

APPENDIX B

GENERAL TERMS & CONDITIONS
(continued)

27. FUEL PERCENTAGES (continued)

27.8 Transporter will assess the applicable non-Line CP Fuel Use and LUFG percentages, as well as the Line CP Fuel Use and LUFG percentages as described in Section 27.7 above, for transactions which consist of physical deliveries or flows directly from Transporter's non-Line CP Pooling Area transmission lines into Line CP and for further transport and delivery to delivery points located on Line CP, lines directly connected thereto, or Delivery Points that are Perryville Hub Delivery Points.

27.9 Transporter will assess the Line CP Fuel Use percentage, the Line CP LUFG percentage and the non-Line CP LUFG percentage, and Transporter will not assess any non-Line CP Fuel use, for transactions utilizing the receipt and delivery combinations listed below:

Receipt Points: Receipt Points and Pools located in the Line CP Pooling Area.

Delivery Points: Delivery Points located on the following of Transporter's lines, and any lateral lines directly connected thereto that receive gas only from such lines:

D-2-N

LIT-1

LIT-2

LIT-9

LIT-19

LIM-1

N

NM-3

NM-4

NM-7

NT-1

NT-2

ST-1 (16-inch portion only)

R (only such portion of Line R that connects to Line R-1-N)

R-1-N

APPENDIX C

EGT South Shreveport Overview

