

August 1, 2023

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

Re: Gulf Run Transmission, LLC
Docket No. RP23-

Interim Transporter's Use Filing

Dear Ms. Bose:

Gulf Run Transmission, LLC ("Gulf Run") hereby electronically submits for filing with the Federal Energy Regulatory Commission ("Commission") the following revised tariff records to its FERC NGA Gas Tariff, Original Volume No. 1 ("Tariff"), proposed to become effective September 1, 2023.

	<u>Version</u>	<u>Description</u>	<u>Title</u>
· · · · · · · · · · · · · · · · · · ·	1.0.0	Rate Schedule ITS	Currently Effective Rates Currently Effective Rates Currently Effective Rates

## STATEMENT OF NATURE, REASONS AND BASIS

Section 22.2(a) of the General Terms and Conditions ("GT&C") of Gulf Run's Tariff provides that Gulf Run is required to file an Annual Transporter's Use Filing to redetermine Transporter's Use Percentage after one year of operation and each June 1<sup>st</sup> thereafter. Gulf Run may also file an Interim Transporter's Use Filing between its Annual Transporter's Use Filings to adjust the fuel retainage percentages and lost and unaccounted for gas percentages. This filing includes Gulf Run's Interim Transporter's Use Filing to adjust the fuel retainage and lost and unaccounted for gas percentages applicable to each transporter prepared in accordance with the Tariff.

On November 3, 2022, in Docket No. RP23-166-000, Gulf Run filed its baseline tariff filing in compliance with the Commission's Order Issuing Certificates and Approving Abandonment issued in Docket Nos. CP20-68-000, *et al.*, which stated the initial Transporter's Use Percentages for fuel retainage and lost and unaccounted for gas based upon appropriate engineering principles as stated in Section 22.2(a) of the GT&C of Gulf Run's Tariff. The Transporter Use Percentages were approved by Commission Letter Order dated November 18, 2022, and were placed into effect by Gulf Run on December 19<sup>th</sup>, 2022. Gulf Run has not filed an Annual Transporter's Use Filing since this initial filing because Gulf Run has not yet been in operation for a full year.

Since being placed into service, Gulf Run has experienced an increase in compression, and a corresponding increase in fuel usage, in Zone 1 and a decrease in compression, and a corresponding

<sup>1</sup> Enable Gas Transmission, LLC and Enable Gulf Run Transmission, LLC, 175 FERC ¶ 61,183 (2021).

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decrease in fuel usage, in Zone 2 from what was initially projected before being placed in service. Gulf Run also has experienced a decrease in lost and unaccounted for gas from what was initially projected before being placed in service. By proposing this out of cycle adjustment for the last nine months of the current recovery period, Gulf Run seeks to reduce any under and over collection on Zone's 1 and 2, respectively, that would result if Gulf Run left the current Transporter's Use percentages in place, and in turn, minimize any future deferred account balance, as well as more accurately reflect the actual lost and unaccounted for gas percentage based on actual operations rather than the pre-in service projections used to arrive at the current lost and unaccounted for gas percentages. In addition, Gulf Run anticipates that the actual data from the past six months of compression and lost and unaccounted for will be similar for the foreseeable future. Therefore, Gulf Run proposes herein to modify the Transporter's Use fuel and lost and unaccounted for gas percentages for the period of September 2023 through May 2024, the last nine months of this recovery period.

### **Proposed Reimbursement Percentages**

The proposed adjustment to the Transporter Use percentages for fuel retainage in Zone 1 is 0.50%, reflecting an increase of 0.10% from the currently effective rate of 0.40%. The proposed adjustment to the Transporter Use percentages for fuel retainage in Zone 2 is 0.00%, reflecting a decrease of 0.40% from the currently effective rate of 0.40%. Gulf Run is proposing for lost and unaccounted for gas to be 0.02%, reflecting a decrease of 0.08% from the currently effective rate of 0.10%.

## Supporting Documentation

The worksheets attached hereto as Appendix A provide supporting calculations used in deriving the proposed Transporter's Use and lost and unaccounted for gas percentages. Page 1 sets forth, by zone path, the change in the Transporter's Use percentage from the currently effective Transporter's Use percentage. Page 2 reflects the computation of the projected Transporter's Use percentage by zone path. Page 3 shows the compressor fuel use components for the projected quantities of gas to be expended for fuel use based on the projected level of throughput during the period September 2023 through May 2024. Page 4 shows the loss and unaccounted for gas component for the projected level of throughput during the period September 2023 through May 2024. Page 5 reflects the projected compressor fuel use by zone by month for the period September 2023 through May 2024. Page 7 reflects the projected throughput by zone by month for the period September 2023 through May 2024. Page 7 reflects the projected throughput by zone by month for the period September 2023 through May 2024.

### **IMPLEMENTATION AND WAIVER REQUEST**

Gulf Run respectfully requests that the Commission grant Gulf Run any waivers of the Commission's Regulations which may be necessary to accept these tariff records to be effective September 1, 2023. Gulf Run asks that the Commission act upon this filing on or before August 21, 2023, so that shippers on Gulf Run's system will know the fuel rates prior to making nominations for September business at least a week prior to the proposed September 1, 2023, effective date of the revised Transporter's Use and Lost and Unaccounted for percentages adjustments.

Pursuant to Section 154.7(a)(9) of the Commission's regulations, Gulf Run moves to place the proposed tariff record into effect on September 1, 2023. Gulf Run reserves the right to file a motion to place the tariff record into effect at a later date in the event that the Commission does not approve the tariff record as filed and without condition.

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#### **CONTENTS OF THE FILING**

This filing is made in electronic format in compliance with Section 154.4 of the Commission's Regulations. In addition to the proposed tariff records in RTF format with metadata attached, the XML filing package contains:

- A transmittal letter including a Statement of Nature, Reasons and Basis in PDF format.
- A clean copy of the proposed tariff records in PDF format.
- A marked version of the proposed tariff changes in PDF format.
- Supporting documentation and work papers in Appendix A in PDF format
- A copy of the complete filing in PDF format for publishing in eLibrary.

#### **COMMUNICATIONS, PLEADINGS AND ORDERS**

Gulf Run requests that all Commission orders and correspondence as well as pleadings and correspondence from other parties concerning this filing be served on each of the following:

Michael T. Langston 2

Vice President
Chief Regulatory Officer
Gulf Run Transmission, LLC
1300 Main Street
Houston, TX 77002
(713) 989-7610
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(713) 989-1212 (Fax)
jonathan.christian@energytransfer.com

In accordance with Section 154.2(d) of the Commission's Regulations, a copy of this filing is available for public inspection during regular business hours at Gulf Run's office at 1300 Main Street, Houston, Texas 77002. In addition, copies of this filing are being served on jurisdictional customers and interested state regulatory agencies. Gulf Run has posted a copy of this filing on its Internet website accessible via <a href="https://pipelines.energytransfer.com/ipost/GR">https://pipelines.energytransfer.com/ipost/GR</a> under Informational Postings, Regulatory.

Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. Gulf Run respectfully requests the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow Gulf Run to include additional representatives on the official service list.

Designated as responsible Company official under Section 154.7(a)(2) of the Commission's Regulations.

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Pursuant to Section 385.2011(c)(5) of the Commission's Regulations, the undersigned has read this filing and knows its contents; the contents are true as stated, to the best of his knowledge and belief; and the undersigned possesses full power and authority to sign such filing.

Respectfully submitted,

GULF RUN TRANSMISSION, LLC

/s/ Lawrence J. Biediger

Lawrence J. Biediger Sr. Director, Rates and Regulatory Affairs

# Currently Effective Rates Rate Schedule FTS

RATE SCHEDULE FTS	Maximum Minimum Rate Rate Per Dth Per Dth		Fuel Retainage	Lost & Unaccounted For Gas
December Chance Dec Dec				
Reservation Charge Per Day				
Zone 1 – Zone 1	\$0.1041	\$0.0000	-	-
Zone 1 – Zone 2	\$0.2731	\$0.0000	-	-
Zone 2 – Zone 1	\$0.2731	\$0.0000	-	-
Zone 2 – Zone 2	\$0.1690	\$0.0000	-	-
Usage-1 Rate				
Zone 1 – Zone 1	\$0.0020	\$0.0020	0.50%	0.02%
Zone 1 – Zone 2	\$0.0042	\$0.0042	0.50%	0.02%
Zone 2 – Zone 1	\$0.0042	\$0.0042	0.50%	0.02%
Zone 2 – Zone 2	\$0.0022	\$0.0022	0.00%	0.02%
Authorized Overrun				
Zone 1 – Zone 1	\$0.1061	\$0.0020	0.50%	0.02%
Zone 1 – Zone 2	\$0.2773	\$0.0042	0.50%	0.02%
Zone 2 – Zone 1	\$0.2773	\$0.0042	0.50%	0.02%
Zone 2 – Zone 2	\$0.1712	\$0.0022	0.00%	0.02%

# Currently Effective Rates Rate Schedule ITS

RATE SCHEDULE ITS	Maximum Rate Per Dth 	Minimum Rate Per Dth	Fuel Retainage 	Lost & Unaccounted For Gas	
Zone 1 – Zone 1	\$0.1061	\$0.0020	0.50%	0.02%	
Zone 1 – Zone 2	\$0.2773	\$0.0042	0.50%	0.02%	
Zone 2 – Zone 1	\$0.2773	\$0.0042	0.50%	0.02%	
Zone 2 – Zone 2	\$0.1712	\$0.0022	0.00%	0.02%	

# Currently Effective Rates Rate Schedule PS

RATE SCHEDULE PS	Maximum Rate Per Dth	Minimum Rate Per Dth	Fuel Retainage	Lost & Unaccounted For Gas	
Pool Transfer Area					
Zone 1 – Zone 1	\$0.1061	\$0.0020	-	-	
Zone 1 – Zone 2	\$0.2773	\$0.0042	0.50%	0.02%	
Zone 2 – Zone 1	\$0.2773	\$0.0042	0.50%	0.02%	
Zone 2 – Zone 2	\$0.1712	\$0.0022	-	-	



# Currently Effective Rates Rate Schedule FTS

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Zone 1 – Zone 1	\$0.1041	\$0.0000	-	-
Zone 1 – Zone 2	\$0.2731	\$0.0000	-	-
Zone 2 – Zone 1	\$0.2731	\$0.0000	-	-
Zone 2 – Zone 2	\$0.1690 \$0.0000 -		-	-
Usage-1 Rate				
Zone 1 – Zone 1	\$0.0020	\$0.0020	<del>0.40</del> 0.50%	<del>0.10</del> 0.02%
Zone 1 – Zone 2	\$0.0042	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%
Zone 2 – Zone 1	\$0.0042	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%
Zone 2 – Zone 2	\$0.0022	\$0.0022	<del>0.40</del> <u>0.00</u> %	<del>0.10</del> <u>0.02</u> %
Authorized Overrun				
Zone 1 – Zone 1	\$0.1061	\$0.0020	<del>0.40</del> 0.50%	<del>0.10</del> 0.02%
Zone 1 – Zone 2	\$0.2773	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%
Zone 2 – Zone 1	\$0.2773	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%
Zone 2 – Zone 2	\$0.1712	\$0.0022	<del>0.40</del> 0.00%	<del>0.10</del> 0.02%

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RATE SCHEDULE ITS	Maximum Rate Per Dth	Minimum Rate Per Dth	Fuel Retainage 	Lost & Unaccounted For Gas
Zone 1 – Zone 1	\$0.1061	\$0.0020	<del>0.40</del> <u>0.50</u> %	<del>0.10</del> 0.02%
Zone 1 – Zone 2	\$0.2773	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%
Zone 2 – Zone 1	\$0.2773	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%
Zone 2 – Zone 2	\$0.1712	\$0.0022	<del>0.40</del> <u>0.00</u> %	<del>0.10</del> 0.02%

# Currently Effective Rates Rate Schedule PS

RATE SCHEDULE PS	Maximum Rate Per Dth			Lost & Unaccounted For Gas	
Pool Transfer Area					
Zone 1 – Zone 1	\$0.1061	\$0.0020	-	-	
Zone 1 – Zone 2	\$0.2773	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%	
Zone 2 – Zone 1	\$0.2773	\$0.0042	<del>0.80</del> 0.50%	<del>0.10</del> 0.02%	
Zone 2 – Zone 2	\$0.1712	\$0.0022	-	-	

# Computation of the Effective Transporter's Use Pursuant to Section 22 of the General Terms and Conditions of Gulf Run's FERC NGA Gas Tariff, Original Volume No. 1 Effective September 1, 2023

Line No.	Description	Transporter's Use Effective December 19, 2022 (a) %	Transporter's Use Adjustment (b) %	Transporter's Use Effective September 1, 2023 (c) %
1	Zone 1	0.50	0.02	0.52
2	Zone 2	0.50	(0.48)	0.02
3	Zone 1 - Zone 2	0.90	(0.38)	0.52

Computation of the Effective Transporter's Use Pursuant to Section 22 of the General Terms and Conditions of Gulf Run's FERC NGA Gas Tariff, Original Volume No. 1 Effective September 1, 2023

Line No.	Description	Zone 1 (a) %	Zone 2 (b) %	Zone 1 - Zone 2 (c) %	
1 2	Proposed Fuel Use % Proposed LUFG %	0.50 0.02	0.02	0.50 0.02	
3	Total Effective Fuel Use & LUFG %	0.52	0.02	0.52	

Computation of Projected Compressor Fuel Use Component Pursuant to Section 22 of the General Terms and Conditions of Gulf Run's FERC NGA Gas Tariff, Original Volume No. 1 Effective September 1, 2023 (Dth)

Line No.	Description	Estimated Fuel (a)	Estimated Flow (b)	Fuel Use Component (c) %
1	Zone 1	3,085,546	617,109,102	0.50
2	Zone 2	-	95,262,950	_

Computation of the Effective Transporter's Use
Pursuant to Section 22 of the General Terms and Conditions
of Gulf Run's FERC NGA Gas Tariff, Original Volume No. 1
Effective September 1, 2023
(Dth)

Line No.	Estimated Description Flow		Estimated LUFG	LUFG	
	<u> </u>	(a)	(b)	(c) %	
1	System LUFG	712,372,052	142,471	0.02	

# Projected System Fuel Summary For the Period September 1, 2023 through May 31, 2024 (Dth)

Line		2023			2024						
No.	Description	September	October	November	December	January	February	March	April	May	Total
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	Zone 1	337,833	349,095	337,833	349,095	349,095	326,572	349,095	337,833	349,095	3,085,546
2	Zone 2	_	-	-	-	-	_	_	_	_	-

# Projected System LUFG Summary For the Period September 1, 2023 through May 31, 2024 (Dth)

Line		2023					2024				
No.	Description	September	October	November	December	January	February	March	April	May	Total
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	System LUFG	15,599	16,119	15,599	16,119	16,119	15,079	16,119	15,599	16,119	142,471

## Projected System Flow Summary For the Period September 1, 2023 through May 31, 2024 (Dth)

Line	2023										
No.	Description	September	October	November	December	January	February	March	April	May	Total
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	Zone 1	67,566,690	69,818,913	67,566,690	69,818,913	69,818,913	65,314,467	69,818,913	67,566,690	69,818,913	617,109,102
2	Zone 2	10,430,250	10,777,925	10,430,250	10,777,925	10,777,925	10,082,575	10,777,925	10,430,250	10,777,925	95,262,950