



TRUNKLINE GAS COMPANY
An ENERGY TRANSFER Company

September 28, 2022

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

Re: Trunkline Gas Company, LLC
Docket No. RP22-
Update to GT&C Section 22

Dear Ms. Bose:

Trunkline Gas Company, LLC ("Trunkline") hereby electronically submits for filing with the Federal Energy Regulatory Commission ("Commission") the following revised tariff record to its FERC NGA Gas Tariff, Fourth Revised Volume No. 1 ("Tariff"), proposed to become effective October 28, 2022:

<u>Version</u>	<u>Description</u>	<u>Title</u>
4.0.0	GT&C Section 22.	Fuel Reimbursement Adjustment

STATEMENT OF NATURE, REASONS AND BASIS

Section 22 of the General Terms and Conditions ("GT&C") of Trunkline's Tariff provides that Trunkline will file a Periodic Rate Adjustment of the Fuel Reimbursement percentage under Rate Schedules FT, SST, EFT, QNT, LFT, IT and QNIT to reflect reductions or increases in fuel usage, including miscellaneous fuel usage and electric compression costs, and lost or unaccounted for gas. Currently, Trunkline's GT&C Section 22 is not structured to address a situation in which it would be required to charge any of its shippers a negative Fuel Reimbursement percentage. Trunkline proposes to modify GT&C Section 22 to permit it to charge a Fuel Reimbursement of 0.00% when the calculated Fuel Reimbursement percentage would result in a negative percentage.

IMPLEMENTATION AND WAIVER REQUEST

Pursuant to Section 154.7(a)(9) of the Commission's Regulations, Trunkline requests that the proposed tariff record submitted herewith become effective October 28, 2022. Trunkline respectfully requests the Commission grant any waivers of its Regulations that it deems necessary to accept this filing and allow the proposed tariff record in this filing to become effective on October 28, 2022.

CONTENTS OF THE FILING

This filing is made in electronic format in compliance with Section 154.4 of the Commission's Regulations. The proposed tariff record in RTF format with metadata attached is being submitted as part of an XML filing package containing the following:

- . A transmittal letter in PDF format
- . A clean copy of the proposed tariff record in PDF format for publishing in eLibrary
- . A marked version of the proposed tariff changes in PDF format
- . A copy of the complete filing in PDF format for publishing in eLibrary

COMMUNICATIONS, PLEADINGS AND ORDERS

Trunkline 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:

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Sr. Director, Rates and Regulatory Affairs
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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 Trunkline's office at 1300 Main Street, Houston, Texas 77002. In addition, copies of this filing are being served electronically on jurisdictional customers and interested state regulatory agencies. Trunkline has posted this filing on its Internet

¹ Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. Trunkline respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow Trunkline to include additional representatives on the official service list.

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

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website accessible via <https://tgcmessenger.energytransfer.com> under Informational Postings, Regulatory.

Pursuant to Section 385.2005(a) 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 possesses full power and authority to sign such filing.

Respectfully submitted,

TRUNKLINE GAS COMPANY, LLC

/s/ Lawrence J. Biediger

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

GENERAL TERMS AND CONDITIONS
(Continued)

22. FUEL REIMBURSEMENT ADJUSTMENT

The Fuel Reimbursement percentages under Rate Schedules FT, SST, EFT, QNT, LFT, IT and QNIT shall be adjusted downward to reflect reductions and shall be adjusted upward to reflect increases in fuel usage, including miscellaneous fuel usage and electric compression costs, and lost or unaccounted for Gas in accordance with this Section 22; provided, however, fuel reimbursement for transactions on the South Texas Modified Transmission System shall be isolated from other fuel reimbursement adjustment provisions and shall be calculated separately in accordance with Section 22.6 herein. For purposes of this Section 22, the term "miscellaneous fuel usage" shall pertain to fuel use volumes other than FERC Account No. 854, Gas for Compressor Station Fuel, which are accounted for in FERC Account Nos. 819, 823, 853 and 856. For purposes of this Section 22, the term "electric compression costs" shall consist of the cost of electric power, including surcharges, purchased by or for Trunkline to be used in the operation of electrical powered compressor stations.

22.1 Filing of Fuel Reimbursement Adjustment

(A) Effective Date of Adjustment

The effective date of each Fuel Reimbursement Adjustment shall be November 1 and April 1.

(B) Filing Procedure

At least thirty (30) days prior to the Effective Date of Adjustment, Trunkline shall file with the Commission and post, as defined by Section 154.2(d) of the Commission's Regulations, a schedule of effective Fuel Reimbursement percentages together with supporting documentation including a report of actual monthly South Texas Modified Transmission System retention rates and data demonstrating that South Texas Modified Transmission System costs are not included in the schedule of effective Fuel Reimbursement percentages. With respect to the adjustment described herein, such filing shall be in lieu of any other rate change filing required by the Commission's Regulations under the Natural Gas Act.

(C) Fuel Reimbursement Adjustment Period

The Fuel Reimbursement Adjustment Period shall be the billing periods beginning with each Effective Date of Adjustment.

22.2 Computation of Effective Fuel Reimbursement Percentage

The effective Fuel Reimbursement percentage shall be the sum of the current Fuel Reimbursement percentage and the Annual Fuel Reimbursement Surcharge; however, if the sum of the current Fuel Reimbursement percentage and the Annual Fuel Reimbursement Surcharge results in an overall negative Fuel Reimbursement percentage, the effective Fuel Reimbursement percentage will be 0.00%.

22.3 Computation of Current Fuel Reimbursement Percentage

The Current Fuel Reimbursement percentage shall be determined on the basis of (1) the projected Quantity of Gas received for the account of Shippers under Rate Schedules FT, SST, EFT, QNT, LFT, IT, and QNIT and (2) the projected Quantity of Gas that shall be required for fuel usage, including miscellaneous fuel usage and electric compression costs, and the lost or unaccounted for Gas, for each Fuel Reimbursement Adjustment Period. The fuel usage, including miscellaneous fuel usage and electric compression costs, and the lost or unaccounted for Gas components of the current fuel reimbursement percentage shall be calculated separately. The projected Quantity of Gas qualifying under Section 28.7 herein shall be excluded from the fuel usage component calculation but shall be included in the lost or unaccounted for component calculation. The projected electric compression costs shall be converted to an equivalent Quantity of Gas for the fuel usage component. The projected electric compression costs shall be divided by the projected Spot Index Price as defined in Section 5.2(F) of these General Terms and Conditions for the Fuel Reimbursement Adjustment Period to determine the equivalent Quantity of Gas representing the electric compression costs.

22.4 Computation of the Annual Fuel Reimbursement Surcharge

- (A) The Annual Fuel Reimbursement Surcharge shall be computed by dividing the balance, four Months prior to November 1, of the Deferred Fuel Reimbursement Account by Trunkline's projected Quantity of Gas for Transportation under Rate Schedules FT, SST, EFT, QNT, LFT, IT and QNIT for the Recovery Period, excluding the projected Quantity of Gas qualifying under Section 28.7 herein.
- (B) The Recovery Period for the Annual Fuel Reimbursement Surcharge shall be the twelve (12) billing Months beginning November 1.
- (C) Trunkline shall maintain a Deferred Fuel Reimbursement Account with appropriate subaccounts, beginning with the effective date of this Section 22. For each billing Month, the applicable subaccounts shall be increased or decreased for a positive or negative change in Fuel Reimbursement for the billing Month.
- (D) A change in Fuel Reimbursement for each billing Month shall be the difference between (1) the applicable currently effective Fuel Reimbursement percentage for the billing Month multiplied by the Quantity of Gas received during the

billing Month and (2) the actual Quantity of Gas expended for fuel usage, including miscellaneous fuel usage, and lost or unaccounted for Gas during the billing Month as well as the equivalent Quantity of Gas representing the actual electric compression costs. The actual electric compression costs for the billing Month shall be divided by the average of the weekly Spot Index Prices, calculated in accordance with Section 5.2(F) of the General Terms and Conditions, for the billing Month to determine the equivalent Quantity of Gas representing the electric compression costs.

22.5 Notice of Responsibility of Deferred Amounts

In the event this Section 22 shall be changed in any manner that adversely affects Trunkline's recovery of the full amount of fuel amounts reflected in its deferred fuel accounts, each Shipper that received transportation service during the period affected by such fuel adjustment deferred account shall be responsible to Trunkline for its proportionate share of the amount of Trunkline's unrecovered deferred fuel amounts for the transportation services which they were provided.

22.6 South Texas Modified Transmission System Fuel Reimbursement

Shippers on the South Texas Modified Transmission System shall reimburse Trunkline in kind for the actual Quantity of Gas required for fuel usage, including miscellaneous fuel usage, and lost or unaccounted for Gas. Trunkline shall retain a pro rata share of gas delivered for the account of Shipper each Month as fuel reimbursement. Pro rata share shall mean the ratio of each Shipper's actual Quantity of Gas delivered in the South Texas Modified Transmission System to the total Quantity of Gas delivered in the South Texas Modified Transmission System for the Month.

MARKED VERSION

GENERAL TERMS AND CONDITIONS
(Continued)

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(C) Fuel Reimbursement Adjustment Period

The Fuel Reimbursement Adjustment Period shall be the billing periods beginning with each Effective Date of Adjustment.

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- (D) A change in Fuel Reimbursement for each billing Month shall be the difference between (1) the applicable currently effective Fuel Reimbursement percentage for the billing Month multiplied by the Quantity of Gas received during the

billing Month and (2) the actual Quantity of Gas expended for fuel usage, including miscellaneous fuel usage, and lost or unaccounted for Gas during the billing Month as well as the equivalent Quantity of Gas representing the actual electric compression costs. The actual electric compression costs for the billing Month shall be divided by the average of the weekly Spot Index Prices, calculated in accordance with Section 5.2(F) of the General Terms and Conditions, for the billing Month to determine the equivalent Quantity of Gas representing the electric compression costs.

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