

November 5, 2018

Via eFiling

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re: Docket No. RP19-77-\_\_\_\_ Trunkline Gas Company, LLC Form No. 501-G, Revised Exhibit A

Dear Ms. Bose:

On October 11, 2018 in compliance with Order No. 849 (Final Rule) and Section 260.402 of the Commission's Regulations under the Natural Gas Act, Trunkline Gas Company, LLC (Trunkline) filed with the Commission its FERC Form No. 501-G, One-time Report on Rate Effect of the Tax Cuts and Jobs Act, established in Docket No. RM18-11-000, for the twelve months ending December 31, 2017.

In addition, Trunkline submitted an Addendum to its Form No. 501-G, which reflected certain adjustments that Trunkline believed were necessary to properly reflect its situation. However, the regulatory liability reflecting the excess accumulated deferred income taxes shown on page 2, line 17, Other Regulatory Liabilities, was inadvertently omitted. The revised Exhibit A submitted herewith corrects that omission.

Also, Trunkline would note that it is a Delaware limited liability company, while its parent, Panhandle Eastern Pipe Line Company, LP (Panhandle) is a limited partnership. Both Trunkline and Panhandle are treated as a disregarded entity for federal and certain state income tax purposes. Accordingly, Trunkline and Panhandle are not treated as separate taxpayers; instead, their income is directly taxable to Panhandle's parent, SUG Holding Company, a Delaware corporation. Under the Tax Sharing Agreement between SUG Holding Company and Panhandle, Panhandle pays its share of taxes, including Trunkline's share, based on taxable income, which generally equals the liability that Panhandle and Trunkline would have incurred as separate taxpayers.

Paragraph 3 of the Final Rule clarified "that a natural gas company organized as a pass-through entity all of whose income or losses are consolidated on the federal income tax return of its corporate parent is considered to be the subject to the federal corporate income tax, and is thus eligible for a tax allowance."

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission November 5, 2018 Page 2

As stated in Trunkline's October 11, 2018 filing, this submission is being made solely to comply with the Final Rule. Nothing in this filing should be construed as being supported or proposed by Trunkline as the appropriate amount or level of costs, or the methodology for functionalizing, classifying, or allocating costs, or designing or establishing rates. This filing is without prejudice to any filings made on behalf of Trunkline in this proceeding or Docket No. RM18-11-000, as well as any petitions for rehearing, stay, or judicial review of any orders that may be issued in the referenced proceeding or this proceeding.

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 all parties on the service list in this proceeding. Trunkline has posted this filing on its Internet website accessible via <a href="http://tgcmessenger.energytransfer.com">http://tgcmessenger.energytransfer.com</a> under Informational Postings, Regulatory.

Trunkline respectfully requests that, should the Commission determine that any such waivers are required, the Commission grant such waivers as are necessary in order that this filing may be deemed to satisfy the Commission's regulations and requirements.

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

By /s/ Thomas E. Long
Thomas E. Long
Chief Financial Officer

Enclosures

Date Prepared: November 1, 2018

## Exhibit A - FERC Form No. 501-G One-time Report on Rate Effect of the Tax Cuts and Jobs Act

## **Cost of Service**

2	Pipeline Company Name	mpany Trunkline Gas Company, LLC						
		(A)		(B)	(C)	(D)	(E)	
Line No.		Description		Form 2 Reference	Calendar Year 2017 Actuals	Net Amort. of Excess/ Deficient ADIT	With Adjusted Allowance	
3	CID	C000251						
4	Is the Pipeli	ne a separate income taxpa	ying entity?		Yes			
	•	uct business, realize net inc		come taxes and distribut		?		
	Cost of Serv	ice - Non Fuel						
	Operating, I	Maintenance and Administr	ative & General			•		
5	Total Prod	uction & Gathering		P. 317; L. 30, C. (b)	\$ -		\$	-
6	Total Prod	ucts Extraction		P. 318; L. 58, C. (b)	-			-
7		ral Gas Storage		P. 322; L. 177, C. (b)	,, -		•	50,284
8		Compressor Station Fuel &		P. 320; L. 106, C. (b)			6	67,728
9	(Less) Ot	her Compressor Station Fuel		. 321; LL. 131 & 132, C. (b)	-			-
10	(Less) LN	G Compressor Station Fuel 8	k Power F	. 322; LL. 157 & 158, C. (b)	-			-
11	Net Sto	rage Costs		L. 7 minus LL. 8-10	1,182,556	•	1,18	82,556
12	Total Trans	smission		P. 323; L. 201, C. (b)	/ /		38,13	11,026
13		s for Compressor Station Fu		P. 323; L. 184, C. (b)	,,		4,37	79,500
14		her Fuel & Power for Compr in true-up or tracking mecha		P. 323; L. 185, C. (b)	-			
15	Net Tra	nsmission Costs		L. 12 minus LL. 13-14	33,731,526		33,73	31,526
16	Administra	itive & General		P. 325; L. 270, C. (b)	13,909,049		13,90	09,049
17	Total Oper	ating, Maintenance and Adr	nin. & Gen.	Sum of LL. 4, 5, 10, 14, 15	\$ 48,823,131	•	\$ 48,82	23,131
18	Depreciatio	n, Depletion, and Amortizat		orm 2 - P. 337; L. 12, C. (h) n 2A - P. 114; LL. 6-8, C. (c)	24,835,475		24,83	35,475
19	Amort. of	Plant Acq. Adj.		Form 501-G then 0, else P. 114; L. 9, C. (c)	-			-
	Credits to Co	ost of Service						
20	Regulatory [	Debits (if incl. in a § 4 rate fil	ng)	P. 114; L. 12, C. (c)	-			-
21	(Less) Regu	ulatory Credits (if incl. in a §	4 rate filing)	P. 114; L. 13, C. (c)	-			-
22	Other Taxes			P. 114; L. 14, C. (c)	9,409,963		9,40	09,963
	Return							
23	Long Term	Debt		P. 2; L. 27 of Form 501-G	16,343,161		16,42	23,694
24	Preferred :	Stock (or equivalent)		P. 2; L. 28 of Form 501-G	-			-
25	Common E	quity		P. 2; L. 29 of Form 501-G	32,263,758		32,42	22,742
26	Total Ret	urn			48,606,919		48,84	46,436
	Allowance f	or Income Taxes						
27	Federal Inc	come Tax Rate		P. 5; L. 3 of Form 501-G	35.00%		:	21.00%
28	Weighted	Average State Income Tax Ra	ate	P. 5; L. 4 of Form 501-G	<u>5.92%</u>			5.92%
29	Composi	te Income Tax Rate		P. 5; LL. 3-6 of Form 501-G	<u>38.67%</u>		<u> </u>	<u>25.55%</u>
30		x Allowance on Equity Retur		24+L. 25)*(L. 29/(1-L. 29))]	20,346,019			27,287
31	(Less) Net	Amort. of Excess(+) and/or [	Deficient(-) ADIT	(Year 1 amortization)		2,660,728	2,66	60,728
32	Total Incor	ne Tax Allowance		L. 30 minus L. 31	20,346,019		8,46	66,559
33	Total Cost o	f Service - Non Fuel	Sum of LL.	17-20, 22, 26, 32 less L. 21	\$ 152,021,507		\$ 140,38	81,565
34	Indicated Co	ost of Service Reduction	1 minus [L. 33, C.	(E) divided by L. 33, C. (C)]				7.7%

(D)

(E)

## Exhibit A - FERC Form No. 501-G One-time Report on Rate Effect of the Tax Cuts and Jobs Act

### **Rate Base**

## Trunkline Gas Company, LLC

(A)

	• •	, ,	• •	• •	• •
ne No.	Description	Form 2 Reference	Calendar Year 2017 Actuals	Excess/ Deficient ADIT Adjustment	With Adjusted Tax Allowance
	Rate Base				
1	Gas Plant in Service	P. 110; L. 2, C. (c)	\$ 1,442,474,224		\$ 1,442,474,224
2	Accumulated Depreciation	P. 110; L. 5, C. (c)	753,496,793		753,496,793
3	Acquisition Adjustment	P. 200; L. 12, C. (b)	-		-
4	(Less) Amort. of Plant Acquisition Adjustment	P. 200; L. 32, C. (b)			
5	No Has the pipeline received permission	to include Acq. Adjustment(s) in	Rate Base? If no, provide	amounts as a reduction	to Rate Base.
6	FERC Order Cite				
7	Net Acquisition Adjustment If L. 5	is yes, then zero; else L. 3 minus L. 4			
8	Net Plant	L. 1 minus L. 2 minus L. 7	688,977,431		688,977,431
	Gas Stored Underground			_	
9	Base Gas - Account No. 117.1	P. 220; L. 5, C. (b)	42,131,376		42,131,376
10	System Balancing - Account No. 117.2	P. 220; L. 5, C. (c)	8,446,839		8,446,839
	Working Capital				
11	Prepayments	P. 111; L. 54, C. (c)	359,652		359,652
12	Materials and Supplies	P. 111; L. 45, C. (c)	8,544,998		8,544,998
	ADIT and Regulatory Assets and Liabilities				
13	Accumulated Deferred Income Taxes (IT)	P. 235; L. 3, C. (k)(see footnote)	-		-
14	(Less) Accum. Deferred IT - Other Property	P. 275; L. 3, C. (k)(see footnote)	131,053,079		131,053,079
15	(Less) Accum. Deferred IT - Other	P. 277; L. 3, C. (k)(see footnote)	2,946,521		2,946,521
16	Other Regulatory Assets	P. 232; L. 40, C. (g)	-	-	-
17	(Less) Other Regulatory Liabilities	P. 278; L. 45, C. (g)	74,500,374	-	71,839,646
18	Rate Base Sum of LL. 8 - 13 n	ninus LL. 14-15 plus L. 16 minus L. 17	\$ 539,960,322		\$ 542,621,050

The Commission will apply Opinion No. 414, et al. in reviewing data submitted on page 4. Opinion No. 414, et al. requires that the pipeline's, or the parent's debt if using the parent's capital, must be issued in its name, be publicly traded, and be rated by a rating agency. The pipeline or parent must have a proper capital structure, which for purposes of FERC Form No. 501-G must have a equity ratio less than 65%.

Opinion No. 414, 80 FERC  $\P$  61,157 (1997); reh'g denied, Opinion No. 414-A, 84 FERC  $\P$  61,084 (1998).

Employing the data provided on Page 4 for capital structure and the component costs of Long Term Debt and Preferred Stock, the Pipeline's cost of capital for purposes of FERC From No. 501-G will be based upon Case 2 - amounts obtained from Page 218a of the FERC Form No. 2.

	Summary of Page 4 Capital Structure and Capital	Case 1	Case 2	Case 3	Case 4	
	Component Costs	Balance Sheet &	Dago 210a	Parent's	Hypothotical	
		Income Statement	Page 218a	SEC Form 10K	Hypothetical	
19	1) Is the debt issued in the entity's name and traded?	No	Yes	No		
20	2) Is the debt rated by a rating agency?	Yes	Yes	No		
21	3) Is the equity ratio less than 65%?	No	Yes	No		
22	Each of the three above questions must be answered yes as the basis for using the capital structure and individual capital component cost .	Not using Case 1 per Opinion No. 414 et al	All are 'Yes', using Case 2	Using Case 2	Using Case 2	
	Return based upon values from Page 218a of Pipeline's Fo	orm 2.	Capitalization Ratio	Component Cost	Wtd. Cost of Capital	
23	Return based upon values from Page 218a of Pipeline's Fo Long Term Debt	P. 4 of Form 501-G	Capitalization Ratio 43.36%		Wtd. Cost of Capital 3.03%	
23 24				6.98%		
	Long Term Debt	P. 4 of Form 501-G	43.36%	6.98% 0.00%	3.03%	
24	Long Term Debt Preferred Stock (or equivalent)	P. 4 of Form 501-G P. 4 of Form 501-G	43.36% 0.00%	6.98% 0.00% <u>10.55%</u>	3.03% 0.00%	
24 25	Long Term Debt Preferred Stock (or equivalent) Common Equity	P. 4 of Form 501-G P. 4 of Form 501-G P. 4 of Form 501-G	43.36% 0.00% <u>56.64%</u> 100.00%	6.98% 0.00% <u>10.55%</u>	3.03% 0.00% <u>5.98%</u>	
24 25 26	Long Term Debt Preferred Stock (or equivalent) Common Equity Total Return	P. 4 of Form 501-G P. 4 of Form 501-G P. 4 of Form 501-G Sum of LL. 23 - 25	43.36% 0.00% <u>56.64%</u> 100.00%	6.98% 0.00% <u>10.55%</u>	3.03% 0.00% <u>5.98%</u> <u>9.00%</u>	
24 25 26 27	Long Term Debt Preferred Stock (or equivalent) Common Equity Total Return Return - Long Term Debt	P. 4 of Form 501-G P. 4 of Form 501-G P. 4 of Form 501-G Sum of LL. 23 - 25 L. 18 times L. 23, C. (E)	43.36% 0.00% <u>56.64%</u> 100.00% \$ 16,343,161	6.98% 0.00% <u>10.55%</u>	3.03% 0.00% <u>5.98%</u> <u>9.00%</u>	

OMB No. 1902-0302 (Expires mm/dd/yyyy)

Date Prepared: November 1, 2018

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## Exhibit A - FERC Form No. 501-G One-time Report on Rate Effect of the Tax Cuts and Jobs Act

## **Return on Equity**

## **Pre Tax Cut and Pro Forma Post Tax Cut**

## **Trunkline Gas Company, LLC**

	(A)	(B)		(C)		(D)		(E)
Line No.	Description	Form 2 Reference	Cale	ndar Year 2017 Actuals	٧	Vith Adjusted Tax Allowance	ı	Rate Moratorium Option 12% ROE Test
	Operating Revenue							icated Cost of Service Reduction of 7.7%
1	Total Operating Revenues	P. 301; L. 21, C. (h)	\$	140,272,154	\$	140,272,154		
2	(Less) Sales for Resale (Acct. Nos. 480-484)	P. 301; L. 4, C. (h)		-		-		
3	(Less) Commercial & Industrial Sales	P. 301; L. 2, C. (h)		-		-		
4	(Less) Gas Sales & Other Adj. from Acct. No. 495	P. 308; L. 10, C. (b)		-		-		
5	(Less) Fuel Related Revenues Incl. in Total Revenues	per Pipeline		-		-		
6	Total Adjusted Revenue	L. 1 minus sum of LL. 2-5	\$	140,272,154	\$	140,272,154	\$	129,531,833
7 8	Yes Enter 'Yes' or 'No' - Does the Pipeline track or Yes Enter 'Yes' or 'No' - Does the Pipeline have sto  Calculation of Return On Equity - Pre Tax Cut and Pro For	ated fuel rates?						
	Calculation of Return On Equity - Pre Tax Cut and Pro For	ilia Post Tax Cut						
9	Total Operating, Maintenance and Admin. & Gen.	P. 1; L. 17 of 501-G	\$	48,823,131	\$	48,823,131	\$	48,823,131
10	Depreciation, Depletion, and Amortization	P. 1; L. 18 of 501-G		24,835,475		24,835,475		24,835,475
11	Amort. of Plant Acq. Adj.	P. 1; L. 19 of 501-G		-		-		-
12 13	Regulatory Debits (if incl. in a § 4 rate filing) (Less) Regulatory Credits (if incl. in a § 4 rate filing)	P. 1; L. 20 of 501-G P. 1; L. 21 of 501-G		-		-		-
14	Other Taxes	P. 1; L. 22 of 501-G		9,409,963		9,409,963		9,409,963
15	Non-Fuel Operating Cost Excl. Interest and Taxes	Sum of LL. 9-12 minus L.		83,068,569	-	83,068,569	_	83,068,569
13	Tion rue operating cost Exer. Interest and ruxes	13 plus L. 14		03,000,303		63,000,303		03,000,303
16	Operating Income	L. 6 minus L. 15	\$	57,203,585	\$	57,203,585	\$	46,463,264
17	Interest Expense	P. 1; L. 23, C. (C) of 501-G		16,343,161		16,423,694	_	16,423,694
18	Income Before Income Taxes	L. 16 minus L. 17	\$	40,860,424	\$	40,779,891	\$	30,039,570
	Allowance for Income Taxes							
19	Composite Income Tax Rate	P. 1; L. 29 of 501-G		38.67%		25.55%		25.55%
20	Income Taxes	L. 18 times L. 19	Ş	15,802,138	\$	10,419,501 2,660,728	\$	7,675,286
21 22	(Less) Net Amort. of Excess(+) and/or Deficient(-) ADIT Total Income Tax Allowance	P. 1; L. 31 of 501-G L. 20 minus L. 21		15,802,138		7,758,773	_	2,660,728
22	Total Income Tax Allowance	L. 20 IIIIIus L. 21		15,802,138		7,758,773		5,014,558
23	Net Income	L. 18 minus L. 22	\$	25,058,286	\$	33,021,118	\$	25,025,012
24	(Less) Preferred Dividends	P. 1; L. 24, C. (C) of 501-G			_			<u> </u>
25	Rate Base	P. 2; L. 18 of 501-G	\$	539,960,322	\$	542,621,050	\$	542,621,050
26	Total Estimated ROE (excluding fuel)	[L. 23 - L. 24] / [L. 25 * P. 2; L. 25 C. (C) of 501-G]		8.2%		10.7%		8.1%

OMB No. 1902-0302 (Expires mm/dd/yyyy)

Date Prepared: November 1, 2018

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# Exhibit A - FERC Form No. 501-G One-time Report on Rate Effect of the Tax Cuts and Jobs Act

## **Capital Structure and Component Costs**

Trunkline Gas Company, LLC

	(A)	(B)	(C)	(D)	(E)	(F)
Line No.	Description	Form 2 Reference	Capitalization	Capitalization Ratio	Capital Component Cost Rate	Weighted Cost of Capital

The Commission will use your responses on the following four cases to evaluate your capital structure and capital component costs for Form No. 501-G: Case 1, balance sheet and income statement; Case 2, Page 218a of Form No. 2; Case 3, the parent's financial statements as filed in its SEC Form 10-K; or Case 4, a hypothetical capital structure and capital component costs.

Cost of Dobt on LD	formed Check				
Cost of Debt and Pref		ć 42.C20			
Interest	P. 116; LL. 62-68, C. (c)		= 0		
Long-Term Debt	P. 112; L. 24, C. (c)	\$ -			
Preferred Dividends	P. 120a; L. 68, C. (b)	\$ -	= 0		
Preferred Stock (or equivalent)	P. 112; L. 3, C. (c)				
Common Equity	P. 112; L. 15, C. (c)	\$ 606,340,910			
Cost of Capital					
Long-Term Debt	L. 3	\$ -	0.00%	0.00%	0.0
Preferred Stock (or equivalent)	L. 5	-	0.00%	0.00%	0.0
Common Equity	L. 6 minus L. 5	\$ 606,340,910	100.00%	10.55%	10.5
Totals		\$ 606,340,910	<u>100.00%</u>		10.5
No Enter 'Yes' or 'No' - Is	all of the debt listed on	L. 3 above issued in the p	pipeline's name and publicl	y traded?	
Yes Enter 'Yes' or 'No' - Is	all the debt listed on L.	3 above rated by a rating	agency?		
Case 2. Cost of Capital based upon	n amounts obtained fro	om Page 218a of the FERO	Form No. 2.		
	P. 218a	Column (b)	Column (c)	Column (d)	
Lang Tarm Dobt	L. 3		43.36%	6.98%	3.0
Long-Term Debt	L. 3	\$ 1,085,494,211 \$ -			
Preferred Stock (or equivalent)			0.00%	0.00%	0.0
Common Equity	L. 5		<u>56.64%</u>	10.55%	5.9
Totals		\$ 2,503,275,885	<u>100.00%</u>		<u>9.0</u>
		d records of Trunkline Ga	s Company, LLC?		
			f +b - D 210		
			ce of the Page 218a amour	nts.	
Ticker	Company Name	Panhandle Eastern Pipe	Line Company, LP		publicly traded?
Ticker Yes Enter 'Yes' or 'No' - Is	Company Name all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the	Line Company, LP pipeline's name, or, that o	nts. of the entity on L. 21? and p	oublicly traded?
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is	Company Name all of the debt listed on all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra	Line Company, LP pipeline's name, or, that o ting agency?	of the entity on L. 21? and p	oublicly traded?
Ticker Yes Enter 'Yes' or 'No' - Is	Company Name all of the debt listed on all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra	Line Company, LP pipeline's name, or, that o ting agency?	of the entity on L. 21? and p	publicly traded?
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is	Company Name all of the debt listed on all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra	Line Company, LP pipeline's name, or, that o ting agency?	of the entity on L. 21? and p	·
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra ture and costs for Long T	Line Company, LP pipeline's name, or, that o ting agency?  erm Debt and Preferred S	of the entity on L. 21? and p	0.0
Ticker Yes Enter 'Yes' or 'No' - Is Yes Enter 'Yes' or 'No' - Is Case 3. Cost of Capital based upor Long-Term Debt	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T	Line Company, LP pipeline's name, or, that o ting agency?  Ferm Debt and Preferred S  0.00%	of the entity on L. 21? and ptock.	0.0 0.0
Ticker Yes Enter 'Yes' or 'No' - Is Yes Enter 'Yes' or 'No' - Is Case 3. Cost of Capital based upon Long-Term Debt Preferred Stock (or equivalent)	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T	Line Company, LP pipeline's name, or, that o ting agency?  erm Debt and Preferred S  0.00% 0.00%	tock.  0.00% 0.00%	0.0 0.0 <u>0.</u> 0
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt  Preferred Stock (or equivalent)  Common Equity	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ \$ - \$	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% 0.00%	of the entity on L. 21? and particle.  0.00% 0.00% 10.55%	0.0 0.0 <u>0.</u> 0
Ticker Yes Enter 'Yes' or 'No' - Is Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ \$ - \$	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% 0.00%	of the entity on L. 21? and particle.  0.00% 0.00% 10.55%	0.0 0.0 <u>0.</u> 0
Ticker Yes Enter 'Yes' or 'No' - Is Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the name	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ \$ - \$	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% 0.00%	of the entity on L. 21? and particle.  0.00% 0.00% 10.55%	0.0 0.0 <u>0.</u> 0
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the naticker(s)  Year	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K ame of the parent comp Company Name(s) 10K Hyperlink(s)	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ \$ - \$	Line Company, LP pipeline's name, or, that o ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% parent's SEC Form 10-K, a	of the entity on L. 21? and particle.  0.00% 0.00% 10.55%	0.0 0.0 <u>0.0</u>
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the naticker(s)  Year No Enter 'Yes' or 'No' - Is	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K ame of the parent comp Company Name(s) 10K Hyperlink(s) all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% parent's SEC Form 10-K, a	of the entity on L. 21? and particle.  0.00% 0.00% 10.55%	0.0 0.0 <u>0.0</u>
Ticker  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upo  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the naticker(s)  Year  No Enter 'Yes' or 'No' - Is  Enter 'Yes' or 'No' - Is	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K Company Name(s) 10K Hyperlink(s) all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ s	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% parent's SEC Form 10-K, a	of the entity on L. 21? and particle.  0.00% 0.00% 10.55%	0.0 0.0 <u>0.0</u>
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the naticker(s) Year No Enter 'Yes' or 'No' - Is No Enter 'Yes' or 'No' - Is Case 4. Cost of Capital based upon	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K Company Name(s) 10K Hyperlink(s) all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ s	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% parent's SEC Form 10-K, a	tock.  0.00% 0.00% 10.55%  nd the associated year:	0.0 0.0 <u>0.0</u>
Ticker  Yes Enter 'Yes' or 'No' - Is  Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the naticker(s) Year No Enter 'Yes' or 'No' - Is No Enter 'Yes' or 'No' - Is Case 4. Cost of Capital based upon  Long-Term Debt	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K Company Name(s) 10K Hyperlink(s) all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ s	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% parent's SEC Form 10-K, a  ed? ting agency?  of new Corporate Debt.  43.00%	tock.  0.00% 0.00% 10.55%  nd the associated year:  5.00%	0.0 0.0 0.0 0.0
Ticker Yes Enter 'Yes' or 'No' - Is Yes Enter 'Yes' or 'No' - Is  Case 3. Cost of Capital based upon  Long-Term Debt Preferred Stock (or equivalent) Common Equity Totals Provide the stock symbol(s), the naticker(s) Year No Enter 'Yes' or 'No' - Is No Enter 'Yes' or 'No' - Is Case 4. Cost of Capital based upon	Company Name all of the debt listed on all of the debt listed on n Parent's Capital Struc SEC - 10K SEC - 10K SEC - 10K Company Name(s) 10K Hyperlink(s) all of the debt listed on	Panhandle Eastern Pipe L. 15 above issued in the L. 15 above rated by a ra  ture and costs for Long T  \$ s	Line Company, LP pipeline's name, or, that of ting agency?  erm Debt and Preferred S  0.00% 0.00% 0.00% 0.00% parent's SEC Form 10-K, a	tock.  0.00% 0.00% 10.55%  nd the associated year:	0.0 0.0 0.0 0.0 0.0 0.0 0.0

Page 5

## Exhibit A - FERC Form No. 501-G One-time Report on Rate Effect of the Tax Cuts and Jobs Act

## **Current Composite Income Tax Rate**

**Trunkline Gas Company, LLC** 

	(A)	(B)	(C)	(D)	(E)
Line No.	Description	Form 2 Reference	Weighting	Marginal Tax Rates	Weighted Average Tax Rates
1 2	Based on the response to Line 4 on Page 1 of Fo	· · · · · · · · · · · · · · · · · · ·	pany, LLC		
2	is a C Corp subject to the 35% tax rate for 2017.	Please fill out lines 6 and 9.			
3	Federal Income Tax Rate (FIT) - Calendar Year 20	17:			35.00%
4	State Income Tax Rate (SIT) - Calendar Year 2017	<b>'</b> :			<u>5.92%</u>
5	Composite Tax Rate - Calendar Year 2017:				<u>38.68%</u>
6	Provide the percentage of federal income tax de	eductible for state income taxes.	= (p)		13.49%
7	Composite Tax Rate equals				
8	[FIT Rate * (1 -SIT Rate) / (1 - SIT Rate * FIT Rate * p	)] + [SIT Rate * (1 -FIT Rate * p) / (1	- SIT Rate * FIT Rat	e * p)	
	Tax Rates for C Corps.				
9	Provide the sum of weighted state tax rate(s)	sum of all rows from P. 263b:,	C. (q)		5.92%
	Tax Rates for Pass Through Entities */ Federal Income Tax Rates				
10	Subchapter C	per Pipeline's parents' owners	0.0%	0.0%	0.00%
11	Individuals	per Pipeline's parents' owners	0.0%	0.0%	0.00%
12	Mutual Funds	per Pipeline's parents' owners	0.0%	0.0%	0.00%
13	Pensions, IRAs, Keogh Plans	per Pipeline's parents' owners	0.0%	0.0%	0.00%
14	UBTI Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
15	Non-Taxpaying Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
16	Weighted Average Rate		<u>0.00%</u>		0.00%
	State and Local Income Tax Rates				
17	Subchapter C	per Pipeline's parents' owners	0.0%	0.0%	0.00%
18	Individuals	per Pipeline's parents' owners	0.0%	0.0%	0.00%
19	Mutual Funds	per Pipeline's parents' owners	0.0%	0.0%	0.00%
20	Pensions, IRAs, Keogh Plans	per Pipeline's parents' owners	0.0%	0.0%	0.00%
21	UBTI Entities	per Pipeline's parents' owners	0.0%	0.0%	0.00%
22	Non-Taxpaying Entities	per Pipeline's parents' owners	0.0%	0.0%	<u>0.00%</u>
23	Weighted Average Rate	_	<u>0.00%</u>		0.00%
24	Provide the date when the marginal tax rates v	vere determined.		mm/dd/yyyy	

<sup>\*/</sup> Income tax rates and weighting must be consistent with the Commission's Policy Statement on Income Tax Allowances, 111 FERC ¶ 61,139 (2005), and the Commission's Order on Initial Decision and on Certain Remanded Cost Issues, 113 FERC ¶ 61,277 (2005).

### Trunkline Gas Company, LLC

#### FERC Form No. 501-G Rate Base Page 2 Line 16 Column ( E)

### Other Regulatory Assets (Account 182.3) - Adjustments

	Description and Purpose of Other Regulatory Assets	FERC Form No. 501-G Balance at December 31, 2017	Less: Adjustments - See Addendum to Exhibit A (1)	Exhibit A Balance at December 31, 2017
		Column E	, ,	Column E
(1)	AFUDC Equity Gross Up Deferred Cashout Asset Retirement Obligation - Unfiled	\$ 12,576,343 3,443,173 803,380	\$ 12,576,343 3,443,173 803,380	\$ - - -
	Total	\$ 16,822,896	\$ 16,822,896	-

#### Notes:

(1) Recoveries of these items are outside of Rate Base in a section 4 rate case filing.

### Exhibit A

## Trunkline Gas Company, LLC

#### FERC Form No. 501-G Rate Base Page 2 Line 17 Column ( E)

## Other Regulatory Liabilities (Account 254) - Adjustments

	Description and Purpose of Other Regulatory Liabilities	FERC Form No. 501-G Balance at December 31, 2017	Less: Adjustments - See Addendum	Exhibit A Balance at December 31, 2017
		Column E	to Exhibit A (1)	Column E
(1) (1)	Other Postretirement Employee Benefits Fuel Tracker Federal Tax Rate Change	\$ 30,519,591 1,464,329 71,839,646	1,464,329	\$ - - 71,839,646
	Total	\$ 103,823,566	\$ 31,983,920	\$ 71,839,646

#### Notes:

(1) Recoveries of these items are outside of Rate Base in a section 4 rate case filing.