



March 27, 2019

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

RE: TRANSWESTERN PIPELINE COMPANY, LLC
Docket No. RP19-_____
Negotiated Rate Agreement

Dear Ms. Bose:

Transwestern Pipeline Company, LLC (Transwestern) hereby electronically submits for filing with the Federal Energy Regulatory Commission (Commission) the following revised tariff record to its FERC NGA Gas Tariff, Fifth Revised Volume No. 1, (Tariff) proposed to be effective April 1, 2019:

| <u>Version</u> | <u>Description</u> | <u>Title</u> |
|----------------|---------------------|---------------------------|
| 6.0.0 | 9. Negotiated Rates | Currently Effective Rates |

STATEMENT OF NATURE, REASONS AND BASIS

The purpose of this filing is to submit to the Commission a summary of the negotiated rate agreement with BP Energy Company. This tariff record is being submitted in compliance with Section 3.5 of Rate Schedule FTS-1 of the Tariff and the Commission’s modified policy on negotiated rates as described below.

The Commission’s current policy, among other things, permits pipelines to file notice of negotiated rate agreements that conform in all material respects with the *pro forma* service agreement contained in the pipeline’s tariff by submitting a tariff record summarizing the negotiated rate. The proposed tariff record provides the requisite information concerning the agreement, including the name of the shipper, the negotiated rate, the type of service, the receipt and delivery points applicable to the service and the volume of gas to be transported. In addition, Transwestern shows the applicability of the negotiated rates to alternate receipt and delivery points for each negotiated rate agreement. The Currently Effective Rates for Negotiated Rates tariff record contains a statement certifying that the agreement contains no deviation from the form of service agreement in Transwestern’s tariff that goes beyond filling in the blank spaces or that affects the substantive rights of the parties in any way. Therefore, no redlined service agreement is included with this filing.

IMPLEMENTATION AND WAIVER REQUEST

Pursuant to Section 154.7(a)(9) of the Commission’s Regulations, Transwestern requests that the tariff record submitted herewith become effective April 1, 2019. Transwestern respectfully requests that the Commission grant waiver of Section 154.207 of the Commission’s Regulations and any other waivers of its Regulations that it deems necessary to allow the proposed tariff record in this filing to become effective on April 1, 2019, the effective date of the negotiated rate agreement.

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 record 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 record in PDF format
- . 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

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

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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 Transwestern'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. Transwestern has posted this filing on its Internet website accessible via <http://twtransfer.energytransfer.com> under Informational Postings, Regulatory.

¹ Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. Transwestern respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow Transwestern 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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Pursuant to Section 385.2005(a) of the Commission's Regulations, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of her knowledge and belief, and possesses full power and authority to sign such filing.

Respectfully submitted,

TRANSWESTERN PIPELINE COMPANY, LLC

/s/ Deborah A. Bradbury

Deborah A. Bradbury
Sr. Director – Regulatory Tariffs & Reporting

STATEMENT OF NEGOTIATED RATES (1)

| Shipper Name | Rate Schedule | Negotiated Rate (2) | Receipt Point(s) | Delivery Point(s) | Term | Volume MMBtu/d |
|---------------------------------------------------|---------------|---------------------|------------------|-------------------|------|----------------|
| Talen Energy Marketing, LLC Contract 100052 | FTS-1 | (3) | (4) | (5) | (3) | 20,000 |
| Enterprise Field Services, LLC Contract 104195 | FTS-1 | (6) | (7) | (7) | (6) | 50,000 |
| BP Energy Company Contract 104828 | FTS-1 | (8) | (9) | (10) | (11) | 40,000 |

(1) These negotiated rate agreements do not deviate in any material respect from the applicable form of service agreement set forth in Transwestern's Tariff.

(2) The rates stated are inclusive of surcharges unless otherwise stated in this Negotiated Rate Tariff section.

(3) The combined reservation and usage rate is \$0.38/MMBtu/day. The rate includes all applicable surcharges. Transwestern shall allocate the Rate between reservation and usage components inclusive of surcharges.

The term is from June 15, 2002 through July 14, 2032.

(4) Primary Point(s) of Receipt Point Name
 58646 West Texas Pool
 The negotiated rate applies to all alternate receipt points.

(5) Primary Point(s) of Delivery Point Name
 10487 SoCal Needles
 78069 Citizens Griffith Energy Del
 The negotiated rate applies to all alternate delivery points.

(6) The Fixed Negotiated Reservation Rate is \$0.43/Dth per day times the MAXDTQ for the term of the agreement. The negotiated rate is only applicable to the Primary Points.

The term of the agreement commences on March 1, 2016 and continues for a Primary Term of five years.

In addition to the Fixed Reservation Charge, Shipper shall pay the applicable commodity rate, charges, surcharges, fuel and penalties set forth in Transporter's Tariff including fuel charges, overrun charges, reservation surcharges, usage charges and surcharges, and ACA surcharges.

(7) Primary Point(s) of Receipt Point Name
 79075 Enterprise South Eddy

 Primary Point(s) of Delivery Point Name
 78409 West Texas Area Boundary

(8) The Fixed Negotiated Base Reservation Rate is \$0.4400/Dth of MAXDTQ.

(9) Primary Receipt Points
 58646 West Texas Pool (4-1-19 through 10-31-19)
 78093 Enterprise Eddy (11-1-19 through 3-31-20)
 10594 Southern Star-Canadian River (11-1-19 through 3-31-20)
 The negotiated rate applies to alternate receipt points in all zones except West of Thoreau.

(10) Primary Delivery Point
 56698 PG&E Topock
 The negotiated rate applies to all alternate delivery points.

(11) From 04/01/2019 through 03/31/2020

MARKED VERSION

STATEMENT OF NEGOTIATED RATES (1)

| Shipper Name | Rate Schedule | Negotiated Rate (2) | Receipt Point(s) | Delivery Point(s) | Term | Volume MMBtu/d |
|---------------------------------------------------|------------------|---------------------|------------------|-------------------|-----------------|-------------------|
| Talen Energy Marketing, LLC Contract 100052 | FTS-1 | (3) | (4) | (5) | (3) | 20,000 |
| Enterprise Field Services, LLC Contract 104195 | FTS-1 | (6) | (7) | (7) | (6) | 50,000 |
| BP Energy Company Contract 104827 | FTS-1 | (8) | (9) | (10) | (11) | 40,000 |
| BP Energy Company Contract 104828 | FTS-1 | (8) | (9) | (10) | (11) | 40,000 |

(1) These negotiated rate agreements do not deviate in any material respect from the applicable form of service agreement set forth in Transwestern's Tariff. ~~The negotiated rates shall apply at all of shippers' alternate receipt and delivery points unless otherwise noted herein.~~

(2) The rates stated are inclusive of surcharges unless otherwise stated in this Negotiated Rate Tariff section.

(3) The combined reservation and usage rate is \$0.38/MMBtu/day. The rate includes all applicable surcharges. Transwestern shall allocate the Rate between reservation and usage components inclusive of surcharges.

The term is from June 15, 2002 through July 14, 2032.

(4) Primary Point(s) of Receipt Point Name
 58646 West Texas Pool
~~The negotiated rate applies to all alternate receipt points.~~

(5) Primary Point(s) of Delivery Point Name
 10487 SoCal Needles
 78069 Citizens Griffith Energy Del
~~The negotiated rate applies to all alternate delivery points.~~

(6) The Fixed Negotiated Reservation Rate is \$0.43/Dth per day times the MAXDTQ for the term of the agreement. The negotiated rate is only applicable to the Primary Points.

The term of the agreement commences on March 1, 2016 and continues for a Primary Term of five years.

In addition to the Fixed Reservation Charge, Shipper shall pay the applicable commodity rate, charges, surcharges, fuel and penalties set forth in Transporter's Tariff including fuel charges, overrun charges, reservation surcharges, usage charges and surcharges, and ACA surcharges.

(7) Primary Point(s) of Receipt Point Name
 79075 Enterprise South Eddy
 Primary Point(s) of Delivery Point Name
 78409 West Texas Area Boundary

(8) The Fixed Negotiated Base Reservation Rate is \$0.4400/Dth of MAXDTQ. ~~In addition to the rates herein, Shipper shall pay Transporter the sum of \$108,000.~~

~~Unless otherwise expressly provided in this Service Agreement or agreed to in writing by Transporter, all applicable maximum rates, charges, surcharges, and penalties of any nature set forth in Transporter's Tariff, as may be revised from time to time, shall apply to service provided to Shipper under this Service Agreement, including without limitation all applicable: (i) Transport Fuel charges; (ii) authorized and unauthorized overrun charges; (iii) reservation surcharges; (iv) usage rates, charges and surcharges; and (v) ACA surcharges.~~

~~(9) NEGOTIATED PRIMARY RECEIPT POINTS: The Primary Receipt Points set forth on Appendix A to the Service Agreement (currently 56498, Bloomington, Illinois). Transporter is willing to extend the Fixed Negotiated Base Reservation Rate for all or a portion of the MAXDTQ by amending Appendix A~~

~~to include primary receipt points in the San Juan-Blanco area, San Juan-North of Blanco area, and East of Thoreau area existing at the date of this Service Agreement.~~

~~NEGOTIATED ALTERNATE RECEIPT POINTS: All receipt points in the San Juan Blanco area, San Juan North of Blanco area, Thoreau area and East of Thoreau area existing at the date of execution of this Service Agreement.~~Primary Receipt Points

~~58646 West Texas Pool (4-1-19 through 10-31-19)~~

~~78093 Enterprise Eddy (11-1-19 through 3-31-20)~~

~~10594 Southern Star-Canadian River (11-1-19 through 3-31-20)~~

~~The negotiated rate applies to alternate receipt points in all zones except West of Thoreau.~~

- ~~-(10) NEGOTIATED PRIMARY DELIVERY POINTS: The Primary Delivery Points set forth on Appendix A [currently 8042, PEPL Hansford Cactus] to the Service Agreement. Transporter is willing to extend the Fixed Negotiated Base Reservation Rate for all or a portion of the MAXDTQ by amending Appendix A to include primary delivery points in the West of Thoreau area and East of Thoreau area existing at the date of this Service Agreement.~~

~~NEGOTIATED ALTERNATE DELIVERY POINTS: All delivery points in the East of Thoreau area, San Juan Blanco area, San Juan North of Blanco area, Thoreau area and West of Thoreau (including the Phoenix Lateral) area existing at the date of execution of this Service Agreement.~~Primary Delivery Point

~~56698 PG&E Topock~~

~~The negotiated rate applies to all alternate delivery points.~~

- ~~-(11) From 12/11/2018 through 03/31/201904/01/2019 through 03/31/2020~~