

Exhibit No. 0001
Affidavit of Tina Smith

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

)

**AFFIDAVIT OF TINA SMITH
ON BEHALF OF
MUNICIPAL GAS AUTHORITY OF GEORGIA**

1. My name is Tina Smith. I am Chief Operating Officer for the Municipal Gas Authority of Georgia (MGAG or Gas Authority). In addition to my other duties, I am responsible for overseeing the acquisition of pipeline capacity to serve the natural gas requirements of the Gas Authority and its members.

2. The purpose of my affidavit is to provide an updated version of the 2022 affidavit sponsored in Docket No. RM22-17-000 by Michael J. Frey on the practice of junk and jewel capacity sales by natural gas pipelines and its effect on local distribution companies,¹ in conjunction with the Notice of Inquiry (NOI) of the Commission in this docket. As explained by Mr. Frey, that practice has had very serious, unfair impacts on local distribution companies (LDCs), such as the numerous member LDCs of MGAG, almost all of whom are small and municipally owned and operated. The pipeline-supplier of many of MGAG's members is Southern Natural Gas Company (SNG).

3. While I will provide information solicited by the NOI, my chief focus will be to demonstrate that the practice of junk and jewel continues to eliminate the only access of our

¹ The affidavit was included as Exhibit No. 1 in the June 2, 2022 "Petition For Rulemaking to Update Commission Regulations Regarding the Allocation of Interstate Natural Gas Pipeline Capacity" filed in Docket No. RM22-17-000.

LDC members to FERC-regulated capacity on SNG at rates determined to be just and reasonable to meet the firm requirements of its customers that have grown and will continue to grow.

Instead, the practice forces LDCs to rely on unregulated alternatives that are priced at a cost that has often substantially exceeded--often by several multiples—the cost of delivered gas that these LDCs would have incurred had the auction capacity been available. Indeed, there have been many times when the cost of alternative gas was so high, that firm commercial and industrial retail load chose to self-curtail.

4. As Mr. Frey correctly stated, MGAG LDCs periodically experienced firm retail load growth which, in turn, required additional interstate pipeline capacity. “Open Seasons,” i.e., a pipeline auctions of its excess capacity comprised one of only two ways that these customers could have obtained additional pipeline capacity to meet such increasing firm requirements. The other was through participating in capacity expansion projects, which occur much less frequently, and municipal LDC requests for capacity were not large enough to justify a pipeline expansion project. Moreover, pipeline expansion projects had become less and less frequent. As a result, pipeline auctions became a critical substitute for long-term capacity for MGAG LDCs to meet their growing firm retail needs.²

5. The situation has only grown worse since Mr. Frey’s affidavit as those firm requirements have continued to grow. Moreover, except for one minor example that allowed one MGAG LDC to obtain 500 dth/day of additional pipeline capacity, SNG pipeline auctions have not provided any additional capacity to meet the ever continuing load growth.

² I note that Mr. Frey did not discuss in his affidavit the possibility of obtaining a capacity release. I do not discuss this theoretical option, given the fact that capacity release has very rarely been available on SNG to those MGAG LDCs that needed supplemental capacity to meet growing loads.

6. Relevant in this regard is the question posed by the Commission in Question C.1 of the NOI, asking how short-term contracts would help meet long-term load growth. The actual short-term SNG auctions set forth in Mr. Frey's prior affidavit and also included here clearly answer that question. Each of the four auctions covered the full five months of the winter season. The capacity provided by these auctions could have helped to meet the peak requirements of LDCs in need of capacity. Such peak requirements occurred only in the winter. Accordingly, to the extent that the short-term capacity was available, it would have provided long term capacity requirements. These auctions are set forth in Attachment 1, pages 1 to 7. Also included in that attachment are four other examples of short-term SNG auctions for the same 5-month winter capacity since 2020 which also would have helped to meet the growing peak firm requirements because, it should be stressed again, occur only in the winter.

7. As Mr. Frey demonstrated, the junk and jewel practice denied the Gas Authority and its LDC members access to auctioned short-term capacity. By way of context, the junk and jewel practice occurs when the pipeline not only offers for bidding capacity along a defined path, but then invites bidders to enhance the value of their bids by including bids for additional capacity on other paths.

8. As Mr. Frey demonstrated, SNG adopted the junk and jewel approach for its auctioned capacity many years ago. Since then, that practice has consistently precluded MGAG from obtaining that capacity. One typical example is the July 15, 2019 Open Season in which SNG offered 5,000 Dth/day of capacity for seven months during the 2019-2020 winter along a defined primary path of its north mainline. See Attachment 1, pages 1-2. MGAG provided a full rate bid for 2,000 Dth/day of capacity. The capacity was awarded to another shipper that also bid on that capacity (the jewel) but also supplemented its bid by purchasing 6,000 Dth/day of

capacity on other paths that MGAG could not use (the junk). The Open Season specifically listed the supplemental capacity that was available to increase the net present value of the bid, with all receipt points for capacity into the south mainline.

9. Mr. Frey demonstrated many other instances of the junk and jewel practice in Southern Natural capacity auctions. To cite but a few examples:

- An July 15, 2019 Open Season offered 50,000 Dth/day of capacity for the 2019-2020 winter period for a defined path on SNG's south system. The capacity was awarded to a customer that supplemented its bid by offering to purchase **90,000 Dth/day** of capacity on other paths. See Attachment 1, pages 3-4.
- An earlier August 2, 2018 Open Season offered 40,000 Dth/day for the 2018-2019 winter period, and the capacity was awarded to a customer that supplemented its bid by offering to purchase **73,000 Dth/day** of capacity on other paths. See Attachment 1, pages 5-6.
- An August 13, 2021 Open Season offered 5,000 Dth/day for the October, 2021 – April 30, 2022 winter period for a defined path on SNG's north system. The capacity was awarded to a customer that supplemented its bid by offering to purchase **17,000 Dth/day** of capacity on other paths. See Attachment 1, page 7.

There are additional SNG open seasons that prompted junk and jewel capacity sales that were not included in Mr. Frey's earlier affidavit in this proceeding for capacity sales that occurred in the 2020 to 2023 period. Specifically:

- A July 21, 2020 Open Season offered 60,000 Dth/day from October to December 2020 and 50,000 Dth/day from January to April 2021 over the winter period for a defined path on SNG's south system. The capacity was awarded to two

customers that supplemented their bids by offering to purchase an average of **15,000 Dth/day** and **28,500 Dth/day** of capacity on other paths. See Attachment 1, page 8.

- A July 23, 2021 Open Season offered 37,500 Dth/day of capacity from October 2021 through April 2022 over the winter period for a defined path on SNG's south system. The capacity was awarded to three customers that supplemented their bids by offering to purchase **132,000 Dth/day** of additional capacity on other paths (including one customer that was awarded an exceedingly large 125,000 Dth/day parcel of junk capacity in order to obtain just 30,000 Dth/day of jewel capacity). See Attachment 1, page 9.
- A September 8, 2022 Open Season offered 50,000 Dth/day of capacity from October 2021 through April 2022 over the winter period on SNG's south system. The capacity was awarded to four customers that supplemented their bids by offering to purchase **410,248 Dth/day** of additional capacity on other paths (including one customer that was awarded **100,000 Dth/day** parcel of junk capacity in order to obtain 20,000 Dth/day of jewel capacity and another customer that was awarded **195,832 Dth/day** of junk capacity to receive just 21,300 Dth/day of jewel capacity). See Attachment 1, page 10-11.
- A September 12, 2022 Open Season offered 5,000 Dth/day of capacity from October 2022 through April 2023 over the winter period on SNG's north system. The capacity was awarded to one customer that supplemented its bid by offering to purchase an additional **23,500 Dth/day** of capacity on other paths. See Attachment 1, pages 12-13.

All of the foregoing would have been substitutes for long-term SNG expansion capacity to meet the growing requirements of MGAG's LDC members. Here, too, the successful bidders of the capacity purchased junk capacity, some of which were several multiples—*and more*—of the jewel capacity that was offered. While MGAG did not bid in the recent pipeline auctions, their results, as well as similar results in numerous other pipeline auctions sent a message that is starkly clear—to win, the bidder must bid on secondary capacity (the junk) to be able to purchase the primary capacity (the jewel).

10. In Question C.1 of the NOI, the Commission also asked for an explanation of alternative solutions employed to meet load growth and/or long-term supply needs. For the reasons set forth above, the short-term capacity is the only available access to price regulated capacity. The only alternatives are unregulated sources, such as a peaking service that provides delivered gas, that are wholly dependent on market conditions. These services are generally short term, are not guaranteed to be available, and their prices often sky rocket during periods of winter peak demand.

11. By way of examples, MGAG has entered into numerous alternative peaking services at the start of each of four recent winters for many of its LDCs. These services consisted of two varieties. The first is a service that required the LDCs to pay a low reservation charge but the gas price component was determined by the daily Transco Zone 5 South ("LRS"). This service is thus structured to provide a delivered price of gas that is higher than the cost that would have been incurred if the gas were sourced by Inside FERC Southern Natural Gas Daily index that would have been used by SNG auction capacity. Historically, the Transco Zone 5 index is higher than the SNG daily index. For example, over the same four recent winter seasons, the Transco Zone 5 South Daily Index for the top 10 priced days of each of those winter seasons

has averaged around 200% more than the SNG daily index price. On individual peak days during those winters, the Transco Zone 5 South Daily Index has been as high as 750% greater than the SNG daily index price and peaked at \$63/per dth. Incidentally, the highest daily peak price the last seven winter seasons was \$128/dth. The second alternative service is a fixed price must take gas contract for an agreed upon quantity (“Fixed Price”). These contracts also are structured to result in high delivered gas prices as they are based on the seller’s cost of using their storage and capacity assets along SNG’s system for delivery.

12. Examples abound where the structuring of these alternate services have resulted in high costs. Specifically, there have been numerous times when MGAG has been required to enter into fixed price contracts where the delivered price of gas has been at least \$10/dth and up to \$50/dth. Similarly, the price of LRS gas has reached several times as high at the above-noted price peak of \$63/dth. These are many multiples of the delivered cost of gas that would have been incurred had the MGAG LDCs used auctioned capacity. In addition, the LRS is a ratable service that must be dispatched on the business day ahead, and has in fact been called on for 4 days of a holiday weekend, which resulted in only one day of cold weather, requiring the LDC to absorb the cost of the gas contracted for but unused for the remaining three days. This situation—where the LDC has obligated itself for more days than necessary—has been a recurring situation.

13. As noted, there have been many instances where the price was so high that retail commercial and industrial customers chose to self-curtail. That is an obviously unfortunate, potentially disastrous situation for the customer. It is also a bad situation for the LDC, as it risks that the customer may choose to re-locate elsewhere, and clearly acts as a disincentive for the customer to expand or new customers to locate in the LDC service area.

14. One other important deleterious effect of including junk in capacity auctions is that it acts as a disincentive for the pipeline to build expansion capacity. Expansion capacity is an obvious source of additional revenues, but that incentive is reduced when the pipeline has another source of revenue by adding junk capacity to capacity auctions. As history underscores, for small LDCs, such as MGAG's members, this incentive has guaranteed that they will need to rely on short-term unregulated sources indefinitely.

15. The purchase of the junk capacity also acts as a shield against the risk in rate cases that the pipeline will be required to absorb the costs for uncontracted capacity. The inclusion in an auction of junk capacity converts this potential risk to a cost to shippers for capacity that they do not need. It is a perversion of the guiding principle that capacity should be sold to those that value it the most, as there is no value to such capacity. To state the obvious, inclusion of junk capacity results in shippers paying for capacity that they do not value.

16. I note that one argument that has been mentioned is that if the junk capacity were precluded as a consideration in auctions, then there might be times when all potential shippers bid the same price for the capacity which would result in allocation of the capacity on a pro rata basis. That result however is fair, as it will result in shippers that value the capacity the same—within the limit that rates for the capacity must be reasonable—to obtain the same amount of capacity. For the Gas Authority's municipal LDCs, it is far better to receive a share of available capacity than to be unfairly deprived of all of it.

17. In Question B-1 of the NOI, the Commission suggests that pipeline customers may benefit from junk capacity because such revenue will be a credit to determine rates in future rate cases. I do not believe that is true for a number of reasons. First, it assumes that there will be a rate case, when the history of the last several decades is that pipeline rarely file rate cases.

While there are Section 5 investigations, there are not many of those,³ and any relief from them is prospective only, a condition that either substantially delays relief or requires customers to take that delay into account in determining how much above a just and reasonable rate is acceptable. Third, when pipelines file rate cases, as a matter of practice, they radically reduce billing determinants and/or actual revenues received from short term services, as an issue to be resolved, most likely in settlement. A vivid case in point is the currently ongoing SNG rate case.

18. During the base period of its rate case in Docket No. RP24-744-000 (the year ending December 2023), SNG sold a substantial amount of short-term firm transportation service. Schedule G-1(1) filed on May 1, 2024 in Docket No. RP24-744-000 reports 2,109,652 Dth of short-term firm billing determinants and \$19,512,006 of short-term firm revenues during the base period. SNG largely eliminated its short-term firm service through test-period adjustments, reducing the billing determinants to 477,183 Dth and reducing the revenue to \$6,021,810, as reported in Schedule G-2(1). SNG credits short-term firm and certain other revenues to its cost of service, so the elimination of \$13,490,196 in short-term firm revenues directly increased SNG's overall cost of service by that amount, and its proposed rates increased accordingly. In this instance, SNG captured and retained the benefit of revenues from short-term firm service (including both the jewel and the junk sales). Based on its testimony and the reduction to its test-period billing determinants, it appears that SNG has included the jewel

³ To my knowledge, the Commission has not initiated a Section 5 investigation of an interstate pipeline's rates since 2022 and has only initiated nine rate investigations over the past eight years. More specifically, FERC initiated four Section 5 investigations in 2016 (Tuscarora Gas Transmission Co. Docket No. RP16-299-000; Empire Pipeline, Inc., Docket No. RP16-300-000; Iroquois Gas Transmission System, LP, Docket No. RP16-301-000; and Columbia Gulf Transmission, LLC, Docket No. RP16-302-000). Following passage of the Tax Cut and Jobs Act, which reduced the federal corporate income tax rate from 35% to 21%, FERC initiated three Section 5 rate investigations (Bear Creek Storage Co., Docket No. RP19-51-000; Panhandle Eastern Pipe Line Co., LP., Docket No. RP19-78-000; and Northern Natural Gas Co., Docket No. RP19-59-000). Since 2019, FERC has initiated only two Section 5 investigations (El Paso Natural Gas Co. Docket No. RP19-73-006, which stemmed from the requirement in an earlier settlement that the pipeline file a cost and rate study; and Guardian Pipeline, LLC, Docket No. RP22-725-000).

capacity in its test period at a reduced economic value, but has largely, if not completely, eliminated revenues associated with its sales of the junk capacity. As a result, there is basically no sharing of the benefits of the junk capacity sales.

STATE OF GEORGIA)

) ss:

COUNTY OF COBB)

I, Tina Smith, being duly sworn, certify that the foregoing Affidavit was prepared by me and the accompanying Exhibits were prepared by me or under my supervision and that the information contained in such Affidavit and Attachments is true and correct to the best of my knowledge, information and belief.

Tina Smith
Tina Smith

Subscribed and sworn to before _____ me this 24th day of June, 2024.

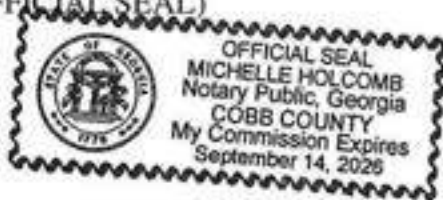
Michelle Holcomb

Notary Public

My Commission Expires:

September 14, 2026

(OFFICIAL SEAL)



ATTACHMENT TO
TINA SMITH AFFIDAVIT

Robin Young

From: Wendy Callahan
Sent: Wednesday, August 7, 2019 9:51 AM
To: OPERATIONS
Subject: FW: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20190807,SNG,6900518

FYI

From: SNG@kindermorgan.com <SNG@kindermorgan.com>
Sent: Wednesday, August 07, 2019 9:44 AM
To: SNG@kindermorgan.com
Subject: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20190807,SNG,6900518

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

August 7, 2019

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On July 15, 2019, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for bids for approximately 5,000 dth/day of short-term firm transportation capacity ("FT") that is operationally available from October 1, 2019 through April 30, 2020 on the north system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. This capacity is available from receipt pins as far west as those on Segment 50 which includes Tex Gas/SNG Kosciusko Attala (PIN #609000) and TET/SNG Kosciusko Attala (PIN #49128) and any receipt pins downstream of this location along Southern's north system. This capacity is available to delivery pins on the north system that are downstream of this location, including those pins on the Chattanooga lateral.

Shippers could increase their net present value (NPV) by bidding to buy supplemental capacity which is available in other locations on the system or for capacity that is available from receipt pins at the Elba Island LNG Terminal, the SNG-Elba Express Interconnects, or the FGT-Suwanee Interconnect to various delivery pins. In addition, Shippers currently receiving discounted FT service could increase the NPV of their bids by increasing their discounted rate for a period of time stated by the shipper in its bid.

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1
Volume – 5,000 dth/day

Term – October 1, 2019 through April 30, 2020

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 6,000 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2018 through April 30, 2019.

SNG Marketing

The following is a link to a notice that was recently posted on the pipeline's Interactive Website. If you have any questions concerning the content of the notice, please contact your pipeline representative. DO NOT REPLY to this email. You are receiving this notice based on directions you provided when logged into the pipeline's Interactive Website "Business Preferences" section.

Pipeline: SNG

Notice Category: Non-Critical

Notice Type (1): TSP CAPACITY OFFERING

Notice Type (2): TSP CAP OFFERING

Issued: Wednesday, August 7, 2019 @ 8:41 CCT

Notice Subject: Award of North System Firm Transport

Link:

http://pipeline2.kindermorgan.com/Notices/NoticeDetail.aspx?code=SNG&pl_id=3705¬c_nbr=70359

Robin Young

From: Wendy Cailahan
Sent: Wednesday, August 7, 2019 9:51 AM
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Subject: FW: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20190807,SNG,6900518

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CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

August 7, 2019

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On July 15, 2019, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for bids for approximately 50,000 dth/day of short-term firm transportation capacity ("FT") that is operationally available from October 1, 2019 through April 30, 2020 on the south system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. 40,000 dth/day of this capacity is available from receipt pins as far west as those on Segment 410 which includes MS Hub/SNG Simpson County (PIN #609400), SNG/MEP Smith County (PIN #44449) and Gulf South/SNG Smith County (PIN #608100) and another 50,000 dth/d is available from receipt pins downstream of this location along Southern's south system including TGP Rose Hill (Pin #420546). This capacity is available to delivery pins upstream of Southern's Wrens Compressor Station (Segment 560) as well as pins that are south of the Wrens Compressor Station (Segments 580, 590, 600, 610, 615, 620). Out of the above 50,000 dth/day, up to 10,000 dth/day is available to delivery pins east of the Wrens Compressor Station as far east as Aiken, S.C. (Segment 570).

Shippers could increase their net present value (NPV) by bidding to buy supplemental capacity which is available in other locations on the system or for capacity that is available from receipt pins at the Elba Island LNG Terminal, the SNG-Elba Express Interconnects, or the FGT-Suwanee Interconnect to various delivery pins. In addition, Shippers currently receiving discounted FT service could increase the NPV of their bids by increasing their discounted rate for a period of time stated by the shipper in its bid.

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1

Volume – 50,000 dth/day

Term – October 1, 2019 through April 30, 2020

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded an average of 90,000 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2018 through April 30, 2019.

SNG Marketing

The following is a link to a notice that was recently posted on the pipeline's Interactive Website. If you have any questions concerning the content of the notice, please contact your pipeline representative. DO NOT REPLY to this email. You are receiving this notice based on directions you provided when logged into the pipeline's Interactive Website "Business Preferences" section.

Pipeline: SNG

Notice Category: Non-Critical

Notice Type (1): TSP CAPACITY OFFERING

Notice Type (2): TSP CAP OFFERING

Issued: Wednesday, August 7, 2019 @ 8:40 CCT

Notice Subject: Award of South System Firm Transport

Link:

http://pipeline2.kindermorgan.com/Notices/NoticeDetail.aspx?code=SNG&pl_id=3705¬c_nbr=70359

Robin Young

From: Wendy Callahan
Sent: Monday, August 20, 2018 5:17 PM
To: OPERATIONS
Subject: Fwd: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20180820,SNG,6900518

FYI

Sent from my iPhone

Begin forwarded message:

From: <SNG@kindermorgan.com>
Date: August 20, 2018 at 4:58:20 PM EDT
To: <SNG@kindermorgan.com>
Subject: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20180820,SNG,6900518

August 20, 2018

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On August 2, 2018, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for bids for approximately 40,000 dth/day of short-term firm transportation capacity ("FT") that is operationally available from October 1, 2018 through April 30, 2019 on the south system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. This capacity is available from receipt pins as far west as those on Segment 410 which includes MS Hub/SNG Simpson County (PIN #609400), SNG/MEP Smith County (PIN #44449) and Gulf South/SNG Smith County (PIN #608100) and any receipt pins downstream of this location along Southern's south system including TGP Rose Hill (Pin #420546). This capacity is available to delivery pins upstream of Southern's Wrens Compressor Station (Segment 560) as well as pins that are south of the Wrens Compressor Station (Segments 580, 590, 600, 610, 615, 620). Out of the above 40,000 dth/day, up to 10,000 dth/day is available to delivery pins east of the Wrens Compressor Station as far east as Aiken, S.C. (Segment 570).

Shippers could increase their net present value (NPV) by bidding to buy supplemental capacity which is available in other locations on the system or for capacity that is available from receipt pins at the Elba Island LNG Terminal, the SNG-Elba Express Interconnects, or the FGT-Suwanee Interconnect to various delivery pins. In addition, Shippers currently receiving discounted FT service could increase the NPV of their bids by increasing their discounted rate for a period of time stated by the shipper in its bid.

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the

capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1

Volume – 40,000 dth/day

Term – October 1, 2018 through April 30, 2019

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 73,000 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2018 through April 30, 2019.

SNG Marketing

The following is a link to a notice that was recently posted on the pipeline's Interactive Website. If you have any questions concerning the content of the notice, please contact pipeline representative. DO NOT REPLY to this email. You are receiving this notice based on the directions you provided when logged into the pipeline's Interactive Website "Business Preferences" section.

Pipeline: SNG

Notice Category: Non-Critical

Notice Type (1): TSP CAPACITY OFFERING

Notice Type (2): TSP CAP OFFERING

Issued: Monday, August 20, 2018 @ 15:58 CCT

Notice Subject: Award of South System Firm Transport

Link:

http://pipeline2.kindermorgan.com/Notices/NoticeDetail.aspx?code=SNG&pi_id=3705¬e_nbr

TSP/TSP Name: 6900518-SOUTHERN NATURAL GAS CO. Critical: N
Notice Type Desc (1): TSP CAPACITY OFFERING Notice Type Desc (2): TSP CAP OFFERING
Notice Eff Date/Time: 08/25/2021 11:21:21AM Notice End Date/Time: 12/31/2049 9:00:00AM
Post Date: 8/25/2021 11:21:21 AM Notice ID: 705990
Reqrd Rsp: 5 Notice Stat Desc: INITIATE Prior Notice:
Subject: Operational Firm NS Award Notice

Notice Text:
August 25, 2021

To All Southern Natural Gas Shoppers

Re: Award of Firm Transportation Capacity in Open Season

On August 13, 2021, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for bids for approximately 5,000 dth/day of short-term firm transportation capacity ("FT") that is operationally available from October 1, 2021 through April 30, 2022 on the north system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. This capacity is available from receipt pins as far west as those on Segment 50 which includes Tex Gas/SNG Kosciusko Attala (PIN #609000) and TET/SNG Kosciusko Attala (PIN #49128) and any receipt pins downstream of this location along Southern's north system. This capacity is available to delivery pins on the north system that are downstream of this location, including those pins on the Chattanooga lateral.

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s).

Winning Bid(s):

Shipper 1
Volume - 5,000 dth/day
Term - October 1, 2021 through April 30, 2022
Rate - Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 17,000 dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period December 1, 2021 through February 28, 2022.

SNG Marketing :

TSP/TSP Name: 6900518-SOUTHERN NATURAL GAS CO. Critical: N

Notice Type Desc (1): TSP CAPACITY OFFERING

Notice Type Desc (2): TSP CAP OFFERING

(8)

Notice Eff Date/Time: 08/06/2020 4:31:01PM

Notice End Date/Time: 12/31/2049 9:00:00AM

Post Date: 8/6/2020 4:31:01 PM

Notice ID: 704756

Reqrd Rsp: 5

Notice Stat Desc: SUPERSEDE

Prior Notice: 704703

Subject: Award of South System Capacity

Notice Text:

August 6, 2020

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On July 21, 2020, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for bids for short-term firm transportation capacity ("FT") that is operationally available from October 1, 2020 through April 30, 2021 on the south system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. 60,000 dth/day is available until December 31, 2020 and 50,000 dth/day is available for the period of January 1, 2021 through April 30, 2021. 40,000 dth/day of this capacity is available from receipt pins as far west as those on Segment 410 which includes MS Hub/SNG Simpson County (PIN #609400), SNG/MEP Smith County (PIN #44449) and Gulf South/SNG Smith County (PIN #608100) or 60,000 dth/d is available from receipt pins downstream of this location along Southern's south system including TGP Rose Hill (PIN #420546). This capacity is available to delivery pins as far east as Southern's Wrens Compressor Station (Segment 560). 50,000 dth/day is available to pins that are south of the Wrens Compressor Station (Segments 580, 590, 600, 610, 615, 620) and up to 10,000 dth/day is available to delivery pins east of the Wrens Compressor Station as far as Aiken, S.C. (Segment 570).

Shippers could increase their net present value (NPV) by bidding to buy supplemental capacity which is available in other locations on the system or for capacity that is available from receipt pins at the Elba Island LNG Terminal, the SNG-Elba Express Interconnects, or the FGT-Suwanee Interconnect to various delivery pins. In addition, Shippers currently receiving discounted FT service could increase the NPV of their bids by increasing their discounted rate for a period of time stated by the shipper in its bid.

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1

Volume – 50,000 dth/day (Oct – Dec) and 40,000 dth/d (Jan – Apr)

Term – October 1, 2020 through April 30, 2021

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded an average of 15,000 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2020 through March 31, 2021.

Shipper 2

Volume – 10,000 dth/day

Term – October 1, 2020 through April 30, 2021

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded an average of 28,500 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period December 1, 2020 through February 28, 2021.

SNG Marketing

TSP/TSP Name: 6900518-SOUTHERN NATURAL GAS CO. Critical: N

Notice Type Desc (1): TSP CAPACITY OFFERING

Notice Type Desc (2): TSP CAP OFFERING

(9)

Notice Eff Date/Time: 08/17/2021 8:42:39AM

Notice End Date/Time: 12/31/2049 9:00:00AM

Post Date: 8/17/2021 8:42:39 AM

Notice ID: 705965

Reqrd Rsp: 5

Notice Stat Desc: INITIATE

Prior Notice:

Subject: Award of SS Operational Firm

Notice Text:

August 17, 2021

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On July 23, 2021, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for bids for short-term firm transportation capacity ("FT") that is operationally available from October 1, 2021 through April 30, 2022 on the south system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. 37,500 dth/day is available from receipt pins as far west as those on Segment 410 which includes MS Hub/SNG Simpson County (PIN #609400), SNG/MEP Smith County (PIN #44449) and Gulf South/SNG Smith County (PIN #608100) and TGP Rose Hill (PIN #420546). This capacity is available to delivery pins as far east as Southern's Wrens Compressor Station (Segment 560). 37,500 dth/day is available to pins that are south of the Wrens Compressor Station (Segments 580, 590, 600, 610 and 615) except Segment 620 which is limited to 1,200dth/day and up to 10,000 dth/day is available to delivery pins east of the Wrens Compressor Station as far as Aiken, S.C. (Segment 570).

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1

Volume – 30,000 dth/day

Term – October 1, 2021 through April 30, 2022

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 125,000 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period December 1, 2021 through February 28, 2022.

Shipper 2

Volume – 7,500 dth/day

Term – October 1, 2021 through April 30, 2022

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 7,800 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2021 through April 30, 2022.

Shipper 3

Volume 5,000dth/day

Term – November 1, 2021 through March 31, 2022

Rate – Maximum applicable zone 3 tariff rate

Note:

The capacity is from a Zone 3 receipt pin to a Zone 3 delivery pin. To increase its NPV, the Winning Shipper also bid and was awarded 100 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period November 1, 2021 through April 30, 2022

SNG Marketing

From: [Karen Copeland](#)
To: [OPERATIONS](#)
Subject: FW: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20220922,SNG,6900518
Date: Thursday, September 22, 2022 3:49:09 PM

From: SNG@kindermorgan.com <SNG@kindermorgan.com>
Sent: Thursday, September 22, 2022 3:45 PM
To: SNG@kindermorgan.com
Subject: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20220922,SNG,6900518

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

September 22, 2022

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On September 8, 2022, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for 50,000 Dth/day short-term firm transportation capacity ("FT") that is operationally available from October 1, 2022 through April 30, 2023 on the south system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system. Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1

Volume – 20,000 Dth/ day

Term – October 1, 2022 through April 30, 2023

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 100,000 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2022 through September 30, 2023.

Shipper 2

Volume – 6,200 Dth/ day

Term – October 1, 2022 through March 31, 2023

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 65,856 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2022 through February 28, 2023.

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 10,560 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 1 at the maximum tariff rate for the period October 1, 2022 through February 28, 2023.

Shipper 3

Volume 21,300 Dth/day

Term – October 1, 2022 through April 30, 2023

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 195,832 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2022 through March 31, 2023.

Shipper 4

Volume – 2,500 Dth/ day

Term – October 1, 2022 through April 30, 2023

Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 35,500 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period October 1, 2022 through February 28, 2023.

SNG Marketing

The following is a link to a notice that was recently posted on the pipeline's Interactive Website. If you have any questions concerning the content of the notice, please contact your pipeline representative. DO NOT REPLY to this email. You are receiving this notice based on directions you provided when logged into the pipeline's Interactive Website "Business Preferences" section.

Pipeline: SNG

Notice Category: Non-Critical

Notice Type (1): TSP CAPACITY OFFERING

Notice Type (2): TSP CAP OFFERING

Issued: Thursday, September 22, 2022 @ 14:43 CCT

Notice Subject: Award of Firm Transportation Capacity

Link: http://pipeline2.kindermorgan.com/Notices/NoticeDetail.aspx?code=SNG&pl_id=3705¬c_nbr=707278

From: [Karen Copeland](#)
To: [OPERATIONS](#)
Subject: FW: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20220923,SNG,6900518
Date: Friday, September 23, 2022 1:59:51 PM

From: SNG@kindermorgan.com <SNG@kindermorgan.com>
Sent: Friday, September 23, 2022 1:04 PM
To: SNG@kindermorgan.com
Subject: Non-Critical,TSP CAPACITY OFFERING/TSP CAP OFFERING,20220923,SNG,6900518

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

September 23, 2022

To All Southern Natural Gas Shippers

Re: Award of Firm Transportation Capacity in Open Season

On September 12, 2022, Southern Natural Gas Company, L.L.C. ("Southern") announced an open season for 5,000 Dth/day short-term firm transportation capacity ("FT") that is operationally available from October 1, 2022 through April 30, 2023 on the north system of the Southern Natural Gas Company, L.L.C. ("Southern") pipeline system.

Pursuant to the terms of Section 2.1(b) of the General Terms and Conditions of the Southern Natural Tariff, Southern is required to post the winning bid(s) within 24 hours of awarding the capacity. Below are the winning bid(s). Southern did not have capacity to award all of the requested bids.

Winning Bid(s):

Shipper 1
Volume – 5,000 Dth/ day
Term – October 1, 2022 through April 30, 2023
Rate – Maximum applicable zone 3 tariff rate

Note:

To increase its NPV, the Winning Shipper also bid and was awarded 23,500 Dth/day of supplemental capacity that was available to and from receipt and delivery pins in Zone 3 at the maximum tariff rate for the period November 1, 2022 through March 31, 2023.

SNG Marketing

The following is a link to a notice that was recently posted on the pipeline's Interactive Website. If you have any questions concerning the content of the notice, please contact your pipeline representative. DO NOT REPLY to this email. You are receiving this notice based on directions you provided when logged into the pipeline's Interactive Website "Business Preferences" section.

Pipeline: SNG
Notice Category: Non-Critical
Notice Type (1): TSP CAPACITY OFFERING
Notice Type (2): TSP CAP OFFERING
Issued: Friday, September 23, 2022 @ 12:03 CCT
Notice Subject: Award of Firm Transportation Capacity
Link: http://pipeline2.kindermorgan.com/Notices/NoticeDetail.aspx?code=SNG&pl_id=3705¬c_nbr=707283

Exhibit No. 0002
Testimony of Terry Lewandowski

Testimony of Terry Lewandowski

1 **Q. Please state your name and your current position.**

2 A. My name is Terry Lewandowski and my position is Senior Director of Energy at Nutrien.

3 **Q. Please state your business address.**

4 A. My business address is 500 Lake Cook Road, Suite 150, Deerfield, Il. 60015.

5 **Q. Can you please describe Nutrien's business activities and why natural gas is important to**
6 **Nutrien's operations.**

7 A. Nutrien is the world's largest producer of crop inputs and services, playing a critical role in
8 helping growers increase crop production in a sustainable manner, and natural gas is used by
9 Nutrien as a feedstock to produce its products which are used to grow food to feed the world.

10 **Q. Please describe your testimony.**

11 A. My testimony concerns the practice by natural gas pipelines of tying packages of pipeline
12 capacity that are non-contiguous in open seasons and awarding capacity to the bid that produces
13 highest net present value including bids for both packages.

14 **Q. What is your understanding of how this practice developed?**

15 A. My understanding is that the Commission has allowed this practice in several pipeline
16 proceedings due to its understanding that the shippers are not required to bid on both packages
17 and the Commission's expectation that awarding capacity on this basis would result in future
18 benefits to shippers in subsequent rate cases due to increased billing determinants.

19 **Q. What are your concerns with how this policy discriminates against some shippers?**

1 **A.** My concern is that allowing capacity tying effectively forces shippers to bid on both
2 packages if they want to be awarded the valuable package, and industrials do not have the
3 ability to buy capacity that they cannot use.

4 **Q. What about the fact that you, as a shipper, are not required to bid on more than one**
5 **package?**

6 **A.** While the tariff does not require shippers to bid on more than one package, in practice, a shipper
7 who does not bid on both packages is likely not to be rewarded the capacity that they need.

8 **Q. Can you give me an example of how this harms Nutrien.**

9 **A.** Yes, Nutrien holds pipeline capacity on certain pipelines to serve its plants. If there is an open
10 season and Nutrien wants to bid on capacity to serve its plant which is located in the market area
11 for that pipeline, and the pipeline posts capacity in the market area that is valuable and also posts
12 a segment of capacity between two points in the supply area that Nutrien cannot use to serve its
13 plant. In this case, Nutrien cannot justify the expense of bidding on non-contiguous pipeline
14 capacity in the supply area along with the market area capacity in order to win the valuable
15 market area capacity award based on the Net Present Value of the bids for both packages.

16 **Q. Why can't Nutrien just bid on the non-contiguous package?**

17 **A.** Putting aside for a moment the issue of whether Nutrien should be forced to pay a market-rate for
18 a regulated monopoly pipeline service, the fact is that Nutrien competes in a global market for its
19 products and is subject to global competition for its products, so Nutrien faces competitive cost
20 constraints. Even if Nutrien were able to pay multiples of the maximum tariff rate for the
21 capacity that it needs to serve its plants by also bidding on capacity that it cannot use, and
22 assuming that Nutrien could pass some increase in the transportation costs for natural gas by
23 increasing the price of its crop inputs, this practice ultimately harms consumers by inflating the
24 cost of food globally.

1 **Q. In your experience, have shippers benefitted from this practice?**

2 **A.** I do not believe that there has been a case where the pipeline has demonstrated that this practice
3 benefits shippers. In my experience, pipelines do not file rate cases when they are overcollecting
4 their costs and this practice allows pipelines to charge rates in excess of the maximum tariff rate
5 for valuable capacity. In my experience, when pipelines do file rate cases, they often claim that
6 they expect their billing determinants to decrease.

7 **Q. In addition to the issue of the discriminatory nature of the impact of this practice on**
8 **Nutrien in terms of award of the capacity, do you know of any other adverse impacts that**
9 **this practice has on shippers?**


10 **A.** Yes, in my experience, pipelines appear to have less incentive to add capacity to resolve
11 constraints on the pipeline system to provide more reliable and cost-effective service to
12 consumers. By being able to collect excessive revenues without even building any additional
13 capacity, pipelines increase revenues and decrease costs, while shippers, that cannot obtain
14 capacity they need to expand their manufacturing plants, are often subject to operational flow
15 orders or other constraints that impact our productivity.

16 **Q. Does this end your testimony?**

17 **A.** Yes.

VERIFICATION OF TERRY LEWANDOWSKI

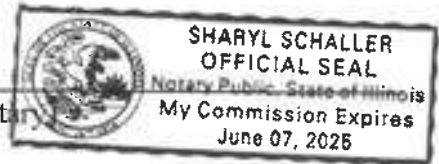
I state under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge, information, and belief.


Terry J. Lewandowski

SWORN TO AND SUBSCRIBED before me this 24 of June, 2024.


Notary Public

(Print or stamp name of Notary)



NOTARY PUBLIC in and for the State
of ILLINOIS, residing at PROSPECT HEIGHTS, IL
My Appointment Expires: JUNE 7, 2025

Exhibit No. 0003
Affidavit of Elizabeth H. Crowe

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Petition for Rulemaking to Update)
Commission Regulations Regarding)
Allocation of Interstate Pipeline Capacity)**

Docket No. RM22-17

**AFFIDAVIT OF
ELIZABETH H. CROWE**

on behalf of

Natural Gas Supply Association

June 25, 2024

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Petition for Rulemaking to Update)
Commission Regulations Regarding)
Allocation of Interstate Pipeline Capacity)

Docket No. RM22-17

AFFIDAVIT OF
ELIZABETH H. CROWE
on behalf of

I. Introduction and Summary

1 1. My name is Elizabeth H. Crowe. My address is P. O. Box 318, Wenham,
2 Massachusetts 01984. I am president of Foresite Energy Services, LLC, an independent
3 firm providing economic consulting services to the regulated energy industry. My
4 primary consulting work over the past forty years has been in the area of interstate
5 natural gas pipeline rates. I have testified and filed testimony in numerous rate cases
6 before the Federal Energy Regulatory Commission (“Commission”) and the Regulatory
7 Commission of Alaska (“RCA”). My qualifications and a list of the proceedings in
8 which I have been involved are attached as Attachment 1.

9 2. This affidavit has been prepared at the request of the Natural Gas Supply
10 Association (“NGSA”). I have been asked to present data and analysis concerning the
11 packaging of high value capacity with low value capacity by Gas Transmission
12 Northwest LLC (“GTN”) over the past two years. My analysis is limited to a single

1 pipeline to provide more in-depth examination of the relevant data. I will provide an
 2 overview of these transactions over the past two years, evidence that the packaged
 3 capacity contains a high-value and a low- or no- value component, an analysis of the
 4 extent to which these packages have exceeded maximum recourse rate amounts and a
 5 discussion of whether the excess revenue is likely to benefit the customers of GTN.

6

7

Overview of Transactions

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3. GTN has been increasingly engaged in bundling of non-contiguous high-value capacity with capacity of no or almost no value over the last several years. These capacity packages are sold as short-term firm (“STF”) transactions, almost all of which have one-month terms, with an occasional two-month term package. This can be confirmed through postings of firm transactions on GTN’s website. A download of these packaged capacity STF transactions for the first six months of 2024 is contained in Attachment 2. STF transactions for 2023 are contained in Attachment 3. The table below shows the significant increase in STF transactions over the past 4 years on GTN:

GTN STF Revenue	STF Revenue	Total Revenue	STF % of Total
2020	120,488	225,624,731	0.05%
2021	483,844	222,567,409	0.22%
2022	8,479,130	238,047,516	3.56%
2023	19,761,152	259,915,411	7.60%
2024 Jan-Mar	5,733,385	68,921,684	8.32%
2024 Annualized	22,933,540		

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As this table shows, GTN’s total STF revenues increased dramatically between 2021 and 2022, and then more than doubled between 2022 and 2023. Moreover, the first quarter of 2024 indicates that 2024 revenues are likely to exceed 2023 revenues by a considerable amount.

1 4. There are three significant facts about the nature of GTN’s STF that impact
2 the analysis of how much junk and jewel capacity bundling is transpiring on this
3 pipeline. First, almost all GTN’s STF transactions are for a duration of one month or
4 less. This suggests that these contracts are directly tied to rapidly varying market
5 conditions and price spreads at different points on its system. Second, all STF
6 transactions were provided at maximum recourse rates. None were sold at discounted or
7 negotiated rates. Third, 60% of GTN’s STF revenue in 2023 was received from
8 displacement contracts for gas received at Malin (the terminus of GTN’s system) and
9 delivered to Kingsgate (the origin point of GTN’s system). As will be shown below,
10 these transactions have virtually no value to shippers.

11 **Evidence that Backhaul/Displacement Contracts are “Junk”**

12 5. The fact that backhaul/displacement contracts on GTN have virtually no value
13 is clear from the data demonstrating that these contracts are not used by the shippers
14 who buy them as part of packaged capacity deals. As the table below shows, shippers
15 have paid GTN over \$14 million in the last 3 years for almost 200,000 Dth/d of STF
16 backhaul capacity that they did not use at all.

GTN Backhaul/Displacement Transactions			
	MDQ (Dth/d)	Volumes	Revenue
2020	0	0	0
2021	5,417	0	75,570
2022	42,296	0	2,772,417
2023	151,820	0	11,830,881

17
18 The fact that in 2023 GTN sold an average of 151,820 Dth/d of STF capacity at
19 maximum rates to shippers who paid \$11.8 million for capacity they did not use to move
20 any gas on any day all year long quantifies the extent to which GTN used its market
21 position and the price spreads between Kingsgate and Malin to earn revenue far in

1 excess of maximum recourse rates without having to enter into negotiated rate
 2 agreements or obtain permission from the Commission to charge market-based rates.

3 **Excess Above Maximum Rates Earned by GTN**

4 6. As noted above, 60% or more of GTN’s 2023 STF revenue was received from
 5 the “junk” portion of bundled capacity sales at times when price spreads enabled GTN to
 6 capture significantly in excess of its maximum recourse rate for short-term transactions
 7 on its system. In 2023, \$11.8 million of the total \$19.8 million in STF revenues was
 8 attributable to backhaul/displacement contracts. In the first quarter of 2024, as shown
 9 on Attachment 1, \$4.6 million of the total \$5.7 million, or 79%, of the STF revenue was
 10 attributable to backhaul/displacement transactions contracted for service from Malin to
 11 Kingsgate. The revenue associated with these backhaul / displacement transactions
 12 represents premiums above maximum recourse rates for valuable forward-haul capacity
 13 that GTN has been able to capture by packaging high-value capacity with worthless
 14 capacity. The table below shows the calculation of the premiums GTN has realized as a
 15 result of packaging high- and low-value capacity in the recent past. Note that the
 16 calculation uses total STF revenue rather than only the revenue associated with the
 17 packaged STF junk and jewel sales. If that calculation was made, the percentage
 18 premiums would be much higher.

GTN Premium Received Over Maximum Recourse Rates for STF			
	Backhaul/Displ.	Total STF	Premium Above
	Revenue	Revenue	Maximum Rates
2020	0	120,488	
2021	75,570	483,844	18.5%
2022	2,772,417	8,479,130	48.6%
2023	11,830,881	19,761,152	149.2%
1st Qtr 2024	4,552,054	5,733,385	385.3%

19
 20 As an example of the extent to which this understates the actual profit made on just the

1 junk and jewel transactions, the first quarter 2024 premium above max rates for just the
2 packaged forward- and backhaul capacity sales between Kingsgate and Malin was
3 798%, or more than double the overall percentage premium shown in the table above.
4 The calculation of just the junk and jewel package premiums for the first quarter of 2024
5 is shown on Attachment 2, page 3.

6

7 **Likelihood that GTN Shippers will Benefit from Junk and Jewel Revenue**

8 7. In the NOI, the Commission asked whether and how shippers do or do not
9 receive the benefit of a rate reduction related to the revenues received from junk and
10 jewel transactions. Based on my experience, it is highly unlikely that shippers will ever
11 benefit by means of a rate reduction that reflects more than a fraction of the premiums
12 pipelines are receiving from junk and jewel transactions. There are two primary
13 reasons for this. First, junk and jewel transactions are highly sporadic as well as short-
14 term by nature, dependent on favorable price spreads and the availability of valuable
15 capacity that a pipeline can pair with unwanted capacity. Pipelines generally have at
16 least some flexibility as to when to file NGA Section 4 rate cases, and thus can often
17 choose a base period when junk and jewel capacity packaging has been less active
18 and/or less profitable than other times. This optionality for when to file a Section 4 rate
19 case significantly decreases the likelihood that a Section 4 rate case will include a test
20 period that has high levels of junk and jewel revenue.

21 8. GTN is actually a rare example of a pipeline with a Section 4 rate case that
22 includes a test period with record high levels of junk and jewel revenues, as discussed
23 above. However, GTN's rate filing projected that the high levels of STF that were
24 experienced during the base period would not repeat themselves due to a sale of long-
25 term capacity that transpired during the base period and thus was no longer available to

1 sell on a short-term, interim basis.¹ As it turned out, however, STF revenues during the
 2 test period exceeded base period STF revenues by 100%, as shown in the table below:

GTN Section 4 rate case STF			
	STF Revenue	Total Revenue	STF % of Total
RP23-1099 Base Period Actual	10,751,886	246,547,534	4.36%
RP23-1099 Projected Test Period	4,456,520	271,591,743	1.64%
RP23-1099 Test Period Actual	21,623,295	262,647,486	8.23%

5 GTN projected a 60% reduction in STF revenue during the test period in this case, and
 6 instead saw a 100% increase in STF revenue.

7 9. Another pipeline that has a current rate case and also has marketed significant
 8 volumes of packaged capacity that contains both high- and low-value contractual paths
 9 is Southern Natural Gas Co., L.L.C. (“SNG”). Like GTN, SNG’s rate filing contained a
 10 test period projection of STF revenues that was a 62% reduction from base period actual
 11 levels, as shown below. In addition, like GTN, SNG’s STF contracts were all sold at
 12 maximum recourse rates (see Attachment 4).

SNG Section 4 rate case STF			
	STF Revenue	Total Revenue	STF % of Total
RP24-744 Base Period Actual	19,512,006	661,050,662	2.95%
RP24-744 Projected Test Period	6,021,810	701,627,205	0.86%
RP24-744 Test Period Actual	NA	NA	NA

14 SNG’s test period ends September 30, 2024. Thus, test period actual STF revenues are
 15 not yet available. However, it is clear that SNG is taking the position that STF revenue
 16 levels should not be considered to be recurring in the test period to the same extent they
 17 were experienced during the base period; their note for STF on Schedule G-3 states,
 18 “Not expected to sell same ST capacity due to marketing/operating conditions.”

19 10. The second reason it is unlikely that shippers will see any rate reduction

¹ See Prepared Direct Testimony of Eric J. Miller, Jr., Docket No. RP23-1099, Exhibit No. GTN-0073, pages 4-6.

1 because of junk and jewel transactions is that the vast majority of pipeline rate cases are
2 resolved by settlement rather than litigation. In settlement, pipelines often have
3 significant leverage over shippers and usually get significantly higher rates than would
4 result in litigation. This is particularly true if the litigated rate is likely to be lower than
5 the rate previously in effect, which often would be expected if the pipeline is earning
6 significant levels of revenue from packaging highly desirable capacity with unwanted
7 capacity. In such a case, the refund floor rule, which limits refunds to the difference
8 between the litigated rate and the pre-filed rate, gives pipelines every incentive to drag
9 out the settlement negotiations and only make minimal moves during the process. This
10 in turn increases pressure on customers to be willing to offer and accept rates much
11 higher than those that would likely result from litigation, thus mitigating or erasing
12 entirely any benefit the supplemental junk and jewel revenues might otherwise have
13 provided to them.

14 11. In the past 10 years, only two of the hundreds of NGA Section 4 rate cases
15 filed by gas pipelines were fully litigated: Panhandle Eastern Pipeline Company, LP
16 (decision in 2022) and El Paso Natural Gas Co. (decision in 2013). Only through
17 litigation can shippers have any real chance of showing that junk and jewel transactions
18 are recurring in nature and should be reflected in rates. If the GTN rate case were to be
19 litigated, there is some chance shippers could benefit from the substantial amount of
20 revenues in excess of maximum rates that GTN has earned during the test period. But
21 litigation is an expensive, lengthy process that significantly delays the realization of any
22 rate reduction benefit. These facts alone give pipelines a strong position in any
23 settlement process, and significantly reduce the possibility of shippers receiving any
24 benefit from the pipeline's ability to successfully sell packages of valuable and
25 unwanted capacity, even when that occurs during the test period of a Section 4 rate case.

STATE OF MASSACHUSETTS)

) ss:

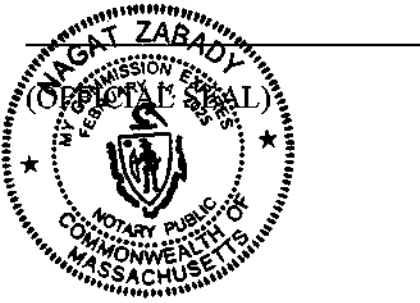
COUNTY OF ESSEX)

I, Elizabeth H. Crowe, being duly sworn, certify that the foregoing Affidavit was prepared by me and the accompanying Attachments were prepared by me or under my supervision and that the information contained in such Affidavit and Attachments is true and correct to the best of my knowledge, information and belief.

Elizabeth H. Crowe
Elizabeth H. Crowe

Subscribed and sworn to before me this 25th day of June, 2024.
[Signature]

[Signature]
Notary Public
My Commission Expires:





FORESITE ENERGY SERVICES, LLC

fes@foresiteenergy.com

P.O. Box 318 • Wenham, MA 01984

phone (978) 969-0812

ELIZABETH H. CROWE
Abbreviated C.V.

Ms. Crowe is President of Foresite Energy Services, LLC, an independent consulting firm offering economic consulting services to the energy industries. She has been engaged in regulated energy consulting since 1981. Her consulting work has focused primarily on the interstate transportation of oil and natural gas, and has included:

Regulatory Analysis and Expert Testimony

- Testimony at the FERC in many oil and gas pipeline rate cases concerning cost of service, cost classification, cost allocation, rate design and throughput levels.
- Preparation of cost of service, rates and financial schedules for natural gas pipeline certificate applications at the FERC.
- Testimony before state regulatory agencies in pipeline ratemaking and fuel proceedings.
- Analysis and recommendations in FERC proposed rulemakings to revise Uniform System of Accounts and pipeline filing requirements.
- Analysis of competition on a pipeline applying to participate in FERC's capacity release pilot program.
- Feasibility analysis of FERC's proposed negotiated services policy for natural gas pipelines.
- Testimony before the National Energy Board concerning initial rates for service on a new diluent pipeline and regulated rates for TransCanada (Canadian Mainline) pipeline.
- Conduct an audit of a pipeline's expansion project costs on behalf of the project's negotiated rate shippers.
- Analysis and affidavits on behalf of shippers in two Five-Year Reviews of the Oil Pipeline Index by the FERC.
- Development of a model to calculate annual earned rate of return on equity for natural gas pipelines.
- Analysis of several FERC proposed policy statements regarding return on equity and income tax allowances for oil and gas pipelines.
- Preparation of cost and rate information in CRE filing for proposed natural gas pipeline in Mexico, and development of economic bid packages on several gas distribution systems.

Supply, Demand, Pricing and other Economic Analysis

- Analysis of the competitive positions of an interstate natural gas pipeline applying for market-based rate authority from the FERC.
- Measurement of market concentration in the origin market of a crude oil pipeline applying for market-based rate authority from the FERC.
- Quantitative analysis of the vulnerability of a producer's sales to specific pipeline companies due to the impact of FERC Order Nos. 380 and 436.
- Development of an earned rate of return on equity model for the Natural Gas Supply Association to calculate annual interstate gas pipeline earnings.
- For a natural gas pipeline, analysis of a two-level incentive pricing rate design.
- Development of various databases for monitoring supplies, deliveries, prices and other developments and trends in the U.S. natural gas industry.
- Analysis of fuel over-recovery by major U.S. interstate natural gas pipelines.
- Article for Natural Gas Monthly on the Economics of FERC Order No. 637 (April 2000)

Prior to founding Foresite Energy Services, LLC, Ms. Crowe was Vice President of Swanson Energy Group, Inc., where she worked in various capacities from 1981 to 2000. Ms. Crowe received a Bachelor of Arts in Economics, magna cum laude, from Wellesley College in 1975.

Additional information is available upon request.

LIST OF REGULATORY PROCEEDINGS AND TESTIMONY
of
Elizabeth H. Crowe

A. Testimony Before the FERC

1. Southern Natural Gas Company, Docket No. RP93-15
2. Tennessee Gas Pipeline Company, Docket No. RP91-203 (Phase I)
3. Mojave Pipeline Company, Docket No. RP95-175
4. Stingray Pipeline Company, Docket No. RP99-166
5. Wyoming Interstate Company, Docket No. RP99-381
6. Trailblazer Pipeline Company, Docket No. RP03-162
7. High Island Offshore System, L.L.C., Docket No. RP03-221
8. Texaco Refining and Marketing Inc., *et al.*, v. SFPP, L.P., Docket Nos. OR96-2, *et al.*
9. Kern River Gas Transmission Company, Docket No. RP04-274
10. SFPP, L.P., Docket No. IS05-230
11. Chevron Products Company, *et al.* v. SFPP, L.P., Docket Nos. OR03-5, *et al.*
12. ANR Pipeline Company, Docket No. RP07-439
13. Sea Robin Pipeline Company, LLC, Docket Nos. RP09-995 and RP10-422
14. Rockies Express Pipeline LLC, Docket Nos. RP11-1844 and RP12-399
15. Seaway Crude Pipeline Company LLC, Docket No. IS12-226-000
16. Sea Robin Pipeline Company LLC, Docket No. RP21-937-000

B. Filed Testimony at the FERC

1. Tennessee Gas Pipeline Company, Docket No. RP91-203
2. Southern Natural Gas Company, Docket No. RP92-134
3. Texas Eastern Transmission Corporation, Docket No. RP93-192
4. Tennessee Gas Pipeline Company, Docket No. RP91-203 (Phase II)
5. Koch Gateway Pipeline Company, Docket No. RP94-120
6. Tennessee Gas Pipeline Company, Docket No. RP95-112
7. Northern Natural Gas Company, Docket No. RP95-185
8. Indicated Shippers v. Sea Robin Pipeline Company, Docket No. RP95-167
9. El Paso Natural Gas Company, Docket No. RP95-363 (Affidavit)
10. Colorado Interstate Gas Company, Docket No. RP96-190
11. Eastern Shore Natural Gas Company, Docket No. RP97-32
12. Columbia Gulf Transmission Company, Docket No. RP97-52
13. Wyoming Interstate Company, Ltd., Docket No. RP97-375
14. Koch Gateway Pipeline Company, Docket No. RP97-373
15. Trailblazer Pipeline Company, Docket No. RP97-408
16. KN Interstate Gas Transmission Company, Docket No. RP98-117
17. Mojave Pipeline Company, Docket No. RP01-172
18. Texas Gas Transmission Corporation, Docket No. RP00-260 (Affidavit)
19. Northern Natural Gas Company, Docket No. RP03-398
20. Maritimes & Northeast Pipeline, L.L.C., Docket No. RP04-360
21. SFPP, L.P., Docket No. OR92-8-025
22. Northern Border Pipeline Company, Docket No. RP06-72

23. Southwest Gas Storage Company, Docket No. RP07-34
24. Gas Transmission Northwest Corporation, Docket No. RP06-407
25. SFPP, L.P., Docket No. IS08-390
26. El Paso Natural Gas Company, Docket No. RP08-426
27. High Island Offshore System, L.L.C., Docket No. RP09-487
28. Suncor Energy Marketing Inc. and Enbridge Energy, Limited Partnership, Docket Nos. OR10-5 and IS10-139 (Affidavits)
29. Florida Gas Transmission Company, LLC, Docket No. RP10-21
30. Northern Natural Gas Company, Docket No. RP10-148
31. Kern River Gas Transmission Company, Docket No. RP04-274-023
32. El Paso Natural Gas Company, Docket No. RP10-951
33. El Paso Natural Gas Company, Docket No. RP10-1398
34. Enbridge Pipelines (Southern Lights) LLC, Docket Nos. IS10-399 and IS11-146
35. TE Enterprise Products Pipeline Company LLC, Docket No. IS12-203
36. CenterPoint Energy Mississippi River Transmission, LLC, Docket No. RP12-955
37. Seaway Crude Pipeline Company LLC, Docket No. OR15-6 (Affidavits)
38. Northern Natural Gas Company, Docket No. RP19-59-000
39. West Texas Gulf Pipe Line Company LLC, Docket No. OR19-22-000 (Affidavit)
40. Enable Mississippi River Transmission, LLC, Docket No. RP18-923-000
41. Northern Natural Gas Company, Docket No. RP19-1353-000
42. Panhandle Eastern Pipe Line Company, LP, Docket No. RP19-1523-000
43. Midwestern Gas Transmission Company, Docket No. RP21-525-000
44. Sea Robin Pipeline Company LLC, Docket No. RP22-476-000
45. Northern Natural Gas Company, Docket No. RP22-1033
46. ANR Pipeline Company, Docket No. RP22-501

C. Testimony Before Other Regulatory Agencies

1. Regulatory Commission of Alaska: Beluga Pipe Line Company, Docket No. U-04-81
2. Regulatory Commission of Alaska: Cook Inlet Gas Gathering System, Docket No. P-04-20
3. Public Utilities Commission of Nevada: Southwest Gas Corporation, Docket Nos. 08-03033 and 08-05010
4. National Energy Board: Enbridge Southern Lights Pipeline, Hearing Order RH-1-2011
5. National Energy Board: TransCanada PipeLines Limited Application for Approval of Restructuring and Mainline Final Tolls for 2012 and 2013, RH-3-2011

D. Filed Testimony at Other Regulatory Agencies

1. Regulatory Commission of Alaska: Kenai-Nikiski Pipeline, Docket No. P-03-07
2. Regulatory Commission of Alaska: Kenai-Nikiski Pipeline, Docket No. P-04-12
3. Regulatory Commission of Alaska: Beluga Pipeline Company, Docket No. U-07-141
4. Regulatory Commission of Alaska: Kenai Kachemak Pipeline, Docket No. P-09-14
5. Regulatory Commission of Alaska: Kenai Beluga Pipeline, Docket No. P-16-004
6. Public Utilities Commission of the State of California: Application No. 09-05-014
7. Public Utilities Commission of the State of California: Application No. 21-09-018

E. Selected Filings in Other FERC Proceedings

1. Regulation of Interstate Natural Gas Transportation Services, Docket No. RM98-12; “An Incentivized Cost-Based Ratemaking Proposal to Increase the Efficiency of the Ratemaking Process” (April, 1999)
2. Regulation of Short-Term Natural Gas Transportation Services, and Regulation of Interstate Natural Gas Transportation Services, Docket No. RM98-10-011, “An Analysis of Long-Term Contracting Practices on Selected Interstate Pipelines” (July, 2002)
3. Revisions to Forms, Statements, and Reporting Requirements for Natural Gas Pipelines, Docket No. RM07-9 (Analysis on behalf of NGSA, March, 2007)
4. Composition of Proxy Groups for Determining Gas and Oil Pipeline Return on Equity, Docket No. PL07-2 (Analysis on behalf of NGSA, August, 2007)
5. Fuel Retention Practices of Natural Gas Companies, Docket No. RM07-20, “Analysis of Pipeline Fuel Over-Recovery” (November, 2007)
6. Five-Year Review of the Oil Pipeline Index, Docket No. RM15-20 (Affidavits on behalf of Liquids Shippers Group, 2015)
7. Inquiry Regarding the Commission’s Policy for Recovery of Income Tax Costs, Docket No. PL17-1 (Affidavits on behalf of Natural Gas Indicated Shippers, 2017)
8. Five-Year Review of the Oil Pipeline Index, Docket No. RM20-14 (Affidavits on behalf of Liquids Shippers Group, 2020)

Gas Transmission Northwest LLC
Transactional Reports: Firm Transportation
January - May 2024

Post Date / K Holder Name	Svc Req K	Rate Sch	K Beg Date	K End Date	Loc Name	Loc/QTI De	Loc Name	Loc/QTI De	K Qty - K	Rate Chgd	Max Trf Rat	Revenue
May												
20240430 Concord Energy LLC	21009	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	SPOKANE NPC	Del Qty	20,000	0.076543	0.076543	45,926
20240430 Concord Energy LLC	21009	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	SPOKANE NPC	Del Qty	20,000	0.002396	0.002396	1,438
20240430 Concord Energy LLC	21010	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	STANFIELD MC	Del Qty	6,000	0.149197	0.149197	26,855
20240430 Concord Energy LLC	21010	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	STANFIELD MC	Del Qty	6,000	0.003952	0.003952	711
20240430 Citadel Energy Marketing LLC	21004	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	25,000	0.293185	0.293185	219,889
20240430 Citadel Energy Marketing LLC	21004	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	25,000	0.007035	0.007035	5,276
20240430 Citadel Energy Marketing LLC	21005	FTS-1	20240501	20240531	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	2,000	0.293185	0.293185	17,591
20240430 Citadel Energy Marketing LLC	21005	FTS-1	20240501	20240531	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	2,000	0.007035	0.007035	422
20240430 Mercuria Commodities Canada Corporation	21006	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	19,000	0.293185	0.293185	167,115
20240430 Mercuria Commodities Canada Corporation	21006	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	19,000	0.007035	0.007035	4,010
20240430 Mercuria Commodities Canada Corporation	21007	FTS-1	20240501	20240531	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,000	0.293185	0.293185	8,796
20240430 Mercuria Commodities Canada Corporation	21007	FTS-1	20240501	20240531	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,000	0.007035	0.007035	211
20240430 Sequent Energy Management LLC	21008	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	30,000	0.293185	0.293185	263,867
20240430 Sequent Energy Management LLC	21008	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	30,000	0.007035	0.007035	6,332
20240430 Tenaska Marketing Ventures	21002	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	10,000	0.293185	0.293185	87,956
20240430 Tenaska Marketing Ventures	21002	FTS-1	20240501	20240531	KINGSGATE	Rec Qty	MALIN	Del Qty	10,000	0.007035	0.007035	2,111
20240430 Tenaska Marketing Ventures	21003	FTS-1	20240501	20240531	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,000	0.293185	0.293185	8,796
20240430 Tenaska Marketing Ventures	21003	FTS-1	20240501	20240531	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,000	0.007035	0.007035	211
20240430 Tourmaline Oil Marketing Corp.	20699	FTS-1	20240501	20250331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	50,000	0.293185	0.293185	454,437
20240430 Tourmaline Oil Marketing Corp.	20699	FTS-1	20240501	20250331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	50,000	0.007035	0.007035	10,904
Total									164,000			1,332,852
Total for "junk" capacity									8,000			36,027
April												
20240423 Concord Energy LLC	20998	FTS-1	20240424	20240430	KINGSGATE MC	Rec Qty	STANFIELD MC	Del Qty	19,300	0.149197	0.149197	17,277
20240423 Concord Energy LLC	20998	FTS-1	20240424	20240430	KINGSGATE MC	Rec Qty	STANFIELD MC	Del Qty	19,300	0.003952	0.003952	458
20240410 Concord Energy LLC	20994	FTS-1	20240411	20240430	KINGSGATE	Rec Qty	SPOKANE NPC	Del Qty	20,200	0.076543	0.076543	29,377
20240410 Concord Energy LLC	20994	FTS-1	20240411	20240430	KINGSGATE	Rec Qty	SPOKANE NPC	Del Qty	20,200	0.002396	0.002396	920
20240331 Gunvor USA LLC	20988	FTS-1	20240401	20240430	KINGSGATE	Rec Qty	MALIN	Del Qty	2,500	0.293185	0.293185	21,256
20240331 Gunvor USA LLC	20988	FTS-1	20240401	20240430	KINGSGATE	Rec Qty	MALIN	Del Qty	2,500	0.007035	0.007035	510
20240331 Gunvor USA LLC	20989	FTS-1	20240401	20240430	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,100	0.293185	0.293185	9,353
20240331 Gunvor USA LLC	20989	FTS-1	20240401	20240430	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,100	0.007035	0.007035	224
Total									43,100			79,375
Total for "junk" capacity									2,200			9,577

Transactional Reports: Firm Transportation
January - May 2024

Post Date / K Holder Name	Svc Req K	Rate Sch	K Beg Date	K End Date	Loc Name	Loc/QTI De	Loc Name	Loc/QTI De	K Qty - K	Rate Chgd	Max Trf Rat	Revenue
March												
20240229 Castleton Commodities Merchant Trading L.I	20960	FTS-1	20240301	20240331	SPOKANE NPC	Rec Qty	KINGSGATE MC	Del Qty	50,000	0.067813	0.067813	101,720
20240229 Castleton Commodities Merchant Trading L.I	20960	FTS-1	20240301	20240331	SPOKANE NPC	Rec Qty	KINGSGATE MC	Del Qty	50,000	0.003133	0.003133	4,700
20240229 Gunvor USA LLC	20961	FTS-1	20240301	20240331	KINGSGATE	Rec Qty	MALIN	Del Qty	2,500	0.250323	0.250323	18,774
20240229 Gunvor USA LLC	20961	FTS-1	20240301	20240331	KINGSGATE	Rec Qty	MALIN	Del Qty	2,500	0.011199	0.011199	840
20240229 Gunvor USA LLC	20962	FTS-1	20240301	20240331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,600	0.250323	0.250323	12,016
20240229 Gunvor USA LLC	20962	FTS-1	20240301	20240331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	1,600	0.011199	0.011199	538
20240229 Mercuria Commodities Canada Corporation	20958	FTS-1	20240301	20240331	KINGSGATE	Rec Qty	MALIN	Del Qty	5,000	0.250323	0.250323	37,548
20240229 Mercuria Commodities Canada Corporation	20958	FTS-1	20240301	20240331	KINGSGATE	Rec Qty	MALIN	Del Qty	5,000	0.011199	0.011199	1,680
20240229 Mercuria Commodities Canada Corporation	20959	FTS-1	20240301	20240331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	6,000	0.250323	0.250323	45,058
20240229 Mercuria Commodities Canada Corporation	20959	FTS-1	20240301	20240331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	6,000	0.011199	0.011199	2,016
20240229 Tenaska Marketing Ventures	20963	FTS-1	20240301	20240331	KINGSGATE	Rec Qty	MALIN	Del Qty	17,500	0.250323	0.250323	131,420
20240229 Tenaska Marketing Ventures	20963	FTS-1	20240301	20240331	KINGSGATE	Rec Qty	MALIN	Del Qty	17,500	0.011199	0.011199	5,879
20240229 Tenaska Marketing Ventures	20964	FTS-1	20240301	20240331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	10,500	0.250323	0.250323	78,852
20240229 Tenaska Marketing Ventures	20964	FTS-1	20240301	20240331	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	10,500	0.011199	0.011199	3,528
Total									93,100			444,567
Total for "junk" capacity									18,100			142,008
Total for packaged "junk and jewel"									43,100			338,149
February												
20240212 Citadel Energy Marketing LLC	20939	FTS-1	20240213	20240229	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	5,000	0.250323	0.250323	20,026
20240212 Citadel Energy Marketing LLC	20939	FTS-1	20240213	20240229	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	5,000	0.011199	0.011199	896
20240131 Castleton Commodities Merchant Trading L.I	20922	FTS-1	20240201	20240229	KINGSGATE	Rec Qty	MALIN	Del Qty	25,000	0.250323	0.250323	175,226
20240131 Castleton Commodities Merchant Trading L.I	20922	FTS-1	20240201	20240229	KINGSGATE	Rec Qty	MALIN	Del Qty	25,000	0.011199	0.011199	7,839
20240131 Castleton Commodities Merchant Trading L.I	20923	FTS-1	20240201	20240229	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	271,000	0.250323	0.250323	1,899,451
20240131 Castleton Commodities Merchant Trading L.I	20923	FTS-1	20240201	20240229	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	271,000	0.011199	0.011199	84,978
20240131 ExxonMobil Oil Corporation	20929	FTS-1	20240201	20240229	MALIN MC	Rec Qty	TUSCARORA/G	Del Qty	23,500	0.029575	0.029575	19,460
20240131 ExxonMobil Oil Corporation	20929	FTS-1	20240201	20240229	MALIN MC	Rec Qty	TUSCARORA/G	Del Qty	23,500	0.001443	0.001443	949
20240131 IGI Resources, Inc.	20925	FTS-1	20240201	20240229	MALIN MC	Rec Qty	MEDFORD LATI	Del Qty	10,000	0.033412	0.033412	9,355
20240131 IGI Resources, Inc.	20925	FTS-1	20240201	20240229	MALIN MC	Rec Qty	MEDFORD LATI	Del Qty	10,000	0.001612	0.001612	451
20240131 Tenaska Marketing Ventures	20928	FTS-1	20240201	20240229	STANFIELD MC	Rec Qty	KINGSGATE MC	Del Qty	20,000	0.12902	0.12902	72,251
20240131 Tenaska Marketing Ventures	20928	FTS-1	20240201	20240229	STANFIELD MC	Rec Qty	KINGSGATE MC	Del Qty	20,000	0.005838	0.005838	3,269
Total									354,500			2,294,151
Total for "junk" capacity									276,000			1,984,429
Total for packaged "junk and jewel"									324,500			2,167,494

**Transactional Reports: Firm Transportation
January - May 2024**

Post Date / K Holder Name	Svc Req K	Rate Sch	K Beg Date	K End Date	Loc Name	Loc/QTI De	Loc Name	Loc/QTI De	K Qty - K	Rate Chgd	Max Trf Rat	Revenue
January												
20240111 Citadel Energy Marketing LLC	20915	FTS-1	20240112	20240131	TURQUOISE FL	Rec Qty	STANFIELD DEI	Del Qty	50,000	0.148952	0.148952	141,504
20240111 Citadel Energy Marketing LLC	20915	FTS-1	20240112	20240131	TURQUOISE FL	Rec Qty	STANFIELD DEI	Del Qty	50,000	0.006719	0.006719	6,383
20231231 Castleton Commodities Merchant Trading L.I	20890	FTS-1	20240101	20240131	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	45,000	0.250323	0.250323	337,936
20231231 Castleton Commodities Merchant Trading L.I	20890	FTS-1	20240101	20240131	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	45,000	0.011199	0.011199	15,119
20231231 Castleton Commodities Merchant Trading L.I	20899	FTS-1	20240101	20240131	SPOKANE NPC	Rec Qty	KINGSGATE MC	Del Qty	50,000	0.067813	0.067813	101,720
20231231 Castleton Commodities Merchant Trading L.I	20899	FTS-1	20240101	20240131	SPOKANE NPC	Rec Qty	KINGSGATE MC	Del Qty	50,000	0.003133	0.003133	4,700
20231231 ExxonMobil Oil Corporation	20903	FTS-1	20240101	20240131	MALIN MC	Rec Qty	TURQUOISE FL	Del Qty	23,500	0.029575	0.029575	20,850
20231231 ExxonMobil Oil Corporation	20903	FTS-1	20240101	20240131	MALIN MC	Rec Qty	TURQUOISE FL	Del Qty	23,500	0.001443	0.001443	1,017
20231231 IGI Resources, Inc.	20894	FTS-1	20240101	20240131	MALIN MC	Rec Qty	MEDFORD LATI	Del Qty	10,000	0.033412	0.033412	10,024
20231231 IGI Resources, Inc.	20894	FTS-1	20240101	20240131	MALIN MC	Rec Qty	MEDFORD LATI	Del Qty	10,000	0.001612	0.001612	484
20231231 Mercuria Commodities Canada Corporation	20888	FTS-1	20240101	20240131	KINGSGATE	Rec Qty	MALIN	Del Qty	28,000	0.250323	0.250323	210,271
20231231 Mercuria Commodities Canada Corporation	20888	FTS-1	20240101	20240131	KINGSGATE	Rec Qty	MALIN	Del Qty	28,000	0.011199	0.011199	9,407
20231231 Mercuria Commodities Canada Corporation	20889	FTS-1	20240101	20240131	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	261,500	0.250323	0.250323	1,963,784
20231231 Mercuria Commodities Canada Corporation	20889	FTS-1	20240101	20240131	MALIN MC	Rec Qty	KINGSGATE MC	Del Qty	261,500	0.011199	0.011199	87,856
Total									498,000			2,911,055
Total for "junk" capacity									351,500			2,051,640
Total for packaged "junk and jewel"									384,500			2,271,318
December 2023 (Partial)												
20231221 Tenaska Marketing Ventures	20898	FTS-1	20231222	20240131	STANFIELD MC	Rec Qty	KINGSGATE MC	Del Qty	20,000	0.12902	0.12902	79,992
20231221 Tenaska Marketing Ventures	20898	FTS-1	20231222	20240131	STANFIELD MC	Rec Qty	KINGSGATE MC	Del Qty	20,000	0.005838	0.005838	3,620
Note: Contract starting 12/1/2023 only included for month of January 2024												
									Total 2024			7,145,613
									Total 1st qtr (Jan-Mar)			5,733,385
									Total "junk"			4,178,077
									Percent "junk"			73%
									Packaged junk&jewel			4,776,961
									Total "jewel"			598,884
									Excess of max rate for "jewel"			798%

**Gas Transmission Northwest LLC
2023 Short-Term Firm Transactions**

Line No.	TSP	AcctPer	inline / Lat	Term	Svc_Req_Name	Rec_Loc_Name	Del_Loc_Name	MDQ	Thruput	Amount	K Start	K End	nl or Displacem
8416	GTN	01/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	TURQUOISE FLATS	KINGSGATE MC	15,000	0	\$143,763.40	11/1/2022	3/31/2023	
8417	GTN	02/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	TURQUOISE FLATS	KINGSGATE MC	15,000	0	\$85,286.63	11/1/2022	3/31/2023	
8418	GTN	03/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	TURQUOISE FLATS	KINGSGATE MC	15,000	0	\$94,424.48	11/1/2022	3/31/2023	
8419	GTN	03/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	KINGSGATE	MALIN	20,000	0	\$61,184.75	3/1/2023	3/15/2023	
8420	GTN	03/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$79,030.31	3/1/2023	10/31/2023	Displacement
8421	GTN	04/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$76,480.94	3/1/2023	10/31/2023	Displacement
8422	GTN	05/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$79,030.31	3/1/2023	10/31/2023	Displacement
8423	GTN	06/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$83,141.45	3/1/2023	10/31/2023	Displacement
8424	GTN	07/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$85,912.83	3/1/2023	10/31/2023	Displacement
8425	GTN	08/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$85,912.83	3/1/2023	10/31/2023	Displacement
8426	GTN	09/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$83,141.45	3/1/2023	10/31/2023	Displacement
8427	GTN	10/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	12,500	0	\$85,912.83	3/1/2023	10/31/2023	Displacement
8428	GTN	08/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	KINGSGATE	MALIN	22,500	0	\$154,643.09	8/1/2023	8/31/2023	
8429	GTN	08/2023	Mainline	STF	Castleton Commodities Merchant Trading L.P.	MALIN MC	KINGSGATE MC	90,500	0	\$622,008.86	8/1/2023	8/31/2023	Displacement
8610	GTN	03/2023	Mainline	STF	Citadel Energy Marketing LLC	KINGSGATE	MALIN	50,000	0	\$152,961.89	3/1/2023	3/15/2023	
8611	GTN	03/2023	Mainline	STF	Citadel Energy Marketing LLC	MALIN MC	KINGSGATE MC	398,000	0	\$1,217,576.60	3/1/2023	3/15/2023	Displacement
8612	GTN	07/2023	Mainline	STF	Citadel Energy Marketing LLC	KINGSGATE	MALIN	18,900	0	\$129,900.19	7/1/2023	7/31/2023	
8613	GTN	07/2023	Mainline	STF	Citadel Energy Marketing LLC	MALIN MC	KINGSGATE MC	58,590	0	\$402,690.60	7/1/2023	7/31/2023	Displacement
8614	GTN	08/2023	Mainline	STF	Citadel Energy Marketing LLC	KINGSGATE	MALIN	27,900	0	\$191,757.43	8/1/2023	8/31/2023	
8615	GTN	08/2023	Mainline	STF	Citadel Energy Marketing LLC	MALIN MC	KINGSGATE MC	121,690	0	\$836,378.55	8/1/2023	8/31/2023	Displacement
8616	GTN	09/2023	Mainline	STF	Citadel Energy Marketing LLC	KINGSGATE	MALIN	15,000	0	\$99,769.73	9/1/2023	9/30/2023	
8617	GTN	09/2023	Mainline	STF	Citadel Energy Marketing LLC	MALIN MC	KINGSGATE MC	46,200	0	\$307,290.78	9/1/2023	9/30/2023	Displacement
8618	GTN	09/2023	Mainline	STF	Citadel Energy Marketing LLC	KINGSGATE	MALIN	44,700	0	\$297,313.81	9/1/2023	9/30/2023	
8619	GTN	09/2023	Mainline	STF	Citadel Energy Marketing LLC	MALIN MC	KINGSGATE MC	116,961	0	\$777,944.52	9/1/2023	9/30/2023	Displacement
8804	GTN	03/2023	Mainline	STF	Concord Energy LLC	KINGSGATE	MALIN	25,000	0	\$76,480.94	3/1/2023	3/15/2023	
8805	GTN	03/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	15,000	0	\$94,836.37	3/1/2023	8/20/2023	Displacement
8806	GTN	04/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	15,000	0	\$91,777.13	3/1/2023	8/20/2023	Displacement
8807	GTN	05/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	15,000	0	\$94,836.37	3/1/2023	8/20/2023	Displacement
8808	GTN	06/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	15,000	0	\$99,769.73	3/1/2023	8/20/2023	Displacement
8809	GTN	07/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	15,000	0	\$103,095.39	3/1/2023	8/20/2023	Displacement
8810	GTN	08/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	15,000	0	\$66,513.16	3/1/2023	8/20/2023	Displacement
8811	GTN	03/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	35,000	0	\$7,138.22	3/27/2023	3/27/2023	Displacement
8812	GTN	05/2023	Mainline	STF	Concord Energy LLC	KINGSGATE	MALIN	26,400	0	\$166,912.01	5/1/2023	5/31/2023	
8813	GTN	05/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	16,103	0	\$101,810.00	5/1/2023	5/31/2023	Displacement
8814	GTN	06/2023	Mainline	STF	Concord Energy LLC	KINGSGATE	MALIN	1,400	0	\$9,311.84	6/1/2023	6/30/2023	
8815	GTN	06/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	399	0	\$2,653.87	6/1/2023	6/30/2023	Displacement
8816	GTN	10/2023	Mainline	STF	Concord Energy LLC	KINGSGATE	MALIN	23,500	0	\$161,516.11	10/1/2023	10/31/2023	
8817	GTN	10/2023	Mainline	STF	Concord Energy LLC	MALIN MC	KINGSGATE MC	33,088	0	\$227,414.69	10/1/2023	10/31/2023	Displacement
8818	GTN	08/2023	Mainline	STF	ConocoPhillips Company	KINGSGATE	MALIN	7,500	0	\$51,547.70	8/1/2023	8/31/2023	
8819	GTN	08/2023	Mainline	STF	ConocoPhillips Company	MALIN MC	KINGSGATE MC	30,100	0	\$206,878.09	8/1/2023	8/31/2023	Displacement
8820	GTN	06/2023	Mainline	STF	Gunvor USA LLC	MALIN MC	KINGSGATE MC	2,500	0	\$16,628.29	6/1/2023	6/30/2023	Displacement
8821	GTN	06/2023	Mainline	STF	Gunvor USA LLC	KINGSGATE	MALIN	5,000	0	\$33,256.58	6/1/2023	6/30/2023	
8822	GTN	07/2023	Mainline	STF	Gunvor USA LLC	KINGSGATE	MALIN	6,400	0	\$43,987.37	7/1/2023	7/31/2023	
8823	GTN	07/2023	Mainline	STF	Gunvor USA LLC	MALIN MC	KINGSGATE MC	22,600	0	\$155,330.39	7/1/2023	7/31/2023	Displacement
8824	GTN	07/2023	Mainline	STF	Gunvor USA LLC	KINGSGATE	MALIN	6,100	0	\$41,925.46	7/1/2023	7/31/2023	
8825	GTN	07/2023	Mainline	STF	Gunvor USA LLC	MALIN MC	KINGSGATE MC	21,500	0	\$147,770.06	7/1/2023	7/31/2023	Displacement
8826	GTN	07/2023	Mainline	STF	Gunvor USA LLC	KINGSGATE	MALIN	5,000	0	\$34,365.13	7/1/2023	7/31/2023	

**Gas Transmission Northwest LLC
2023 Short-Term Firm Transactions**

Line No.	TSP	AcctPer	inline / Lat	Term	Svc_Req_Name	Rec_Loc_Name	Del_Loc_Name	MDQ	Thruput	Amount	K Start	K End	nl or Displacem
8827	GTN	07/2023	Mainline	STF	Gunvor USA LLC	MALIN MC	KINGSGATE MC	15,600	0	\$107,219.21	7/1/2023	7/31/2023	Displacement
8828	GTN	08/2023	Mainline	STF	Gunvor USA LLC	KINGSGATE	MALIN	12,500	0	\$85,912.83	8/1/2023	8/31/2023	
8829	GTN	08/2023	Mainline	STF	Gunvor USA LLC	MALIN MC	KINGSGATE MC	45,500	0	\$312,722.69	8/1/2023	8/31/2023	Displacement
8830	GTN	09/2023	Mainline	STF	Gunvor USA LLC	KINGSGATE	MALIN	2,500	0	\$16,628.29	9/1/2023	9/30/2023	
8831	GTN	09/2023	Mainline	STF	Gunvor USA LLC	MALIN MC	KINGSGATE MC	9,000	0	\$59,861.84	9/1/2023	9/30/2023	Displacement
9296	GTN	01/2023	Mainline	STF	IGI Resources, Inc.	MALIN	MEDFORD LATEI	10,000	0	\$2,084.07	11/1/2022	3/31/2023	
9297	GTN	02/2023	Mainline	STF	IGI Resources, Inc.	MALIN	MEDFORD LATEI	10,000	0	\$1,236.36	11/1/2022	3/31/2023	
9298	GTN	03/2023	Mainline	STF	IGI Resources, Inc.	MALIN	MEDFORD LATEI	10,000	0	\$1,368.83	11/1/2022	3/31/2023	
9352	GTN	06/2023	Mainline	STF	Koch Energy Services, LLC	KINGSGATE	MALIN	10,000	0	\$66,513.16	6/1/2023	6/30/2023	
9353	GTN	06/2023	Mainline	STF	Koch Energy Services, LLC	MALIN MC	KINGSGATE MC	10,000	0	\$66,513.16	6/1/2023	6/30/2023	Displacement
9354	GTN	09/2023	Mainline	STF	Koch Energy Services, LLC	KINGSGATE	MALIN	10,000	0	\$66,513.16	9/1/2023	9/30/2023	
9355	GTN	09/2023	Mainline	STF	Koch Energy Services, LLC	MALIN MC	KINGSGATE MC	27,500	0	\$182,911.18	9/1/2023	9/30/2023	Displacement
9356	GTN	10/2023	Mainline	STF	Koch Energy Services, LLC	KINGSGATE	MALIN	10,000	0	\$68,730.26	10/1/2023	10/31/2023	
9357	GTN	10/2023	Mainline	STF	Koch Energy Services, LLC	MALIN MC	KINGSGATE MC	22,500	0	\$154,643.09	10/1/2023	10/31/2023	Displacement
9369	GTN	01/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$47,921.13	11/1/2022	9/30/2023	
9370	GTN	02/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$28,428.88	11/1/2022	9/30/2023	
9371	GTN	03/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$31,474.83	11/1/2022	9/30/2023	
9372	GTN	04/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$30,459.51	11/1/2022	9/30/2023	
9373	GTN	05/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$31,474.83	11/1/2022	9/30/2023	
9374	GTN	06/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$33,112.14	11/1/2022	9/30/2023	
9375	GTN	07/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$34,215.88	11/1/2022	9/30/2023	
9376	GTN	08/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$34,215.88	11/1/2022	9/30/2023	
9377	GTN	09/2023	Mainline	STF	Macquarie Energy LLC	TURQUOISE FLATS	KINGSGATE MC	5,000	0	\$33,112.14	11/1/2022	9/30/2023	
9654	GTN	04/2023	Mainline	STF	Mercuria Commodities Canada Corporation	TURQUOISE FLATS	KINGSGATE MC	5,250	0	\$31,982.49	4/1/2023	9/30/2023	
9655	GTN	05/2023	Mainline	STF	Mercuria Commodities Canada Corporation	TURQUOISE FLATS	KINGSGATE MC	5,250	0	\$33,048.57	4/1/2023	9/30/2023	
9656	GTN	06/2023	Mainline	STF	Mercuria Commodities Canada Corporation	TURQUOISE FLATS	KINGSGATE MC	5,250	0	\$34,767.75	4/1/2023	9/30/2023	
9657	GTN	07/2023	Mainline	STF	Mercuria Commodities Canada Corporation	TURQUOISE FLATS	KINGSGATE MC	5,250	0	\$35,926.67	4/1/2023	9/30/2023	
9658	GTN	08/2023	Mainline	STF	Mercuria Commodities Canada Corporation	TURQUOISE FLATS	KINGSGATE MC	5,250	0	\$35,926.67	4/1/2023	9/30/2023	
9659	GTN	09/2023	Mainline	STF	Mercuria Commodities Canada Corporation	TURQUOISE FLATS	KINGSGATE MC	5,250	0	\$34,767.75	4/1/2023	9/30/2023	
9660	GTN	01/2023	Mainline	STF	Mercuria Commodities Canada Corporation	KINGSGATE	MALIN	100,000	0	\$962,603.38	1/1/2023	1/31/2023	
9661	GTN	01/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$192,520.68	1/1/2023	10/31/2023	Displacement
9662	GTN	02/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$114,211.54	1/1/2023	10/31/2023	Displacement
9663	GTN	03/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$126,448.49	1/1/2023	10/31/2023	Displacement
9664	GTN	04/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$122,369.51	1/1/2023	10/31/2023	Displacement
9665	GTN	05/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$126,448.49	1/1/2023	10/31/2023	Displacement
9666	GTN	06/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$133,026.31	1/1/2023	10/31/2023	Displacement
9667	GTN	07/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$137,460.52	1/1/2023	10/31/2023	Displacement
9668	GTN	08/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$137,460.52	1/1/2023	10/31/2023	Displacement
9669	GTN	09/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$133,026.31	1/1/2023	10/31/2023	Displacement
9670	GTN	10/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	20,000	0	\$137,460.52	1/1/2023	10/31/2023	Displacement
9671	GTN	07/2023	Mainline	STF	Mercuria Commodities Canada Corporation	KINGSGATE	MALIN	15,000	0	\$103,095.39	7/1/2023	7/31/2023	
9672	GTN	07/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	51,000	0	\$350,524.33	7/1/2023	7/31/2023	Displacement
9673	GTN	08/2023	Mainline	STF	Mercuria Commodities Canada Corporation	KINGSGATE	MALIN	10,000	0	\$68,730.26	8/1/2023	8/31/2023	
9674	GTN	08/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	47,000	0	\$323,032.23	8/1/2023	8/31/2023	Displacement
9675	GTN	09/2023	Mainline	STF	Mercuria Commodities Canada Corporation	KINGSGATE	MALIN	10,000	0	\$66,513.16	9/1/2023	9/30/2023	
9676	GTN	09/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	35,000	0	\$232,796.05	9/1/2023	9/30/2023	Displacement
9677	GTN	10/2023	Mainline	STF	Mercuria Commodities Canada Corporation	KINGSGATE	MALIN	10,000	0	\$68,730.26	10/1/2023	10/31/2023	

Gas Transmission Northwest LLC
2023 Short-Term Firm Transactions

Line No.	TSP	AcctPer	inline / Lat	Term	Svc_Req_Name	Rec_Loc_Name	Del_Loc_Name	MDQ	Thruput	Amount	K Start	K End	ul or Displacem
9678	GTN	10/2023	Mainline	STF	Mercuria Commodities Canada Corporation	MALIN MC	KINGSGATE MC	22,000	0	\$151,206.57	10/1/2023	10/31/2023	Displacement
11376	GTN	03/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	5,000	0	\$15,296.19	3/1/2023	3/15/2023	
11377	GTN	03/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	12,505	0	\$79,061.92	3/1/2023	3/31/2023	Displacement
11378	GTN	06/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	10,000	0	\$66,513.16	6/1/2023	6/30/2023	
11379	GTN	06/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	6,100	0	\$40,573.03	6/1/2023	6/30/2023	Displacement
11380	GTN	07/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	5,000	0	\$34,365.13	7/1/2023	7/31/2023	
11381	GTN	07/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	15,500	0	\$106,531.90	7/1/2023	7/31/2023	Displacement
11382	GTN	08/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	5,000	0	\$34,365.13	8/1/2023	8/31/2023	
11383	GTN	08/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	27,500	0	\$189,008.22	8/1/2023	8/31/2023	Displacement
11384	GTN	08/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	6,500	0	\$24,499.01	8/15/2023	8/31/2023	
11385	GTN	08/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	32,900	0	\$124,002.69	8/15/2023	8/31/2023	Displacement
11386	GTN	09/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	10,000	0	\$66,513.16	9/1/2023	9/30/2023	
11387	GTN	09/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	31,000	0	\$206,190.78	9/1/2023	9/30/2023	Displacement
11388	GTN	10/2023	Mainline	STF	Tenaska Marketing Ventures	KINGSGATE	MALIN	10,000	0	\$68,730.26	10/1/2023	10/31/2023	
11389	GTN	10/2023	Mainline	STF	Tenaska Marketing Ventures	MALIN MC	KINGSGATE MC	28,000	0	\$192,444.73	10/1/2023	10/31/2023	Displacement
									Total STF	\$19,761,152			
									Total Junk	\$10,478,581			
									Total Junk + Jewel	\$17,030,774			
									Total "jewel"	\$6,552,193			
									Excess of max rate for "jewel"	260%			

Docket No. RP24-__-__
 Schedule G-3
 Exhibit No. SNG-027

Southern Natural Gas Company, L.L.C.
 Changes in Revenue and Billing Determinants
 Twelve Months Ending December 31, 2023 v. Twelve Months Ending September 30, 2024, as adjusted

Line No.	Term	Type	Rate Schedule	Delivery Zone	Shipper Name	Contract Code	12/31/23 Billed Quantity (Dth)	12/31/23 Billed Revenue (\$)	9/30/24 Forecasted Revenue (\$)	Revenue Variance (\$)	Percent change
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(j)	(l)	(m)
28	TOTAL LT RESERVATION				TOTAL LT RESERVATION		2,274,664	\$ 18,896,305	\$ 9,384,618	\$ (9,511,687)	
29	ST	MAX	FT	0	MULTIPLE SHII	VARIOUS	41,802	\$ 195,215	\$ -	\$ (195,215)	
30	ST	MAX	FT	1	MULTIPLE SHII	VARIOUS	369,320	\$ 1,902,320	\$ -	\$ (1,902,320)	
31	ST	MAX	FT	3	MULTIPLE SHII	VARIOUS	1,698,530	\$ 17,414,471	\$ 6,021,810	\$ (11,392,661)	
32	TOTAL ST RESERVATION				TOTAL ST RESERVATION		2,109,652	\$ 19,512,006	\$ 6,021,810	\$ (13,490,196)	1/ -69.1%
33					TOTAL TRANSMISSION		4,384,316	\$ 38,408,312	\$ 15,406,428	\$ (23,001,883)	
34					TOTAL SYSTEM			\$ 38,408,312	\$ 15,406,428	\$ (23,001,883)	

1/ Not expected to sell same ST capacity due to market/operating conditions