

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
Letter Order Pursuant to § 375.307
Guardian Pipeline, L.L.C.
Docket No. RP20-20-000

Issued: October 29, 2019

Guardian Pipeline, L.L.C.
c/o ONEOK, Inc.
100 West 5th Street
Tulsa, OK 74103

Attention: David E. Keglovits
Vice President and Associate General Counsel

Reference: Electric Power Cost Recovery Surcharge Adjustment

Dear Mr. Keglovits:

On October 1, 2019, Guardian Pipeline, L.L.C. (Guardian) filed a tariff record¹ to reflect Guardian's semi-annual adjustment to its Electric Power Cost Recovery (EPCR) surcharge. Guardian proposes to increase its EPCR surcharge from \$0.0220 to \$0.0391 per dekatherm. The referenced tariff record is accepted effective November 1, 2019, as requested.

Public notice of the filing was issued on October 4, 2019. Interventions and protests were due as provided in section 154.210 of the Commission's regulations (18 C.F.R. § 154.210 (2019)). Pursuant to Rule 214 (18 C.F.R. § 385.214 (2019)), all timely filed motions to intervene and any unopposed motion to intervene filed out-of-time before the issuance date of this order are granted. Granting late intervention at this stage of the proceeding will not disrupt the proceeding or place additional burdens on existing parties. No protests or adverse comments were filed.

This acceptance for filing shall not be construed as a waiver of the requirements of section 7 of the Natural Gas Act, as amended; nor shall it be construed as constituting

¹ Guardian Pipeline, L.L.C., FERC NGA Gas Tariff, Guardian FERC Gas Tariff [Part 5.0, Statement of Rates, 36.0.0](#).

approval of the referenced filing or of any rate, charge, classification, or any rule, regulation, or practice affecting such rate or service contained in your tariff; nor shall such acceptance be deemed as recognition of any claimed contractual right or obligation associated therewith; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against your company.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713 (2019).

Issued by: Marsha K. Palazzi, Director, Division of Pipeline Regulation

Document Content(s)

RP20-20-000.DOCX.....1-2



October 1, 2019

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

Re: Guardian Pipeline, L.L.C.
Electric Power Cost Recovery Surcharge Adjustment
Docket No. RP20-20-000

Dear Ms. Bose:

Pursuant to section 154.403 of the Federal Energy Regulatory Commission's (Commission) regulations, Guardian Pipeline, L.L.C. (Guardian) respectfully submits for filing and acceptance the tariff record listed below for inclusion in its FERC Gas Tariff, Volume No. 1. The proposed tariff record is submitted to become effective November 1, 2019.

Part 5.0, Statement of Rates, v. 36.0.0

Statement of Nature, Reasons and Basis for the Proposed Changes

The purpose of this filing is to revise the above-referenced tariff record to reflect Guardian's semi-annual adjustment to its Electric Power Cost Recovery (EPCR) surcharge in accordance with Part 8, Section 34 of the General Terms and Conditions of Guardian's FERC Gas Tariff. The revised tariff record submitted herewith reflects a change in the EPCR surcharge applicable under Guardian's Rate Schedule(s) FT-1, FT-2, IT-1, and IT-2 from (\$0.0220) to \$0.0391 per dekatherm. The workpapers attached hereto as Appendix A provide supporting calculations used in deriving the proposed surcharge.

Materials Enclosed

In accordance with section 154.7 of the Commission's regulations, the following items are included in this filing:

1. an eTariff XML filing package containing the proposal in electronic format;
2. a transmittal letter in PDF format, which incorporates the Statement of Nature, Reasons and Basis for the filing required by section 154.7(a)(6) of the Commission's regulations;

Guardian Pipeline Company
100 West Fifth Street
Tulsa, OK 74103
www.oneok.com

3. Appendix A – the workpapers providing supporting calculations used in deriving the proposed surcharge;
4. Appendix B – a clean version of the tariff record in PDF format for publishing in eLibrary; and
5. Appendix C – a marked version of the tariff record in PDF format for publishing in eLibrary.

Proposed Effective Date

Pursuant to section 154.7(a)(3) of the Commission's regulations, Guardian respectfully requests that the tariff record submitted herewith be approved effective November 1, 2019, which date is at least thirty (30) days after receipt of this filing by the Commission. In accordance with section 154.7(a)(9) of the Commission's regulations, Guardian hereby files a motion to place the proposed tariff section into effect at the end of any suspension period if one is so ordered by the Commission in this proceeding.

Waivers

Pursuant to section 154.7(a)(7) of the Commission's regulations, Guardian has not identified any waivers of the Commission's regulations needed to permit its filing to become effective as proposed; however, Guardian respectfully requests that, should the Commission determine that any such waivers are required, the Commission grant such waivers as are necessary in order that the revised tariff section may be made effective as proposed.

Service and Correspondence

In accordance with section 154.208 of the Commission's regulations, the undersigned certifies that a copy of this filing has been served electronically on Guardian's customers and affected state regulatory commissions. A paper copy of this filing may only be served if a customer has been granted waiver of electronic service pursuant to Part 390 of the Commission's regulations. In addition, a copy of this filing is available for public inspection during regular business hours at Guardian's office at 100 West Fifth Street, Tulsa, Oklahoma 74103.

Pursuant to section 385.2005 and section 385.2011(c)(5) of the Commission's regulations, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best knowledge and belief of the undersigned.

It is requested that a copy of all communications, correspondence, and pleadings with respect to this filing be sent to:

Ms. Kimberly D. Bose
October 1, 2019
Page 3 of 3

Denise Adams Director, Regulatory Affairs ONEOK, Inc. 100 West 5th Street Tulsa, Oklahoma 74103 (918) 732-1408 Email: denise.adams@oneok.com	Lisa Nishimuta Legal Counsel, Interstate Regulatory ONEOK, Inc. 100 West 5th Street Tulsa, Oklahoma 74103 (918) 588-7730 Email: lisa.nishimuta@oneok.com
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Any questions regarding this filing may be directed to Denise Adams at (918) 732-1408.

Respectfully submitted,

/s/ David E. Keglovits

David E. Keglovits
Vice President and Associate General Counsel
ONEOK, Inc.
100 West 5th Street
Tulsa, Oklahoma 74103

Attachments

Appendix A

Workpapers

Guardian Pipeline, L.L.C.
Electric Power Cost Recovery
Effective November 1, 2019

Schedule 1

Line No.	Description	November through March	
1	Compressor Electric Power Expense	\$1,598,632	Schedule 3
2	Deferred Electric Power Cost	1,252,068	Schedule 5
3	Carrying Costs	18,391	Schedule 5
4	Total Costs	<u>\$2,869,091</u>	
		Usage (Dth/Season)	
5	Firm Transport	73,209,458	
6	Interruptible Transport	187,739	
7	Total Usage	<u>73,397,197</u>	Schedule 2
8	Electric Power Cost Recovery Rate (\$/Dth)	<u>\$0.0391</u>	

Guardian Pipeline, L.L.C.
Electric Power Cost Recovery
Effective November 1, 2019
Estimated Quantities

Schedule 2

Line No.	Month	Volumes (Dth)
	(a)	(b)
1	November-19	8,385,718
2	December-19	13,336,023
3	January-20	20,023,827
4	February-20	16,459,624
5	March-20	<u>15,192,005</u>
6	Total Quantities	73,397,197
7	Adjustment	<u>-</u>
8	Estimated Quantities	<u><u>73,397,197</u></u>

Volumes are based on actual prior year receipt volumes plus projected new contracted volumes for the seasonal period, less any terminated contracts.

Guardian Pipeline, L.L.C.
Electric Power Cost Recovery
Effective November 1, 2019
Estimated Costs

Line No.	Month	1/ Electricity Demand & Commodity Cost	Taxes, Riders, Assessments	2/ Amortization of Facility	Maintenance Costs	Total Costs
		(a)	(b)	(c)	(d)	(a+b+c+d)
1	November-19	\$14,221	\$0	\$0	\$0	\$14,221
2	December-19	14,065	0	0	0	14,065
3	January-20	18,025	0	0	0	18,025
4	February-20	791,609	0	0	0	791,609
5	March-20	760,712	0	0	0	760,712
6	Total	<u>\$1,598,632</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$1,598,632</u>

1/ Estimated Electricity Demand and Commodity Costs are based on actual invoices for the prior year's corresponding seasonal period.

2/ Amortization of the Facility was completed in October 2018.

Guardian Pipeline, L.L.C.
Electric Power Cost Recovery
Effective November 1, 2019
Deferred Costs

Schedule 4

Line No.	Month	1/ Electricity Demand & Commodity Cost	Taxes, Riders, Assessments	Amortization of Facility	Maintenance Costs	Interest Cost	Total Costs	Cost Recoveries	Total Deferred Costs
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(f+g)
		Beginning Balance							(\$961,495)
1	February-19	\$1,433,775	\$0	\$0	\$0	\$0	\$1,433,775	(\$348,135)	1,085,640
2	March-19	118,790	0	0	0	546	119,336	(314,574)	(195,238)
3	April-19	538,042	0	0	0	-	538,042	273,864	811,906
4	May-19	15,261	0	0	0	3,429	18,690	161,963	180,653
5	June-19	8,634	0	0	0	4,128	12,762	107,412	120,174
6	July-19	-	0	0	0	4,866	4,866	114,256	119,122
7	August-19	(3,252)	0	0	0	5,422	2,170	107,527	109,697
8	Total	<u>\$2,111,250</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$18,391</u>	<u>\$2,129,641</u>	<u>\$102,313</u>	<u>\$1,270,459</u>

1/ Electricity Demand and Commodity Costs are the composite of monthly accruals, prior month accrual reversals and actual invoices in a month.

Guardian Pipeline, L.L.C.
Electric Power Cost Recovery
Effective November 1, 2019
Carrying Costs

Line No.	Month	Balance in Account 186	Interest	Total
1	February-19	\$124,145	\$0	\$124,145
2	March-19	(71,638)	546	(71,092)
3	April-19	740,814	-	740,814
4	May-19	918,037	3,429	921,467
5	June-19	1,037,513	4,128	1,041,641
6	July-19	1,155,897	4,866	1,160,763
7	August-19	1,265,037	5,422	1,270,459

Total Deferred Costs (due Customer) due GPL (excluding interest)	\$1,252,068
Total Interest Charged (only if Total Deferred Costs is a positive balance)	\$18,391

Appendix B

Clean Tariff Record

STATEMENT OF RATES

(Rates Per Dekatherm)

Rate Schedule	Base Rate Per Dth	Electric Power Cost Recovery Rate	Rate After Adjustment	Transporter's Use Gas
Firm Transportation Services:(1)				
Rate Schedule FT-1				
Max Monthly Reservation Rate	\$ 4.6641	-	\$4.6641	-
Min Monthly Reservation Rate	0.0000	-	0.0000	-
Max Usage Rate	0.0000	0.0391	0.0391	0.00 %
Min Usage Rate	0.0000	0.0391	0.0391	0.00 %
Max Daily Overrun Rate	0.1533	0.0391	0.1924	0.00 %
Min Daily Overrun Rate	0.0000	0.0391	0.0391	0.00 %
Rate Schedule FT-2				
Max Monthly Reservation Rate	\$ 6.7032	-	\$ 6.7032	-
Min Monthly Reservation Rate	0.0000	-	0.0000	-
Max Usage Rate	0.0000	0.0391	0.0391	0.00 %
Min Usage Rate	0.0000	0.0391	0.0391	0.00 %
Max Daily Overrun Rate	0.2205	0.0391	0.2596	0.00 %
Min Daily Overrun Rate	0.0000	0.0391	0.0391	0.00 %

(1) Pursuant to Section 31 of the General Terms and Conditions, the maximum and minimum Firm Transportation Usage Rates and Overrun Rates shall be increased to include the Commission-authorized Annual Charge Adjustment as published on the Commission's web site located at <http://www.ferc.gov>.

STATEMENT OF RATES

(Rates Per Dekatherm)

Rate Schedule	Base Rate Per Dth	Electric Power Cost Recovery Rate	Rate After Adjustment	Transporter's Use Gas
Interruptible Transportation Services:(1)				
Rate Schedule IT-1				
Max Usage Rate	0.1533	0.0391	0.1924	0.00 %
Min Usage Rate	0.0000	0.0391	0.0391	0.00 %
Max Daily Overrun Rate	0.1533	0.0391	0.1924	0.00 %
Min Daily Overrun Rate	0.0000	0.0391	0.0391	0.00 %
Rate Schedule IT-2				
Max Usage Rate	0.2205	0.0391	0.2596	0.00 %
Min Usage Rate	0.0000	0.0391	0.0391	0.00 %
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STATEMENT OF RATES

(Rates Per Dekatherm)

Rate Schedule	Base Rate Per Dth	Electric Power Cost Recovery Rate	Rate After Adjustment	Transporter's Use Gas
Enhanced Aggregation and Wheeling Service:				
Rate Schedule EAW Firm Service				
Max Monthly Reservation Rate	\$ 0.2778	-	\$ 0.2778	-
Min Monthly Reservation Rate	0.0000	-	0.0000	-
Max Usage Rate	0.0000	-	0.0000	0.00 % (1)
Min Usage Rate	0.0000	-	0.0000	0.00 % (1)
Max Overrun Rate	0.0091	-	0.0091	0.00 % (1)
Min Overrun Rate	0.0000	-	0.0000	0.00 % (1)
Interruptible Service				
Max Usage Rate	\$ 0.0091	-	\$ 0.0091	0.00 % (1)
Min Usage Rate	0.0000	-	0.0000	0.00 % (1)
Parking and Lending Services:				
Rate Schedule PAL				
NPL Service				
Max Daily Usage Rate	\$ 0.1533	-	\$ 0.1533	-
Min Daily Usage Rate	0.0000	-	0.0000	-
RPL Service				
Max Daily Reservation Rate	\$0.1533	-	\$0.1533	-
Min Daily Reservation Rate	0.0000	-	0.0000	-
Market Aggregation Service:				
Rate Schedule MA				
Max Rate	\$ 0.0200	-	\$ 0.0200	-
Min Rate	0.0000	-	0.0000	-

(1) Applies to quantities received from a Low Pressure Receipt Point

STATEMENT OF RATES

APPLICABLE TO RATE SCHEDULES CONTAINED
IN FERC GAS TARIFF VOLUME NO. 1

Description	Recourse Rate
Rate Schedule OSS (\$/Dth)	
Maximum Monthly Reservation Rate	\$ 0.0925
Maximum Injection Usage Rate	\$ 0.0160
Maximum Withdrawal Usage Rate	\$ 0.0000
Rate Schedule LBS (\$/Dth)	
Maximum Monthly Reservation Rate	\$ 0.0925
Maximum Injection Usage Rate	\$ 0.0160
Maximum Withdrawal Usage Rate	\$ 0.0000

Appendix C

Marked Tariff Record

STATEMENT OF RATES

(Rates Per Dekatherm)

Rate Schedule	Base Rate Per Dth	Electric Power Cost Recovery Rate	Rate After Adjustment	Transporter's Use Gas
Firm Transportation Services:(1)				
Rate Schedule FT-1				
Max Monthly Reservation Rate	\$ 4.6641	-	\$4.6641	-
Min Monthly Reservation Rate	0.0000	-	0.0000	-
Max Usage Rate	0.0000	(0.0220) 0.0391	(0.0220) 0.0391	0.00 %
Min Usage Rate	0.0000	(0.0220) 0.0391	(0.0220) 0.0391	0.00 %
Max Daily Overrun Rate	0.1533	(0.0220) 0.0391	0.1313 0.1924	0.00 %
Min Daily Overrun Rate	0.0000	(0.0220) 0.0391	(0.0220) 0.0391	0.00 %
Rate Schedule FT-2				
Max Monthly Reservation Rate	\$ 6.7032	-	\$ 6.7032	-
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Min Usage Rate	0.0000	(0.0220) 0.0391	(0.0220) 0.0391	0.00 %
Max Daily Overrun Rate	0.2205	(0.0220) 0.0391	0.1985 0.2596	0.00 %
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Min Overrun Rate	0.0000	-	0.0000	0.00 % (1)
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Min Daily Usage Rate	0.0000	-	0.0000	-
RPL Service				
Max Daily Reservation Rate	\$0.1533	-	\$0.1533	-
Min Daily Reservation Rate	0.0000	-	0.0000	-
Market Aggregation Service:				
Rate Schedule MA				
Max Rate	\$ 0.0200	-	\$ 0.0200	-
Min Rate	0.0000	-	0.0000	-

(1) Applies to quantities received from a Low Pressure Receipt Point

STATEMENT OF RATES

APPLICABLE TO RATE SCHEDULES CONTAINED
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