

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. RP20-551-000

March 16, 2020

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

Attention: Denise Adams, Director  
Regulatory Affairs

Reference: Electric Power Cost Recovery Surcharge Adjustment

Dear Ms. Adams:

On February 26, 2020, Guardian Pipeline, L.L.C. filed a tariff record<sup>1</sup> to reflect its semi-annual adjustment to its electric power cost recovery surcharge. The referenced tariff record is accepted effective April 1, 2020, as requested.

Public notice of the filing was issued on February 26, 2020. 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 motions 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 approval of the referenced filing or of any rate, charge, classification, or any rule,

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<sup>1</sup> Guardian Pipeline, L.L.C., FERC NGA Gas Tariff, Guardian FERC Gas Tariff, [Part 5.0, Statement of Rates, 38.0.0](#).

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)

RP20-551-000.DOCX.....1-2



February 26, 2020

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. RP20-551-000

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 April 1, 2020.

Part 5.0, Statement of Rates, v. 38.0.0

**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 \$0.0391 to \$0.0402 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 April 1, 2020, 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.

Ms. Kimberly D. Bose  
February 26, 2020  
Page 3 of 3

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

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, 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 April 1, 2020**

**Schedule 1**

<b>Line No.</b>	<b>Description</b>	<b>April through October</b>	
1	Compressor Electric Power Expense	\$605,218	<b>Schedule 3</b>
2	Deferred Electric Power Cost	1,301,139	<b>Schedule 5</b>
3	Carrying Costs	35,645	<b>Schedule 5</b>
4	Total Costs	<u>\$1,942,002</u>	
		<b>Usage (Dth/Season)</b>	
5	Firm Transport	48,298,552	
6	Interruptible Transport	0	
7	Total Usage	<u>48,298,552</u>	<b>Schedule 2</b>
8	Electric Power Cost Recovery Rate (\$/Dth)	<u>\$0.0402</u>	



**Guardian Pipeline, L.L.C.**  
**Electric Power Cost Recovery**  
**Effective April 1, 2020**  
**Estimated Quantities**

**Schedule 2**

<b>Line No.</b>	<b>Month</b>	<b>Volumes (Dth)</b>
	<b>(a)</b>	<b>(b)</b>
1	April-20	12,448,346
2	May-20	7,361,961
3	June-20	4,882,381
4	July-20	5,193,456
5	August-20	4,887,611
6	September-20	4,949,162
7	October-20	<u>8,575,635</u>
8	Total Quantities	48,298,552
9	Adjustment	<u>-</u>
10	Estimated Quantities	<u><u>48,298,552</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 April 1, 2020**  
**Estimated Costs**

Line No.	Month	1/ Electricity Demand & Commodity Costs	Taxes, Riders, Assessments	2/ Amortization of Facility	Maintenance Costs	Total Costs
		(a)	(b)	(c)	(d)	(a+b+c+d)
1	April-20	\$536,099	\$0	\$0	\$0	\$536,099
2	May-20	13,670	0	0	0	13,670
3	June-20	11,976	0	0	0	11,976
4	July-20	10,980	0	0	0	10,980
5	August-20	11,040	0	0	0	11,040
6	September-20	11,217	0	0	0	11,217
7	October-20	10,236	0	0	0	10,236
8	Total	<u>\$605,218</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$605,218</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 April 1, 2020**  
**Deferred Costs**

**Schedule 4**

Line No.	Month	1/ Electricity Demand & Commodity Costs (a)	Taxes, Riders, Assessments (b)	Amortization of Facility (c)	Maintenance Costs (d)	Interest Cost (e)	Total Costs (f)	Cost Recoveries (g)	Total Deferred Costs (f+g)
	Beginning Balance								\$1,270,459
1	September-19	(\$257)	\$0	\$0	\$0	\$5,743	\$5,486	\$108,882	114,368
2	October-19	(87)	0	0	0	6,375	6,288	188,664	194,952
3	November-19	3,705	0	0	0	7,037	10,742	(488,103)	(477,361)
4	December-19	835,098	0	0	0	5,075	840,173	(519,907)	320,266
5	January-20	438,437	0	0	0	5,993	444,430	(530,330)	(85,900)
6	Total	<u>\$1,276,896</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$30,223</u>	<u>\$1,307,119</u>	<u>(\$1,240,794)</u>	<u>\$1,336,784</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 April 1, 2020**  
**Carrying Costs**

**Schedule 5**

<b>Line No.</b>	<b>Month</b>	<b>Balance in Account 186</b>	<b>Interest</b>	<b>Total</b>
1	August-19	\$1,265,037	\$5,422	\$1,270,459
2	September-19	1,379,084	5,743	1,384,827
3	October-19	1,573,403	6,375	1,579,778
4	November-19	1,095,380	7,037	1,102,417
5	December-19	1,417,609	5,075	1,422,684
6	January-20	1,330,791	5,993	1,336,784

<b>Total Deferred Costs (due Customer) due Guardian (excluding interest)</b>	<b>\$1,301,139</b>
<b>Total Interest Charged (only if Total Deferred Costs is a positive balance)</b>	<b>\$35,645</b>

# 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	0.0402	0.0402	0.38 %
Min Usage Rate	0.0000	0.0402	0.0402	0.38 %
Max Daily Overrun Rate	0.1533	0.0402	0.1935	0.38 %
Min Daily Overrun Rate	0.0000	0.0402	0.0402	0.38 %
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	0.0402	0.0402	0.38 %
Min Usage Rate	0.0000	0.0402	0.0402	0.38 %
Max Daily Overrun Rate	0.2205	0.0402	0.2607	0.38 %
Min Daily Overrun Rate	0.0000	0.0402	0.0402	0.38 %

(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	0.0402	0.1935	0.38 %
Min Usage Rate	0.0000	0.0402	0.0402	0.38 %
Max Daily Overrun Rate	0.1533	0.0402	0.1935	0.38 %
Min Daily Overrun Rate	0.0000	0.0402	0.0402	0.38 %
Rate Schedule IT-2				
Max Usage Rate	0.2205	0.0402	0.2607	0.38 %
Min Usage Rate	0.0000	0.0402	0.0402	0.38 %
Max Daily Overrun Rate	0.2205	0.0402	0.2607	0.38 %
Min Daily Overrun Rate	0.0000	0.0402	0.0402	0.38 %

(1) Pursuant to Section 31 of the General Terms and Conditions, the maximum and minimum Interruptible 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
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	0.38 % (1)
Min Usage Rate	0.0000	-	0.0000	0.38 % (1)
Max Overrun Rate	0.0091	-	0.0091	0.38 % (1)
Min Overrun Rate	0.0000	-	0.0000	0.38 % (1)
Interruptible Service				
Max Usage Rate	\$ 0.0091	-	\$ 0.0091	0.38 % (1)
Min Usage Rate	0.0000	-	0.0000	0.38 % (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	<del>0.039</del> +0.0402	<del>0.039</del> +0.0402	0.38 %
Min Usage Rate	0.0000	<del>0.039</del> +0.0402	<del>0.039</del> +0.0402	0.38 %
Max Daily Overrun Rate	0.1533	<del>0.039</del> +0.0402	<del>0.1924</del> 0.1935	0.38 %
Min Daily Overrun Rate	0.0000	<del>0.039</del> +0.0402	<del>0.039</del> +0.0402	0.38 %
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	<del>0.039</del> +0.0402	<del>0.039</del> +0.0402	0.38 %
Min Usage Rate	0.0000	<del>0.039</del> +0.0402	<del>0.039</del> +0.0402	0.38 %
Max Daily Overrun Rate	0.2205	<del>0.039</del> +0.0402	<del>0.2596</del> 0.2607	0.38 %
Min Daily Overrun Rate	0.0000	<del>0.039</del> +0.0402	<del>0.039</del> +0.0402	0.38 %

(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	<del>0.0391</del> 0.0402	<del>0.1924</del> 0.1935	0.38 %
Min Usage Rate	0.0000	<del>0.0391</del> 0.0402	<del>0.0391</del> 0.0402	0.38 %
Max Daily Overrun Rate	0.1533	<del>0.0391</del> 0.0402	<del>0.1924</del> 0.1935	0.38 %
Min Daily Overrun Rate	0.0000	<del>0.0391</del> 0.0402	<del>0.0391</del> 0.0402	0.38 %
Rate Schedule IT-2				
Max Usage Rate	0.2205	<del>0.0391</del> 0.0402	<del>0.2596</del> 0.2607	0.38 %
Min Usage Rate	0.0000	<del>0.0391</del> 0.0402	<del>0.0391</del> 0.0402	0.38 %
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Min Daily Overrun Rate	0.0000	<del>0.0391</del> 0.0402	<del>0.0391</del> 0.0402	0.38 %

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Max Overrun Rate	0.0091	-	0.0091	0.38 % (1)
Min Overrun Rate	0.0000	-	0.0000	0.38 % (1)
Interruptible Service				
Max Usage Rate	\$ 0.0091	-	\$ 0.0091	0.38 % (1)
Min Usage Rate	0.0000	-	0.0000	0.38 % (1)
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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

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Maximum Monthly Reservation Rate	\$ 0.0925
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Maximum Withdrawal Usage Rate	\$ 0.0000