



January 7, 2020

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

Gas Transmission Northwest LLC
700 Louisiana Street, Suite 700
Houston, TX 77002

John A. Roscher
Director, Rates & Tariffs

tel 832.320.5675
fax 832.320.6675
email John_Roscher@tcenergy.com
web www.tcplus.com/GTN

Re: Gas Transmission Northwest LLC
Refund Report
Docket No. RP20- ____-____

Dear Ms. Bose:

Pursuant to Section 154.501 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations and Section 6.36¹ of the General Terms and Conditions ("GT&C") of Gas Transmission Northwest LLC's ("GTN") FERC Gas Tariff, Fourth Revised Volume No. 1-A ("Tariff"), GTN hereby submits for filing and acceptance a report of refunds of Coyote Springs Lateral interruptible transportation ("IT") revenue for the period from November 1, 2018, through October 31, 2019 (the "Refund Year").

Correspondence

The names, titles and mailing address of the persons to whom correspondence and communications concerning this filing should be directed are as follows:

* Eva N. Neufeld
Associate General Counsel
Gas Transmission Northwest LLC
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700
Tel. (832) 320-5509
Fax (832) 320-6509
eva_neufeld@tcenergy.com

John A. Roscher
Director, Rates & Tariffs
* David A. Alonzo
Manager, Tariffs
Gas Transmission Northwest LLC
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700
Tel. (832) 320-5477
david_alonzo@tcenergy.com

¹ Section 6.36 – GT&C, Crediting of IT Revenues on Extensions ("Section 6.36").

Statement of the Nature, Reasons, and Basis for Filing

GTN's Coyote Springs Lateral extends 18.5 miles from milepost 304.25 on GTN's mainline to two (2) power plants located in Boardman, Oregon. GTN provides firm service on its Coyote Springs Lateral pursuant to a certificate issued in Docket No. CP93-618² and GTN's open access Rate Schedule FTS-1(E-3). GTN provides interruptible service on the Coyote Springs Lateral under Rate Schedule ITS-1(E-3), as approved by Commission Letter Order dated October 30, 1995.

Section 6.36 of GTN's GT&C requires GTN to credit back to "eligible" firm shippers ninety percent (90%) of the interruptible transportation revenues it receives on the Coyote Springs Lateral. Specifically, Section 6.36 provides that within forty-five days after November 1st of each year, GTN shall determine the total amount of applicable IT revenues received on the Coyote Springs Lateral (exclusive of variable costs and volumetric surcharges) during the previous twelve-month period and the portion of such amount to be credited to each eligible firm shipper.³

GTN will then credit the eligible firm shippers through a credit billing adjustment in the next invoice rendered after the determination of the applicable credit amount. In accordance with this provision, GTN refunded \$14,718.99 to eligible shippers through a credit billing adjustment on January 3, 2020. This refund includes interest calculated through the January 3rd invoice date.

Workpapers setting out the refund information as required by Section 154.501(e) of the Commission's Regulations are included in Appendix A. Schedule 1 sets forth the origin of the revenues subject to refund, showing a step-by-step calculation of the refund amount. Specifically, this worksheet shows the interruptible revenue collected during each month of the Refund Year and calculates the credit amount for each month (*i.e.*, 90% of the revenue for each month). For the year ending October 31, 2019, GTN collected interruptible revenues under Rate Schedule ITS-1(E-3) totaling \$15,821.51 (Schedule 1, column h, line 25), of which \$14,239.36 was refunded to eligible shippers (Schedule 1, column i, line 25). Schedule 2 provides a

² *Pacific Gas Transmission Company*, 70 FERC ¶ 61,016, *reh'g*, 71 FERC ¶ 61,268 (1995).

³ "Eligible" shippers are defined in Section 6.36(1)(a) of GTN's Tariff as firm shippers under Rate Schedule FTS-1(E-3), excluding shippers receiving service under a capacity release agreement.

calculation of the interest accrual on a monthly basis, including quarterly compounding. The interest rate used is the average prime rate for the calendar quarter as specified in Section 154.501(d) of the Commission's regulations. As indicated on Schedule 2, column h, line 26, GTN accrued cumulative interest charges of \$479.63 for a total refund amount of \$14,718.99 (Schedule 2, column j, line 26).

Schedule 3 shows the calculation of the refund amount issued to each shipper. Schedule 3, column b, reflects the total transportation revenue from firm transportation service on the Coyote Springs Lateral under Rate Schedule FTS-1(E-3) during the Refund Year.⁴ As reflected on Schedule 3, column b, line 3, GTN collected a total of \$919,656.20 in firm revenue during the Refund Year. The percent of each shipper's contribution to GTN's firm revenue on the Coyote Springs Lateral is calculated by dividing each shipper's net contribution (column b) by the total firm revenue collected (column c); the resulting percentage is shown in column d, "Customer Allocation Percent." Each shipper's proportionate share of the refund is calculated by multiplying the Customer Allocation Percentage (column d) by the total amount to be refunded (column e), as calculated on Schedule 2. The resulting refund for each customer is set out in column f.

In accordance with Section 154.501(e)(6)(i) of the Commission's Regulations, this filing includes this transmittal letter (including all information required by the Commission's regulations), and workpapers showing the calculation of the refund (Appendix A).

⁴ Pursuant to Section 6.28.10 of GTN's GT&C, GTN invoices releasing shippers for their capacity, but credits the releasing shippers with revenue received from replacement shippers. In those instances where a shipper holds capacity at a rate below GTN's maximum tariff rate and releases capacity to a second shipper at a rate greater than the releasing shipper's as-billed rate, the amount in excess of the releasing shipper's as-billed rate is credited directly to the releasing shipper, and does not constitute revenue received by GTN. As such, the net transportation revenues received from individual customers may not equal the total amount of a shipper's monthly invoice.

Certificate of Service

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R Section 385.2010, a copy of this filing, together with all enclosures, is being served upon all jurisdictional customers and interested state regulatory agencies.

In accordance with 18 C.F.R. Section 154.4 and Rule 2011(c)(5) of the Commission's Rules of Practice and Procedure, 18 C.F.R. Section 385.2011(c)(5), I hereby certify that I have read this filing and know the contents of the eFiling; that the contents as stated in the filing are true to the best of my knowledge and belief and that I possess the full power and authority to sign this filing.

Any questions regarding this filing may be directed to David A. Alonzo at (832) 320-5477.

Respectfully submitted,

A handwritten signature in black ink that reads "John A. Roscher". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John A. Roscher
Director, Rates & Tariffs

Enclosures

Appendix A

Interruptible Revenues Under Rate Schedule ITS-1(E-3)

Line Number	Invoice Period [a]	Quantity (Dth) [b]	Distance [c]	Non-Mileage Delivery Rate 1/ (per Dth) [d]	Mileage Delivery Rate 1/ (per Dth-mile) [e]	Non-Mileage Revenue [f] (b x d)	Mileage Revenue [g] (b x c x e)	Total Revenue [h] (f + g)	Revenue Credit 2/ [i] (h x 90%)
1	Nov-18	12,300	6.00	0.001283	0.001282	\$ 15.78	\$ 94.61	\$ 110.39	\$ 99.35
2	Nov-18	58,500	18.50	0.001283	0.001282	75.06	1,387.44	1,462.50	1,316.25
3	Dec-18	21,700	6.00	0.001283	0.001282	27.84	166.92	194.76	175.28
4	Dec-18	53,350	18.50	0.001283	0.001282	68.45	1,265.30	1,333.75	1,200.38
5	Jan-19	20,150	6.00	0.001155	0.001154	23.27	139.52	162.79	146.51
6	Jan-19	45,650	18.50	0.001155	0.001154	52.73	974.58	1,027.31	924.58
7	Feb-19	18,200	6.00	0.001155	0.001154	21.02	126.02	147.04	132.34
8	Feb-19	43,871	18.50	0.001155	0.001154	50.67	936.60	987.27	888.54
9	Mar-19	-	6.00	0.001155	0.001154	-	-	-	-
10	Mar-19	76,900	18.50	0.001155	0.001154	88.82	1,641.74	1,730.56	1,557.50
11	Apr-19	-	6.00	0.001155	0.001154	-	-	-	-
12	Apr-19	57,000	18.50	0.001155	0.001154	65.84	1,216.89	1,282.73	1,154.46
13	May-19	-	6.00	0.001155	0.001154	-	-	-	-
14	May-19	48,377	18.50	0.001155	0.001154	55.88	1,032.80	1,088.68	979.81
15	Jun-19	-	6.00	0.001155	0.001154	-	-	-	-
16	Jun-19	57,000	18.50	0.001155	0.001154	65.84	1,216.89	1,282.73	1,154.46
17	Jul-19	-	6.00	0.001155	0.001154	-	-	-	-
18	Jul-19	44,553	18.50	0.001155	0.001154	51.46	951.16	1,002.62	902.36
19	Aug-19	-	6.00	0.001155	0.001154	-	-	-	-
20	Aug-19	67,260	18.50	0.001155	0.001154	77.69	1,435.93	1,513.62	1,362.26
21	Sep-19	3,000	6.00	0.001155	0.001154	3.47	20.77	24.24	21.82
22	Sep-19	48,225	18.50	0.001155	0.001154	55.70	1,029.56	1,085.26	976.73
23	Oct-19	30,100	6.00	0.001155	0.001154	34.77	208.41	243.18	218.86
24	Oct-19	50,750	18.50	0.001155	0.001154	58.62	1,083.46	1,142.08	1,027.87
25						\$ 892.91	\$ 14,928.60	\$ 15,821.51	\$ 14,239.36

1/ FERC Gas Tariff, Fourth Revised Volume No. 1-A, Section 4.2, Statement of Rates, ITS-1 Rates.

2/ Per GTN's Tariff (Section 6.36 - GT&C, Crediting of IT Revenues on Extensions) the Crediting Percentage (90%) is applied to interruptible transportation revenues, exclusive of variable costs and surcharges.

Calculation of Interest

Line Number	Invoice Period	Revenue Credit	Start Date 1/	End Date	Days of Interest Accrual	Cumulative Interest Basis	FERC Interest Rate	Interest Amount 2/	Accrued Interest Used for Quarterly Compounding	Total Revenue Credit
[a]	[b]	[c]	[d]	[e]	[f]	[g]	[h]	[i]	[j]	
1	Nov-18	\$ 1,415.60	12/15/2018	12/31/2018	17	\$ 1,415.60	4.96%	\$ 3.27	\$ 3.27	\$ 1,418.87
2	Nov-18		1/1/2019	1/14/2019	14	\$ 1,418.87	5.18%	\$ 2.82		\$ 1,418.87
3	Dec-18	\$ 1,375.66	1/15/2019	1/31/2019	17	\$ 2,794.53	5.18%	\$ 6.74		\$ 2,794.53
4	Dec-18		2/1/2019	2/14/2019	14	\$ 2,794.53	5.18%	\$ 5.55		\$ 2,794.53
5	Jan-19	\$ 1,071.09	2/15/2019	2/28/2019	14	\$ 3,865.62	5.18%	\$ 7.68		\$ 3,865.62
6	Jan-19		3/1/2019	3/14/2019	14	\$ 3,865.62	5.18%	\$ 7.68		\$ 3,865.62
7	Feb-19	\$ 1,020.88	3/15/2019	3/31/2019	17	\$ 4,886.50	5.18%	\$ 11.79	\$ 42.26	\$ 4,928.76
8	Feb-19		4/1/2019	4/12/2019	12	\$ 4,928.76	5.45%	\$ 8.83		\$ 4,928.76
9	Mar-19	\$ 1,557.50	4/13/2019	4/30/2019	18	\$ 6,486.26	5.45%	\$ 17.43		\$ 6,486.26
10	Mar-19		5/1/2019	5/13/2019	13	\$ 6,486.26	5.45%	\$ 12.59		\$ 6,486.26
11	Apr-19	\$ 1,154.46	5/14/2019	5/31/2019	18	\$ 7,640.72	5.45%	\$ 20.54		\$ 7,640.72
12	Apr-19		6/1/2019	6/14/2019	14	\$ 7,640.72	5.45%	\$ 15.97		\$ 7,640.72
13	May-19	\$ 979.81	6/15/2019	6/30/2019	16	\$ 8,620.53	5.45%	\$ 20.59	\$ 95.95	\$ 8,716.48
14	May-19		7/1/2019	7/12/2019	12	\$ 8,716.48	5.50%	\$ 15.76		\$ 8,716.48
15	Jun-19	\$ 1,154.46	7/13/2019	7/31/2019	19	\$ 9,870.94	5.50%	\$ 28.26		\$ 9,870.94
16	Jun-19		8/1/2019	8/12/2019	12	\$ 9,870.94	5.50%	\$ 17.85		\$ 9,870.94
17	Jul-19	\$ 902.36	8/13/2019	8/31/2019	19	\$ 10,773.30	5.50%	\$ 30.84		\$ 10,773.30
18	Jul-19		9/1/2019	9/16/2019	16	\$ 10,773.30	5.50%	\$ 25.97		\$ 10,773.30
19	Aug-19	\$ 1,362.26	9/17/2019	9/30/2019	14	\$ 12,135.56	5.50%	\$ 25.60	\$ 144.28	\$ 12,279.84
20	Aug-19		10/1/2019	10/15/2019	15	\$ 12,279.84	5.42%	\$ 27.35		\$ 12,279.84
21	Sep-19	\$ 998.55	10/16/2019	10/31/2019	16	\$ 13,278.39	5.42%	\$ 31.55		\$ 13,278.39
22	Sep-19		11/1/2019	11/14/2019	14	\$ 13,278.39	5.42%	\$ 27.60		\$ 13,278.39
23	Oct-19	\$ 1,246.73	11/15/2019	11/30/2019	16	\$ 14,525.12	5.42%	\$ 34.51		\$ 14,525.12
24	Oct-19		12/1/2019	12/31/2019	31	\$ 14,525.12	5.42%	\$ 66.86	\$ 187.87	\$ 14,712.99
25			1/1/2020	1/3/2020	3	\$ 14,712.99	4.96%	\$ 6.00	\$ 6.00	\$ 14,718.99
26		\$ 14,239.36						\$ 479.63		\$ 14,718.99

1/ The Start Date for interest calculation is the next day following the invoice due date.

2/ Interest is computed in accordance with Section 154.501 of the Commission's Regulations - the FERC interest rate (column g) times the proration of number of days in the month divided by the number of days in the year times the principle and any applicable compounded interest. Per Section 154.501, interest is compounded quarterly.

Allocation of Revenue Credit

Line Number	Customer [a]	Net Transportation Revenue Contributed On Coyote Springs Lateral [b]	Total Net Transportation Revenue Contributed On Coyote Springs Lateral (Col. b, Line 3) [c]	Customer Allocation Percent 1/ (Col. b / Col. c) [d]	Refund Total (Schedule 2, Col. J, Line 26) [e]	Refund Per Customer (Col. d x Col. e) [f]
1	Avista Corporation	\$ 478,982.50	\$ 919,656.20	52.08%	\$ 14,718.99	\$ 7,666.06
2	Portland General Electric Company	440,673.70	919,656.20	47.92%	14,718.99	7,052.93
3	TOTAL	\$ 919,656.20		100.00%		\$ 14,718.99

1/ Percentage rounded to 2 digits for display. Calculation based on 8 decimal places.