

171 FERC ¶ 61,064
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

(April 21, 2020)

In Reply Refer To:
Trailblazer Pipeline Company LLC
Docket No. RP20-649-000

Trailblazer Pipeline Company LLC
370 Van Gordon Street
Lakewood, CO 80228

Attention: L. Drew Cutright
Vice President, Regulatory Affairs

Dear Mr. Cutright:

1. On March 5, 2020, Trailblazer Pipeline Company LLC (Trailblazer) filed tariff records,¹ pursuant to sections 38 and 40 of the General Terms and Conditions (GT&C) of Trailblazer's tariff, to revise its Fuel, and Lost and Unaccounted For (L&U) percentages (together, FL&U), and its Total Power Cost Tracker (PCT) charge. As discussed below, we accept the filed tariff records effective May 1, 2020, as requested, and grant waiver of Section 38 of the GT&C of Trailblazer's tariff, to allow Trailblazer to reflect a zero L&U Reimbursement Percentage in its tariff.

2. Sections 38 and 40 of the GT&C require Trailblazer to re-determine its FL&U percentages, for shippers on its Expansion System and shippers on the previously existing mainline, and the PCT charge to be effective May 1 of each year. Trailblazer states that, for the purposes of calculating the FL&U percentages and PCT charge proposed in the instant filing, it is utilizing the 12-month Base Period actual usage and throughput data observed during 2019, plus any amounts contained in the applicable deferral accounts. According to Trailblazer, the L&U percentage is calculated by summing the current L&U and the under- and over-recovered L&U for both Existing and Expansion Systems, respectively. Last, Trailblazer indicates that the Total PCT

¹ Trailblazer Pipeline Company LLC, FERC NGA Gas Tariff, Tariffs, [Rates, Cur. Eff. Rts. - FTS & FTB Expan Syst, ITS, & AOR Fuel & L&U, 14.0.0](#); and [Rates, Curr. Eff. Rts. - Expan. System Power Cost Tracker Rates, 9.0.0](#).

charge is calculated by summing the Expansion System PCT charge and the Unrecovered PCT charge adjustment.

3. Trailblazer states that, because the L&U percentage for the Expansion System would otherwise be negative (i.e., -0.2%), the proposed L&U percentage is reflected as 0.00% on the applicable tariff record. However, for purposes of calculating the total FL&U percentage for the Expansion System, Trailblazer explains that it is summing the actual L&U percentage (i.e., -0.2%) and Fuel percentage (i.e., 1.12%), yielding a total FL&U percentage of 0.92%. Trailblazer states that this method provides Expansion System shippers with full credit for the over-collection.

4. Public notice of the subject filing was issued on March 9, 2020. Interventions and protests were due as provided in section 154.210 of the Commission's regulations.² Pursuant to Rule 214,³ 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.

5. We accept the revised tariff records establishing Trailblazer's proposed FL&U percentages and the PCT charge, effective May 1, 2020, as requested. We also deem Trailblazer to have requested waiver of its tariff in order to implement its proposed zero L&U percentage, and find good cause to grant waiver of Section 38 of the GT&C of its tariff, which is consistent with similar waivers granted by the Commission.⁴ The Commission has previously found that holding reimbursement rates at zero is reasonable so long as all over-recovered amounts are eventually returned to the shippers.⁵

6. In the future, if Trailblazer wishes to use a zero L&U percentage in lieu of a calculated negative L&U percentage without seeking a waiver of its tariff from the

² 18 C.F.R. § 154.210 (2019).

³ 18 C.F.R § 385.214 (2019).

⁴ *E.g.*, *Crossroads Pipeline Co.*, 162 FERC ¶ 61,274 (2018); *Fayetteville Express Pipeline LLC*, 161 FERC ¶ 61,234 (2017); *Millennium Pipeline Co., LLC*, 156 FERC ¶ 61,143, at P 6 (2016).

⁵ *Trailblazer Pipeline Co. LLC*, 167 FERC ¶ 61,061 (2019); *Trailblazer Pipeline Co.*, 163 FERC ¶ 61,044 (2018); *ETC Tiger Pipeline, LLC*, 155 FERC ¶ 61,206, at P 7 (2016); *ETC Tiger Pipeline, LLC*, 153 FERC ¶ 61,252 (2015); *Columbia Gulf Transmission Co.*, 132 FERC ¶ 61,134, at P 43 (2010).

Commission, Trailblazer may make a filing with the Commission proposing to revise its tariff to explicitly permit Trailblazer to adjust a negative L&U percentage to zero.⁶

By direction of the Commission.

Kimberly D. Bose,
Secretary.

⁶ See *Gulf South Pipeline Co., L.P.*, 154 FERC ¶ 61,115, at PP 14 & 19, *order on reh'g*, 155 FERC ¶ 61,132 (2016).