



**NORTHWEST PIPELINE LLC**  
2800 Post Oak Boulevard (77056)  
P.O. Box 1396  
Houston, Texas 77251-1396  
713-215-2000

April 12, 2021

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

Reference: Northwest Pipeline LLC  
Compliance Filing  
Docket No. RP21-543

Dear Ms. Bose:

In compliance with the “Order Accepting Tariff Records Subject to Condition” issued on March 31, 2021 by the Federal Energy Regulatory Commission (“Commission” or “FERC”) in Docket No. RP21-543-000 (“March 31 Order”),<sup>1</sup> Northwest Pipeline LLC (“Northwest”) submits for filing and acceptance of the tariff records listed as part of its FERC Gas Tariff, Fifth Revised Volume No. 1 (“Tariff”).

Substitute Third Revised Sheet No. 221  
Substitute Fifth Revised Sheet No. 222-A  
Substitute Sixth Revised Sheet No. 222-B

The revised tariff records are proposed to be effective April 1, 2021.

**Statement of Nature, Reasons and Basis for the Filing**

On February 26, 2021, Northwest filed revised tariff records proposing to (1) add new Rate Schedule TPAL, and related tariff provisions, to Northwest’s Tariff to establish a new interruptible term park and loan (“TPAL”) service; (2) modify the existing Rate Schedule PAL (“PAL”) park and loan service to (a) allow shippers to use mutually agreeable non-storage park and loan points, (b) modify language surrounding transfers, and (c) state Northwest will post minimum PAL rates required for daily service at each point on Northwest’s Designated Site; and (3) update other park and loan service-related tariff records to include a reference to the new Rate Schedule TPAL.

On March 31, 2021, the Commission issued an order accepting Northwest’s filing subject to condition. Northwest proposed to schedule nominations for service under Rate Schedule TPAL at

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<sup>1</sup> Northwest Pipeline LLC, 174 FERC ¶ 61,255.

its Jackson Prairie Storage, Clay Basin Storage, and Non-Storage Points, by rate, highest to lowest, and when rates are the same, then based on the contract date with the newest contract receiving the lowest scheduling priority. However, in the March 31 Order the Commission explained that it could not find that scheduling nominations by contract date when rates are the same is consistent with Commission precedent. Therefore, the Commission directed Northwest to either revise Sections 12.2(d), 12.3(c), and 12.5 of the General Terms & Conditions of its Tariff to allocate capacity when rates are the same on a pro rata basis within 30 days or demonstrate why its proposal is consistent with the Commission's precedent.

To comply with the Commission's directive, Northwest hereby submits revised tariff records to allocate capacity when rates are the same on a pro rata basis rather than by contract date.

### **Proposed Effective Date and Waiver Request**

Northwest requests that the Commission accept the revised tariff records submitted herein to be effective April 1, 2021.

### **Materials Submitted Herewith**

In accordance with Section 154.7(a)(1) of the Commission's regulations, the following material is submitted herewith:

An eTariff XML filing package, filed as a zip (compressed) file, containing:

- (1) The revised tariff records in RTF format with metadata attached;
- (2) A transmittal letter in PDF format;
- (3) A clean version of the revised tariff records in PDF format for publishing in eLibrary;
- (4) A marked version of the tariff records in accordance with Section 154.201(a) of the Commission's regulations; and
- (5) A copy of the complete filing in PDF format for publishing in eLibrary.

### **Posting and Certification of Service**

In accordance with the provisions of Section 154.2(d) of the Commission's regulations, copies of this filing are available for public inspection, during regular business hours, in a convenient form and place at Northwest's main office at 2800 Post Oak Boulevard in Houston, Texas. In addition, Northwest certifies that copies of this filing have been served electronically upon Northwest's customers and upon interested state regulatory commissions.

Ms. Kimberly D. Bose  
April 12, 2021  
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All communications regarding this filing should be served by e-mail to:

Bela Patel  
Manager, Rates & Regulatory  
(713) 215-2659  
Northwest Pipeline LLC  
P.O. Box 1396  
Houston, Texas 77251-1396  
bela.patel@williams.com

Bruce Reemsnyder  
Senior Counsel  
(801) 584-6742  
Northwest Pipeline LLC  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900  
bruce.reemsnyder@williams.com

The undersigned certifies that the contents of this filing are true and correct to the best of her knowledge and belief; that the paper and electronic versions of the submitted tariff records contain the same information; and that she possesses full power and authority to sign this filing.

Respectfully submitted,

**NORTHWEST PIPELINE LLC**



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Manager, Rates & Regulatory

Enclosures

GENERAL TERMS AND CONDITIONS  
(Continued)

12. SCHEDULING PRIORITIES AND CURTAILMENT POLICY (Continued)

its operationally available capacity for Nominations that have not already been scheduled for a given Gas Day in accordance with the following priorities of service:

(a) First, Nominations for firm service under Rate Schedule SGS-2F and Transporter's firm balancing rights will be scheduled. If all such Nominations cannot be accommodated, available capacity for injections will be allocated pro rata based on Transporter's and Shipper's Storage Capacities and available capacity for withdrawals will be allocated pro rata based on Transporter's and Shipper's Storage Demand, which is subject to the limitations in Rate Schedule SGS-2F, Section 9.2.

(b) Second, Nominations for deliveries of Deferred Exchange Quantities at Jackson Prairie under Rate Schedule DEX-1, up to the Daily Delivery Quantity, will be scheduled. If all such Nominations cannot be accommodated, capacity will be allocated based on rate, highest to lowest. For services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations.

(c) Third, Nominations for Transporter's best-efforts system balancing requirements will be scheduled.

(d) Fourth, Nominations (including Shipper's requests for in-ground storage transfers) for interruptible storage capacity under Rate Schedules SGS-2F (as best-efforts), SGS-2I, PAL and/or TPAL will be scheduled. If all such storage capacity Nominations cannot be accommodated, available capacity will be allocated based on rate, highest to lowest. For Rate Schedules SGS-2F (as best-efforts), SGS-2I, PAL and/or TPAL services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations. To the extent there is more storage capacity than there is injection and/or withdrawal capacity, Transporter will separately and subsequently allocate capacity for in-ground transfer requests using the methodologies herein.

GENERAL TERMS AND CONDITIONS  
(Continued)

12. SCHEDULING PRIORITIES AND CURTAILMENT POLICY (Continued)

capacity Nominations cannot be accommodated, available capacity will be allocated based on rate, highest to lowest. For Rate Schedules PAL and/or TPAL services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations. To the extent there is more storage capacity than there is injection and/or withdrawal capacity, Transporter will separately and subsequently allocate capacity for in-ground transfer requests using the methodologies herein.

After scheduling interruptible storage capacity, Nominations for injections/withdrawals for interruptible service under Rate Schedules DEX-1 (Deferred Exchange Quantities that exceed the Daily Delivery Quantity) and PAL will be scheduled. If all such injection and/or withdrawal Nominations cannot be accommodated, available capacity will be allocated pro rata based on otherwise acceptable and confirmable Nominations.

For services with Negotiated Rates, the rates used for scheduling priorities are delineated in Section 12.6.

12.4 Scheduling Priorities for Plymouth LNG Facilities

If Transporter determines that its operationally available liquefaction, vaporization and/or LNG delivery capacities at the Plymouth LNG Facility are insufficient to accommodate all otherwise acceptable new Nominations for services under Rate Schedules LS-2F, LS-3F, LS-2I and LD-4I in any Nomination cycle, Transporter will schedule its operationally available capacity for Nominations that have not already been scheduled for a given Gas Day in accordance with the following priorities of service:

(a) First, Nominations for firm service under Rate Schedules LS-2F and LS-3F will be scheduled. If all such Nominations cannot be accommodated, available liquefaction capacity and available LNG delivery capacity will be allocated pro rata based on Shipper's Storage Capacities and available vaporization capacity will be allocated based on Shipper's Storage Demand.

GENERAL TERMS AND CONDITIONS  
(Continued)

12. SCHEDULING PRIORITIES AND CURTAILMENT POLICY (Continued)

(b) Second, Nominations for interruptible service under Rate Schedules LS-2I and LD-4I, and Nominations for overrun service under Rate Schedules LS-2F and LS-3F will be scheduled. If all such Nominations cannot be accommodated, available capacity will be allocated according to the rates applicable to the service, from highest to lowest. For services at the same rates, any necessary allocations will be pro rata based on Nominations. For services with Negotiated Rates, the rates used for scheduling priorities are delineated in Section 12.6.

12.5 Scheduling Priorities for Park and Loan at Non-Storage Points

Nominations (including Shipper's requests for transfers) for interruptible service under Rate Schedules PAL and/or TPAL will be scheduled. If all such Nominations cannot be accommodated, available capacity will be allocated based on rate, highest to lowest. For Rate Schedules PAL and/or TPAL services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations.

For services with Negotiated Rates, the rates used for scheduling priorities are delineated in Section 12.6.

12.6 Negotiated Rate Used to Establish Priority

For non-firm services subject to Negotiated Rates, the rate used for scheduling priorities will be:

- (1) the lower of the Negotiated Rate or the corresponding Recourse Rate, if the Negotiated Rate is a stated rate;
- (2) the lower of the minimum Negotiated Rate or the corresponding Recourse Rate, if the Negotiated Rate is a formula rate with a specified minimum; or
- (3) the corresponding minimum base rate set forth on the Statement of Rates, if the Negotiated Rate is a formula rate without a specified minimum.

GENERAL TERMS AND CONDITIONS  
(Continued)

12. SCHEDULING PRIORITIES AND CURTAILMENT POLICY (Continued)

its operationally available capacity for Nominations that have not already been scheduled for a given Gas Day in accordance with the following priorities of service:

(a) First, Nominations for firm service under Rate Schedule SGS-2F and Transporter's firm balancing rights will be scheduled. If all such Nominations cannot be accommodated, available capacity for injections will be allocated pro rata based on Transporter's and Shipper's Storage Capacities and available capacity for withdrawals will be allocated pro rata based on Transporter's and Shipper's Storage Demand, which is subject to the limitations in Rate Schedule SGS-2F, Section 9.2.

(b) Second, Nominations for deliveries of Deferred Exchange Quantities at Jackson Prairie under Rate Schedule DEX-1, up to the Daily Delivery Quantity, will be scheduled. If all such Nominations cannot be accommodated, capacity will be allocated based on rate, highest to lowest. For services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations.

(c) Third, Nominations for Transporter's best-efforts system balancing requirements will be scheduled.

(d) Fourth, Nominations (including Shipper's requests for in-ground storage transfers) for interruptible storage capacity under Rate Schedules SGS-2F (as best-efforts), SGS-2I, PAL and/or TPAL will be scheduled. If all such storage capacity Nominations cannot be accommodated, available capacity will be allocated based on rate, highest to lowest. For Rate Schedules SGS-2F (as best-efforts), SGS-2I, PAL and/or TPAL services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations. ~~For Rate Schedule TPAL services at the same rate, any necessary allocations of available capacity will be based on contract date, with the newest contracts receiving the lowest priority.~~ To the extent there is more storage capacity than there is injection and/or withdrawal capacity, Transporter will separately and subsequently allocate capacity for in-ground transfer requests using the methodologies herein.

GENERAL TERMS AND CONDITIONS  
(Continued)

12. SCHEDULING PRIORITIES AND CURTAILMENT POLICY (Continued)

capacity Nominations cannot be accommodated, available capacity will be allocated based on rate, highest to lowest. For Rate Schedules PAL and/or TPAL services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations. ~~For Rate Schedule TPAL services at the same rates, any necessary allocations of available capacity will be based on contract date, with newest contracts receiving the lowest priority.~~ To the extent there is more storage capacity than there is injection and/or withdrawal capacity, Transporter will separately and subsequently allocate capacity for in-ground transfer requests using the methodologies herein.

After scheduling interruptible storage capacity, Nominations for injections/withdrawals for interruptible service under Rate Schedules DEX-1 (Deferred Exchange Quantities that exceed the Daily Delivery Quantity) and PAL will be scheduled. If all such injection and/or withdrawal Nominations cannot be accommodated, available capacity will be allocated pro rata based on otherwise acceptable and confirmable Nominations.

For services with Negotiated Rates, the rates used for scheduling priorities are delineated in Section 12.6.

12.4 Scheduling Priorities for Plymouth LNG Facilities

If Transporter determines that its operationally available liquefaction, vaporization and/or LNG delivery capacities at the Plymouth LNG Facility are insufficient to accommodate all otherwise acceptable new Nominations for services under Rate Schedules LS-2F, LS-3F, LS-2I and LD-4I in any Nomination cycle, Transporter will schedule its operationally available capacity for Nominations that have not already been scheduled for a given Gas Day in accordance with the following priorities of service:

(a) First, Nominations for firm service under Rate Schedules LS-2F and LS-3F will be scheduled. If all such Nominations cannot be accommodated, available liquefaction capacity and available LNG delivery capacity will be allocated pro rata based on Shipper's Storage Capacities and available vaporization capacity will be allocated based on Shipper's Storage Demand.



GENERAL TERMS AND CONDITIONS  
(Continued)

12. SCHEDULING PRIORITIES AND CURTAILMENT POLICY (Continued)

(b) Second, Nominations for interruptible service under Rate Schedules LS-2I and LD-4I, and Nominations for overrun service under Rate Schedules LS-2F and LS-3F will be scheduled. If all such Nominations cannot be accommodated, available capacity will be allocated according to the rates applicable to the service, from highest to lowest. For services at the same rates, any necessary allocations will be pro rata based on Nominations. For services with Negotiated Rates, the rates used for scheduling priorities are delineated in Section 12.6.

12.5 Scheduling Priorities for Park and Loan at Non-Storage Points

Nominations (including Shipper's requests for transfers) for interruptible service under Rate Schedules PAL and/or TPAL will be scheduled. If all such Nominations cannot be accommodated, available capacity will be allocated based on rate, highest to lowest. For Rate Schedules PAL and/or TPAL services at the same rates, any necessary allocations of available capacity will be pro rata based on otherwise acceptable and confirmable Nominations. ~~For Rate Schedule TPAL service at the same rate, any necessary allocations of available capacity will be allocated based on contract date, with the newest contracts receiving the lowest priority.~~

For services with Negotiated Rates, the rates used for scheduling priorities are delineated in Section 12.6.

12.6 Negotiated Rate Used to Establish Priority

For non-firm services subject to Negotiated Rates, the rate used for scheduling priorities will be:

- (1) the lower of the Negotiated Rate or the corresponding Recourse Rate, if the Negotiated Rate is a stated rate;
- (2) the lower of the minimum Negotiated Rate or the corresponding Recourse Rate, if the Negotiated Rate is a formula rate with a specified minimum; or
- (3) the corresponding minimum base rate set forth on the Statement of Rates, if the Negotiated Rate is a formula rate without a specified minimum.