



NORTHWEST PIPELINE LLC
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March 6, 2020

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

Re: Northwest Pipeline LLC
Docket No. RP20-531-___

Dear Ms. Bose:

Pursuant to Part 154 of the regulations of the Federal Energy Regulatory Commission (“Commission” or “FERC”), Northwest Pipeline LLC (“Northwest”) tenders for filing and acceptance the following tariff sheets as part of its FERC Gas Tariff, Fifth Revised Volume No. 1 (“Tariff”).

Substitute Second Revised Sheet No. 204-D
Substitute Second Revised Sheet No. 205

Statement of Nature, Reasons and Basis for the Filing

On February 19, 2020, in the above referenced docket, Northwest submitted for the Commission’s acceptance new Tariff language regarding renewable natural gas (“RNG”). In its initial filing, Northwest proposed Tariff changes that, among other things, prohibits the delivery of RNG from landfills receiving any hazardous waste. On March 2, 2020, BP Energy Company (“BP”) intervened and provided comments concerning Northwest’s proposed Tariff language that prohibits the delivery of RNG from landfills receiving any hazard waste. BP believes that such prohibition is overly restrictive and may unintentionally impede further development of RNG and interconnection of facilities to Northwest’s system. BP suggests that Northwest differentiate between “permitted” hazardous waste landfills and regular landfills that may receive only small quantities of hazardous waste, and to limit Northwest’s prohibition to “permitted” hazardous waste landfills. After further research, Northwest agrees with BP’s suggestion and proposes to replace the previously proposed Section 3.1(c)(2) of the Tariff’s General Terms and Conditions with the following:

“Transporter prohibits the delivery of RNG to Transporter’s Receipt Points from any landfill permitted under the Resource Conservation and Recovery Act Subtitle C (42 U.S.C. § 6921 - 6932), whether by the United States Environmental Protection Agency or by a state under a program authorized by the United States Environmental Protection Agency (“Hazardous Waste Landfills”). A Hazardous Waste Landfill includes all

continuous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, and disposal or recycling of hazardous waste. A Hazardous Waste Landfill may consist of one or more treatment, transfer, storage, resource recovery, disposal, or recycling hazardous waste management units, or combinations of these units. The landfill operator shall certify in writing to Transporter that the RNG is not being produced from landfill gas collected from a Hazardous Waste Landfill before delivering the RNG into Transporter's pipeline”

Northwest has discussed this change with BP and BP agrees that it adequately addresses their concerns.

Filings Pending Before the Commission

In compliance with 18 CFR § 154.204(f), Northwest states that it has no other tariff filings pending before the Commission that may significantly impact this filing.

Effective Date and Waiver Request

Northwest respectfully requests that the Commission grant a waiver of Section 154.207 of its regulations and accept the substitute tariff records submitted herein effective March 20, 2020, the same effective date Northwest requested in its February 19, 2020 filing. In the event the Commission elects to accept and suspend the substitute tariff records, in accordance with Section 154.7(a)(9) of the Commission's regulations, Northwest moves to place such tariff records into effect at the end of the applicable suspension period.

Procedural Matters

Pursuant to the applicable provisions in Section 154 of the Commission's regulations, Northwest submits an eTariff .xml filing package, containing the following items:

- Proposed tariff sheet,
- Marked tariff sheet,
- Transmittal letter

Service and Communications

In compliance with 18 CFR § 154.7(b), Northwest certifies that copies of this filing have been served electronically upon Northwest's customers and upon interested state regulatory commissions.

All communications regarding this filing should be served by e-mail to:

Ms. Kimberly D. Bose
March 6, 2020
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The undersigned certifies that the contents of this filing are true and correct to the best of his knowledge and belief; that the paper and electronic versions of the submitted tariff sheets contain the same information; and that he possesses full power and authority to sign this filing.
Respectfully submitted,

NORTHWEST PIPELINE LLC

David J. Madsen
Director, Rates & Regulatory Affairs

Enclosures

GENERAL TERMS AND CONDITIONS
(Continued)

3. QUALITY (Continued)

~~(1110)~~ Toxic or Hazardous Substance: The gas shall not contain any toxic or hazardous substance in concentrations which, in the normal use of the gas, may be hazardous to health, injurious to pipeline facilities, or be a limit to merchantability or be contrary to applicable government standards.

~~(1211)~~ Bacteria: The gas, including any associated liquids, shall not contain any microbiological organism, active bacteria or bacterial agent capable of causing or contributing to: (i) injury to Transporter's pipelines, meters, regulators, or other facilities and appliances through which such gas flows or (ii) interference with the proper operation of the Transporter's facilities. Microbiological organisms, include, but are not limited to, sulfate reducing bacteria (SRB) and acid producing bacteria (ACB). When bacteria or microbiological organisms are considered a possibility, Shipper(s) desiring to Nominate such gas, upon Transporter's request, shall cause such gas to be tested for bacteria or bacterial agents utilizing the American Petroleum Institute test method API-RP38 or other acceptable test method as determined by both parties.

(c) RNG delivered by Shipper to Transporter at Receipt Point mentioned in Section 3.1(a) shall conform to the following specifications and testing /monitoring requirements:

(1) RNG gas delivered into Transporter's system shall conform to the gas quality specifications set forth in Section 3.1(a) above except when Transporter, in its reasonable judgement, determines it can accept RNG: (a) containing not more than a combined total of four percent by volume of inerts including, but not limited to, carbon dioxide, nitrogen and oxygen and/or (b) with a total gross heating value of not less than 970 Btu.

(2) Transporter prohibits the delivery of RNG to Transporter's Receipt Points from any landfill permitted under the Resource Conservation and Recovery Act Subtitle C (42 U.S.C. § 6921 - 6932), whether by the United States Environmental Protection Agency or by a state under a program authorized by the United States Environmental Protection Agency ("Hazardous Waste Landfills"). A Hazardous Waste Landfill includes all continuous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, disposal or recycling hazardous waste management units, or combinations of these units.

~~3.2 Gas Quality at Delivery Point(s). The gas delivered by Transporter to Shipper at the Delivery Point shall be natural gas containing a gross heating value of at least 985 Btus. Such gas shall be commercially free of dust, gums, dirt, impurities and other solid matter and shall not contain more than one-quarter grain hydrogen sulfide per one hundred cubic feet as determined by using commercially available on-line analyses and/or such analytical methods that are generally accepted in industry practice; provided that Transporter may install and utilize a recording hydrogen sulfide analyzer to monitor the gas at points at which it deems such continuous monitoring to be desirable. The gas to be delivered shall not contain more than five grains of total sulfur per one hundred cubic feet, unless Transporter determines that there is a regulatory requirement for gas to be odorized upstream of the Delivery Point, in which case, the gas to be delivered shall not contain more than six grains of total sulfur per one hundred cubic feet.~~

GENERAL TERMS AND CONDITIONS
(Continued)

3. QUALITY (Continued)

The landfill operator shall certify in writing to Transporter that the RNG is not being produced from landfill gas collected from a Hazardous Waste landfill before delivering the RNG into Transporter's pipeline system.

(3) RNG to be delivered to and transported on Transporter's pipeline system shall be subject to periodic testing and monitoring based on the biogas source. Transporter's RNG operating policy and testing requirements for the acceptance of RNG into Transporter's system will be posted on Transporter's Designated Site.

3.2 Gas Quality at Delivery Point(s). The gas delivered by Transporter to Shipper at the Delivery Point shall be natural gas containing a gross heating value of at least 985 Btus. Such gas shall be commercially free of dust, gums, dirt, impurities and other solid matter and shall not contain more than one-quarter grain hydrogen sulfide per one hundred cubic feet as determined by using commercially available on-line analyses and/or such analytical methods that are generally accepted in industry practice; provided that Transporter may install and utilize a recording hydrogen sulfide analyzer to monitor the gas at points at which it deems such continuous monitoring to be desirable. The gas to be delivered shall not contain more than five grains of total sulfur per on hundred cubic feet, unless Transporter determines that there is a regulatory requirement for gas to be odorized upstream of the Delivery Point, in which case, the gas to be delivered shall not contain more than six grains of total sulfur per one hundred cubic feet.

The gas shall be free of water and hydrocarbons in liquid form at the temperature and pressure at which the gas is delivered and in no event shall have a water content in excess of seven pounds in vapor phase per million cubic feet.

~~3.3 Determination of Gross Heating Value and Component Analysis. The party operating the measurement equipment shall determine the gross heating value of the gas delivered and its component analysis at reasonable intervals. Such determination shall be made using either an on-line chromatograph or by chromatographic analysis of a representative sample of gas taken with a continuous sampler. Transporter may at its option allow the use of spot samples. If at any time and for any reason Shipper or Transporter should question the results of any spot sampling, a redetermination shall be made and the redetermination mutually acceptable to the parties shall be used; provided, however, if neither party questions such results within a period of sixty (60) days following the determination thereof, then such results shall be deemed conclusive and binding upon the parties. Btu measuring equipment shall be installed at a location or locations where the gross heating value of the gas received or delivered hereunder may be reasonably determined.~~

~~3.4 Failure to Meet Specifications. Transporter or Shipper shall have the right, exercisable by the giving of written or oral notice to the other party, to require the remedy of any failure to deliver or redeliver gas in accordance with the quality specifications set forth in Sections 3.1 and 3.2. In the event gas delivered by either party fails to conform to such specifications, as evidenced by the latest chromatograph analysis derived from an on-line chromatograph or from a sample taken manually and analyzed by a chromatograph, or from any other verifiable evidence, the receiving party may refuse to accept all or any portion of such gas.~~

GENERAL TERMS AND CONDITIONS
(Continued)

3. QUALITY (Continued)

(11) Toxic or Hazardous Substance: The gas shall not contain any toxic or hazardous substance in concentrations which, in the normal use of the gas, may be hazardous to health, injurious to pipeline facilities, or be a limit to merchantability or be contrary to applicable government standards.

(12) Bacteria: The gas, including any associated liquids, shall not contain any microbiological organism, active bacteria or bacterial agent capable of causing or contributing to: (i) injury to Transporter's pipelines, meters, regulators, or other facilities and appliances through which such gas flows or (ii) interference with the proper operation of the Transporter's facilities. Microbiological organisms, include, but are not limited to, sulfate reducing bacteria (SRB) and acid producing bacteria (ACB). When bacteria or microbiological organisms are considered a possibility, Shipper(s) desiring to Nominate such gas, upon Transporter's request, shall cause such gas to be tested for bacteria or bacterial agents utilizing the American Petroleum Institute test method API-RP38 or other acceptable test method as determined by both parties.

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GENERAL TERMS AND CONDITIONS
(Continued)

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