



**NORTHWEST PIPELINE LLC**  
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December 20, 2019

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

**Re: Northwest Pipeline LLC**  
Docket No. RP20-309-\_\_\_

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 Fifth Revised Sheet No. 232  
Fourth Revised Sheet No. 232-D  
Fifth Revised Sheet No. 232-E

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

On December 3, 2019, in the above referenced docket, Northwest submitted for Commission acceptance a miscellaneous and housekeeping tariff filing to, among other changes, propose to revise Section 14.15(c) of the General Terms and Conditions (“GT&C”) of the Tariff to address Northwest’s reliance on scheduled quantities for OFO calculations. On December 16, 2019, Idaho Power Company (“Idaho Power”) intervened and provided comments concerning the revisions to Section 14.15(c). Idaho Power’s concern is that in situations when displacement gas that is being relied upon for OFO calculations is reduced after the Timely Nomination Cycle, but restored in a subsequent nomination cycle, a shipper could still “be subject to the proposed penalties, even if the gas actually flows on the Gas Day of the OFO and may have no operational impact to Northwest Pipeline.”<sup>1</sup> To provide clarity, Northwest proposes to add additional text to the last sentence in revised Section 14.15(c) so that the sentence reads as follows (the highlighted words are the proposed new text):

“If such Scheduled Quantities are reduced in a subsequent Nomination cycle during the Gas Day on which an OFO has been issued **and not restored in the next available Nomination cycle**, they will be subject to the same OFO penalties as those outlined in

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<sup>1</sup> “Motion to Intervene and Comments of Idaho Power Company” filed in Docket No. RP20-309 at page 3.

Section 14.15(f) herein, unless a Shipper reduces a corresponding quantity flowing through the constraint point, in the constrained direction, or takes other actions acceptable to Transporter.”

To further address Idaho Power’s concerns, Northwest is proposing to clarify its historical business practice relating to mutually agreeable alternative actions, including those related to the timelines for compliance detailed in GT&C Section 14.15. Northwest proposes to move the following provision on Sheet No. 232-D and relocate it after the “Issuance of an OFO” provision in GT&C Section 14.15(e):

“Notwithstanding the foregoing, Transporter and Shipper may agree to take any other mutually agreeable action that would assist in alleviating the operating condition which necessitated the issuance of the OFO.”

These proposed revisions address the situation discussed in Idaho Power’s comments by clarifying that penalties will only be assessed if the relied upon scheduled quantities are not restored or other mutually agreeable actions are not taken. Northwest has discussed these changes with Idaho Power and believes these edits address Idaho Power’s concerns.

Northwest requests the Commission accept the revisions stated above to Section 14.15 of the GT&C of the Tariff by accepting the proposed tariff sheets included herein and rejecting Fifth Revised Sheet No. 232 filed in this docket on December 3, 2019.

### ***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 tariff sheets submitted herein effective January 3, 2020, the same effective date Northwest requested in its December 3, 2019 filing. In the event the Commission elects to accept and suspend the tariff sheets, in accordance with Section 154.7(a)(9) of the Commission’s regulations, Northwest moves to place such tariff sheets 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 sheets,

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- Marked tariff sheets,
- 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:

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Director, Business Development &  
Regulatory Affairs  
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Northwest Pipeline LLC  
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(801) 584-6326  
Northwest Pipeline LLC  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900  
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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, Business Development &  
Regulatory Affairs

Enclosures

GENERAL TERMS AND CONDITIONS (Continued)

14. OPERATING CONDITIONS (Continued)

14.15 Operational Flow Order ("OFO")

(a) General. NAESB WGQ Nominations Related Standards 1.3.26 and 1.3.34 will apply.

This Section 14.15 will apply to any Shipper, including any Replacement Shipper, receiving firm transportation service under any Rate Schedule contained in Transporter's FERC Gas Tariff. Transporter will issue OFOs when in its reasonable judgment Transporter determines OFOs are necessitated by the condition described in Section 14.15(b) hereof, and when all other available operating measures, including storage options and excluding any firm service curtailment, have been exhausted.

This Section 14.15 also will apply to the implementation and administration of contract-specific OFOs issued by Transporter within the contract-specific OFO parameters set forth on Exhibit A or a FERC approved non-conforming provision on Exhibit B of Rate Schedule TF-1 and TF-2 Service Agreements.

(b) OFO Operational Conditions. An OFO may be issued when primary firm nominations through a given constraint point exceed the greater of the physical design capacity or the posted operationally available capacity for a given day. Transporter will not issue an OFO when Transporter's inability to meet firm transportation commitments is due to scheduled or unscheduled maintenance, force majeure, or the Unavailability of Transporter's Facilities.

(c) ~~RESERVED FOR FUTURE USE.~~ Reliance on Scheduled Quantities for OFO Calculations. When calculating OFO obligations to alleviate the adverse operating condition, Transporter relies on Scheduled Quantities from the Timely Nomination Cycle that are (i) on the downstream side of the constraint point and scheduled on a Service Agreement subject to a Realignment OFO, or (ii) flowing through the OFO constraint point in the non-constrained direction. Due to this reliance, Shippers may not reduce such Scheduled Quantities in subsequent Nomination cycles during the Gas Day for which Transporter has issued an OFO. If such Scheduled Quantities are reduced in a subsequent Nomination cycle during the Gas Day on which an OFO has been issued and not restored in the next available Nomination cycle, they will be subject to the same OFO penalties as those outlined in Section 14.15(f) herein, unless a Shipper reduces a corresponding quantity flowing through the constraint point, in the constrained direction, or takes other actions acceptable to Transporter.

(d) Order of Operational Remedies. Transporter will take the following actions in order to alleviate adverse operating conditions utilizing the mechanisms below in the following order:

~~(i) Entitlement and Scheduling Remedies — to the extent Transporter determines they will alleviate the adverse operating condition, invoke the scheduling and entitlement mechanisms provided for by Transporter's Tariff;~~

~~(ii) Contract-Specific OFO — to the extent Transporter determines they will alleviate the adverse operating condition, invoke, pro rata based on applicable contract quantities, specific contractual provisions which require, as a condition of a Capacity Release or a commitment of capacity, certain Shippers to flow gas upon Transporter's request;~~

GENERAL TERMS AND CONDITIONS  
(Continued)

14. OPERATING CONDITIONS (Continued)

constrained direction and the remedies outlined in (i) through (iv) above have not alleviated the adverse operating condition.

When a Supply Shortage OFO is required due to a supply interruption that would result in operational problems, Transporter will fill the OFO constraint point in the Intraday 1 Nomination Cycle to the greater of the physical design capacity or the posted operationally available capacity by allocating Shipper's primary firm nomination requests pro rata based on the Shipper's primary firm corridor rights through the OFO constraint point. If Transporter reduces Shipper nominations pursuant to a Supply Shortage OFO, reservation charge adjustments will not be paid to such Shipper by Transporter.

~~Notwithstanding the foregoing, Transporter and Shipper may agree to take any other mutually agreeable action that would assist in alleviating the operating condition which necessitated the issuance of the OFO.~~

In no event will Transporter issue a Realignment or Must-flow OFO associated with any contract whose OFO obligation is 100 Dth or less.

Transporter will remove OFOs in an order reversed from the order set forth above.

(e) OFO Notice, Contents and Procedures.

Portal Posting Requirements

Transporter will make reasonable efforts to notify Shippers that an operational problem is developing which could potentially necessitate the issuance of an OFO. Transporter will declare an OFO for one or more specific constraint points via an All Shipper Notice, identifying the effective date and duration of the OFO (if none is specified, the OFO will be effective until further notice).

Transporter will post to its designated site, summary level information each Gas Day the OFO is in effect.

Issuance of an OFO

Subsequent to the Portal Posting on the day prior to commencement of the Gas Day, no later than 5:00 p.m. Central Clock Time (4:00 p.m. Mountain Clock Time), during the scheduling and confirmation procedure, Transporter will provide notification of the Contract-specific, Realignment and Must-flow OFO obligations via an Internet E-mail to the affected Shipper(s).

GENERAL TERMS AND CONDITIONS  
(Continued)

14. OPERATING CONDITIONS (Continued)

~~Issuance of an OFO~~

~~Subsequent to the Portal Posting on the day prior to commencement of the Gas Day, no later than 5:00 p.m. Central Clock Time (4:00 p.m. Mountain Clock Time), during the scheduling and confirmation procedure, Transporter will provide notification of the Contract-specific, Realignment and Must-flow OFO obligations via an Internet E-mail to the affected Shipper(s).~~

Each Shipper shall designate an operational contact, and/or a third-party designee, for Transporter to notify on a 24-hour a day, 365 days a year basis. If Transporter is unable to notify any Shipper because that Shipper's contact is unavailable, such Shipper shall be solely responsible for any consequences arising from such failure of communication. Each OFO notification will contain the following provisions:

- (i) time and date of issuance;
- (ii) time that the OFO is considered to be effective;
- (iii) OFO type of operational remedy as defined in Section 14.15 (d) (ii), (iii), (iv) or (v);
- (iv) the Service Agreement subject to the OFO;
- (v) constrained point location;
- (vi) specific action necessary to remedy the condition;
- (vii) any other terms Transporter may reasonably require to ensure the effectiveness of the OFO; and
- (viii) to the extent that a Shipper has been requested to take action pursuant to Section 14.15(d) (ii), (iii) or (iv) above and such Shipper has temporarily released all or a portion of its capacity subject to the OFO recall provisions of Section 22.2(a) (2), then Transporter will provide, at a contract level, the associated Replacement Shipper's scheduled quantities used to calculate its OFO obligation.

Unless Transporter has invoked a Supply Shortage OFO, or unless otherwise specified in the OFO, compliance must commence at the beginning of the applicable gas day (Evening Nomination Cycle). If Transporter has invoked a Supply Shortage OFO, compliance by Shippers subject to a Contract-Specific or Must-flow OFO must commence no later than the Intraday 1 Nomination Cycle.

Notwithstanding the foregoing, Transporter and Shipper may agree to take any other mutually agreeable action that would assist in alleviating the operating condition which necessitated the issuance of the OFO.



GENERAL TERMS AND CONDITIONS (Continued)

14. OPERATING CONDITIONS (Continued)

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(Continued)

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GENERAL TERMS AND CONDITIONS  
(Continued)

14. OPERATING CONDITIONS (Continued)

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- (iv) the Service Agreement subject to the OFO;
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- (vi) specific action necessary to remedy the condition;
- (vii) any other terms Transporter may reasonably require to ensure the effectiveness of the OFO; and
- (viii) to the extent that a Shipper has been requested to take action pursuant to Section 14.15(d)(ii), (iii) or (iv) above and such Shipper has temporarily released all or a portion of its capacity subject to the OFO recall provisions of Section 22.2(a)(2), then Transporter will provide, at a contract level, the associated Replacement Shipper's scheduled quantities used to calculate its OFO obligation.

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