

December 19, 2018

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

RE: Florida Gas Transmission Company, LLC
Docket No. CP17-8-000 Compliance Filing
Docket No. RP19-_____

Dear Ms. Bose:

Florida Gas Transmission Company, LLC (FGT) hereby electronically submits for filing with the Federal Energy Regulatory Commission (Commission) the revised tariff records listed below to its FERC NGA Gas Tariff, Fifth Revised Volume No. 1, proposed to be effective on February 1, 2019 the expected in-service date of FGT's East-West Project Phase 2 facilities.

Version	Description	Title
1.0.0	Rate Schedule FTS-WD-2	Currently Effective Rates
9.0.0	GT&C Section 30.	Non-Conforming Agreements

STATEMENT OF NATURE, REASONS AND BASIS

The Commission's Order Issuing Certificate issued April 5, 2018 in Docket No. CP17-8-000 (Order) grants FGT authorization under Section 7(c) of the Natural Gas Act to construct and operate FGT's East-West Project, as more fully described in the application and as conditioned in the body and ordering paragraphs of such Order. The Phase 2 facilities are being constructed pursuant to the certificate issued in the Order and should be completed by February 1, 2019. In compliance with Ordering Paragraphs (D) and (G) of the Order, FGT is filing the proposed tariff records in advance of the anticipated in-service date of the East-West Project Phase 2 facilities.

The Rate Schedule FTS-WD-2, Currently Effective Rates tariff record submitted herewith is identical to the *pro forma* Phase 2 tariff record filed in Docket No. CP17-8-000 with two exceptions. First, in a January 19, 2018 response to a staff data request, FGT provided an adjusted cost of service and a recalculated initial incremental recourse reservation charge to reflect changes in the federal tax code, as per the Tax Cuts and Jobs Act of 2017, which became effective January 2018.¹ FGT's work papers show a reduction in the initial incremental recourse reservation charges to \$0.1015 per Dth for the Phase 2 service. The Commission found that the revised cost of service and resulting incremental recourse reservation charge are appropriate for the purpose of establishing the initial incremental rates. Second, the unit fuel charge and fuel reimbursement charge percentage have been updated to reflect the values filed in FGT's most recent fuel filing in Docket No. RP18-1106-000 and accepted by the Commission's letter order dated September 20, 2018 to be effective October 1, 2018. Appendix A shows the changes to the Pro Forma Rate Schedule FTS-WD-2 Currently Effective Rates tariff record.

¹ Pub. L. No. 115-97, 131 Stat. 2054.

FGT also submits herein an updated list of non-conforming agreements to reflect a new Rate Schedule FTS-WD-2 service agreement with JERA Energy America LLC, Contract No. 123157, to commence on February 1, 2019, the anticipated in-service date for FGT's East-West Project Phase 2. FGT is making a concurrent filing to add this new non-conforming service agreement as tariff records in its Original Volume No. 1-A.

IMPLEMENTATION AND WAIVER REQUESTS

Pursuant to Section 154.7(a)(9) of the Commission's Regulations, FGT requests that the proposed tariff records be accepted effective upon the in-service date of FGT's East-West Project Phase 2 facilities, without further action from FGT. FGT respectfully requests the Commission grant any waiver of its Regulations that it deems necessary to allow the proposed tariff records in this filing to become effective upon the in-service date of FGT's East-West Project Phase 2 facilities, which is expected to be February 1, 2019.

CONTENTS OF THE FILING

This filing is made in electronic format in compliance with Section 154.4 of the Commission's Regulations. The proposed tariff records in RTF format with metadata attached are being submitted as part of an XML filing package containing the following:

- . A transmittal letter in PDF format
- . A clean copy of the proposed tariff records in PDF format for publishing in eLibrary
- . A marked version of the proposed tariff changes in PDF format
- . Appendix A in PDF format
- . A copy of the complete filing in PDF format for publishing in eLibrary

COMMUNICATIONS, PLEADINGS AND ORDERS

FGT requests that all Commission orders and correspondence as well as pleadings and correspondence from other parties concerning this filing be served on each of the following:

Michael T. Langston²
Vice President
Chief Regulatory Officer
Florida Gas Transmission Company, LLC
1300 Main Street
Houston, TX 77002
(713) 989-7610
(713) 989-1205 (Fax)
michael.langston@energytransfer.com

Kevin P. Erwin²
General Counsel
Florida Gas Transmission Company, LLC
1300 Main Street
Houston, TX 77002
(713) 989-2745
(713) 989-1212 (Fax)
kevin.erwin@energytransfer.com

² Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. FGT respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow FGT to include additional representatives on the official service list.

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December 19, 2018
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Deborah A. Bradbury ^{2 3}
Sr. Director – Regulatory Tariffs & Reporting
Florida Gas Transmission Company, LLC
1300 Main Street
Houston, TX 77002
(713) 989-7571
(713) 989-1205 (Fax)
debbie.bradbury@energytransfer.com

In accordance with Section 154.2(d) of the Commission's Regulations, a copy of this filing is available for public inspection during regular business hours at FGT's office at 1300 Main Street, Houston, Texas 77002. In addition, copies of this filing are being served electronically on all parties on the official service list for Docket No. CP17-8-000. FGT has posted this filing on its Internet web site accessible via <http://fgttransfer.energytransfer.com> under "Informational Postings, Regulatory."

Pursuant to Section 385.2005(a) of the Commission's Regulations, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of her knowledge and belief, and possesses full power and authority to sign such filing.

Respectfully submitted,

FLORIDA GAS TRANSMISSION COMPANY, LLC

/s/ Deborah A. Bradbury

Deborah A. Bradbury
Sr. Director – Regulatory Tariffs & Reporting

³ Designated as responsible Company official under Section 154.7(a)(2) of the Commission's Regulations.

CURRENTLY EFFECTIVE RATES
 RATE SCHEDULE FTS-WD-2
 Cents per MMBtu

<u>Description</u>	<u>Rate Per MMBtu</u>	<u>GT&C Sect. 27 Unit Fuel</u>	<u>Maximum Rate</u>	<u>Minimum Rate</u>	<u>Fuel Reimbursement Charge Percentage</u>
FIRM TRANSPORTATION 2/					
Forwardhaul					
Reservation	10.15 ¢	-	10.15 ¢	0.00 ¢	-
Usage 3/	0.03	0.39 ¢ 4/	5/	5/	0.99 % 1/
Backhaul/Exchange					
Reservation	10.15 ¢	-	10.15 ¢	0.00 ¢	-
Usage 3/	0.03	0.20 ¢	5/	5/	0.08 %

- 1/ Excludes fuel charges by Transporting Pipelines, if any, that are applicable to Shipper in accordance with Section 5 of Rate Schedule FTS-WD-2. Exceptions to the stated Fuel Reimbursement Charge Percentage are: 1) volumes that do not move through a forwardhaul compressor station within the Western Division shall be charged a fuel and lost and unaccounted for gas percentage of 0.00% and 2) gas volumes received and delivered within the Western Division that move through only one forwardhaul compressor station shall be charged the lesser of a) a fuel percentage of one-half of one percent (0.50%) plus the lost and unaccounted for gas percentage of 0.08% or b) the stated Fuel Reimbursement Charge Percentage.
- 2/ 100% Load Factor Rate shall equal the sum of the Reservation and Usage Charge.
- 3/ Excludes the ACA unit charge applicable to Shippers pursuant to GT&C Section 22.
- 4/ Exceptions to the stated Unit Fuel Surcharge are: 1) quantities that do not move through any forwardhaul compressor station shall be charged 0.00¢ and 2) quantities that move through only one forwardhaul compressor station shall be charged the lost and unaccounted for rate of 0.20¢.
- 5/ Shall be the sum of the usage rate plus the Unit Fuel Charge.

GENERAL TERMS AND CONDITIONS

30. NON-CONFORMING AGREEMENTS

A. Rate Schedule FTS-2

1. Southern Company Services, Inc. Firm Transportation Service Agreement dated June 4, 1999, Contract No. 5997
2. Florida Power & Light Company Firm Transportation Service Agreement dated August 3, 1999 (subsequently consolidated with Florida Power & Light FTS-2 contract dated December 12, 1991), Contract No. 3623
3. JEA Firm Transportation Service Agreement dated October 20, 1999, Contract No. 6034
4. Peoples Gas System Firm Transportation Service Agreement dated October 13, 1999, Contract No. 6035
5. City of Tallahassee Firm Transportation Service Agreement dated September 22, 1999, Contract No. 6036
6. Tampa Electric Company Firm Transportation Service Agreement dated June 12, 2000, Contract No. 6088

B. Rate Schedule FTS-1

1. Florida Power & Light Company Firm Transportation Service Agreement dated November 1, 1989, Contract No. 3247

C. Rate Schedule FTS-3

1. Progress Energy Florida, Inc. Firm Transportation Service Agreement dated December 9, 2009, Contract No. 111144
2. Florida Power & Light Company Firm Transportation Service Agreement dated December 9, 2009, Contract No. 111145
3. Seminole Electric Cooperative, Inc. Firm Transportation Service Agreement dated June 1, 2018, Contract No. 122314
4. Seminole Electric Cooperative, Inc. Firm Transportation Service Agreement dated June 1, 2018, Contract No. 122315

5. Seminole Electric Cooperative, Inc. Firm Transportation Service Agreement dated June 1, 2018, Contract No. 122316
- D. Rate Schedule FTS-WD-2
1. Shell Energy North America (US), L.P. Firm Transportation Service Agreement dated May 18, 2018, Contract No. 122907
 2. JERA Energy America LLC, Firm Transportation Service Agreement dated May 29, 2018, Contract No. 123157.
- E. Rate Schedule FTS-WD
1. PowerSouth Energy Cooperative, Firm Transportation Service Agreement dated November 16, 2018, Contract No. 123086.
 2. Ascend Performance Materials Inc., Firm Transportation Service Agreement dated November 27, 2018, Contract No. 123145.

MARKED VERSION

CURRENTLY EFFECTIVE RATES
 RATE SCHEDULE FTS-WD-2
 Cents per MMBtu

Description	Rate Per MMBtu	GT&C Sect. 27 Unit Fuel	Maximum Rate	Minimum Rate	Fuel Reimbursement Charge	
					Percentage	
FIRM TRANSPORTATION 2/						
Forwardhaul						
Reservation	<u>-9.2210.15</u> ¢	-	<u>-9.2210.15</u> ¢		0.00 ¢	-
Usage 3/	0.03	0.39 ¢ 4/	5/	5/	0.99 %	1/
Backhaul/Exchange						
Reservation	<u>-9.2210.15</u> ¢	-	<u>-9.2210.15</u> ¢		0.00 ¢	-
Usage 3/	0.03	0.20 ¢	5/	5/	0.08 %	

- 1/ Excludes fuel charges by Transporting Pipelines, if any, that are applicable to Shipper in accordance with Section 5 of Rate Schedule FTS-WD-2. Exceptions to the stated Fuel Reimbursement Charge Percentage are: 1) volumes that do not move through a forwardhaul compressor station within the Western Division shall be charged a fuel and lost and unaccounted for gas percentage of 0.00% and 2) gas volumes received and delivered within the Western Division that move through only one forwardhaul compressor station shall be charged the lesser of a) a fuel percentage of one-half of one percent (0.50%) plus the lost and unaccounted for gas percentage of 0.08% or b) the stated Fuel Reimbursement Charge Percentage.
- 2/ 100% Load Factor Rate shall equal the sum of the Reservation and Usage Charge.
- 3/ Excludes the ACA unit charge applicable to Shippers pursuant to GT&C Section 22.
- 4/ Exceptions to the stated Unit Fuel Surcharge are: 1) quantities that do not move through any forwardhaul compressor station shall be charged 0.00¢ and 2) quantities that move through only one forwardhaul compressor station shall be charged the lost and unaccounted for rate of 0.20¢.
- 5/ Shall be the sum of the usage rate plus the Unit Fuel Charge.

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Appendix A

Florida Gas Transmission Company, LLC
FERC NGA Gas Tariff
Fifth Revised Volume No. 1

Part IV Currently Effective Rates
Rate Schedule FTS-WD-2
Pro Forma Version 1.0.0

CURRENTLY EFFECTIVE RATES
RATE SCHEDULE FTS-WD-2
Cents per MMBtu

Description	Rate Per MMBtu	GT&C Sect. 27 Unit Fuel	Maximum Rate	Minimum Rate	Fuel
					Reimbursement Charge Percentage
FIRM TRANSPORTATION 2/					
Forwardhaul					
Reservation	11.31 10.15 ¢	- ¢	11.31 10.15	0.00 ¢	-
Usage 3/	0.03	0.39 0.39 ¢ 4/	5/	5/	1.01 0.99 % 1/
Backhaul/Exchange					
Reservation	11.31 10.15 ¢	- ¢	11.31 10.15	0.00 ¢	-
Usage 3/	0.03	0.20 0.20 ¢	5/	5/	0.01 0.08 %

1/ Excludes fuel charges by Transporting Pipelines, if any, that are applicable to Shipper in accordance with Section 5 of Rate Schedule FTS-WD-2. Exceptions to the stated Fuel Reimbursement Charge Percentage are: 1) volumes that do not move through a forwardhaul compressor station within the Western Division shall be charged a fuel and lost and unaccounted for gas percentage of 0.00% and 2) gas volumes received and delivered within the Western Division that move through only one forwardhaul compressor station shall be charged the lesser of a) a fuel percentage of one-half of one percent (0.50%) plus the lost and unaccounted for gas percentage of 0.018% or b) the stated Fuel Reimbursement Charge Percentage.

2/ 100% Load Factor Rate shall equal the sum of the Reservation and Usage Charge.

3/ Excludes the ACA unit charge applicable to Shippers pursuant to GT&C Section 22.

4/ Exceptions to the stated Unit Fuel Surcharge are: 1) quantities that do not move through any forwardhaul compressor station shall be charged 0.00¢ and 2) quantities that move through only one forwardhaul compressor station shall be charged the lost and unaccounted for rate of ~~0.20~~0.20 ¢.

5 Shall be the sum of the usage rate plus the Unit Fuel Surcharge.