



November 6, 2020

ANR Pipeline Company
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Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: ANR Pipeline Company
Request for Action on August 21, 2020 Refund Proposal
Docket No. RP19-741-003

Dear Ms. Bose:

On August 21, 2020, ANR Pipeline Company (“ANR”) submitted for filing and acceptance its refund proposal for the under- and over-collections of Transporter’s Use percentages and Electric Power Cost Charges during the period April 1, 2019 through March 31, 2020, to comply with the Commission’s July 24, 2020 Order on Compliance Filing.¹ As part of its Refund Proposal, ANR submitted revised Section 4.18 to be part of its FERC Gas Tariff, Third Revised Volume No. 1 (“Tariff”), to implement surcharges over a 12-month period commencing November 1, 2020.²

In the August 21 Filing, ANR requested that the Commission issue an order accepting the Refund Proposal by October 30, 2020, to ensure that the Transporter’s Use surcharges and adjustments will go into effect on November 1, 2020, the beginning of the winter heating season. In light of the Commission not issuing an order accepting the refund proposal by October 30, 2020, ANR respectfully requests that any Commission action approving the Refund Proposal will effectuate the Transporter’s Use surcharges and adjustments to become effective on the first day of the month immediately following the date that the Commission issues an order. In addition, ANR respectfully requests any action from the Commission approving the Refund Proposal come at least 5 business days in advance of the first day of the month.

Under ANR’s Tariff, shippers furnish gas in-kind at receipt points utilizing the applicable Transporter’s Use (%) set forth in Section 4.18. ANR shippers count on the certainty of fuel rates when making supply arrangements and delivery commitments, often for a full month or full season at a time. As such, a mid-month fuel change or a fuel change late in the month for the following month could create both a financial and administrative burden for shippers. Approving the Refund Proposal and Transporter’s Use surcharges and adjustments to become effective on the first day of the month immediately following the date that the Commission issues an order, and providing at

¹ ANR Pipeline Company, Compliance Filing, Docket No. RP19-741-003 (“Refund Proposal”).

² Part 4.18 – Statement of Rates, Transporter’s Use (%) (“Section 4.18”).

least 5 business days' notice in advance of the first of day of the month, will provide certainty and adequate time for ANR's shippers to move forward with supply procurement and nominations. In addition, the requested implementation and notice timing will provide ANR a sufficient amount of time to make system modifications to reflect any new rates approved prior to the first of the month.

Any questions regarding this filing may be directed to David A. Alonzo at (832) 320-5477.

Respectfully submitted,

ANR PIPELINE COMPANY

A handwritten signature in black ink that reads "John A. Roscher". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John A. Roscher
Director, Rates & Tariffs