



April 8, 2019

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

ANR Pipeline Company
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700

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Re: ANR Pipeline Company
Request for Waiver of FERC Gas Tariff
Part 6.3 of the General Terms & Conditions
Docket No. RP19- -

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act (“NGA”) and Part 154 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,¹ ANR Pipeline Company (“ANR”) hereby requests that the Commission grant a waiver of the provisions of Section 6.3.3 of the General Terms and Conditions of ANR’s FERC Gas Tariff, Third Revised Volume No. 1 (“Tariff”) that limit the time period during which ANR may reserve capacity for a potential expansion project to twelve (12) months prior to filing for certificate approval of such proposed expansion. ANR herein respectfully requests that the Commission allow ANR to continue to reserve capacity for its proposed Gulf Coast Project (“Project”) until May 1, 2020, as described below:

¹ 18 C.F.R. Part 154 (2019).

Capacity currently under reservation for use with the Gulf Coast Project:

- For use with the Gulf Coast Project beginning November 1, 2021 for the period November 1 – March 31, annually:
 - 180,000 Dth/day Woolfolk Southbound (Loc ID 226631)
 - 180,000 Dth/day Bridgman Eastbound (Loc ID 362605)
- For use with the Gulf Coast Project beginning April 1, 2021 for the period of April 1 – October 31, annually:
 - 180,000 Dth/d Crystal Falls Southbound (Loc ID 378890)
 - 180,000 Dth/d Sandwich Eastbound (Loc ID 698362)
 - 180,000 Dth/d Bridgman Eastbound (Loc ID 362605)
- For use with the Gulf Coast Project beginning November 1, 2021, annually:
 - 160,000 Emerson to C-Fall/F-Lake (Loc ID 505610)

Correspondence

The names, titles, mailing addresses, and telephone numbers of those persons to whom correspondence and communications concerning this filing should be addressed are as follows:

* David Brown
Manager, Tariffs
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* Persons designated for official service pursuant to Rule 2010.

Statement of the Nature, Reasons and Basis for Filing

Background

On May 1, 2018, ANR reserved capacity for use in a future expansion of ANR’s pipeline system pursuant to Section 6.3.3 of ANR’s Tariff. ANR designed its potential Gulf Coast Project to make use of this reserved capacity, which in turn lessened the environmental impacts that could result

from the Project while also increasing the economic viability of the Project and lowering the cost of transportation service that would be created by it.

ANR has been negotiating with multiple potential shippers regarding the terms of natural gas transportation service that would make use of Project capacity. Recently, ANR and a shipper have executed a term sheet for the full capacity of the Project with terms based in part upon the anticipated use of the reserved capacity.

However, Section 6.3.3 of ANR's tariff limits the time period during which ANR may reserve capacity for an expansion project to a twelve (12) month period prior to the filing of a certificate application (or May 1, 2019) and thereafter until all expansion facilities are placed into service. Due to the nature and duration of negotiations with potential shippers, ANR is not yet able to file for certificate approval of the Gulf Coast Project. However, it expects to do so in the near future. Specifically, ANR and the committed shipper anticipate executing a corresponding precedent agreement in the coming months, after which ANR anticipates conducting a full open season for Project capacity. ANR will also continue working with all potential Project shippers to execute all necessary commercial agreements. ANR expects to file for certificate approval of its proposed Project shortly after the execution of all necessary commercial agreements. ANR therefore respectfully requests that the Commission waive the aforementioned twelve (12) month limitation on this reservation set forth in Section 6.3.3 of its Tariff.

Due to market commitment demonstrated by the executed term sheet, ANR will continue to reserve this capacity for the Project while the instant request for waiver is pending Commission action.

Effective Date and Request for Waiver

ANR submits this request for a waiver of Section 6.3.3 of ANR's Tariff to allow ANR to extend the reservation of the above-referenced capacity for an additional one year, until May 1, 2020, in order to align certain critical dates for ANR's Gulf Coast Project and to allow ANR to submit its filing for certificate approval within that timeframe. ANR is seeking the waiver requested herein for the following reasons:

1. ANR and a shipper have executed a term sheet for transportation service that will make use of the entire amount of capacity related to the Gulf Coast Project, including the capacity that is subject to the capacity reservation discussed herein; and
2. Both ANR and the committed shipper anticipate executing a Precedent Agreement prior to or within the fourth quarter of 2019, subject to finalization thereof.

Request for Expedited Approval

For the reasons discussed above, ANR respectfully requests that the Commission grant a waiver of the provisions of Section 6.3.3 of ANR's Tariff that limit the time period during which ANR may reserve capacity for a potential expansion project to twelve (12) months prior to filing for certificate approval of such proposed expansion, and allow ANR to continue to reserve such capacity for the Project until May 1, 2020.

Because the termination of the capacity reservation referenced above would jeopardize the viability of the Gulf Coast Project for both the committed shipper and ANR, and such termination would occur on May 1, 2019 without the waiver requested herein, ANR respectfully requests that the Commission grant the waiver sought herein as expeditiously as possible, but no later than April 18, 2019. ANR submits that good cause exists to continue the reservation of capacity, and for the Commission to approve the request for waiver, in order to facilitate the proposed Gulf Coast Project.

Pursuant to Section 385.2005, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of his knowledge and belief. The undersigned possesses full power and authority to sign such filing.

Any questions regarding this filing may be directed to David Brown at (832) 320-5512.

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