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September 8, 2014

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

Re: ANR Pipeline Company
Response to Data Request
Docket No. RP14-830-000

Dear Ms. Bose:

On August 27, 2014, the Federal Energy Regulatory Commission ("FERC" or "Commission") issued a data request seeking information to assist Staff in their analysis of ANR Pipeline Company's ("ANR") annual Operational Purchases and Sales Report, filed May 1, 2014, in Docket No. RP14-830-000. The request stated that a response should be filed seven business days from the date of the issuance of the request, *i.e.,* September 8, 2014. Accordingly, ANR Pipeline Company ("ANR") submits herein a complete response to the request.

Pursuant to Section 385.2010 of the Commission's regulations, copies of ANR's responses are being served to each person whose name appears on the official service for this proceeding. Pursuant to Section 385.2005 and Section 385.2011, 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. Additionally, the undersigned possesses full power and authority to sign such filing.

Any questions regarding this filing may be directed to Joan Collins at (832) 320-5651.

Respectfully submitted,
ANR Pipeline Company

John A. Roscher

John A. Roscher
Director, Rates and Tariffs

Enclosure

ANR Pipeline Company
Docket No. RP14-830-000
Responses to August 27, 2014 Data Request

1. In its annual Operational Purchases and Sales Report (Report), filed in Docket No. RP14-830-000 on May 1, 2014, ANR Pipeline Company (ANR) details a total $4,172,404.71 in Total Operational Purchases and Sales. Please provide detailed and complete answers to the following:

   a. What is ANR's justification for the 1,087,490 Dekatherms of Excess Storage Gas Sale to Integrys Energy Services and what is the basis and full explanation of Footnote 2 of the Report concerning the change in Btu content?

ANR Response

The excess storage gas sold by ANR came about as the result of the relative Btu (or heat content) enrichment that has occurred over time as gas has been cycled through ANR's storage fields. The overall Btu content of gas in storage has increased above the BTU levels of the gas delivered by shippers to ANR for injection due to the presence of ANR-owned residual liquids within ANR's storage fields, which originally contained oil, condensate or retrograde condensate. ANR notes that its various storage fields have experienced both Btu gains and losses over a number of years. On a net basis, however, ANR has experienced Btu gains over this time period equaling 1,087,490 Dth.

ANR additionally notes that ANR's storage agreements are balanced on a dekatherm basis. Therefore, ANR re-delivers to shippers from storage the same quantities of gas in dekatherms as were originally delivered by shippers to ANR for injection into storage.

Respondent Name: Stephen Nowaczewski
Position: Director, Process and Storage Engineering
Phone Number: 248-205-4541

ANR Pipeline Company
Docket No. RP14-830-000
Responses to August 27, 2014 Data Request

1. In its annual Operational Purchases and Sales Report (Report), filed in Docket No. RP14-830-000 on May 1, 2014, ANR Pipeline Company (ANR) details a total $4,172,404.71 in Total Operational Purchases and Sales. Please provide detailed and complete answers to the following:

    b. What is the basis for ANR's assumption that the referenced gas belongs to ANR and not ANR's customers?

ANR Response

First, ANR does not believe it should be required to refund revenues that are the product of residual liquids that ANR owns [see ANR response to question 1(a)]. Second, the question of whether ANR should or should not credit any revenues associated with operational sales was addressed in *ANR Pipeline Company,* 111 FERC ¶ 61,290 (2005) ("2005 Order"). In the 2005 Order, the Commission granted ANR's request for clarification that to the extent ANR does not have a mechanism to recover the costs of operational purchases and ANR is willing to absorb the costs of operational purchases, then ANR should not be required to credit the revenues associated with operational sales. 2005 Order at PP 20 – 21. Therefore, consistent with Commission policy, since ANR is required to bear the risk for any Btu losses incurred through the operation of its storage facilities, ANR should not be required to credit revenues associated with Btu gains.

Respondent Name: John Roscher
Position: Director, Rates and Tariffs
Phone Number: 832-320-5675

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2. To the extent not encompassed in your answers to the above questions, please respond fully to the questions raised by protests and comments on the Report.

ANR Response

Responses 1(a) and 1(b) address the single set of comments filed by the Wisconsin Distributor Group on May 13, 2014, in this docket.

Respondent Name: John Roscher
Position: Director, Rates and Tariffs
Phone Number: 832-320-5675