



August 12, 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

John A. Roscher
Director, Rates & Tariffs

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Re: ANR Pipeline Company
Request for Waiver of FERC Gas Tariff
Part 6.3 of the General Terms and Conditions
Docket No. RP19-____-000

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 Part 6.3.3 of the General Terms and Conditions (“Section 6.3.3”) of ANR’s FERC Gas Tariff, Third Revised Volume No. 1 (“Tariff”), which limits the time period that ANR may reserve capacity for a potential expansion project to one (1) year 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 Grand Chenier Project (“ANR Project”) until September 14, 2020, as described below.

Unsubscribed Capacity to be Reserved:

700,000 Dth/day EUNICE TO GRAND CHENIER (Loc ID 226640)

¹ 18 C.F.R. Part 154 (2019).

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:

John A. Roscher Director, Rates & Tariffs	* Dave R. Hammel Director, Commercial and Regulatory Law, U.S. Natural Gas Pipelines
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* Persons designated for official service pursuant to Rule 2010.

Statement of the Nature, Reasons and Basis for Filing

Background

On September 1, 2016, ANR commenced the ANR Project Open Season seeking binding commitments for firm transportation service with receipt from ANR's Southeast Headstation to a new delivery point located at or near ANR's Grand Chenier Compressor Station. Subsequent to the open season, Venture Global Calcasieu Pass, LLC committed to the ANR Project ("Project Shipper") through the execution of a Precedent Agreement for the entire amount of the ANR Project capacity subject to the capacity reservation.

On September 14, 2016, ANR reserved capacity for use in a future expansion of ANR's pipeline system pursuant to Section 6.3.3 of ANR's Tariff. On September 13, 2017, ANR filed with the Commission to extend the reservation of capacity for an additional year.²

² On September 13, 2017, in Docket No. RP17-1047-000, ANR filed with the Commission requesting that it may be allowed to continue to reserve capacity for the ANR Project through September 14, 2018. The Commission found good cause to grant ANR's unopposed request for the extension of time. *ANR Pipeline Company*, 161 FERC ¶ 61,008 (2017).

On August 21, 2018, ANR filed with the Commission to extend the reservation of capacity for an additional year.³ The capacity reservation for the ANR Project is therefore set to expire on September 14, 2019.

Due to the market commitment demonstrated by the executed Precedent Agreement, ANR is seeking, through the instant filing, to extend the reservation of capacity for an additional year and intends to continue to reserve this capacity for the ANR 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 continue to reserve the above-referenced capacity for up to an additional one year through September 14, 2020, in order to allow ANR to begin preparing its application which it anticipates filing with the Commission by the end of the second quarter of 2020 requesting authorization for the ANR Project. ANR submits the following information in support of the waiver requested herein:

1. As previously reported, ANR has executed a Precedent Agreement with the Project Shipper for the entire amount of the capacity that is subject to the capacity reservation;
2. On December 21, 2018, the Project Shipper and ANR executed an Amended and Restated Precedent Agreement that increased the total ANR Project capacity from 700,000 Dth/day to 1,100,000 Dth/day;
3. Under the term of the Precedent Agreement, the Project Shipper has made a positive final investment decision to proceed with its proposed natural gas liquefaction and storage facility, and marine export terminal project ("LNG Project") to be served by the ANR Project (20-year commitments secured for approximately 80% of the LNG Project's total output capacity); and

³ On August 21, 2018, in Docket No. RP18-1070-000, ANR filed with the Commission requesting that it may be allowed to continue to reserve capacity for the ANR Project through September 14, 2019. The Commission found good cause to grant ANR's unopposed request for the extension of time. *ANR Pipeline Company*, 164 FERC ¶ 61,179 (2018) ("2018 Order").

4. On February 21, 2019, in Docket No. CP15-550-000, *et al.*, the Commission granted authorization to the Project Shipper to site, construct and operate the LNG Project.⁴

As a result of the continued progress on the ANR Project as stated above, ANR submits that good cause exists to continue the reservation of capacity in support of the ANR Project, as contemplated by the Amended and Restated Precedent Agreement with the Project Shipper.

Request for Expedited Approval

ANR respectfully requests that the Commission grant the waiver sought herein as expeditiously as possible, as September 14, 2019, is the date the current ANR Project capacity reservation is set to expire pursuant to the 2018 Order. ANR submits that good cause exists to continue the reservation of capacity, and for the Commission to approve this request for waiver, in order to facilitate the proposed ANR Project. Additionally, ANR respectfully requests a shortened comment period for the instant filing.

Pursuant to Section 385.2005 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 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 A. Alonzo at (832) 320-5477.

Respectfully submitted,

ANR PIPELINE COMPANY

A handwritten signature in black ink, reading "John A. Roscher", followed by a horizontal line.

John A. Roscher
Director, Rates & Tariffs

⁴ *Venture Global Calcasieu Pass, LLC, et al*, 166 FERC ¶ 61,144 (2019).