



February 12, 2016

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, and Certificates

tel 832.320.5675
fax 832.320.6675
email John_Roscher@TransCanada.com
web www.anrpl.com/company_info/

Re: ANR Pipeline Company
Non-Conforming Agreement
Docket No. RP16- -

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 tenders for filing and acceptance revised tariff sections Part 1 – Table of Contents (“Table of Contents”) and Part 6.28 – GT&C, Non-Conforming Agreements (“Section 6.28”) to be part of its FERC Gas Tariff, Third Revised Volume No. 1 (“Tariff”), and a tariff record which includes one (1) Rate Schedule FSS² (“FSS”) service agreement containing non-conforming provisions (“Agreement”) that ANR has entered into with J. Aron & Company (“J. Aron”), all of which are included as Appendix A.³ ANR respectfully requests that the Commission accept the proposed tariff sections and Agreement to become effective April 1, 2016.

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:

¹ 18 C.F.R. Part 154 (2015).

² Rate Schedule FSS is ANR’s firm storage service.

³ *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008) (“Order No. 714”). Order No. 714 at P 42. Order No. 714 states that “...non-conforming service agreements need not be divided, but can be filed as entire documents.” ANR has elected to file the Agreement included herein as a whole document, in PDF format.

John A. Roscher
Director, Rates and Tariffs
* Joan F. Collins
Manager, Tariffs and Compliance
ANR Pipeline Company
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700
Tel. (832) 320-5651
Fax (832) 320-6651
E-mail: joan_collins@transcanada.com

* David R. Hammel
Senior Legal Counsel
ANR Pipeline Company
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700
Tel. (832) 320-5861
Fax (832) 320-6861
E-mail: dave_hammel@transcanada.com

* Persons designated for official service pursuant to Rule 2010.

Statement of the Nature, Reasons and Basis for Filing

ANR and J. Aron mutually agreed to enter into the Agreement, dated January 29, 2016, whereby ANR would provide FSS service to J. Aron commencing April 1, 2016, for a thirteen (13) month primary term. The Agreement includes a provision (“Provision”) that deviates from ANR’s applicable *pro forma* form of service agreement (“PFSA”), and ANR’s Tariff.

Specifically, the Further Agreement section of the Agreement (*i.e.*, Article 8) submitted herein contains the Provision, which describes the nature of the FSS service contemplated by the Agreement, and which is not included as either fixed or optional language in the PFSA. The Provision details that J. Aron’s Maximum Daily Withdrawal Quantity (“MDWQ”) will be zero (0) for the first twelve (12) months of the primary term, changing to 44,508 Dth for the final month of the Agreement, and that the parties agree that no infield withdrawal transfers will be allowed, nor will J. Aron nominate a withdrawal under the Agreement while J. Aron’s MDWQ is zero (0). These aspects of the Provision are not contemplated by ANR’s current Tariff.

To utilize FSS on ANR’s system, a shipper first submits a request for service⁴ wherein the shipper is allowed to select an MDWQ that falls between one-two hundred and thirteenth and

⁴ Shippers request service with ANR by submitting a completed form, which is represented in ANR’s Tariff by Section 7.4 - Transportation Service Request Form.

one-tenth of the requesting shipper's elected Maximum Storage Quantity.⁵ With such flexibility, ANR's customers have increasingly purchased firm storage service with higher deliverability (*i.e.*, greater MDWQ's), thus enabling the redelivery of their stored gas quantities over fewer days. This, in turn, has caused a mismatch between deliverability and capacity late in the traditional withdrawal (*i.e.*, winter) period, resulting in a situation where storage capacity is stranded due to a lack of deliverability, leaving ANR with no additional FSS storage service to offer its shippers.

While ANR's FSS service allows shippers the flexibility to elect an MDWQ between a defined range, ANR's Tariff does not currently provide for a zero (0) MDWQ, nor for an MDWQ to vary during the term of a service agreement. As agreed to by the parties, the Agreement calls for J. Aron's MDWQ to remain constant, at zero (0), for the first twelve (12) months of the primary term, and then increase to 44,508 Dth⁶ for the thirteenth and final month of the Agreement. ANR asserts that setting J. Aron's MDWQ to zero (0) for the first twelve (12) months of the Agreement will help, along with the additional restrictions discussed below, to ensure that J. Aron's gas will physically remain in storage beyond the traditional withdrawal period, thus enhancing ANR's deliverability capability through the traditional withdrawal period. This additional deliverability capability, in turn, will allow ANR to make use of otherwise stranded capacity and to sell additional FSS service within the traditional winter period. While J. Aron's zero (0) MDWQ falls outside of the defined limits for FSS service, the zero (0) MDWQ only restricts J. Aron's ability to withdraw stored gas quantities until such time as the MDWQ increases to a Tariff-conforming level for the final month of the Agreement's term.

During the same time frame that J. Aron's MDWQ is set at zero (0) (*i.e.*, the first twelve (12) months of the primary term of the Agreement), the Provision further stipulates that J. Aron will not be allowed to complete an infield withdrawal transfer involving the Agreement, nor will J. Aron be allowed to nominate a withdrawal from the Agreement. Neither restriction is provided

⁵ Section 6.1 – Definitions, paragraph 6, of ANR's Tariff states that "Base Maximum Daily Withdrawal Quantity shall mean the maximum quantity...that [ANR] is required to withdraw from storage for a shipper, and shall be at least one-two hundred and thirteenth (1/213) but not more than one tenth (1/10) of [shipper's] Maximum Storage Quantity." This variability allows FSS shippers to withdraw their storage quantities over as many as 213 days or as few as 10 days.

⁶ An MDWQ of 44,508 Dth represents one thirtieth (1/30) of J. Aron's elected Maximum Storage Quantity, and falls within the Tariff's defined parameters of an allowable MDWQ.

for in ANR's Tariff. These restrictions, as agreed to by J. Aron, are intended to work in concert to ensure that J. Aron's gas will physically remain in storage beyond the traditional withdrawal period, thus increasing ANR's deliverability capability during the traditional withdrawal period as discussed above.

The Agreement accommodates J. Aron's need for near-term storage capacity with redelivery during April 2017, notwithstanding the restrictions that are included in the Provision. Additionally, the Agreement, as agreed to by ANR and J. Aron, increases ANR's deliverability capability and provides ANR with the ability to market otherwise stranded storage capacity, which benefits all storage customers on ANR's system. ANR further asserts that it is agreeable to entering into similar arrangements with other shippers in order to increase the availability of seasonal, ratcheted storage services, thus benefiting ANR's customers and its system.

For the reasons cited above, ANR believes the Provision should not be deemed a material deviation, and respectfully requests that the Commission find this deviation to be immaterial, and accept the Agreement to become effective April 1, 2016. However, in the event the Commission finds that the Provision represents a material deviation under Commission policy, ANR respectfully requests that the Commission accept and approve the deviation as of the effective date of the Agreement, in as much as it does not change the conditions under which service is provided or present a risk of undue discrimination.

Pursuant to Section 154.112(b) and 154.201 of the Commission's regulations, ANR is filing herein a copy of the executed Agreement as tariff record 10.44, included within Appendix A, and a marked version of the Agreement in Appendix C to identify any differences from the PFSA contained in ANR's Tariff. Additionally, a revised Section 1-Table of Contents and revised Section 6.28-GT&C, Non-Conforming Agreements, are submitted herein as part of Appendix A to reflect the housing of the Agreement in ANR's Tariff.

To conform with Order No. 714, ANR is submitting the Agreement⁷ in its entirety as tariff record 10.44. The tariff record includes the original agreement and any subsequent amendments.

ANR is requesting that the Commission accept the tariff sections and Agreement to become effective April 1, 2016.

Effective Date

ANR respectfully requests that the Commission accept the tariff sections and Agreement included as Appendix A to become effective April 1, 2016.

Other Filings Which May Affect This Proceeding

There are no other filings before the Commission that may significantly affect the changes proposed herein.

Contents of Filing

In accordance with Section 154.7 of the Commission's regulations and Order No. 714, ANR is submitting the following XML filing package, which includes:

1. This transmittal letter;
2. Clean tariff sections and tariff record (Appendix A);
3. Marked tariff sections (Appendix B); and
4. Marked service agreement (Appendix C).

Certificate of Service

As required by Sections 154.7(b) and 154.208 of the Commission's regulations, copies of this filing are being served on all of ANR's existing customers and interested state regulatory agencies. A copy of this letter, together with the other attachments, is available during regular business hours for public inspection at ANR's principal place of business.

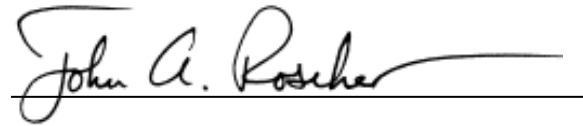
⁷ Order No. 714 at P 13. Order No. 714 states that "...all new...agreements must be filed using the standards. Existing agreements need to be filed electronically only when they are revised."

Pursuant to Section 385.2005 and Section 385.2011(c) (5), 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 Joan Collins at (832) 320-5651.

Respectfully submitted,

ANR PIPELINE COMPANY

A handwritten signature in black ink that reads "John A. Roscher". The signature is written in a cursive style and is positioned above a solid horizontal line.

John A. Roscher
Director, Rates, Tariffs, and Certificates

Enclosures

Appendix A
ANR Pipeline Company
FERC Gas Tariff, Third Revised Volume No. 1
Clean Tariff

| <u>Tariff Sections</u> | <u>Version</u> |
|--|-----------------------|
| 1 - TABLE OF CONTENTS | v.32.0.0 |
| 6.28 - GT&C, Non-Conforming Agreements | v.14.0.0 |

Tariff Record

| <u>Tariff Record</u> | <u>Shipper</u> | <u>Rate Schedule</u> | <u>Agreement</u> | <u>Version</u> |
|---|-------------------|----------------------|------------------|----------------|
| Section 10 – Non-Conforming Agreements | | | | |
| 10.44 | J. Aron & Company | FSS | #127260 | v.0.0.0 |

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| X-132 | Gas Displacement and Exchange Agreement with Michigan Consolidated Gas Company | 1592 |

6.28 NON-CONFORMING AGREEMENTS

1. Midland Cogeneration Venture Limited Partnership FTS-1 Agreements, dated August 30, 2001.

Contract No. 106102
2. Wisconsin Gas LLC, ETS Agreement, dated September 27, 2004.

Contract Nos. 107784, 108014
3. Wisconsin Public Service Corporation, ETS Agreement, dated October 22, 2004.

Contract No. 5500
4. Wisconsin Public Service Corporation, FTS-1 Agreement, dated October 22, 2004.

Contract No. 12000
5. Callon Petroleum Operating Company, Habanero Lease Dedication Agreement, dated December 1, 2003.
6. PXP Offshore LLC, Letter Agreement Regarding Natural Gas Reserve Commitment, dated September 1, 2002.
7. Kerr-McGee Oil & Gas Corp., Red Hawk Lease Dedication Agreement, dated September 12, 2002.
8. ExxonMobil Gas Marketing Company, Lease Dedication Agreement, dated November 1, 2002.
9. BP Exploration & Production, Inc., Red Hawk Lease Dedication Agreement, dated November 1, 2002.
10. Wisconsin Electric Power Company, ETS Agreement, dated September 27, 2004.

Contract No. 107896
11. Conoco Phillips Company, Magnolia Lease Dedication Agreement, dated February 1, 2004.
12. Chevron U.S.A. Inc. & BHP Billiton Petroleum (Deepwater) Inc., Lease Dedication Agreement, dated November 14, 2001.

13. City Gas Company, FTS-1 Agreement, dated June 28, 2004.
Contract No. 109610
14. Centra Gas Manitoba, Inc., FTS-1 Agreement, dated August 1, 2004.
Contract No. 109713
15. Wisconsin Electric Power Company, ETS Agreement, dated August 18, 2014.
Contract No. 124961
16. Antero Resources Corporation, FTS-1 Agreements, dated September 22, 2014.
Contract Nos. 125082, 125083
17. CNX Gas Company LLC, FTS-1 Agreements, dated January 21, 2015.
Contract Nos. 125723, 125724
18. Indeck-Corinth Limited Partnership and ABN-AMRO Bank, N.V.,
Acknowledgement and Consent, dated August 1, 2005.
19. Indeck-Corinth Limited Partnership and General Electric Capital Corporation,
Acknowledgement and Consent, dated August 31, 2005.
20. Iowa Fertilizer Company LLC, FTS-1 Agreement, dated December 23, 2015.
Contract No. 127009
21. Midland Cogeneration Venture Limited Partnership, FTS-1 Agreements, dated May
23, 2006.
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23. Wisconsin Electric Power Company, FTS-1 Agreement, dated April 21, 2003.
Contract No. 109223

24. Wisconsin Gas LLC, ETS Agreement, dated October 17, 2003.
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25. Rice Energy Marketing LLC, FTS-1 Agreements, dated February 23, 2015.
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26. J. Aron & Company, FSS Agreement, dated January 29, 2016.
Contract No. 127260
27. Wisconsin Gas LLC, ETS Agreement, dated August 25, 2011.
Contract No. 118840
28. Wisconsin Gas LLC, ETS Agreement, dated June 27, 2002.
Contract Nos. 107877, 107879
29. Wisconsin Gas LLC, FSS Agreement, dated June 26, 2002.
Contract Nos. 107870, 107871, 107880, 107881
30. Wisconsin Electric Power Company, ETS Agreement, dated June 27, 2002.
Contract Nos. 107895, 107897, 107898, 107899
31. Wisconsin Gas LLC, NNS Agreement, dated June 27, 2002.
Contract No. 107995
32. Wisconsin Electric Power Company, NNS Agreement, dated June 27, 2002.
Contract No. 107997
33. Wisconsin Gas LLC, FSS Agreement, dated April 21, 2003.
Contract Nos. 109210, 109211
34. Wisconsin Gas LLC, ETS Agreement, dated April 21, 2003.
Contract No. 109218

35. Wisconsin Electric Power Company, ETS Agreement, dated April 21, 2003.
Contract No. 109222
36. Wisconsin Electric Power Company, FSS Agreement, dated April 21, 2003.
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37. Wisconsin Gas LLC, FSS Agreement, dated July 22, 2011.
Contract No. 118552
38. Wisconsin Electric Power Company, ETS Agreement, dated July 22, 2011.
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39. Wisconsin Gas LLC, ETS Agreement, dated July 22, 2011.
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40. Tennessee Valley Authority, FTS-3 Agreement, dated July 23, 2008.
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41. Wisconsin Public Service Corporation, ETS Agreement, dated October 6, 2004.
Contract Nos. 1600, 5450, 106322
42. Wisconsin Public Service Corporation, NNS Agreement, dated October 6, 2004.
Contract No. 99515
43. Wisconsin Public Service Corporation, FTS-1 Agreement, dated October 6, 2004.
Contract Nos. 104404, 104405, 106199
44. Wisconsin Public Service Corporation, FSS Agreement, dated March 28, 2008.
Contract Nos. 114369, 114370

45. Wisconsin Gas LLC, ETS Agreement, dated June 26, 2002.
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47. Madison Gas and Electric Company, FTS-1 Agreement, dated April 8, 2008.
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48. Chevron U.S.A. Inc., PTS-2 Agreement, dated November 14, 2001.
Contract No. 107146
49. BHP Billiton Petroleum (Deepwater) Inc., PTS-2 Agreement, dated November 14, 2001.
Contract No. 107147
50. PXP Offshore LLC, PTS-2 Agreement, dated September 12, 2002.
Contract No. 108250
51. Wisconsin Electric Power Company, FSS Agreement, dated June 26, 2002.
Contract Nos. 107889, 107900, 107901
52. Wisconsin Gas LLC, FSS Agreement, dated October 10, 2007.
Contract No. 113715
53. Wisconsin Electric Power Company, FSS Agreement, dated October 10, 2007.
Contract No. 113729
54. Wisconsin Gas LLC, ETS Agreement, dated October 31, 2007.
Contract No. 113710
55. Wisconsin Electric Power Company, ETS Agreement, dated November 1, 2007.
Contract No. 114091

Firm Storage Service Agreement
Rate Schedule FSS

J. Aron & Company
(#127260)

Agreement Effective Date: April 1, 2016

Date: January 29, 2016

Contract No.: 127260

FSS SERVICE AGREEMENT

This AGREEMENT is entered into by ANR Pipeline Company (Transporter) and J. ARON & COMPANY (Shipper).

WHEREAS, Shipper has requested Transporter to transport Gas on its behalf and Transporter represents that it is willing to transport Gas under the terms and conditions of this Agreement.

NOW, THEREFORE, Transporter and Shipper agree that the terms below, together with the terms and conditions of Transporter's applicable Rate Schedule and General Terms and Conditions of Transporter's Tariff constitute the Transportation Service to be provided and the rights and obligations of Shipper and Transporter.

1. **AUTHORITY FOR TRANSPORTATION SERVICE:**

Pursuant to Part 284 of the Federal Energy Regulatory Commission's (FERC or Commission) Regulations.

2. **RATE SCHEDULE: Firm Storage Service**

3. **CONTRACT QUANTITIES:**

Contract Quantities- see Exhibit attached hereto.

Such Contract Quantities shall be reduced for scheduling purposes, but not for billing purposes, by the Contract Quantities that Shipper has released through Transporter's capacity release program for the period of any release.

4. **TERM OF AGREEMENT:**

April 01, 2016 to

April 30, 2017

Right of First Refusal:

Not Applicable to this Agreement.

Date: January 29, 2016

Contract No.: 127260

5. **RATES:**

Maximum rates, charges, and fees shall be applicable for the entitlements and quantities delivered pursuant to this Agreement unless Transporter and Shipper have agreed otherwise as provided herein.

It is further agreed that Transporter may seek authorization from the Commission and/or other appropriate body at any time and from time to time to change any rates, charges or other provisions in the applicable Rate Schedule and General Terms and Conditions of Transporter's Tariff, and Transporter shall have the right to place such changes in effect in accordance with the Natural Gas Act. This Agreement shall be deemed to include such changes and any changes which become effective by operation of law and Commission order. Nothing contained herein shall be construed to deny Shipper any rights it may have under the Natural Gas Act, including the right to participate fully in rate or other proceedings by intervention or otherwise to contest changes in rates in whole or in part.

The rate for storage service shall be a Deliverability rate of \$0.1850 per dth per month for MDWQ, and a Capacity rate of \$0.1789 per dth per month of MSQ divided by twelve, and the applicable Commodity rate for injection or withdrawal charges, not to exceed Transporter's Maximum Tariff Rates. In addition, Shipper will be charged ACA, Transporter's Use (Fuel %) and EPC Charge (Electric Power Cost) and any other applicable governmental surcharges in accordance with Transporter's Tariff.

6. **INCORPORATION BY REFERENCE:**

The provisions of Transporter's applicable Rate Schedule and the General Terms and Conditions of Transporter's Tariff are specifically incorporated herein by reference and made a part hereof.

7. **NOTICES:**

All notices can be given by telephone or other electronic means, however, such notice shall be confirmed in writing at the addresses below or through Transporter's Internet website. Shipper or Transporter may change the addresses below by written notice to the other without the necessity of amending this agreement:

Date: January 29, 2016

Contract No.: 127260

TRANSPORTER:

ANR Pipeline Company
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700
Attention: Commercial Services

SHIPPER:

J. ARON & COMPANY
200 WEST STREET
NEW YORK, NY 10282
Attention: MATT SPELTZ

Telephone: 212-902-7349
FAX:
E-mail: ficc-jaron-natgasops@gs.com

INVOICES AND STATEMENTS:

J. ARON & COMPANY
200 WEST STREET
NEW YORK, NY 10282
Attention: MATT SPELTZ

Telephone: 212-902-7349
FAX:
E-mail: ficc-jaron-natgasops@gs.com

8. FURTHER AGREEMENT:

The MDWQ on this agreement will be zero (0) for the period April 1, 2016 through March 31, 2017, and will be 44,508 for the period April 1, 2017 through April 30, 2017. During the period of April 1, 2016 through March 31, 2017, no infield withdrawal transfers will be allowed, and for this same period Shipper will not nominate a withdrawal from this agreement.

Date: January 29, 2016

Contract No.: 127260

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be signed by their respective Officers or Representatives thereunto duly authorized to be effective as of the date stated above.

SHIPPER: J. ARON & COMPANY

By: *[Signature]*
Title: VP
Date: 1/29/16

TRANSPORTER: ANR PIPELINE COMPANY

By: *[Signature]*
Title: Director, Commercial Services
Date: 2-9-16

PA
2/1/16

TW
2/6/16

1/29/16
[Signature]
Date

SDJ
1/29/16

YPR
1/29/16

CONTRACT QUANTITY EXHIBIT
To Agreement Between
ANR PIPELINE COMPANY (Transporter)
AND J. ARON & COMPANY (Shipper)

Contract No: 127260
Rate Schedule: FSS
Contract Date: January 29, 2016
Amendment Date:

Effective Start: April 01, 2017
Effective End: April 30, 2017

Annual Service
Unratcheted Service

| | |
|--|---------|
| | MDQ |
| | (Dth) |
| Maximum Storage Quantity (MSQ) | 1335236 |
| Base Maximum Daily Withdrawal Quantity (BMDWQ) | 44508 |
| Base Maximum Daily Injection Quantity (BMDIQ) | 6676 |
| Cyclability | 2118912 |

W=Withdrawal ;I=Injection

Note: BMDWQ and BMDIQ are stated without incorporating ratchets.

CONTRACT QUANTITY EXHIBIT
To Agreement Between
ANR PIPELINE COMPANY (Transporter)
AND J. ARON & COMPANY (Shipper)

Contract No: 127260
Rate Schedule: FSS
Contract Date: January 29, 2016
Amendment Date:

Effective Start: April 01, 2016
Effective End: March 31, 2017

Annual Service
Unratcheted Service

| | |
|--|---------|
| | MDQ |
| | (Dth) |
| Maximum Storage Quantity (MSQ) | 1335236 |
| Base Maximum Daily Withdrawal Quantity (BMDWQ) | 0 |
| Base Maximum Daily Injection Quantity (BMDIQ) | 6676 |
| Cyclability | 1896035 |

W=Withdrawal ;I=Injection

Note: BMDWQ and BMDIQ are stated without incorporating ratchets.

Appendix B
ANR Pipeline Company
FERC Gas Tariff, Third Revised Volume No. 1
Marked Tariff

| <u>Tariff Section</u> | <u>Version</u> |
|--|-----------------------|
| 1 - TABLE OF CONTENTS | v.32.0.0 |
| 6.28 - GT&C, Non-Conforming Agreements | v.14.0.0 |

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| X-18 | Exchange Agreement with Natural Gas Pipeline Company of America and Phillips Petroleum Company | 180 |
| X-37 | Exchange Agreement with Southern Natural Gas Company | 278 |
| X-62 | Exchange Agreement with Transcontinental Gas Pipe Line Corporation | 532 |
| X-132 | Gas Displacement and Exchange Agreement with Michigan Consolidated Gas Company | 1592 |

6.28 NON-CONFORMING AGREEMENTS

1. Midland Cogeneration Venture Limited Partnership FTS-1 Agreements, dated August 30, 2001.

Contract No. 106102
2. Wisconsin Gas LLC, ETS Agreement, dated September 27, 2004.

Contract Nos. 107784, 108014
3. Wisconsin Public Service Corporation, ETS Agreement, dated October 22, 2004.

Contract No. 5500
4. Wisconsin Public Service Corporation, FTS-1 Agreement, dated October 22, 2004.

Contract No. 12000
5. Callon Petroleum Operating Company, Habanero Lease Dedication Agreement, dated December 1, 2003.
6. PXP Offshore LLC, Letter Agreement Regarding Natural Gas Reserve Commitment, dated September 1, 2002.
7. Kerr-McGee Oil & Gas Corp., Red Hawk Lease Dedication Agreement, dated September 12, 2002.
8. ExxonMobil Gas Marketing Company, Lease Dedication Agreement, dated November 1, 2002.
9. BP Exploration & Production, Inc., Red Hawk Lease Dedication Agreement, dated November 1, 2002.
10. Wisconsin Electric Power Company, ETS Agreement, dated September 27, 2004.

Contract No. 107896
11. Conoco Phillips Company, Magnolia Lease Dedication Agreement, dated February 1, 2004.
12. Chevron U.S.A. Inc. & BHP Billiton Petroleum (Deepwater) Inc., Lease Dedication Agreement, dated November 14, 2001.

13. City Gas Company, FTS-1 Agreement, dated June 28, 2004.
Contract No. 109610
14. Centra Gas Manitoba, Inc., FTS-1 Agreement, dated August 1, 2004.
Contract No. 109713
15. Wisconsin Electric Power Company, ETS Agreement, dated August 18, 2014.
Contract No. 124961
16. Antero Resources Corporation, FTS-1 Agreements, dated September 22, 2014.
Contract Nos. 125082, 125083
17. CNX Gas Company LLC, FTS-1 Agreements, dated January 21, 2015.
Contract Nos. 125723, 125724
18. Indeck-Corinth Limited Partnership and ABN-AMRO Bank, N.V.,
Acknowledgement and Consent, dated August 1, 2005.
19. Indeck-Corinth Limited Partnership and General Electric Capital Corporation,
Acknowledgement and Consent, dated August 31, 2005.
20. Iowa Fertilizer Company LLC, FTS-1 Agreement, dated December 23, 2015.
Contract No. 127009
21. Midland Cogeneration Venture Limited Partnership, FTS-1 Agreements, dated May
23, 2006.
Contract Nos. 112546, 112547
22. Wisconsin Gas LLC, FTS-1 Agreement, dated April 21, 2003.
Contract No. 109212
23. Wisconsin Electric Power Company, FTS-1 Agreement, dated April 21, 2003.
Contract No. 109223

24. Wisconsin Gas LLC, ETS Agreement, dated October 17, 2003.
Contract No. 109854
25. Rice Energy Marketing LLC, FTS-1 Agreements, dated February 23, 2015.
Contract Nos. 125852, 125853, 125854
26. J. Aron & Company, FSS Agreement, dated January 29, 2016~~Reserved For Future Use~~.

Contract No. 127260
27. Wisconsin Gas LLC, ETS Agreement, dated August 25, 2011.
Contract No. 118840
28. Wisconsin Gas LLC, ETS Agreement, dated June 27, 2002.
Contract Nos. 107877, 107879
29. Wisconsin Gas LLC, FSS Agreement, dated June 26, 2002.
Contract Nos. 107870, 107871, 107880, 107881
30. Wisconsin Electric Power Company, ETS Agreement, dated June 27, 2002.
Contract Nos. 107895, 107897, 107898, 107899
31. Wisconsin Gas LLC, NNS Agreement, dated June 27, 2002.
Contract No. 107995
32. Wisconsin Electric Power Company, NNS Agreement, dated June 27, 2002.
Contract No. 107997
33. Wisconsin Gas LLC, FSS Agreement, dated April 21, 2003.
Contract Nos. 109210, 109211
34. Wisconsin Gas LLC, ETS Agreement, dated April 21, 2003.
Contract No. 109218

35. Wisconsin Electric Power Company, ETS Agreement, dated April 21, 2003.
Contract No. 109222
36. Wisconsin Electric Power Company, FSS Agreement, dated April 21, 2003.
Contract Nos. 109225, 109226, 109227
37. Wisconsin Gas LLC, FSS Agreement, dated July 22, 2011.
Contract No. 118552
38. Wisconsin Electric Power Company, ETS Agreement, dated July 22, 2011.
Contract Nos. 118787, 118789
39. Wisconsin Gas LLC, ETS Agreement, dated July 22, 2011.
Contract Nos. 118793, 118794
40. Tennessee Valley Authority, FTS-3 Agreement, dated July 23, 2008.
Contract Nos. 114655, 114656
41. Wisconsin Public Service Corporation, ETS Agreement, dated October 6, 2004.
Contract Nos. 1600, 5450, 106322
42. Wisconsin Public Service Corporation, NNS Agreement, dated October 6, 2004.
Contract No. 99515
43. Wisconsin Public Service Corporation, FTS-1 Agreement, dated October 6, 2004.
Contract Nos. 104404, 104405, 106199
44. Wisconsin Public Service Corporation, FSS Agreement, dated March 28, 2008.
Contract Nos. 114369, 114370

45. Wisconsin Gas LLC, ETS Agreement, dated June 26, 2002.
Contract No. 107873
46. Wisconsin Electric Power Company, ETS Agreement, dated June 26, 2002.
Contract No. 107893
47. Madison Gas and Electric Company, FTS-1 Agreement, dated April 8, 2008.
Contract No. 114512
48. Chevron U.S.A. Inc., PTS-2 Agreement, dated November 14, 2001.
Contract No. 107146
49. BHP Billiton Petroleum (Deepwater) Inc., PTS-2 Agreement, dated November 14, 2001.
Contract No. 107147
50. PXP Offshore LLC, PTS-2 Agreement, dated September 12, 2002.
Contract No. 108250
51. Wisconsin Electric Power Company, FSS Agreement, dated June 26, 2002.
Contract Nos. 107889, 107900, 107901
52. Wisconsin Gas LLC, FSS Agreement, dated October 10, 2007.
Contract No. 113715
53. Wisconsin Electric Power Company, FSS Agreement, dated October 10, 2007.
Contract No. 113729
54. Wisconsin Gas LLC, ETS Agreement, dated October 31, 2007.
Contract No. 113710
55. Wisconsin Electric Power Company, ETS Agreement, dated November 1, 2007.
Contract No. 114091

Appendix C
ANR Pipeline Company
Marked Agreements

- 1) J. Aron & Company
Rate Schedule FSS Service Agreement (#127260)

Date: January 29, 2016

Contract No.: 127260

FSS SERVICE AGREEMENT

This AGREEMENT is entered into by ANR Pipeline Company (Transporter) and J. ARON & COMPANY (Shipper).

WHEREAS, Shipper has requested Transporter to transport Gas on its behalf and Transporter represents that it is willing to transport Gas under the terms and conditions of this Agreement.

NOW, THEREFORE, Transporter and Shipper agree that the terms below, together with the terms and conditions of Transporter's applicable Rate Schedule and General Terms and Conditions of Transporter's Tariff constitute the Transportation Service to be provided and the rights and obligations of Shipper and Transporter.

1. **AUTHORITY FOR TRANSPORTATION SERVICE:**

Pursuant to Part 284 of the Federal Energy Regulatory Commission's (FERC or Commission) Regulations.

2. **RATE SCHEDULE: Firm Storage Service**

3. **CONTRACT QUANTITIES:**

Contract Quantities- see Exhibit attached hereto.

Such Contract Quantities shall be reduced for scheduling purposes, but not for billing purposes, by the Contract Quantities that Shipper has released through Transporter's capacity release program for the period of any release.

4. **TERM OF AGREEMENT:**

April 01, 2016 to

April 30, 2017

Right of First Refusal:

Not Applicable to this Agreement.

5. RATES:

Maximum rates, charges, and fees shall be applicable for the entitlements and quantities delivered pursuant to this Agreement unless Transporter and Shipper have agreed otherwise as provided herein.

It is further agreed that Transporter may seek authorization from the Commission and/or other appropriate body at any time and from time to time to change any rates, charges or other provisions in the applicable Rate Schedule and General Terms and Conditions of Transporter's Tariff, and Transporter shall have the right to place such changes in effect in accordance with the Natural Gas Act. This Agreement shall be deemed to include such changes and any changes which become effective by operation of law and Commission order. Nothing contained herein shall be construed to deny Shipper any rights it may have under the Natural Gas Act, including the right to participate fully in rate or other proceedings by intervention or otherwise to contest changes in rates in whole or in part.

The rate for storage service shall be a Deliverability rate of \$0.1850 per dth per month for MDWQ, and a Capacity rate of \$0.1789 per dth per month of MSQ divided by twelve, and the applicable Commodity rate for injection or withdrawal charges, not to exceed Transporter's Maximum Tariff Rates. In addition, Shipper will be charged ACA, Transporter's Use (Fuel %) and EPC Charge (Electric Power Cost) and any other applicable governmental surcharges in accordance with Transporter's Tariff.

6. INCORPORATION BY REFERENCE:

The provisions of Transporter's applicable Rate Schedule and the General Terms and Conditions of Transporter's Tariff are specifically incorporated herein by reference and made a part hereof.

7. NOTICES:

All notices can be given by telephone or other electronic means, however, such notice shall be confirmed in writing at the addresses below or through Transporter's Internet website. Shipper or Transporter may change the addresses below by written notice to the other without the necessity of amending this agreement:

Date: January 29, 2016

Contract No.: 127260

TRANSPORTER:

ANR Pipeline Company
700 Louisiana Street, Suite 700
Houston, Texas 77002-2700
Attention: Commercial Services

SHIPPER:

J. ARON & COMPANY
200 WEST STREET
NEW YORK, NY 10282
Attention: MATT SPELTZ

Telephone: 212-902-7349
FAX:
E-mail: ficc-jaron-natgasops@gs.com

INVOICES AND STATEMENTS:

J. ARON & COMPANY
200 WEST STREET
NEW YORK, NY 10282
Attention: MATT SPELTZ

Telephone: 212-902-7349
FAX:
E-mail: ficc-jaron-natgasops@gs.com

8. FURTHER AGREEMENT:

The MDWQ on this agreement will be zero (0) for the period April 1, 2016 through March 31, 2017, and will be 44,508 for the period April 1, 2017 through April 30, 2017. During the period of April 1, 2016 through March 31, 2017, no infield withdrawal transfers will be allowed, and for this same period Shipper will not nominate a withdrawal from this agreement.

Date: January 29, 2016

Contract No.: 127260

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be signed by their respective Officers or Representatives thereunto duly authorized to be effective as of the date stated above.

SHIPPER: J. ARON & COMPANY

By: _____

Title: _____

Date: _____

TRANSPORTER: ANR PIPELINE COMPANY

By: _____

Title: _____ Director, Commercial Services

Date: _____

Contract No: 127260

CONTRACT QUANTITY EXHIBIT

Rate Schedule: FSS

To Agreement Between

Contract Date: January 29, 2016

ANR PIPELINE COMPANY (Transporter)

Amendment Date:

AND J. ARON & COMPANY (Shipper)

Effective Start: April 01, 2017

Effective End: April 30, 2017

Annual Service
Unratcheted Service

| | MDQ (Dth) |
|--|----------------------|
| Maximum Storage Quantity (MSQ) | 1335236 |
| Base Maximum Daily Withdrawal Quantity (BMDWQ) | 44508 |
| Base Maximum Daily Injection Quantity (BMDIQ) | 6676 |
| Cyclability | 2118912 |

W=Withdrawal ;I=Injection

Note: BMDWQ and BMDIQ are stated without incorporating ratchets.

Contract No: 127260

CONTRACT QUANTITY EXHIBIT

Rate Schedule: FSS

To Agreement Between

Contract Date: January 29, 2016

ANR PIPELINE COMPANY (Transporter)

Amendment Date:

AND J. ARON & COMPANY (Shipper)

Effective Start: April 01, 2016

Effective End: March 31, 2017

Annual Service
Unratcheted Service

| | MDQ (Dth) |
|--|----------------------|
| Maximum Storage Quantity (MSQ) | 1335236 |
| Base Maximum Daily Withdrawal Quantity (BMDWQ) | 0 |
| Base Maximum Daily Injection Quantity (BMDIQ) | 6676 |
| Cyclability | 1896035 |

W=Withdrawal ;I=Injection

Note: BMDWQ and BMDIQ are stated without incorporating ratchets.