



Tres Palacios Gas Storage LLC  
915 N Eldridge Parkway, Suite 1100  
Houston, Texas 77079  
(713) 627-5400

June 29, 2023

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

Re: Tres Palacios Gas Storage LLC, Docket No. RP23-\_\_\_\_

Dear Ms. Bose:

Tres Palacios Gas Storage LLC (“Tres Palacios”) submits herewith for filing as part of its FERC Gas Tariff, First Revised Volume No. 1 (“Tariff”), the tariff records listed in Appendix A to be effective October 1, 2023. Tres Palacios respectfully requests that the Federal Energy Regulatory Commission (“FERC” or “Commission”) issue an order accepting the tariff records proposed herein by July 31, 2023, to provide the time necessary for the LINK® System to be updated and to provide Tres Palacios and its customers the time necessary to ensure a smooth transition to the LINK® System, and grant any waivers necessary to allow for the tariff records to be effective October 1, 2023.

On April 3, 2023, a wholly-owned subsidiary of Enbridge (U.S.) Inc. (“Enbridge”) acquired Tres Palacios Holdings LLC (“Tres Palacios Holdings”) from Brookfield Infrastructure Partners L.P. and Crestwood Equity Partners LP (the “Sellers”). Tres Palacios Holdings owns the Tres Palacios storage assets and conducts business as Tres Palacios Gas Storage LLC. Since that date, Tres Palacios’ customers have continued to conduct their daily business activities utilizing the Sellers’ Internet Web Site. During this interim period, Enbridge has worked on certain necessary modifications in order to implement Enbridge’s LINK® Customer Interface System (“the LINK® System”) for Tres Palacios. Following the effective date of the tariff records filed herein, all Tres Palacios daily business activities conducted electronically will be conducted via the LINK® System, effective October 1, 2023. Tres Palacios is submitting the instant filing to:

- (1) reflect the implementation of the LINK® System for Tres Palacios by adding the Form of Service Agreement for the LINK® System and a new General Terms and Conditions (“GT&C”) Section 34 (Electronic Communications) to describe the LINK® System and its functions, the procedures that must be followed in order to gain access to the LINK® System, and the rights and obligations of Tres Palacios, the LINK® System Subscriber and the Internet Web Site user;
- (2) modify the Request for Service provisions to promote administrative efficiency and conformity with the contracting provisions of the other entities operated by Enbridge, automate the process for requesting and contracting for service, and ensure Tres Palacios’ continued compliance with the Commission’s policies and regulations;

- (3) reflect the implementation of the LINK® System for Tres Palacios by modifying the Capacity Release provisions to reflect that the process to effectuate the release of capacity on Tres Palacios' system will be conducted via Tres Palacios' LINK® System;
- (4) modify the Creditworthiness provisions to more closely align the Tres Palacios procedures with the Enbridge credit requirements;
- (5) revise the various Rate Statements, Rate Schedules, and Forms of Service Agreement to achieve consistent and uniform language consistent with other entities operated by Enbridge, remove redundancies between the Forms of Service Agreement and other Tariff Records, and streamline the Rate Statements, Rate Schedules, and Forms of Service Agreement to reflect an enhanced online processing of requests for service. Tres Palacios also proposes to make certain non-substantive, stylistic changes across the various Rate Statements, Rate Schedules, and Forms of Service Agreements;
- (6) modify various GT&C sections to more closely align those provisions with the processes and procedures currently in effect for other Enbridge pipelines and storage facilities; and
- (7) make other miscellaneous changes to correct typographical errors and section references.

The changes proposed in the instant filing are designed to streamline and enhance service to Tres Palacios' customers, create a common platform amongst all Enbridge customers, and generate synergies between Enbridge and its customers.

## **STATEMENT OF NATURE, REASONS, AND BASIS**

The Statement of Nature, Reasons, and Basis is attached hereto as Appendix B.

## **PROPOSED EFFECTIVE DATE AND WAIVERS**

Tres Palacios proposes an effective date of October 1, 2023, for the revised tariff records filed herewith to coincide with the date on which the LINK® System program updates are scheduled to be available to customers. Tres Palacios respectfully requests a waiver of the notice requirement contained in Section 154.207 of the Commission's regulations, 18 C.F.R. § 154.207 (2022), and any other waivers that may be required for the Commission to accept the revised tariff records filed herein to become effective as of October 1, 2023. In addition to the waiver of the notice requirements, Tres Palacios also requests any waivers that may be required for the Commission to accept the tariff records filed herein to become effective as proposed.

## **IMPLEMENTATION**

Pursuant to Section 154.7(a)(9) of the Commission's regulations, 18 C.F.R. § 154.7(a)(9), Tres Palacios files this motion to place the revised tariff records filed herewith into effect at the

expiration of any suspension period set by the Commission, provided that the revised tariff records are approved as filed and without condition. In the event that the revised tariff records filed herewith are not approved as filed and without condition, Tres Palacios reserves the right to file a motion at a later date to place such revised tariff records into effect.

## **LIST OF MATERIALS ENCLOSED**

The following materials are submitted herewith in an XML filing package in accordance with the requirements of the eTariff program set forth in Order No. 714:<sup>1</sup>

1. This transmittal letter;
2. Appendix A containing a list of the proposed tariff records to be effective October 1, 2023, and clean and marked (redlined) versions of the tariff records in PDF format consistent with Section 154.201(a) of the Commission's regulations;<sup>2</sup>
3. Appendix B containing Tres Palacios' Statement of Nature, Reasons, and Basis, which describes the purpose of the instant filing; and
4. A certificate of service certifying that all materials listed in this "List of Materials Enclosed" section have been served on customers of Tres Palacios and interested state commissions that have requested electronic service.

## **CORRESPONDENCE AND COMMUNICATION**

All correspondence and communications regarding this filing should be addressed to the following:

\* Arthur Diestel  
Director, Regulatory  
\* Gina Gray  
Specialist, Regulatory  
Aaron McBride  
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<sup>1</sup> *Electronic Tariff Filings*, Order No. 714, III FERC Stats. & Regs., Regs. Preambles ¶ 31,276 (2008), *order establishing procedures*, 130 FERC ¶ 61,047, *order establishing baseline filing schedule*, 130 FERC ¶ 61,228 (2010), *final rule*, Order No. 714-A, III FERC Stats. & Regs. ¶ 31,356 (2014).

<sup>2</sup> 18 C.F.R. § 154.201(a) (2022).

and

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\* Tres Palacios respectfully requests that the Commission include each of these persons on the Commission's official service list.

## **CERTIFICATE AND ELECTRONIC FILING**

The undersigned certifies that he has read the filing and knows its contents; the contents are true as stated to the best knowledge and belief of the signer; and the signer possesses full power and authority to sign the filing.

## **COMPLIANCE WITH REGULATIONS**

In compliance with Section 154.4(c) of the Commission's regulations, 18 C.F.R. § 154.4(c), all contents of this filing are being submitted as part of an XML filing package in conformance with the Secretary of the Commission's instructions.

In compliance with Section 154.201(a) of the Commission's regulations, 18 C.F.R. § 154.201(a), a marked version of the proposed tariff records showing additions to and deletions from the currently effective tariff records is attached.

In accordance with Section 154.208 of the Commission's regulations, 18 C.F.R. § 154.208, copies of this filing will be sent to the contact email addresses Tres Palacios has available for all customers and interested state commissions. A paper copy of this filing may only be served if a customer or an interested state commission has been granted a waiver of electronic service pursuant to Part 390 of the Commission's regulations, 18 C.F.R. Pt. 390.

Ms. Kimberly D. Bose, Secretary

June 29, 2023

Page 5

If you have any questions or comments regarding this filing, please contact the undersigned at 713-627-1642.

Respectfully submitted,

/s/ Arthur Diestel

Arthur Diestel

Director, Regulatory

Tres Palacios Gas Storage LLC

#### Attachments

cc: Laura Kane (FERC)  
Patricia Eley (FERC)

## APPENDIX A

### LIST OF TARIFF RECORDS

<b><u>Version</u></b>	<b><u>Section (Description &amp; Title, Narrative Name)</u></b>
4.0.0	<i>Part 0 – Cover Page</i>
5.0.0	<i>Part 1 – Table of Contents</i>
4.0.0	<i>Part 3 – Map of System</i>
	<i>Part 4 – Rate Statements</i>
2.0.0	4.1. FSS Rate Statement
1.0.0	4.2. NNSS Rate Statement
1.0.0	4.3. FP Rate Statement
1.0.0	4.4. FL Rate Statement
1.0.0	4.5. ISS Rate Statement
1.0.0	4.6. IHBS Rate Statement
1.0.0	4.7. IP Rate Statement
1.0.0	4.8. IW Rate Statement
1.0.0	4.9. IL Rate Statement
2.0.0	4.10. EIWS Rate Statement
3.0.0	4.11. FWS Rate Statement
	<i>Part 5 – Rate Schedules</i>
3.0.0	5.1. FSS Rate Schedule
3.0.0	5.2. NNSS Rate Schedule
2.0.0	5.3. FP Rate Schedule
2.0.0	5.4. FL Rate Schedule
3.0.0	5.5. ISS Rate Schedule
3.0.0	5.6. IHBS Rate Schedule
3.0.0	5.7. IP Rate Schedule
2.0.0	5.8. IW Rate Schedule
2.0.0	5.9. IL Rate Schedule
3.0.0	5.10. EIWS Rate Schedule
1.0.0	5.11. FWS Rate Schedule

*Part 6 – General Terms and Conditions*

1.0.0		Index
3.0.0	6.2.	Definitions
6.0.0	6.3.	Request for Service
7.0.0	6.4.	Capacity Release
4.0.0	6.5.	Priority, Interruption of Service and OFOS
6.0.0	6.8.	Nominations and Scheduling
2.0.0	6.9.	Point(s) of Receipt and Point(s) of Delivery
1.0.0	6.13.	Measurement
4.0.0	6.14.	Billings and Payments
2.0.0	6.16.	Insurance
2.0.0	6.20.	Gas Title Transfers
1.0.0	6.22.	Transmission Provider Standards of Conduct
9.0.0	6.23.	North American Energy Standards Board
2.0.0	6.25.	Nondiscriminatory Waiver of Tariff Provisions
2.0.0	6.28.	Default and Termination
1.0.0	6.30.	Off-System Capacity
2.0.0	6.31.	Creditworthiness
2.0.0	6.32.	Disposition of Retained Quantities
6.0.0	6.33.	Tres Palacios Contact Address
2.0.0	6.34.	Electronic Communications

*Part 7 – Forms of Service Agreements*

3.0.0		Index
5.0.0	7.1.	Firm Storage Service Agreement
2.0.0	7.2.	No-Notice Storage Service Agreement
3.0.0	7.3.	Firm Parking Service Agreement
3.0.0	7.4.	Firm Loan Service Agreement
2.0.0	7.5.	Interruptible Storage Service Agreement
2.0.0	7.6.	Interruptible Hourly Balancing Service Agreement
4.0.0	7.7.	Hub Services Agreement
3.0.0	7.8.	Capacity Release Umbrella Agreement
2.0.0	7.9.	Firm Wheeling Service Agreement
0.0.0	7.10.	LINK® Service Agreement

## **CLEAN TARIFF RECORDS**



## **MARKED TARIFF RECORDS**

## **APPENDIX B**

### **STATEMENT OF NATURE, REASONS AND BASIS**

# **TRES PALACIOS GAS STORAGE LLC LINK® IMPLEMENTATION FILING**

## **APPENDIX B STATEMENT OF NATURE, REASONS, AND BASIS**

On April 3, 2023, a wholly-owned subsidiary of Enbridge (U.S.) Inc. (“Enbridge”) acquired Tres Palacios Holdings LLC (“Tres Palacios Holdings”) from Brookfield Infrastructure Partners L.P. and Crestwood Equity Partners LP. Tres Palacios Holdings owns the Tres Palacios storage assets and conducts business as Tres Palacios Gas Storage LLC (“Tres Palacios”). In addition to Tres Palacios, Enbridge operates multiple natural gas pipelines,<sup>1</sup> as well as storage facilities that are authorized to charge market-based rates, including Egan Hub Storage, LLC; Moss Bluff Hub, LLC; Steckman Ridge, LP, Bobcat Gas Storage (each an “Enbridge Entity”). Enbridge utilizes the LINK Customer Interface System (“LINK® System”) as its electronic contracting and notice system.

Upon acquiring Tres Palacios, Enbridge began a detailed review of the services offered by Tres Palacios, its existing contracting practices, and its FERC Gas Tariff (“Tariff”). Enbridge’s proposed revisions in this filing are aimed at creating Rate Schedules, Rate Statements, General Terms and Conditions (“GT&C”), and Forms of Service Agreements that are consistent with the services offered by Tres Palacios and consistent with the Enbridge Entities’ Tariffs. Utilizing similarly designed tariffs and LINK® System programming across the Enbridge Entities creates synergies and consistency in applications across the entities. During the review, Enbridge found certain inadvertent errors; provisions that were no longer applicable; inconsistent use of terminology, references, tenses, grammar, and punctuation; and instances where the Tariff could benefit from additional language for clarity of the services provided. The revisions herein aim to generally update and conform the Tariff to address these issues, as well as to incorporate standard provisions utilized across the Enbridge Entities Tariffs and integrate the use of the LINK® System. Capitalized terms not defined herein have the meaning set forth in the Tariff.

The revisions to the Tariff, as described herein, include revisions to (i) the Rate Statements for each service, (ii) each Rate Schedule; (iii) the Form of Service Agreement for each service; (iv) the GT&C; and (v) miscellaneous pages to reflect the updated provisions and the ownership of Tres Palacios by Enbridge, including the title page, table of contents and indexes, preliminary statement, and the reference to the map.

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<sup>1</sup> Algonquin Gas Transmission, LLC; Big Sandy Pipeline, LLC; East Tennessee Natural Gas, LLC; Garden Banks Gas Pipeline, LLC; Maritimes & Northeast Pipeline, L.L.C.; Mississippi Canyon Gas Pipeline, LLC; Nautilus Pipeline Company, L.L.C., NEXUS Gas Transmission, LLC; Sabal Trail Transmission, LLC; Saltville Gas Storage Company L.L.C.; Southeast Supply Header, LLC; and Texas Eastern Transmission, LP (each an “Enbridge Entity”).

## **I. Rate Statements**

Tres Palacios is proposing to revise the Rate Statements applicable to each Rate Schedule—FSS, NNSS, FP, FL, ISS, IHBS, IP, IW, IL, EIWS, and FWS—to remove language explaining the calculation of charges applicable to the respective Rate Schedule. Such explanatory language is being moved to the Rates and Charges section of each individual Rate Schedule, with modification in some instances. Tres Palacios also proposes to make certain non-substantive, stylistic changes to language across the various Rate Statements. Each of the Rate Statements includes conforming language clarifying that the rates are exclusive of all applicable taxes, charges, and surcharges, including without limitation the ACA charge.

Additionally, the Rate Statements related to Rate Schedules FP, FL, IP, and IL were updated to clarify that the Customer may pay the reservation charge or the parking or loan charge over a designated time period, as set forth on the appropriate exhibit to Customer's applicable agreement. The EIWS Rate Statement reflects the deletion of the option for the Wheeling Capacity Charge to have a daily rate and instead reflects that Tres Palacios will only negotiate rates on a Monthly basis.

## **II. Rate Schedules**

Tres Palacios is proposing to revise Rate Schedules FSS, NNSS, FP, FL, ISS, IHBS, IP, IW, IL, EIWS, and FWS to include language explaining the calculation of charges applicable to the respective Rate Schedules. Such explanatory language is being moved from the corresponding Rate Statements, with modification in some instances, to include calculations of rates based on the rate structuring methods added to certain rate schedules. In addition, Tres Palacios includes certain non-substantive, stylistic, clean-up, and housekeeping edits to language across the various Rate Schedules.

### **A. FSS Rate Schedule.**

Tres Palacios is proposing to modify Section 2.2 to clarify that a Customer may negotiate to utilize non-primary points and primary points in excess of Maximum Daily Receipt Quantity ("MDRQ") and Maximum Daily Delivery Quantity ("MDDQ"), on a secondary basis. Section 2.2 further clarifies a Customer's ability to utilize Pooling Points for Firm Storage Service.

Tres Palacios proposes to add a new Section 2.3(e) incorporating the ability for a Customer to elect the method by which a Customer may request Authorized Overrun ("AO") Service. The two methods include the ability to negotiate AO charges as set rates for specified points or, to the extent a Customer has the right to utilize points on a secondary basis, the ability to be charged the AO charges posted daily on Tres Palacios' Internet Web Site. Tres Palacios is proposing to modify Sections 3(f) and 3(g) to clarify the calculation of Customer's payment based on the method elected to establish the AO charges.

B. NNSS Rate Schedule.

Tres Palacios is proposing to modify the NNSS Rate Schedule to add Section 2.2 specifying the Customer's rights to utilize Points of Receipt and Points of Delivery as primary points.

C. FP Rate Schedule.

Tres Palacios is proposing to add Section 2.2 specifying the Customer's rights to utilize Points of Receipt and Points of Delivery as primary points. Tres Palacios is further proposing to modify the FP Rate Schedule to clarify that a Customer may negotiate to utilize non-primary points and primary points in excess of MDRQ and MDDQ, on a secondary basis and a Customer's ability to utilize Pooling Points for Firm Parking Service.

Tres Palacios is proposing to add a new Section 2.4 to the FP Rate Schedule regarding the ability to enter into separate transactions under a service agreement that may be effective for a portion or all of the term of the service agreement, and the ability for the Maximum Park Quantity ("MPQ") and Maximum Daily Withdrawal Quantity ("MDWQ") to be aggregated for nomination purposes with the respective MPQ and MDWQ agreed to in other qualifying transactions under the service agreement.

Tres Palacios is proposing to modify the payment structure in Section 3(a) to require that a Customer's payment frequency shall be as specified as the time period on Exhibit A to the Firm Parking Service Agreement instead of requiring a monthly billing.

D. FL Rate Schedule.

Tres Palacios is proposing to add a new Section 2.3 specifying the Customer's rights to utilize Points of Receipt and Points of Delivery as primary points. Tres Palacios is further proposing to modify the FP Rate Schedule to clarify that a Customer may negotiate to utilize non-primary points and primary points in excess of MDRQ and MDDQ, on a secondary basis and a Customer's ability to utilize Pooling Points for Firm Loan Service.

Tres Palacios is proposing to add a new Section 2.4 to the FL Rate Schedule regarding the ability to enter into separate transactions under a service agreement that may be effective for a portion or all of the term of the service agreement, and the ability for the Maximum Loan Quantity ("MLQ") and Maximum Daily Injection Quantity ("MDIQ") to be aggregated for nomination purposes with the respective MLQ and MDIQ agreed to in other qualifying transactions under the service agreement.

Tres Palacios is proposing to modify the payment structure in Section 3(a) to require that a Customer's payment frequency shall be as specified as the time period on Exhibit A to the Firm Loan Service Agreement instead of requiring a monthly billing.

E. ISS Rate Schedule.

Tres Palacios is proposing to new Section 2.3(d) to ISS Rate Schedule to clarify the point(s) at which the Gas is to be tendered by Customer to Tres Palacios and the point(s) at which the Gas is to be tendered by Tres Palacios to Customer.

F. IHBS Rate Schedule.

Tres Palacios is proposing to add a new Section 2.5 to clarify the point(s) at which the Gas is to be tendered by Customer to Tres Palacios for injection into storage and the point(s) at which the Gas is to be tendered by Tres Palacios to Customer for withdrawal from storage and to clarify a Customer's ability to utilize Pooling Points. In addition, Section 2.5 clarifies the point(s) at which the hourly balancing quantities of Gas are to be tendered by Customer to Tres Palacios and the point(s) at which the hourly balancing quantities of Gas are to be tendered by Tres Palacios to Customer.

G. IP Rate Schedule.

Tres Palacios is proposing to add a new Section 2(d) to the IP Rate Schedule to clarify the point(s) at which the Gas is to be tendered by Customer to Tres Palacios and the point(s) at which the Gas is to be tendered by Tres Palacios to Customer and to clarify a Customer's ability to utilize Pooling Points.

In addition, Section 2 is modified to clarify the ability of Customer to enter into separate transactions under a service agreement that may be effective for a portion or all of the term of the service agreement.

Tres Palacios is proposing to modify the payment structure in Section 3(a) to change the calculation of the payment from a charge per dekatherm of Customer's Park Balance to a charge per dekatherm of Customer's Maximum Park Quantity.

H. IW Rate Schedule.

Tres Palacios is proposing to modify Section 2 to clarify the available points of receipt and delivery for the Interruptible wheeling service. Tres Palacios is proposing to modify Section 3(a) to clarify that the calculation of payment shall be equal to the sum of each applicable Interruptible Wheeling Charge multiplied by the applicable dekatherm quantity Tres Palacios shall have wheeled for Customer during a given invoice period.

Tres Palacios is proposing to add a new Section 4 to incorporate the ability for a Customer to elect the method by which a Customer may request Interruptible Wheeling Service. The two methods include the ability to negotiate set rates for specified paths with a single fuel reimbursement percentage applicable to all paths or the ability to be charged for the service based on the rates and fuel reimbursement percentage posted daily on Tres Palacios' Internet Web Site. Tres Palacios is proposing to modify Section 3(a) to clarify the calculation of Customer's payment based on the rate per path on which Tres Palacios provided service.

**I. IL Rate Schedule.**

Tres Palacios is proposing to modify Section 2 of the IL Rate Schedule to clarify the point(s) at which the Gas is to be tendered by Customer to Tres Palacios and the point(s) at which the Gas is to be tendered by Tres Palacios to Customer and to clarify a Customer's ability to utilize Pooling Points.

In addition, Section 2 is modified to clarify the ability of Customer to enter into separate transactions under a service agreement that may be effective for a portion or all of the term of the service agreement.

Tres Palacios is proposing to modify the payment structure in Section 3(a) to change the calculation of the payment from a charge per dekatherm of Customer's Loan Balance to a charge per dekatherm of Customer's Maximum Loan Quantity.

**J. EIWS Rate Schedule.**

Tres Palacios is proposing to modify Section 2 of the IW Rate Schedule to clarify a Customer's rights to negotiate for utilization of points. As explained in the EIWS Rate Statement explanation, Tres Palacios is proposing to remove the reference to a "daily" charge and only have the ability to negotiate rates on a Monthly basis.

**K. FWS Rate Schedule.**

Tres Palacios is proposing to modify the FWS Rate Schedule to clarify the available points of receipt and delivery for the firm wheeling service.

**III. Forms of Service Agreement**

Tres Palacios is proposing to revise the Forms of Service Agreement under Rate Schedules FSS, NNSS, FP, FL, ISS, IHBS, and FWS, as well as the form of Hub Services Agreement for use under Rate Schedules IP, IW, IL, and EIWS to achieve consistent and uniform language and fill in the blank provisions among the various Forms of Service Agreement. These updates will streamline the Forms of Service Agreement to reflect an enhanced online processing of requests for service and allow for consistency in programming. Tres Palacios also proposes to make certain non-substantive, stylistic changes to language across the various Forms of Service Agreement.

A number of the service agreements referred to the ability for parties to enter into multiple transactions pursuant to such agreement. Tres Palacios does not operate the FSS Agreement, the NNSS Agreement, the ISS Agreement, the IHBS Agreement, or the FWS Agreement as umbrella agreements under which multiple transactions are entered into, and accordingly, such language was removed from the term provision in those agreements. Similarly, Tres Palacios is proposing to remove references to the parties' ability to enter into multiple transactions for storage from any exhibits pursuant to these agreements that referenced transactions. As discussed herein below, Tres Palacios is likewise removing the Transaction Confirmation Procedure from the GT&C section of its Tariff. Where transactions are applicable, provisions governing the transaction process have been added to the applicable Form of Service Agreement.

Tres Palacios included proposed revisions to the points of receipt and delivery sections in the Forms of Service Agreement to clarify which points were available for the service provided under the agreement. To the extent that a service may utilize all of the points available on the Tres Palacios system, the Form of Service Agreement includes a reference to the location on its Internet Web Site where Tres Palacios will post, and update from time to time, all such points. For certain services with specific point requirements, the Form of Service Agreement refers to the applicable Rate Schedule which clarifies the points available and any point restrictions that are applicable to such service.

Each of these Forms of Service Agreement have been revised to state that, unless otherwise required in the Tariff, any notice to be provided to Tres Palacios pursuant to the notice provisions therein is to be sent to the address provided in Section 33.2 of the GT&C of the Tres Palacios' Tariff, and to clarify that either party may change the addresses by written notice to the other party without the need to amend the Service Agreement. Including the notice address in the GT&C provides for consistency of the Tres Palacios notifications among all of the agreements entered into pursuant to the Tariff.

In many of the exhibits to Forms of Service Agreement, Tres Palacios is proposing to modify language identifying the prior Exhibit that is to be superseded by the execution of the subsequent Exhibit. Tres Palacios included this standard provision on exhibits in each Form of Service Agreement that can be superseded by a future amendment. Other substantive updates related to these Forms of Service Agreement are discussed in this section.

Tres Palacios is also proposing to revise the Capacity Release Umbrella Agreement to more closely align with the agreement used by the other Enbridge Entities. The Capacity Release Umbrella Agreement is used to streamline the processes for a potential Replacement Customer to qualify for participation in Tres Palacios' capacity release process and for providing the details of a completed capacity release transaction to the winning Replacement Customer(s).

Tres Palacios is proposing to add a new form—the Form of Service Agreement for the LINK® System (“LINK® System Agreement”). The LINK® System Agreement is a part of the currently effective Commission-approved tariffs for other Enbridge Entities. The agreement is a contract between a Customer and Tres Palacios to provide for use of the LINK® System where the Customer will receive communications, perform functions related to contracting and nominations, and other storage facility activities.

A. Form of Service Agreement under Rate Schedule FSS (“FSS Agreement”).

Tres Palacios is proposing to modify Exhibit A to include additional fill in the blank options for Maximum Storage Quantity, MDIQ, and Maximum Daily Storage Quantity, in the event that such quantities may vary by Term. Tres Palacios also standardized the table of Receipt and Delivery Points that is utilized in multiple service agreements. The table clarifies the location code and which points are unilateral.

Tres Palacios is proposing to modify Exhibit D to provide for the election between one of two methods by which a Customer may request Authorized Overrun Service in accordance with the terms of Rate Schedule FSS, and to include the point and rate chart in the event Customer selects Method 1.



B. Form of Service Agreement under Rate Schedule NNSS (“NNSS Agreement”).

Tres Palacios is proposing to modify Exhibit A to include the standardized table of Receipt and Delivery Points that is utilized in multiple service agreements. Tres Palacios is proposing to further modify Exhibit A to the NNSS Agreement to remove Customer’s ability to utilize Point(s) of Receipt and Point(s) of Delivery on a secondary basis.

C. Form of Service Agreement under Rate Schedule FP (“FP Agreement”) and Rate Schedule FL (“FL Agreement”).

Identical additional substantive proposed changes apply to the Firm Parking and the Firm Loan Forms of Service Agreement. Tres Palacios proposes to add the right for the parties to negotiate for Customer to have the ability to utilize all Points of Receipt and Points of Delivery on a secondary basis for this service.

Tres Palacios is proposing to modify Exhibit A to add the information required for identification of the different transactions and aggregation of such transactions that Customer may enter into pursuant to Rate Schedule FP or FL, respectively. Specifically, each Exhibit A shall receive a transaction ID number and a Group number. Tres Palacios included a new provision on Exhibit A stating that the MPQ/MLQ and the MDWQ/MDIQ may be aggregated with the MPQ/MLQ and MDWQ/MDIQ, respectively for Rate Schedule FP and Rate Schedule FL, set forth on transactions executed under the same Group number. The ability to aggregate these quantities will provide for ease of nominations during the withdrawal period or injection period for the Customer’s firm parking or firm loan service, respectively.

In addition, Tres Palacios is proposing language in Exhibit A permitting the Customer to pay the Firm Parking Reservation Charge or the Firm Loan Reservation Charge over a designated time period, as further specified by the Time Period Description included in Exhibit A. This is being added to ensure that the contract aligns with the billing arrangement negotiated by the parties.

Tres Palacios is proposing to modify Exhibit A to include the standardized table of Receipt and Delivery Points that is utilized in multiple service agreements, and to select whether the parties have negotiated for Customer’s right to use Points of Receipt and Points of Delivery on a secondary basis.

D. Form of Hub Services Agreement under Rate Schedules IP, IW, IL, and EIWS (“HUB Agreement”).

Article I of the HUB Agreement has been revised to state that the parties may agree to terms for separate transactions under the same rate schedule that shall each be set forth on a separate Exhibit A, B, C, or D, as applicable, with a separate designation for each such exhibit, and any of which may be effective for a portion or all of the term set forth on a separate exhibit for service under such rate schedule.

The exhibits to the HUB Agreement are utilized for transactions for the various services. Exhibit A is utilized to contract for Interruptible Wheeling Service; Exhibit B is utilized to contract for Interruptible Parking Service; Exhibit C is utilized to contract for Interruptible Loan Service; and Exhibit D is utilized to contract for Enhanced Interruptible Wheeling Service.

Tres Palacios included proposed updates to Exhibit A to provide for the election between one of two methods by which a Customer may request rates for Interruptible Wheeling Service in accordance with the terms of Rate Schedule IW, and to include the path and rate chart in the event Customer selects Structuring Method 1.

Tres Palacios is proposing language in Exhibit B and Exhibit C permitting the Customer to pay the Interruptible Parking Charge and the Interruptible Loan Charge, respectively, over a designated time period, as further specified by the Time Period Description and Interruptible Parking Charge Calculation and the Interruptible Loan Charge Calculation included in Exhibit B or Exhibit C, respectively. This is being added to ensure that the contract and charge calculation aligns with the billing arrangement negotiated by the parties.

Tres Palacios is proposing to modify Exhibit D to remove the option for a Customer to pay the Enhanced Interruptible Wheeling Capacity Charge on a Daily basis and instead will require payment to be made on Monthly basis.

E. Form of Capacity Release Umbrella Agreement (“Capacity Release Umbrella Agreement”).

The Capacity Release Umbrella Agreement contains an Addendum, which is provided to the Replacement Customer to set forth the details of each capacity release transaction agreed upon by Tres Palacios, Releasing Customer, and Replacement Customer immediately upon the award of released capacity detailing all of the pertinent rates, terms and conditions of the release. Tres Palacios added proposed language to include fill in the blanks for each rate agreed to by the parties.

F. Form of Service Agreement under Rate Schedule FWS (“FWS Agreement”).

Tres Palacios is proposing to modify Exhibit A to include the standardized table of Receipt and Delivery Points which is utilized in multiple service agreements, and to select whether the parties have negotiated for Customer’s right to use Points of Receipt and Points of Delivery on a secondary basis.

#### **IV. General Terms and Conditions**

The proposed edits to the GT&C are primarily made to be consistent with the Enbridge Entities’ Tariffs, specifically related to contracting on the Enbridge electronic system. These revisions are primarily in the Request for Service, Capacity Release, and Electronic Communications sections. Other revisions include removal of outdated provisions, updates to section references as needed, updates to websites and contact information, and other

miscellaneous housekeeping clean up changes. Utilizing similarly designed tariffs and LINK® System programming across the Enbridge Entities creates synergies and consistency in applications across the entities.

A. Definitions

Tres Palacios added certain new defined terms to GT&C Section 2 (Definitions) that are used in the Forms of Service Agreement to clarify the services and points available on the system for such services. Specifically, Tres Palacios included three new terms: Injection Pooling Point, Storage Point, and Withdrawal Pooling Point.

Tres Palacios also is proposing to update the definition for the term “Internet Web Site” to reflect the LINK® System website address.

B. Request for Service Provisions

Tres Palacios is proposing to modify the provisions in GT&C Section 3 (Request for Service) to streamline the process for requesting and contracting for service and to conform the procedures to those currently in effect for the other Enbridge Entities.<sup>2</sup> The specific changes to the Request for Service provisions are found in Sections 3.1(d) through 3.1(h) and contact information updates in Section 3.2. Additionally, Tres Palacios proposes a fully revised Section 3.3 detailing the information requirements applicable to requests for service and a fully revised Section 3.4 specifying the creditworthiness requirements aligned with the Enbridge credit department process.

Tres Palacios is proposing to add a new GT&C Section 3.6 (Execution of Service Agreements and Amendments) to conform to the procedures for execution of Service Agreements and amendments that are currently in place for the other Enbridge Entities.<sup>3</sup> This provision specifically provides for which agreements and amendments shall be executed electronically via the LINK® System by Customer and Tres Palacios and which agreements and amendments shall be executed in writing by Customer and Tres Palacios and the timing requirements of such execution.

Tres Palacios added two new GT&C Sections, including Section 3.11 (Extension of Service Agreements) to provide for the extension of service agreements to be negotiated on a case by case basis. The Commission has previously approved similar types of tariff

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<sup>2</sup> See, e.g., Algonquin Gas Transmission, LLC, GT&C Section 2; East Tennessee Natural Gas, LLC, GT&C Section 5; Egan Hub Storage, LLC, GT&C Section 3; Maritimes & Northeast Pipeline, L.L.C., GT&C Section 3; Saltville Gas Storage Company L.L.C., GT&C Section 3; Texas Eastern Transmission, LP, GT&C Section 3; Bobcat Gas Storage, GT&C Section 3.

<sup>3</sup> See, e.g., Algonquin Gas Transmission, LLC, GT&C Section 2.3; East Tennessee Natural Gas, LLC, GT&C Section 5.10; Egan Hub Storage, LLC, GT&C Section 3.6; Maritimes & Northeast Pipeline, L.L.C., GT&C Section 3.3; Saltville Gas Storage Company L.L.C., GT&C Section 3.6; Texas Eastern Transmission, LP, GT&C Section 3.12; Bobcat Gas Storage, GT&C Section 3.5.

provisions for other pipelines.<sup>4</sup> The Commission has found these types of provisions to be a reasonable way to provide firm shippers with security as to their transportation rights, consistent with the Transporter's needs for operational planning.<sup>5</sup> The new proposed Section 3.12 clarifies that Tres Palacios shall not be required to grant requests for service that will impair Tres Palacios' ability to render firm services. This language is similar to provisions currently in effect in other Commission-approved pipeline tariffs.<sup>6</sup>

### C. Capacity Release Provisions

Tres Palacios is proposing to modify GT&C Section 4 to reflect that the process to effectuate the release of capacity on Tres Palacios' system will be conducted via Tres Palacios' LINK® System. The primary proposed edits are in Sections 4.1, 4.3, 4.4 and 4.5 updating the posting process for a notice of a capacity release offer. Additional proposed edits are included in Sections 4.6 and 4.7 related to the bidding and award of capacity procedures.

Tres Palacios is proposing to add a new Section 4.15 to specify procedures for permanent capacity releases. The proposed language is similar to that in Commission-approved tariffs of other Enbridge Entities<sup>7</sup> and reflects Enbridge's current practices that permanent capacity releases are subject to the detailed procedures specified in GT&C Section 4, and that a Replacement Customer that may acquire the subject capacity must provide the credit information required by GT&C Sections 3.4 and 31. Consistent with the Commission's *Texas Eastern* decision, and to provide additional clarity consistent with the Commission's *Northwest* decision,<sup>8</sup> Tres Palacios is providing that for any permanent

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<sup>4</sup> See, e.g., *Algonquin Gas Transmission, LLC*, 112 FERC ¶ 61,262 (2005); *East Tennessee Natural Gas, LLC*, 112 FERC ¶ 61,261 (2005); *Egan Hub Storage, LLC*, 112 FERC ¶ 61,260 (2005); *Ozark Gas Transmission, L.L.C.*, 129 FERC ¶ 61,067 (2009); *Texas Eastern Transmission, LP*, 112 FERC ¶ 61,235 (2005); *Iroquois Gas Transmission System L.P.*, Docket No. RP05-155-000, Letter Order (Feb. 9, 2005); *Transcontinental Gas Pipe Line Corporation*, 87 FERC ¶ 61,109, *order granting clarification*, 88 FERC ¶ 61,155, *reh'g denied*, 88 FERC ¶ 61,295 (1999). See also, *Texas Gas Transmission Corporation*, 64 FERC ¶ 61,083 (See Section 32.2 of the General Terms and Conditions), *order on compliance filing and granting, in part, and denying, in part, reh'g and clarification*, 65 FERC ¶ 61,008 (1993); *Trailblazer Pipeline Company*, 63 FERC ¶ 61,283 (See Section 21.3 of the General Terms and Conditions), *order on compliance filing and reh'g*, 65 FERC ¶ 61,015 (1993); *Natural Gas Pipeline Company of America*, 48 FERC ¶ 61,306 (1989).

<sup>5</sup> See *Natural Gas Pipeline Company of America*, 48 FERC ¶ 61,306, at p. 62,001.

<sup>6</sup> See, e.g., *Algonquin Gas Transmission, LLC*, GT&C Section 2.2(a); *Egan Hub Storage, LLC*, GT&C Section 3.13; *Texas Eastern Transmission, LP*, GT&C Section 3.8; *Bobcat Gas Storage*, GT&C Section 3.12.

<sup>7</sup> See *Algonquin Gas Transmission, LLC*, GT&C Section 14.14; *Egan Hub Storage, LLC*, GT&C Section 4.16; *East Tennessee Natural Gas, LLC*, GT&C Sections 17.1 and 18.1; *Saltville Gas Storage Company L.L.C.*, GT&C Section 4.16; *Steckman Ridge, LP*, GT&C Section 5.17; *Texas Eastern Transmission, LP*, GT&C Section 3.14(O), *Bobcat Gas Storage*, GT&C Section 4.16.

<sup>8</sup> See *Texas Eastern Transmission Corporation*, 82 FERC ¶ 61,118, *order on reh'g and clarification*, 83 FERC ¶ 61,092, at p. 61,446 (1998) (permitting Texas Eastern to refuse to permit a permanent release when the pipeline has a reasonable basis to conclude that it will not be financially indifferent to the release) ("*Texas Eastern*"). See also

capacity release, Tres Palacios may deny the requested release if it has a reasonable basis to conclude that Tres Palacios will not be financially indifferent to the release. Consistent with the Commission's *Northwest* decision, proposed GT&C Section 4.15 also states (i) that the minimum bid acceptable to Tres Palacios shall be a bid for the remainder of the term of the Service Agreement at the rate(s) the Customer is required to pay for the capacity to be released,<sup>9</sup> and (ii) that in the event a request for permanent release of capacity is denied, Tres Palacios shall provide e-mail notification to the Customer proposing to permanently release the capacity of such denial, specifying the reasons for such denial.<sup>10</sup>

Further, Tres Palacios is proposing to add GT&C Section 4.16 to reflect that any party that desires to acquire capacity via the capacity release mechanism set forth in GT&C Section 4 must submit its request for such capacity to Tres Palacios via e-mail, and that Tres Palacios will post such information on the LINK® System for a period of one (1) month or until a transaction is effected, whichever is shorter. This new section also includes a list of the information that the requesting party is required to include in its request. This provision is based on language currently in effect in Commission-approved tariffs of other interstate pipelines and storage facilities.<sup>11</sup>

D. Priority, Interruption of Service and OFOs.

Tres Palacios is proposing to modify certain provisions in Section 5 to align with practices of other Enbridge Entities. Additionally, Tres Palacios is proposing to add a new GT&C Section 5.6 (Scheduled Maintenance) addressing Tres Palacios' right to curtail, interrupt, or discontinue service on its facilities from time to time to perform maintenance and construction authorized by the Commission and for reasons of Force Majeure.

E. Nominations and Scheduling

Tres Palacios is proposing to modify certain provisions in Section 8 to align with practices of other Enbridge Entities and to address the use of the LINK® System, as well as to remove certain language related to transactions in effect on or before January 20, 2019, that is no longer applicable or necessary.

F. Point(s) of Receipt and Point(s) of Delivery

Tres Palacios is proposing to delete the language in GT&C Sections 9.3 and 9.5 because these requirements are specified in detail in other sections of the GT&C, such as

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*Northwest Pipeline Corporation*, 111 FERC ¶ 61,231, at PP 23-25 (2005) (approving Northwest Pipeline Corporation's proposal to implement comparable tariff language) ("*Northwest*").

<sup>9</sup> See *Northwest*, 111 FERC ¶ 61,231 at P 18.

<sup>10</sup> See *id.* at P 25.

<sup>11</sup> See *East Tennessee Natural Gas, LLC*, GT&C Section 17.3; *Egan Hub Storage, LLC*, GT&C Section 4.17; *Bobcat Gas Storage*, GT&C Section 4.17.

the requirements for submitting, confirming, and scheduling a nomination in GT&C Sections 5 and 8, and the measurement requirements in GT&C Section 13. The Commission previously addressed an identical provision to Section 9.3 contained in the *pro forma* tariff submitted by another storage facility by stating that the obligation for Customers to submit information necessary to complete a nomination is specified in the Nominations and Scheduling section of the GT&C and directed that this section be removed from the Tariff.<sup>12</sup> Subsequent to the issuance of that order, the Commission has approved the removal of similar provisions from other tariffs.<sup>13</sup>

Tres Palacios is also proposing to delete the language in GT&C Section 9.4 that addresses how transportation imbalances between Customer and Customer's Transporter will be resolved by Customer and Customer's Transporter. Tres Palacios has no obligations regarding such imbalance resolution. The Commission previously addressed an identical provision contained in the *pro forma* tariff submitted by another storage facility by stating that the imbalances, their management, and any resulting penalties are matters between the Customer and the interconnecting pipeline and directed that this section be removed from the Tariff.<sup>14</sup> Subsequent to the issuance of that order, the Commission has approved the removal of similar provisions from other tariffs.

Tres Palacios is proposing to add a new GT&C Section 9.5 to reflect that Tres Palacios may use an accounting meter number in the LINK® System to represent a physical location identified in a Customer's Service Agreement. The same rights and obligations exist for both the Customer and Tres Palacios regardless of whether a specific location is identified by means of a physical meter number or its related accounting meter number.

G. Measurement

Tres Palacios is proposing to modify GT&C Section 13.1 to remove the reference to Report No. 3 of the American Gas Association. Report No. 3 provides standards related to orifice meters. However, the majority of meters utilized by Tres Palacios are ultrasonic meters.

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<sup>12</sup> See *Tarpon Whitetail Gas Storage, LLC*, 123 FERC ¶ 61,274 (2008).

<sup>13</sup> See, e.g., *Egan Hub Storage, LLC*, 126 FERC ¶ 61,075 (2009); *Steckman Ridge, LP*, 126 FERC ¶ 61,308 (2009).

<sup>14</sup> See, *Tarpon Whitetail Gas Storage, LLC*, 123 FERC ¶ 61,274 (2008).

H. Billing and Payments Provisions.

Tres Palacios is proposing to modify GT&C Section 14.1 to provide details regarding Tres Palacios' delivery of invoices to Customers by posting Customer's final invoice on the LINK® System for Customer access. Posting the monthly invoices on the LINK® System as proposed herein benefits Customers by providing final invoices earlier than under the current invoicing system, and by allowing a preview of monthly invoice information. These proposed modifications are identical to provisions currently in effect in the Commission-approved tariff of the other Enbridge Entities.<sup>15</sup>

I. Insurance

Tres Palacios is proposing to modify GT&C Section 16 to remove references to insurance coverage required with respect to service agreements with effective dates prior to May 5, 2019. Tres Palacios does not have any remaining service agreements with effective dates prior to May 5, 2019, and accordingly this provision is no longer applicable or necessary.

J. Gas Title Transfers

Tres Palacios is proposing to modify GT&C Section 20.1 to update the requirements for a Customer selling its Storage Inventory or Loan Balance, including that the Customer must initiate a request for Title Transfer via the LINK® System, and the process for approval thereafter in the LINK® System along with the timing of when Tres Palacios will recognize the transfer. Tres Palacios additionally included proposed clarifying updates in Section 20.2.

K. Transmission Provider Standards of Conduct

Tres Palacios is proposing to modify GT&C Section 22 to correct the citation applicable to the Commission's definition of "Transmission Provider" to 18 C.F.R. § 358.3(k). Tres Palacios is further proposing to remove language that is not applicable to the cited regulation, and to update the reference Order No. 717.

L. North American Energy Standards Board

Tres Palacios is proposing updates to GT&C Section 23 to revise the GT&C section references to reflect the revisions made to the GT&C in this filings.

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<sup>15</sup> See, e.g., Algonquin Gas Transmission, LLC, GT&C Section 18.1; East Tennessee Natural Gas, LLC, GT&C Section 16.1; Egan Hub Storage, LLC, GT&C Section 14.1; Texas Eastern Transmission, LP, GT&C Section 10.2; Bobcat Gas Storage, GT&C Section 13.1.

M. Waivers

Tres Palacios is proposing to redesignate GT&C Section 25 as “Nondiscriminatory Waiver of Tariff Provisions” to more closely align the title with the provision of this section.

N. Default and Termination

Tres Palacios is proposing to modify GT&C Section 28.2 to permit Tres Palacios in the event of Default by Customer to demand within five (5) Business Days repayment of the entire balance of the outstanding Gas loan to a Customer.

O. Off-System Capacity

Tres Palacios is proposing to modify GT&C Section 30 (Off-System Capacity) to reflect that Tres Palacios may enter into transportation and/or storage agreements with other pipeline or storage companies. This provision is virtually identical to currently-effective provisions in Commission-approved tariffs of other Enbridge Entities.<sup>16</sup>

P. Creditworthiness

Tres Palacios is proposing to modify its Creditworthiness provisions set forth in GT&C Section 31 to more closely align the Tres Palacios procedures with the Enbridge credit requirements. This provision is substantively the same as the currently-effective provisions in Commission-approved tariffs of the other Enbridge Entities.

Q. Disposition of Retained Quantities

Tres Palacios is proposing to modify GT&C Section 32 to provide that Tres Palacios will post a notice of any auction for Gas retained pursuant to applicable provisions of its Rate Schedules on the LINK® System and what will be specified in such notice.

R. Tres Palacios Contact Address

Tres Palacios proposes to remove the form of service request that was in GT&C Section 33 because that is no longer applicable in light of the updated request for service provisions and replace it with a new GT&C Section 33 (Contact Address) which will provide for a mailing address to which any notice pursuant to the Tariff or pursuant to any agreement subject to the Tariff is to be sent under two circumstances:

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<sup>16</sup> See, e.g., Egan Hub Storage, LLC, GT&C Section 31; Saltville Gas Storage Company L.L.C., GT&C Section 30; Bobcat Gas Storage, GT&C Section 24.6A.



GT&C Section 33.1 applies to any service agreement under any Rate Schedule set forth in Tres Palacios' Tariff or any other agreement subject to its GT&C that requires notices to be addressed to Tres Palacios at 811 Main Street, Suite 3400, Houston, TX 77002 or any other mailing address. Effective October 1, 2023, any such agreement will thereby be amended such that any such address will be deleted in its entirety and replaced by the mailing address listed in GT&C Section 33.1. It is intended that this filing and the language filed herewith in GT&C Section 33.1 constitutes written notice to those such customers of the address change described herein.

GT&C Section 33.2 provides for a mailing address to which any notice shall be provided to Tres Palacios pursuant to any service agreement subject to Tres Palacios' Tariff. As discussed above, a related change to various other provisions and Forms of Service Agreement reference that any notice to be provided to Tres Palacios shall be as set forth in GT&C Section 33.2.

S. Electronic Communications

Tres Palacios is proposing to replace the current Section 34 of the GT&C of the Tres Palacios Tariff with a new Electronic Communications section to reflect Tres Palacios' transition to the LINK® System. The new GT&C Section 34 includes a description of the LINK® System and its Internet Web Site, and describes the functions of and the information available through the LINK® System and the Internet Web Site. The information and functions available via the LINK® System are password protected and consist of customer-specific information and functions available only to authorized users. The information displayed on the Internet Web Site is of a general nature; it applies to Tres Palacios' facilities as a whole and is available to the general public without the requirement to obtain a user ID and password. GT&C Section 34 also describes procedures that must be followed in order to gain access to the LINK® System, as well as the rights and obligations of Tres Palacios, the LINK® System Subscriber, and the Internet Web Site user. The proposed provisions of GT&C Section 34 are virtually identical to the corresponding provisions approved for other Enbridge Entities.<sup>17</sup>

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<sup>17</sup> See, e.g., Algonquin Gas Transmission, LLC, GT&C Section 40; East Tennessee Natural Gas, LLC, GT&C Section 23; Egan Hub Storage, LLC, GT&C Section 32; Texas Eastern Transmission, LP, GT&C Section 2; Bobcat Gas Storage, GT&C Section 25.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have electronically served the foregoing document upon customers of Tres Palacios Gas Storage LLC and interested state commissions that have requested electronic service.

Dated at Houston, TX. this 29th day of June, 2023.

/s/ Aaron McBride

Aaron McBride

Tres Palacios Gas Storage LLC