



February 28, 2022

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

Re: Sabine Pipe Line LLC, Docket No. RP22-____-000
Annual Fuel and Line Loss Reimbursement Filing

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act¹ and Part 154 of the regulations of the Federal Energy Regulatory Commission (“Commission”) promulgated thereunder,² Sabine Pipe Line LLC (“Sabine”) hereby submits for filing as part of its FERC Gas Tariff, First Revised Volume No. 1 (“Tariff”), the following Tariff record proposed to become effective on April 1, 2022, as more fully described in this filing: Section 5, Version 21.0.0.

STATEMENT OF NATURE, REASONS AND BASIS FOR FILING

Pursuant to Section 7.27.3 of Sabine’s Tariff, Sabine hereby files to revise its Unaccounted For Reimbursement Percentage (“UFRP”) and Fuel Gas Percentage (“FRP”) applicable to all of the Sabine rate schedules, which includes Rate Schedule FT-1 and Rate Schedule IT-1, to become effective on April 1, 2022. Specifically, Sabine proposes to decrease the UFRP from the current 0.27% to 0.18% (“Revised UFRP”), maintain the Port Neches FRP at 0.00%, and decrease the Henry Hub FRP from the current 0.18% to 0.00% (“Revised Henry Hub FRP”).

In support of the filing, Sabine has included workpapers as Schedule A to this filing providing details on the computations supporting each UFRP and FRP included on the proposed Tariff record to be effective April 1, 2022. Workpaper 1 of 3 includes a computation of the Revised UFRP, including the estimated Revised UFRP and the UFRP True-up Adjustment; Workpaper 2 of 3 includes a computation of the Port Neches FRP; and Workpaper 3 of 3 includes a computation of the Revised Henry Hub FRP, including the estimated Revised Henry Hub FRP and the Henry Hub FRP True-up Adjustment.

The net resulting Henry Hub FRP True-up Adjustment calculation shown in Workpaper 3 of 3 results in a negative fuel percentage. Sabine submits that implementing a negative fuel

¹ 15 U.S.C. § 717c.

² 18 C.F.R. Pt. 154 (2021).

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percentage has the potential to result in under-recoveries and operational issues if insufficient volumes are available for fuel use on the pipeline system between this filing and the filing of the next fuel percentage change, and the Commission has found that implementing a negative percentage has the potential to distort “the incentive to use capacity efficiently.”³ In addition, Section 7.27.3 of Sabine’s Tariff prohibits implementation of an FRP or UFRP of less than zero. Accordingly, and consistent with Commission precedent,⁴ Sabine is proposing a Revised Henry Hub FRP of 0.00%.

PROPOSED EFFECTIVE DATE AND WAIVER REQUEST

Pursuant to Section 154.207 of the Commission’s regulations,⁵ Sabine proposes that the Tariff records filed herein become effective on April 1, 2022. Pursuant to Section 154.7(a)(7) of the Commission’s regulations,⁶ Sabine respectfully requests that the Commission grant any waivers that may be required for the Commission to accept the Tariff records filed herein to become effective as proposed.

COMPLIANCE WITH REGULATIONS

In compliance with Section 154.4(c) of the Commission’s regulations,⁷ all contents of this filing are being submitted as part of an XML filing in conformance with the instructions provided on the Commission’s website. The filing contains (i) this transmittal letter, including Schedule A attached hereto; (ii) a clean version of the proposed Tariff record in PDF format; and (iii) a marked version of the proposed Tariff record in PDF format showing additions to and deletions from the currently effective Tariff record.

Pursuant to Section 154.201(a) of the Commission’s regulations,⁸ Sabine has included a clean and marked version of the proposed Tariff record reflecting the proposed changes, and pursuant to Sections 154.2(d), 154.7(b), and 154.208(b) of the Commission’s regulations,⁹ Sabine will send a copy of this filing by electronic mail to each of Sabine’s shippers and affected state commissions. This filing is also available for public inspection during regular business hours in a convenient form and place at Sabine’s offices at 1722 Routh Street, Suite 1300, Dallas, Texas 75201.

³ *Gulf South Pipeline Co., LP*, 155 FERC ¶ 61,132, at P 6 (2016).

⁴ *See MIGC LLC*, 176 FERC ¶ 61,114, at PP 6-7 (2021); *Rover Pipeline LLC*, 173 FERC ¶ 61,207, at P 9 (2020); *Gulf South Pipeline Co., LP*, 155 FERC ¶ 61,132, at P 6; *Columbia Gulf Trans. Co.*, 132 FERC ¶ 61,134, at P 43 (2010).

⁵ 18 C.F.R. § 154.207 (2021).

⁶ 18 C.F.R. § 154.7(a)(7) (2021).

⁷ 18 C.F.R. § 154.4(c) (2021).

⁸ 18 C.F.R. § 154.201(a) (2021).

⁹ 18 C.F.R. §§ 154.2(d), 154.7(b), and 154.208(b) (2021).

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In compliance with Section 154.204(f) of the Commission's regulations,¹⁰ Sabine states that it has no other Tariff filings pending before the Commission that may significantly affect this filing.

CORRESPONDENCE AND COMMUNICATION

Pursuant to Rule 203 of the Commission's Rules of Practice and Procedure,¹¹ Sabine respectfully requests that the Commission add the following individuals to the service list in this proceeding:

Alaina Brooks
EVP, Chief Legal & Administrative Officer
1722 Routh Street, Suite 1300
Dallas, TX 75201
Phone: (214) 721-9318
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Ashley Stevens
Senior Counsel
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SUBSCRIPTION

Pursuant to Section 154.4(b) of the Commission's regulations,¹² the undersigned certifies that: (i) she knows the contents of the filing, (ii) the contents are true to the best of her knowledge and belief, and (iii) she possesses full power and authority to sign the filing.

If you have any questions relating to this matter, please contact the undersigned at (214) 721-9355.

Respectfully submitted,

Sabine Pipe Line LLC

/s/ Ashley Stevens

Ashley Stevens
Senior Counsel

¹⁰ 18 C.F.R. § 154.204(f) (2021).

¹¹ 18 C.F.R. § 385.203 (2021).

¹² 18 C.F.R. § 154.4(b) (2021).

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Enclosures: Schedule A: Workpapers 1-3
Clean Tariff
Marked Tariff

Schedule A
Workpaper 1 of 3
Sabine Pipe Line LLC

Annual Determination of Revised UFRP to be effective April 1, 2022

| | Total Measured Receipts February 2021- January 2022 (Dth) | Total Measured Deliveries February 2021- January 2022 (Dth) | Unaccounted For Gas February 2021- January 2022 (Loss)/(Gain) (Dth) | Unaccounted For Gas Volumes Received From Shipper February 2021- January 2022 (Dth) | True Up Volumes (Dth) | Total Delivery Scheduled Transportation Volumes For February 2021-January 2022 (Dth) |
|--------------|---|---|--|---|-----------------------------|--|
| February-21 | 13,438,515 | 13,356,685 | 81,830 | 287,881 | (206,051) | 16,355,606 |
| March-21 | 12,857,050 | 12,803,141 | 53,909 | 260,761 | (206,852) | 14,813,341 |
| April-21 | 23,661,709 | 23,599,784 | 61,925 | 44,125 | 17,800 | 17,239,239 |
| May-21 | 25,263,141 | 25,145,312 | 117,830 | 47,483 | 70,346 | 18,556,104 |
| June-21 | 17,185,354 | 17,239,260 | (53,907) | 42,677 | (96,584) | 16,661,035 |
| July-21 | 17,095,925 | 17,067,290 | 28,634 | 44,066 | (15,432) | 17,210,772 |
| August-21 | 17,906,172 | 17,826,774 | 79,398 | 44,310 | 35,089 | 17,309,613 |
| September-21 | 15,822,849 | 15,754,415 | 68,434 | 41,342 | 27,091 | 16,101,700 |
| October-21 | 7,602,712 | 7,554,639 | 48,073 | 51,561 | (3,488) | 20,147,651 |
| November-21 | 16,411,354 | 16,342,222 | 69,132 | 51,395 | 17,737 | 20,078,634 |
| December-21 | 18,380,725 | 18,286,765 | 93,959 | 54,457 | 39,503 | 21,283,532 |
| January-22 | 21,915,095 | 21,852,894 | 62,201 | 53,958 | 8,242 | 21,073,040 |
| | <u>207,540,600</u> | <u>206,829,182</u> | <u>711,418</u> | <u>1,024,017</u> | <u>(312,599)</u> | <u>216,830,267</u> |

Estimated UFRP

0.33%

| | Projected Scheduled Transportation Volume For April 2022- March 2023 (Dth) |
|--------------|--|
| April-22 | 17,239,239 |
| May-22 | 18,556,104 |
| June-22 | 16,661,035 |
| July-22 | 17,210,772 |
| August-22 | 17,309,613 |
| September-22 | 16,101,700 |
| October-22 | 20,147,651 |
| November-22 | 20,078,634 |
| December-22 | 21,283,532 |
| January-23 | 21,073,040 |
| February-23 | 16,355,606 |
| March-23 | 14,813,341 |
| | <u>216,830,267</u> |

UFRP True-up Adjustment

-0.14%

UFRP Effective 4/1/2022

UFRP

0.18%

Schedule A
 Workpaper 2 of 3
 Sabine Pipe Line LLC

Annual Determination of Port Neches FRP to be effective April 1, 2022

| | Actual Port Neches Compressor Station Fuel Usage February 2021- January 2022 (Dth) | Scheduled Transportation Volume Through Port Neches Compressor Station February 2021- January 2022 (Dth) |
|--------------|---|--|
| February-21 | 0 | 0 |
| March-21 | 0 | 0 |
| April-21 | 0 | 0 |
| May-21 | 0 | 0 |
| June-21 | 0 | 0 |
| July-21 | 0 | 0 |
| August-21 | 0 | 0 |
| September-21 | 0 | 0 |
| October-21 | 0 | 0 |
| November-21 | 0 | 0 |
| December-21 | 0 | 0 |
| January-22 | 0 | 0 |
| Total | 0 | 0 |

Estimated Revised Port Neches FRP 0.00%

| | Actual Port Neches Compressor Station Fuel Usage February 2021- January 2022 (Dth) | Port Neches Compressor Station Fuel Received From Shippers February 2021- January 2022 (Dth) |
|--------------|---|--|
| February-21 | 0 | 0 |
| March-21 | 0 | 0 |
| April-21 | 0 | 0 |
| May-21 | 0 | 0 |
| June-21 | 0 | 0 |
| July-21 | 0 | 0 |
| August-21 | 0 | 0 |
| September-21 | 0 | 0 |
| October-21 | 0 | 0 |
| November-21 | 0 | 0 |
| December-21 | 0 | 0 |
| January-22 | 0 | 0 |
| Total | 0 | 0 |

True-up Volume (Dth) 0

| | Projected Scheduled Transportation Volumes Through Port Neches Compressor Station April 2022 - March 2023 (Dth) |
|--------------|---|
| April-22 | 0 |
| May-22 | 0 |
| June-22 | 0 |
| July-22 | 0 |
| August-22 | 0 |
| September-22 | 0 |
| October-22 | 0 |
| November-22 | 0 |
| December-22 | 0 |
| January-23 | 0 |
| February-23 | 0 |
| March-23 | 0 |
| Total | 0 |

Port Neches FRP True-up Adjustment 0.00%

Port Neches FRP to be Effective 4/1/2022 0.00%

Schedule A
 Workpaper 3 of 3
 Sabine Pipe Line LLC

Annual Determination of Henry Hub FRP to be effective April 1, 2022

| | Actual Henry Hub Compressor Station Fuel Usage February 2021 - January 2022 (Dth) | Scheduled Transportation Volume Through Henry Hub Compressor Station February 2021 - January 2022 (Dth) |
|--------------|--|---|
| February-21 | 17,384 | 4,087,389 |
| March-21 | 4,105 | 1,165,090 |
| April-21 | 7,871 | 1,644,315 |
| May-21 | 9,025 | 1,904,686 |
| June-21 | 3,979 | 874,599 |
| July-21 | 366 | 63,851 |
| August-21 | 3,550 | 812,247 |
| September-21 | 39 | 26,484 |
| October-21 | 755 | 153,387 |
| November-21 | 41 | 0 |
| December-21 | 40 | 216 |
| January-22 | 1,240 | 313,602 |
| Total | 48,395 | 11,045,865 |

Estimated Revised Henry Hub FRP 0.44%

| | Actual Henry Hub Compressor Station Fuel Usage February 2021 - January 2022 (Dth) | Henry Hub Compressor Station Fuel Received From Shippers February 2021 - January 2022 (Dth) |
|--------------|--|---|
| February-21 | 17,384 | -100,973 |
| March-21 | 4,105 | -91,461 |
| April-21 | 7,871 | 33,783 |
| May-21 | 9,025 | 36,355 |
| June-21 | 3,979 | 32,675 |
| July-21 | 366 | 33,738 |
| August-21 | 3,550 | 33,924 |
| September-21 | 39 | 31,653 |
| October-21 | 755 | 39,476 |
| November-21 | 41 | 39,350 |
| December-21 | 40 | 41,693 |
| January-22 | 1,240 | 41,312 |
| Total | 48,395 | 171,524 |

True-up Volume (Dth) -123,130

| | Projected Scheduled Transportation Volumes Through Henry Hub Compressor Station April 2022 - March 2023 (Dth) |
|--------------|---|
| April-22 | 1,644,315 |
| May-22 | 1,904,686 |
| June-22 | 874,599 |
| July-22 | 63,851 |
| August-22 | 812,247 |
| September-22 | 26,484 |
| October-22 | 153,387 |
| November-22 | 0 |
| December-22 | 216 |
| January-23 | 313,602 |
| February-23 | 4,087,389 |
| March-23 | 1,165,090 |
| Total | 11,045,865 |

Henry Hub FRP True-up Adjustment -1.11%
 Net Resulting FRP True-up Adjustment -0.68%

STATEMENT OF TRANSPORTATION RATES
 (Rates per Dt)

| Rate Schedule | Maximum Rate | Minimum Rate |
|-------------------------------------|--------------|--------------|
| FT-1 Rate Schedule | | |
| Monthly Reservation Rate | \$12.6229 | |
| Daily Reservation Rate ¹ | \$0.4150 | |
| Usage Rate ² | \$0.0035 | \$.0000 |
| IT-1 Rate Schedule | | |
| Usage Rate ² | \$0.4185 | \$.0000 |

Additional Charges Applicable to All Rate Schedules:

| Rec / Del Section ³ | Port Neches FRP | Henry Hub FRP | UFRP | Total |
|--------------------------------|-----------------|---------------|---------|---------|
| LP / LP | - | - | 0.2718% | 0.2718% |
| LP / HP | 0.00% | - | 0.2718% | 0.2718% |
| LP / ML | 0.00% | - | 0.2718% | 0.2718% |
| LP / HH | 0.00% | 0.1800% | 0.2718% | 0.4518% |
| HP / LP | - | - | 0.2718% | 0.2718% |
| HP / HP | - | - | 0.2718% | 0.2718% |
| HP / ML | - | - | 0.2718% | 0.2718% |
| HP / HH | - | 0.1800% | 0.2718% | 0.4518% |
| ML / LP | - | - | 0.2718% | 0.2718% |
| ML / HP | - | - | 0.2718% | 0.2718% |
| ML / ML | - | - | 0.2718% | 0.2718% |
| ML / HH | - | 0.1800% | 0.2718% | 0.4518% |
| HH / LP | - | 0.1800% | 0.2718% | 0.4518% |
| HH / HP | - | 0.1800% | 0.2718% | 0.4518% |
| HH / ML | - | 0.1800% | 0.2718% | 0.4518% |
| HH / HH | - | 0.1800% | 0.2718% | 0.4518% |

¹ Section 154.107(f) of the Commission's Regulations requires a total rate. For this purpose only, a Daily Reservation Charge which equals the Monthly Reservation Charge divided by 30.4167 (365 days/12 months) is reflected.

For capacity release transactions at maximum rate, the Monthly Reservation Charge is divided by the number of days in the applicable month. For less than maximum rate transactions only, converting daily rate to monthly rate is accomplished by multiplying the daily rate times number of days in rate period, dividing the result by number of months in rate period and taking the remainder out to 5 decimal places and rounding up or down to the fourth decimal place. Converting a monthly rate to a daily rate is accomplished by multiplying the monthly rate by the number of months in rate period; dividing the result by number of days in rate period and taking the remainder out to 5 decimal places and rounding up or down to the fourth decimal place.

² In addition, Shipper shall also pay the Annual Charge Adjustment (ACA) as specified in the annual notice issued by the Commission entitled “FY [Year] Gas Annual Charges Correction for Annual Charges Unit Charge,” available on the Commission’s website at <http://ferc.gov>. This ACA unit charge will be effective on the first day of October and will extend to the last day of September the following year.

Sabine is electing to recover the annual charges assessed by the Commission under Part 382 of the Commission’s regulations through the operation of this ACA clause, and does not intend to recover any annual charges recorded in FERC Account No. 928. This ACA surcharge is in addition to any amounts otherwise payable to Sabine under its Rate Schedules.

³ Refer to Sabine’s website (www.sabinepipeline.com <<http://www.sabinepipeline.com>>) for a listing of Receipt Points and Delivery Points in each section of Sabine’s pipeline system.

STATEMENT OF TRANSPORTATION RATES
 (Rates per Dt)

| Rate Schedule | Maximum Rate | Minimum Rate |
|-------------------------------------|--------------|--------------|
| FT-1 Rate Schedule | | |
| Monthly Reservation Rate | \$12.6229 | |
| Daily Reservation Rate ¹ | \$0.4150 | |
| Usage Rate ² | \$0.0035 | \$.0000 |
| IT-1 Rate Schedule | | |
| Usage Rate ² | \$0.4185 | \$.0000 |

Additional Charges Applicable to All Rate Schedules:

| Rec / Del Section ³ | Port Neches FRP | Henry Hub FRP | UFRP | Total |
|--------------------------------|-----------------|---------------|-------|-------|
| LP / LP | - | - | 0.18% | 0.18% |
| LP / HP | 0.00% | - | 0.18% | 0.18% |
| LP / ML | 0.00% | - | 0.18% | 0.18% |
| LP / HH | 0.00% | 0.00% | 0.18% | 0.18% |
| HP / LP | - | - | 0.18% | 0.18% |
| HP / HP | - | - | 0.18% | 0.18% |
| HP / ML | - | - | 0.18% | 0.18% |
| HP / HH | - | 0.00% | 0.18% | 0.18% |
| ML / LP | - | - | 0.18% | 0.18% |
| ML / HP | - | - | 0.18% | 0.18% |
| ML / ML | - | - | 0.18% | 0.18% |
| ML / HH | - | 0.00% | 0.18% | 0.18% |
| HH / LP | - | 0.00% | 0.18% | 0.18% |
| HH / HP | - | 0.00% | 0.18% | 0.18% |
| HH / ML | - | 0.00% | 0.18% | 0.18% |
| HH / HH | - | 0.00% | 0.18% | 0.18% |

¹ Section 154.107(f) of the Commission's Regulations requires a total rate. For this purpose only, a Daily Reservation Charge which equals the Monthly Reservation Charge divided by 30.4167 (365 days/12 months) is reflected.

For capacity release transactions at maximum rate, the Monthly Reservation Charge is divided by the number of days in the applicable month. For less than maximum rate transactions only, converting daily rate to monthly rate is accomplished by multiplying the daily rate times number of days in rate period, dividing the result by number of months in rate period and taking the remainder out to 5 decimal places and rounding up or down to the fourth decimal place. Converting a monthly rate to a daily rate is accomplished by multiplying the monthly rate by the number of months in rate period; dividing the result by number of days in rate period and taking the remainder out to 5 decimal places and rounding up or down to the fourth decimal place.

² In addition, Shipper shall also pay the Annual Charge Adjustment (ACA) as specified in the annual notice issued by the Commission entitled “FY [Year] Gas Annual Charges Correction for Annual Charges Unit Charge,” available on the Commission’s website at <http://ferc.gov>. This ACA unit charge will be effective on the first day of October and will extend to the last day of September the following year.

Sabine is electing to recover the annual charges assessed by the Commission under Part 382 of the Commission’s regulations through the operation of this ACA clause, and does not intend to recover any annual charges recorded in FERC Account No. 928. This ACA surcharge is in addition to any amounts otherwise payable to Sabine under its Rate Schedules.

³ Refer to Sabine’s website (www.sabinepipeline.com <<http://www.sabinepipeline.com>>) for a listing of Receipt Points and Delivery Points in each section of Sabine’s pipeline system.