



Southern Star Central Gas Pipeline, Inc.
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December 29, 2017

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

Re: Southern Star Central Gas Pipeline, Inc.
Docket No. RP18-276
Miscellaneous Tariff Filing – Corrected Transmittal Letter

Dear Ms. Bose:

Southern Star Central Gas Pipeline, Inc. (“Southern Star”) respectfully submits by eFiling its revised transmittal letter to Docket No. RP18-276, to be effective February 1, 2018. The original transmittal letter dated December 27, 2017 erroneously stated the effective date as February 1, 2017 and the attached corrected transmittal letter proposes an effective date of February 1, 2018.

List of Materials Enclosed

In accordance with Section 154.7(a)(1) of the Commission’s regulations, submitted herewith is an eTariff XML filing package, filed as a zip (compressed) file, containing:

- i. A transmittal letter.

Statement of Nature, Reasons and Basis for Filing

Southern Star is filing the revised transmittal letter to correct the effective date to February 1, 2018.

Proposed Effective Date and Request for Waiver

Southern Star respectfully requests that the revised tariff sheets become effective February 1, 2018, which date is at least thirty (30) days after receipt of this filing by the Commission. Southern Star respectfully requests that

Kimberly D. Bose, Secretary

December 29, 2017

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the Commission grant any and all waivers as may be necessary for the tariff sheets to become effective February 1, 2018.

Correspondence

Southern Star respectfully requests that all Commission orders and correspondence, as well as pleadings and correspondence from other persons, concerning this filing be served upon:

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If there are any questions pertaining to this filing, please contact any of the parties listed above.

Posting and Certification of Service

Copies of this filing are being distributed to Southern Star's jurisdictional customers and interested state commissions, as well as posted on CSI, Southern Star's online customer service system. A copy of this filing is available for public inspection during regular business hours at the office of Southern Star in Owensboro, Kentucky.

Sincerely,

SOUTHERN STAR CENTRAL GAS PIPELINE, INC.

By: /s/ Philip A. Rullman

Philip A. Rullman
V.P. & Chief Marketing Officer
(270) 852-4440

Enclosures

SOUTHERN STAR 
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December 28, 2017

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

Re: Southern Star Central Gas Pipeline, Inc.
Docket No. RP18-_____
Miscellaneous Tariff Filing

Dear Ms. Bose:

Southern Star Central Gas Pipeline, Inc. ("Southern Star") respectfully submits by eFiling revised tariff sheets or records, as listed in Appendix A, to its FERC Gas Tariff, First Revised Volume No. 1 ("Volume No. 1") and Original Volume No. 2 ("Volume No. 2"), to be effective February 1, 2018. The tariff sheets are being filed pursuant to Part 154 of the Rules and Regulations of the Federal Energy Regulatory Commission ("Commission") to incorporate changes as described further below.

List of Materials Enclosed

In accordance with Section 154.7(a)(1) of the Commission's regulations, submitted herewith is an eTariff XML filing package, filed as a zip (compressed) file, containing:

- i. The proposed tariff sheet versions in RTF format with metadata attached;
- ii. A transmittal letter;
- iii. Appendix A – A listing of the revised sheets/records;
- iv. Appendix B – A list of tariff provisions where miscellaneous grammatical, spelling and formatting errors have been corrected;
- v. Appendix C – A clean version of the tariff sheets/records; and
- vi. Appendix D – A marked version of the tariff sheets/records.

Statement of Nature, Reasons and Basis for Filing

Southern Star is filing the revised tariff sheets to effect housekeeping and other changes to various Rate Schedules, provisions within the General Terms and Conditions (“GT&C”) and Forms of Service Agreements (including Exhibits), as more fully described herein below. Southern Star continues to analyze its tariff and conduct internal “audits” to assess whether changes in tariff provisions are merited based on customer feedback or facts related to actual experiences. Southern Star believes the tariff revisions proposed herein are generally minor in nature including added provisions, updates and clarifications as to how the tariff is applied and will be viewed favorably, or not be opposed, by the shippers on Southern Star’s system.

Corrections

Appendix B contains a list of tariff provisions where miscellaneous grammatical, spelling and formatting errors have been corrected and briefly describes the reason for the correction.

Miscellaneous/Updated Provisions

In addition to the various corrections noted above, some provisions of the tariff have been updated to remove obsolete references, to correct omissions, to eliminate duplication, or to reflect changed or current circumstances. These miscellaneous changes include the following:

Cover Sheet: The cover sheet to Volume No. 1 and Volume No. 2 has been revised to update the contact information for Philip A. Rullman (title and email address).

GT&C -- Sheets 2, 200, 298 and 299: The changes on these sheets reflect a change in the title of GT&C Section 24 from “Types and Portability of Discounts” to “Types of Discounts.” This title change deletes the obsolete reference to portability. Southern Star eliminated the portability of discounts provision (then GT&C Section 30.2) from its tariff in 2005 in Docket No. RP05-668¹ after the Commission vacated its CIG/Granite State portability of discounting policy in its Second Order on Remand in Williston Basin Interstate Pipeline Co.,² but never removed the reference to portability from the title of the section. This obsolete reference creates confusion whenever Southern Star conducts training on its tariff and removal of this obsolete term will eliminate that confusion and more accurately reflect the content of GT&C Section 24. In addition to GT&C Section 24, this title change is also reflected in the Volume No. 1 Table of Contents and the GT&C Table of Contents.

GT&C -- Sheets 208 and 209: GT&C Section 3.2 (j) has been revised to address situations where the quality of gas received in its system may not be acceptable for delivery into interconnects with interstate and intrastate pipelines, plants, end-users or directly connected local distribution companies. In such situations, where the gas in a specific segment of Southern Star’s system is not interchangeable or not acceptable for such downstream deliveries, the new tariff language would permit Southern Star to post notice from time to time, as operationally necessary, of

¹ See *Southern Central Gas Pipeline, Inc.*, 113 FERC ¶ 61,110 (2005).

² *Williston Basin Interstate Pipeline Co.*, 110 FERC ¶ 61,210 (2005).

additional gas quality specifications or different gas quality limits to ensure that the gas quality on such segment(s) is interchangeable and acceptable for delivery into such interconnects. Southern Star will provide as much prior notice of any such limitation as reasonably practicable and will attempt to provide this prior notice in the posting at least ten (10) days before the beginning of the month in which a limitation is to be effective.

GT&C Section 3.2 (j) already recognizes that gas quality may vary throughout segments of Southern Star's pipeline system and that gas received in a segment must be compatible with the gas typically existing in the segment. The new language does not propose any revisions to Southern Star's general gas quality specifications, but provides a process where Southern Star can, by prospective notice, ensure that gas on a specific segment is interchangeable and is acceptable for downstream delivery. This provision is narrowly drafted to address specific situations on a particular line segment as such situations may occur.³

Southern Star's proposed language requiring gas to be capable of delivery to downstream markets is similar to provisions in the tariffs or statement of operating conditions of other interstate⁴ or intrastate⁵ pipelines that Southern Star competes with to attach new gas supplies, but is operationally limited to particular line segments and has additional notice and posting requirements not present in those tariffs.

Form of Service Agreement under Rate Schedule PLS -- Sheets 457 and 458: Two changes are made to the parking and loan service orders (Exhibits A and B respectively) of the form of service agreement under Rate Schedule PLS. First, a drafting option is provided in the header to show either the Creation Date of the park or loan service order, or, if applicable when the service order is being amended, to show the effective date of the revision. This optionality is for administrative convenience to allow original and revised service orders to be more easily tracked and distinguished using this labelling convention.

The second change corrects a typographical omission in the park and loan service orders by adding the phrase "or negotiated rate agreement" to the end of the sentence that states "PLS shipper shall be charged the current maximum tariff rate unless otherwise agreed to in an associated discount letter." GT&C Section 28.1 provides that "Southern Star and Shipper may mutually agree to negotiate rates under any Part 284 Rate Schedule that expressly provides for a negotiated rate

³ Recent examples of such situations occurring on Southern Star include, among others, refusals to accept delivery of gas by Natural Gas Pipeline Company of America LLC (NGPL) on Line Segment 315 due to unacceptable oxygen levels under NGPL's tariff and by Oklahoma Natural Gas Company (ONG) on Line Segment 400 due to unacceptable heat content under ONG's tariff.

⁴ See Section 3.2 of General Terms and Conditions of Colorado Interstate Gas Transmission ("Notwithstanding Sections 3.1 through 3.3, Transporter shall not be required to receive Gas at any Point of Receipt which is of a quality inferior to that required by Shipper or a third Party at any Point of Delivery under the Agreement.").

⁵ See Article 4.3 (j) of General Terms and Conditions of ONEOK Gas Transportation, LLC ("Must be interchangeable with Gas which is: (1) in the receiving transmission facilities; and (2) delivered to the nearest end user, city border station, aggregation point or other pipeline interconnected with such receiving transmission facility; and (3) downstream of the Point(s) of Delivery."); Article 6.1 (j) of Statement of Operating Conditions of ONEOK WesTex Transmission, LLC ("Shall be interchangeable with Gas which is: (1) In the receiving transmission facilities. (2) Delivered to the nearest end user, city border station, aggregation point or other pipeline interconnected with such receiving transmission facility. (3) Downstream of the Point(s) of Delivery.").

and references this Section 28.” Section 3 (c) of the PLS Rate Schedule authorizing Southern Star’s Parking and Loan Service expressly states that “Shipper and Southern Star may mutually agree to a negotiated rate pursuant to Section 28 of the General Terms and Conditions.” Negotiated rates are thus clearly authorized for and intended to be available to park and loan shippers under the PLS rate Schedule.

The pro forma parking and loan service orders in Southern Star’s tariff, however, fail to reference negotiated rates. The additional phrase filed herewith corrects this inadvertent omission and clarifies that Southern Star and the PLS shipper may agree to use negotiated rates as expressly permitted by the PLS Rate Schedule, rather than using maximum rates or discounted rates.

Southern Star has filed, and the Commission has accepted, several non-conforming park and loan service orders using the two language changes referenced above.⁶ In those filings Southern Star stated that it would file to add such language to its tariff in its next housekeeping filing, which Southern Star has now done.

Proposed Effective Date and Request for Waiver

Southern Star respectfully requests that the revised tariff sheets become effective February 1, 2018, which date is at least thirty (30) days after receipt of this filing by the Commission. Southern Star respectfully requests that the Commission grant any and all waivers as may be necessary for the tariff sheets to become effective February 1, 2018.

Motion to Place Tariff Sheets into Effect

Pursuant to Section 154.7(a)(9) of the Commission’s Regulations, Southern Star moves to place the aforementioned revised tariff sheets into effect at the end of the suspension period requested above. Southern Star reserves the right, however, to file a later motion to move the tariff sheets into effect in the event of any change to such tariff sheets which may be ordered by the Commission or the determination by the Commission that a longer suspension period is in order.

Correspondence

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⁶ See, e.g., Letter Order dated November 28, 2017 in Southern Star Central Gas Pipeline, Inc., Docket No.RP18-72.

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December 29, 2017

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