



September 30, 2011

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Dockets Room, Room 1A
888 First Street, N.E.
Washington, D.C. 20426

Gas Transmission Northwest LLC
717 Texas Street, Room 2400
Houston, TX 77002

John A. Roscher
Director, Rates & Tariffs

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Re: Gas Transmission Northwest LLC
Change in FERC Gas Tariff
Docket No. RP11-____-____

Dear Ms. Bose:

Pursuant to Section 154.403 of the Federal Energy Regulatory Commission's ("FERC or Commission") regulations, Gas Transmission Northwest LLC ("GTN") respectfully submits for filing revisions to Section 4.1 of its FERC Gas Tariff,¹ Fourth Revised Volume No. 1-A, to modify the rate for service on GTN's Medford Extension under Rate Schedule FTS-1 (E-2)(WWP) in accordance with the negotiated rate formula for that service. This revision reflects an increase in the maximum FTS-1(E-2)(WWP) mileage reservation rate from \$0.008620/Dth-mile to \$0.009389/Dth-mile. GTN requests that the Commission accept revised Section 4.1 to become effective November 1, 2011.

Correspondence

The names, titles, mailing addresses, and telephone numbers of those persons to whom correspondence and communications concerning this filing should be addressed are as follows:

¹ 4.1 - Statement of Rates, FTS-1 and LFS-1 Rates, v.4.0.0 ("Section 4.1").

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* Persons designated for official service pursuant to Rule 2010.

Statement of Nature, Reasons and Basis for the Proposed Changes

Under the terms of a July 29, 1994, Agreement between GTN and Washington Water Power Company (“WWP”) (now Avista Utilities), GTN provides service to Avista Utilities under Rate Schedule FTS-1(E-2)(WWP) at a negotiated rate that is to be increased or decreased on November 1 of each year by the overall percentage increase or decrease in a “benchmark” rate that is currently based on Pacific Power and Light Company’s (“PP&L”) average Residential Rate Schedule No. 4 for service to a residential customer utilizing 1,000 kWh/month for the preceding year. The Commission approved this negotiated rate formula by order issued January 12, 1995.²

Beginning November 1, 2011, the maximum Rate Schedule FTS-1(E-2)(WWP) rate will increase by approximately 8.92% from \$0.008620/Dth-mile³ to \$0.009389/Dth-mile. The workpapers included in Appendix C illustrate the calculation of this increase. The change in the negotiated rate is calculated by first identifying each PP&L Residential Rate Schedule No. 4 rate (per 1,000 kWh) that was in effect during the previous contract year (November 1 through October 31). Next, a weighted average rate is determined based upon the proportionate number of days each rate was in effect. Using rates in effect during the previous contract year, this method yields a weighted average rate of \$96.82 per 1,000 kWh/month as shown in Appendix C, page 1, line 7.

² Pacific Gas Transmission Company, 70 FERC ¶ 61,016, rehearing, 71 FERC ¶ 61,268 (1995).

³ The current maximum Rate Schedule FTS-1(E-2)(WWP) rate was approved by unpublished Director Letter Order dated October 20, 2010, in Docket No. RP10-1396-000.

The weighted average PP&L Residential Rate Schedule No. 4 rate for the contract year is then divided by the weighted average PP&L Residential Rate Schedule No. 4 rate for the preceding contract year to determine the percentage by which the PP&L Residential Service Rate increased or decreased compared to the previous contract year. In this case, PP&L's Residential Rate Schedule No. 4 rate increased by approximately 8.92% as shown in Appendix C, page 1, lines 7-8.

GTN's Rate Schedule FTS-1(E-2)(WWP) rate is then increased or decreased by the percentage change in PP&L's Residential Rate Schedule No. 4 rate (as calculated above) to establish the new Rate Schedule FTS-1(E-2)(WWP) rate for the following contract year. As shown in Appendix C, page 1, line 11, the new rate for the following contract year is equal to \$0.009389/Dth-mile.

It should be noted that GTN records the differential between a cost-based rate and the negotiated rate in memorandum records.⁴ As required by the Commission, GTN will file an annual report no later than 90 days after the close of each contract year, *i.e.*, no later than January 31, 2012, detailing: (1) the calculation of the cost of service for GTN's Medford Extension; (2) the revenues collected under the negotiated Rate Schedule FTS-1(E-2)(WWP) rate; (3) the amount of the differential between the cost-based rate and the negotiated rate as reflected in memorandum records; (4) the change in the differential between the cost-based rate and the negotiated rate, as reflected in memorandum records, from the previous year; and (5) detailed workpapers supporting items 1-4.⁵

⁴ Pacific Gas Transmission Company, 71 FERC ¶ 61,268 at 62,069, n. 17, (1995).

⁵ Pacific Gas Transmission Company, 70 FERC ¶ 61,016 at 61,046 (1995).

Effective Date

GTN requests that the revised tariff Section 4.1 filed herein become effective on November 1, 2011, provided it is accepted as filed. Pursuant to Section 154.7(a)(9) of the Commission's Regulations, GTN moves to make Section 4.1 effective at the end of any nominal suspension period ordered by the Commission, but otherwise reserves its right to move this section into effect at the end of any longer suspension period that the Commission may impose.

Materials Enclosed

In accordance with Section 154.7 and 154.201 of the Commission's Regulations, and Order No. 714,⁶ GTN is submitting the following XML filing package, which includes:

1. This transmittal letter;
2. The proposed tariff section (Appendix A);
3. A redlined version of the proposed tariff section (Appendix B); and
4. Workpapers showing the calculation of the new rate (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 upon all of GTN's existing customers and interested state regulatory agencies. A copy of this letter, together with the enclosed tariff sections and other attachments, are available during regular business hours for public inspection at GTN's principal place of business.

⁶ *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008) ("Order No. 714").

Pursuant to Section 385.2005 and Section 385.2011, 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. Additionally, 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,

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

John A. Roscher
Director, Rates & Tariffs

Enclosures

Appendix A

Gas Transmission Northwest LLC – GTN Tariffs

FERC Gas Tariff, Fourth Revised Volume No. 1-A

<u>Section No.</u>	<u>Section Description</u>	<u>Version</u>
4.1	Statement of Rates – FTS-1 and LFS-1 Rates	(v.4.0.0)

STATEMENT OF EFFECTIVE RATES AND CHARGES FOR
 TRANSPORTATION OF NATURAL GAS

Rate Schedules FTS-1 and LFS-1

	RESERVATION							
	DAILY MILEAGE (a) (Dth-MILE)		DAILY NON-MILEAGE (b) (Dth)		DELIVERY (c) (Dth-MILE)		FUEL (d) (Dth-MILE)	
	<u>Max.</u>	<u>Min.</u>	<u>Max.</u>	<u>Min.</u>	<u>Max.</u>	<u>Min.</u>	<u>Max.</u>	<u>Min.</u>
BASE	0.000463	0.000000	0.036632	0.000000	0.000016	0.000016	0.0050%	0.0000%
STF (e)	(e)	0.000000	(e)	0.000000	0.000016	0.000016	0.0050%	0.0000%
EXTENSION CHARGES								
MEDFORD								
E-1 (f)	0.003290	0.000000	0.005498	0.000000	0.000026	0.000026	---	---
E-2 (g)(l) (WWP)	0.009389	0.000000	---	---	0.000000	0.000000	---	---
E-2 (h)(l) (Diamond 1)	0.002972	0.000000	---	---	0.000000	0.000000	---	---
E-2(h)(l) (Diamond 2)	0.001166	0.000000	---	---	0.000000	0.000000	---	---
COYOTE SPRINGS								
E-3 (i)	0.001412	0.000000	0.001420	0.000000	0.000000	0.000000	---	---
OVERRUN CHARGE (j)								
	---	---	---	---	---	---	---	---
SURCHARGES								
ACA (k)	---	---	---	---	0.001800	0.001800	---	---

Appendix B

Gas Transmission Northwest LLC – GTN Tariffs

FERC Gas Tariff, Fourth Revised Volume No. 1-A

Marked Format

<u>Section No.</u>	<u>Section Description</u>	<u>Version</u>
4.1	Statement of Rates – FTS-1 and LFS-1 Rates	(v.4.0.0)

STATEMENT OF EFFECTIVE RATES AND CHARGES FOR
 TRANSPORTATION OF NATURAL GAS

Rate Schedules FTS-1 and LFS-1

	RESERVATION							
	DAILY MILEAGE (a) (Dth-MILE)		DAILY NON-MILEAGE (b) (Dth)		DELIVERY (c) (Dth-MILE)		FUEL (d) (Dth-MILE)	
	<u>Max.</u>	<u>Min.</u>	<u>Max.</u>	<u>Min.</u>	<u>Max.</u>	<u>Min.</u>	<u>Max.</u>	<u>Min.</u>
BASE	0.000463	0.000000	0.036632	0.000000	0.000016	0.000016	0.0050%	0.0000%
STF (e)	(e)	0.000000	(e)	0.000000	0.000016	0.000016	0.0050%	0.0000%
EXTENSION CHARGES								
MEDFORD								
E-1 (f)	0.003290	0.000000	0.005498	0.000000	0.000026	0.000026	---	---
E-2 (g)(l) (WWP)	0.00938986290	0.000000	---	---	0.000000	0.000000	---	---
E-2 (h)(l) (Diamond 1)	0.002972	0.000000	---	---	0.000000	0.000000	---	---
E-2(h)(l) (Diamond 2)	0.001166	0.000000	---	---	0.000000	0.000000	---	---
COYOTE SPRINGS								
E-3 (i)	0.001412	0.000000	0.001420	0.000000	0.000000	0.000000	---	---
OVERRUN CHARGE (j)								
	---	---	---	---	---	---	---	---
SURCHARGES								
ACA (k)	---	---	---	---	0.001800	0.001800	---	---

Appendix C

Workpapers

**DETERMINATION OF THE MONTHLY RESERVATION CHARGE
FOR SERVICE UNDER RATE SCHEDULE FTS-1(E-2)(WWP)**

Pacific Power & Light Residential Service Oregon Schedule No. 4:						
Line No.	Effective Date	Monthly Bill @ 1000 kWh		# of Days in Contract Year	Weighting Factor	Amount
1	11/1/2010	\$89.70	(Page 2 Line 1)	61	0.1671	\$14.99
2	1/1/2011	\$97.84	(Page 2 Line 2)	106	0.2904	28.41
3	4/17/2011	\$97.84	(Page 2 Line 3)	42	0.1151	11.26
4	5/29/2011	\$97.76	(Page 2 Line 4)	3	0.0082	0.80
5	6/1/2011	\$98.66	(Page 2 Line 5)	153	0.4192	41.36
6	WEIGHTED AVERAGE RATE/1000 kWh			365	1.0000	\$96.82
7	$\frac{\text{Weighted Average Rate in Contract Year 16}}{\text{Weighted Average Rate in Contract Year 15}}$		=	$\frac{\$96.82}{\$88.89}$		
8	Percentage Increase/Decrease Factor		=	108.9211%		
9	Current Rate Schedule FTS-1(E-2)(WWP) Rate				\$0.008620	
10	Multiplied by Percentage Increase Factor				108.9211%	
11	New Rate				\$0.009389	

**DETERMINATION OF RATE PER 1000 kWh UNDER
PP&L RESIDENTIAL SERVICE OREGON SCHEDULE NO. 4**

Line No.	PP&L Sch. No. 4 Revision No.	Effective Date	Energy Charge		Average Energy Charge/ 1000 kWh	Basic Charge	Schedule 98 BPA Credit	Schedule 91 Adj. Rate	Schedule 290 Public Purpose	Schedule 297 Energy Conservation	Schedule 199 Klam Dam Removal	Total Rate
			0 to 500 kWh	500 to 1000 kWh								
1	Original 6/	8/1/2010	\$0.07599	\$0.08316	7/ \$79.58	\$8.00	(\$4.69)	\$0.50	\$2.63	\$2.34	\$1.34	\$89.70
2	Original 6/	1/1/2011	N/A 1/	\$0.08820	8/ \$88.20	\$9.00	(\$6.46)	\$0.50	\$2.92	\$2.34	\$1.34	\$97.84
3	Original 6/	4/17/2011	N/A 1/	\$0.08820	9/ \$88.20	\$9.00	(\$6.46)	\$0.50	\$2.92	\$2.34	\$1.34	\$97.84
4	Original 6/	5/29/2011	N/A 1/	\$0.08813	10/ \$88.13	\$9.00	(\$6.46)	\$0.50	\$2.91	\$2.34	\$1.34	\$97.76
5	Original 6/	6/1/2011	N/A 1/	\$0.08900	11/ \$89.00	\$9.00	(\$6.46)	\$0.50	\$2.94	\$2.34	\$1.34	\$98.66

1 / Effective January 1, 2011, the Energy Charge for the 1st Block was revised to cover 0-1000kWh

2 / Effective January 1, 2011, Schedule 98 BPA Credit = (1000kWh * -\$0.00646).
Effective October 1, 2009, Schedule 98 BPA Credit = (500kWh * -\$0.00469)+(500kWh * -\$0.00469).

3 / Schedule 290 Public Purpose = (Average Energy Charge + Basic Charge) * 3.00%.

4 / Effective April 1, 2010, Schedule 297 Energy Conservation Charge = 0.234 cents per kWh.

5 / Effective March 18, 2010, Schedule 199 (includes the J.C Boyle Dam Removal Surcharge; and the Copco1, Copco 2 and Iron Gate Dam Surcharge) = 0.033 + 0.101 cents per kWh

6 / The Pacific Power Oregon Tariff No. 36 was effective March 22, 2011.

7 / Effective August 1, 2010, the Energy Charge includes the Distribution Charge, Transmission & Ancillary Services Charge, Supply Service, plus applicable adjustments as specified on Supplemental Schedules 92, 93, 96, 97, 102, 194, 195, 202, 203, and 299.

8 / Effective January 1, 2011, the Energy Charge includes the Distribution Charge, Transmission & Ancillary Services Charge, Supply Service, plus applicable adjustments as specified on Supplemental Schedules 80, 92, 93, 96, 97, 102, 194, 195, 202, 203, and 299.

9 / Effective April 17, 2011, the Energy Charge includes the Distribution Charge, Transmission & Ancillary Services Charge, Supply Service, plus applicable adjustments as specified on Supplemental Schedules 80, 92, 93, 96, 97, 102, 194, 195, 202, 203, and 299.

10 / Effective May 29, 2011, the Energy Charge includes the Distribution Charge, Transmission & Ancillary Services Charge, Supply Service, plus applicable adjustments as specified on Supplemental Schedules 80, 92, 93, 96, 97, 102, 194, 195, 202, 203, and 299.

11 / Effective June 1, 2011, the Energy Charge includes the Distribution Charge, Transmission & Ancillary Services Charge, Supply Service, plus applicable adjustments as specified on Supplemental Schedules 80, 92, 93, 96, 97, 102, 194, 195, 202, 203, and 299.

**Pacific Power - Oregon Price Summary
In Effect as of August 1, 2010**

Gas Transmission Northwest LLC
Docket No. RP11-__-000
September 30, 2011
Appendix C
Page 3 of 7

Tariff Schedules ¹	Delivery Service								Supply Service				Delivery & Supply Subtotal	Tax Adj. 102	Combined Effective Rate ²	Public Purpose 290	Klam Dam Rem JCB 199	Klam Dam Rem C/IG 199	Energy Conserv. 297 ³	BPA Credit 98 ⁴			
	Base Rate	Adjustment Schedules							Total Delivery	Base Supply 200	Cost-Based 201	Adj. Schedules 202 203									Total Supply		
Schedule 4 (Standard Residential)																							
Basic Charge	\$8.00																						
Energy Charge																							
1st Block kWh	3.467	0.000	0.007	0.000	0.000	0.016	0.003	0.151	3.644	2.213	1.660	0.000	0.051	3.924	7.568	0.031	7.599	¢/kWh	3%	0.033	0.101	0.234	-0.469
2nd Block kWh	3.467	0.000	0.007	0.000	0.000	0.016	0.003	0.151	3.644	2.623	1.967	0.000	0.051	4.641	8.285	0.031	8.316	¢/kWh	3%	0.033	0.101	0.234	-0.469
3rd Block kWh	3.467	0.000	0.007	0.000	0.000	0.016	0.003	0.151	3.644	3.236	2.428	0.000	0.051	5.715	9.359	0.031	9.390	¢/kWh	3%	0.033	0.101	0.234	-0.469

For an average month of 30.42 days, blocks would be 0-500kWh, 501-1,000kWh and Over 1,000kWh. However, residential billing kWh blocks shall be prorated to the nearest whole kWh based upon the number of whole days in the billing period (see Rule 10 for details).

kWh blocks for billing period from 20 to 40 days are shown in the following chart:

Days in Billing Period	1st Block kWh	2nd Block kWh	3rd Block kWh	Days in Billing Period	1st Block kWh	2nd Block kWh	3rd Block kWh	Days in Billing Period	1st Block kWh	2nd Block kWh	3rd Block kWh
20	0-329	330-658	Over 658	27	0-444	445-888	Over 888	34	0-559	560-1118	Over 1118
21	0-345	346-690	Over 690	28	0-460	461-920	Over 920	35	0-575	576-1150	Over 1150
22	0-362	363-724	Over 724	29	0-477	478-954	Over 954	36	0-592	593-1184	Over 1184
23	0-378	379-756	Over 756	30	0-493	494-986	Over 986	37	0-608	609-1216	Over 1216
24	0-394	395-788	Over 788	31	0-509	510-1018	Over 1018	38	0-624	625-1248	Over 1248
25	0-411	412-822	Over 822	32	0-526	527-1052	Over 1052	39	0-641	642-1282	Over 1282
26	0-427	428-854	Over 854	33	0-542	543-1084	Over 1084	40	0-657	658-1314	Over 1314

Adjustment Schedule Descriptions. For Application of Adjustment Schedules see Schedule 90.

SCHEDULE	DESCRIPTION
Schedule 92	Klamath Rate Reconciliation Adjustment
Schedule 93	Independent Evaluator Cost Adjustment
Schedule 96	Property Sales Balancing Account Adjustment
Schedule 97	Intervenor Funding Adjustment
Schedule 98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act (BPA Credit)
Schedule 102	Income Tax Adjustment
Schedule 194	MEHC Change-in-Control Severance Regulatory Asset Adjustment
Schedule 195	Grid West Regulatory Asset Adjustment
Schedule 199	Klamath Dam Removal Surcharges (J.C. Boyle Dam Removal Surcharge; Copco 1, Copco 2 and Iron Gate Dam Surcharge)
Schedule 200	Base Supply Service (Base Energy)
Schedule 201	Net Power Costs, Cost-Based Supply Service (Energy)
Schedule 202	Renewable Adjustment Clause (Supply Service Adjustment)
Schedule 203	Renewable Resource Deferral Adjustment (Supply Service Adjustment)
Schedule 290	Public Purpose Charge
Schedule 297	Energy Conservation Charge
Schedule 299	Rate Mitigation Adjustment

¹ See Tariff for application and special conditions.

² Delivery Service plus Supply Service plus Income Tax Adjustment. Prior to Public Purpose Charge, Energy Conservation Charge and BPA Credit. Also, does not include the effect of Low-Income Assistance Schedule 91; for Schedule 4 customers add \$0.50 per meter per month; all other schedules add 0.050 cents per kWh per meter which is capped at \$500 or a maximum usage of 1,000,000 kWh.

³ Consumers over 1aMW (8,760 MWh annually) and consumers certified for public purpose Self Direction by the Oregon Office of Energy are exempted from this charge.

⁴ Cents per qualifying kWh. Applicable to residential and small farm consumers only. Consumer eligibility for this credit is as provided by the Pacific Northwest Electric Power Planning and Conservation Act, Public Law 96-501.

**Pacific Power - Oregon Price Summary
In Effect as of January 1, 2011**

Tariff Schedules ¹	Delivery Service											Supply Service				Delivery & Supply Subtotal	Tax Adj. 102	Combined Effective Rate ²	Public Purpose 290	Klam Dam Rem JCB 199	Klam Dam Rem C/IG 199	Energy Conserv. 297 ³	BPA Credit 98 ⁴		
	Distribution Charge	Transm. & Ancillary	Pop.-Term. 80	Adjustment Schedules								Total Delivery	Base Supply 200	Cost-Based 201	Adj. Schedules									Total Supply	
				92	93	96	97	194	195	299	202				203										
Schedule 4 (Residential)																									
Basic Charge	\$9.00																								
Energy Charge																									
1st Block kWh (0 - 1,000)*	3.266	0.414	-0.040	0.000	0.007	-0.027	0.000	0.016	0.003	0.142	3.781	2.754	2.220	0.000	0.034	5.008	8.789	0.031	8.820	¢/kWh	3%	0.033	0.101	0.234	-0.646
2nd Block kWh (> 1,000)*	3.266	0.414	-0.040	0.000	0.007	-0.027	0.000	0.016	0.003	0.142	3.781	3.761	3.032	0.000	0.034	6.827	10.608	0.031	10.639	¢/kWh	3%	0.033	0.101	0.234	0.000

*For an average month of 30.42 days, blocks would be 0-1,000kWh and Over 1,000kWh. However, residential billing kWh blocks shall be prorated to the nearest whole kWh based upon the number of whole days in the billing period (see Rule 10 for details).

kWh blocks for billing period from 20 to 40 days are shown in the following chart:

Days in Billing Period	First Block kWh	Second Block kWh	Days in Billing Period	First Block kWh	Second Block kWh	Days in Billing Period	First Block kWh	Second Block kWh
20	0 - 657	Over 657	27	0 - 887	Over 887	34	0 - 1,117	Over 1,117
21	0 - 690	Over 690	28	0 - 920	Over 920	35	0 - 1,150	Over 1,150
22	0 - 723	Over 723	29	0 - 953	Over 953	36	0 - 1,183	Over 1,183
23	0 - 756	Over 756	30	0 - 986	Over 986	37	0 - 1,216	Over 1,216
24	0 - 789	Over 789	31	0 - 1,019	Over 1,019	38	0 - 1,249	Over 1,249
25	0 - 822	Over 822	32	0 - 1,052	Over 1,052	39	0 - 1,282	Over 1,282
26	0 - 855	Over 855	33	0 - 1,085	Over 1,085	40	0 - 1,315	Over 1,315

Adjustment Schedule Descriptions. For Application of Adjustment Schedules see Schedule 90.

SCHEDULE	DESCRIPTION
Schedule 80	Populus to Terminal Adjustment
Schedule 92	Klamath Rate Reconciliation Adjustment
Schedule 93	Independent Evaluator Cost Adjustment
Schedule 96	Property Sales Balancing Account Adjustment
Schedule 97	Intervenor Funding Adjustment
Schedule 98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act (BPA Columbia River Benefits Credit)
Schedule 102	Income Tax Adjustment (Oregon Tax Charge)
Schedule 194	MEHC Change-in-Control Severance Regulatory Asset Adjustment
Schedule 195	Grid West Regulatory Asset Adjustment
Schedule 199	Klamath Dam Removal Surcharges (J.C. Boyle Dam Removal Surcharge; Copco 1, Copco 2 and Iron Gate Dam Surcharge)
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³ Consumers over 1aMW (8,760 MWh annually) and consumers certified for public purpose Self Direction by the Oregon Office of Energy are exempted from this charge.

⁴ Cents per qualifying kWh. Applicable to residential and small farm consumers only. Consumer eligibility for this credit is as provided by the Pacific Northwest Electric Power Planning and Conservation Act, Public Law 96-501.

