



June 30, 2025

Ms. Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Columbia Gas Transmission, LLC
700 Louisiana Street, Suite 1300
Houston, TX 77002-2700

Daniel Humble
Manager, Tariffs

tel (832) 320-5583
email daniel_humble@tcenergy.com
web <https://ebb.tceconnects.com>

Re: Columbia Gas Transmission, LLC
Negotiated Rate Agreement
Docket No. RP25-____-000

Dear Ms. Reese:

Pursuant to Section 4 of the Natural Gas Act (“NGA”) and Part 154 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,¹ Columbia Gas Transmission, LLC (“Columbia”) submits for filing and acceptance revised tariff section Part 1 – Table of Contents to be part of its FERC Gas Tariff, Original Volume No. 1.1 (“Tariff No. 1.1”) and one (1) tariff record containing one (1) new Rate Schedule FTS (“FTS”) negotiated rate service agreement (“Agreement” or “Contract No. 320403”), included herein as Appendix A.² Columbia respectfully requests that the Commission accept the proposed tariff section and tariff record to become effective July 1, 2025, as further described below.

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 18 C.F.R. Part 154 (2025).

² *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008) (“Order No. 714”). Order No. 714 at P 42. Order No. 714 states that “Negotiated rate agreements... need not be divided, but can be filed as entire documents.” Columbia has elected to file the Agreement included herein as a whole document, in PDF format.

Sorana Linder
Vice President, Rates & Regulatory
Daniel Humble *
Manager, Tariffs
Columbia Gas Transmission, LLC
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Houston, Texas 77002-2700
Tel. (832) 320-5583
E-mail: daniel_humble@tcenergy.com

Cindy VanCleave
Director, Regulatory & Operations Law
John Ryan *
Sr. Legal Counsel
Columbia Gas Transmission, LLC
700 Louisiana Street, Suite 1300
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E-mail: john_ryan@tcenergy.com

* Persons designated for official service pursuant to Rule 2010.

Statement of Nature, Reasons and Basis for Filing

On October 31, 1996, in Docket No. RP96-390-000,³ the Commission approved Section VII.46 of the General Terms and Conditions of Columbia's FERC Gas Tariff Fourth Revised Volume No. 1 ("Tariff"), which authorized Columbia to enter into negotiated rate agreements with its customers.

Columbia is filing Citadel Energy Marketing LLC ("Citadel") Contract No. 320403 as an FTS negotiated rate service agreement because Columbia and Citadel have mutually agreed that Citadel shall pay a negotiated monthly demand rate of \$4.5625 per dekatherm ("Dth") for transportation service from a secondary receipt point to a secondary delivery point or from a primary receipt point to a secondary delivery point from July 1, 2025 through October 31, 2025. Additionally, the parties have agreed that Citadel shall pay Columbia a negotiated monthly demand rate of \$1.521 per Dth for transportation service from a primary or secondary receipt point to a primary delivery point for the term of July 1, 2025 through October 31, 2025, plus the daily index-based volumetric rate, unless Columbia and Citadel mutually agree to a monthly index-based volumetric rate or alternative volumetric rate in accordance with Columbia's Tariff. Attached to Contract No. 320403 is a Negotiated Rate Letter Agreement, which reflects the parties' agreed-upon rates and other rate provisions for firm service. Contract No. 320403 is included in Appendix A as tariff record 3.54.

Columbia advises that no undisclosed agreements, etc. are linked to the Agreement, and the Agreement included herein does not add any new provision that is either non-conforming or a material deviation from the applicable Form of Service Agreement in Columbia's Tariff.⁴ To

³ *Columbia Gas Transmission Corporation*, 77 FERC ¶ 61,093 (1996), *order on compliance filing*, 78 FERC ¶ 61,263, *reh'g*, 81 FERC ¶ 61,206 (1997).

⁴ Specifically, Section VIII.1 – Form of Service Agreement for Service Under: Rate Schedules FTS, NTS, NTS-S, SST, OPT, ITS, GTS, and TPS.

conform with Order No. 714, Columbia is submitting the Agreement individually and in its entirety as tariff record 3.54.⁵ Additionally, a revised Table of Contents is submitted herein as part of Appendix A to reflect the Agreement.

Request for Waiver and Effective Date

Columbia respectfully requests that the Commission grant all waivers of its regulations, including Section 154.207, necessary to accept the Agreement and Table of Contents, included herein as Appendix A, to become effective July 1, 2025.⁶

Other Filings Which May Affect This Proceeding

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

Contents of Filing

In accordance with Section 154.7 of the Commission's regulations, Columbia is submitting the following via its electronic tariff filing:

1. This transmittal letter;
2. A clean version of the tariff section and tariff record (Appendix A); and
3. A marked version of the tariff section (Appendix B).

Certificate of Service

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

⁵ Consistent with Commission policy, the Agreement provides the essential elements for negotiated rate transactions, including: (1) the exact legal name of the shipper; (2) the negotiated rate; (3) the applicable rate schedule; (4) the receipt and delivery points; and (5) the contract quantities.

⁶ See *Statement of Policy on Alternatives to Traditional Cost-of-Service Ratemaking for Natural Gas Pipelines*, 74 FERC ¶ 61,076 at 61, 241-242 (1996) (indicating that the Commission will "readily grant requests to waive the 30-day requirement").

Pursuant to Section 385.2005 of the Commission's regulations, 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 Daniel Humble at (832) 320-5583.

Respectfully submitted,

Columbia Gas Transmission, LLC

/s/ Daniel Humble

Daniel Humble
Manager, Tariffs

Enclosures

Appendix A

Clean Tariff

*Columbia Gas Transmission, LLC
FERC Gas Tariff, Original Volume No. 1.1*

Tariff Section

Version

| | | |
|---|-------------------|-----------|
| 1 | Table of Contents | v.126.0.0 |
|---|-------------------|-----------|

Tariff Record

Version

| | | |
|------|---|---------|
| 3.54 | FTS Service Agreement No. 320403-0 – Citadel Energy Marketing LLC | v.2.0.0 |
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Columbia Gas Transmission, LLC
FERC NGA Gas Tariff
Baseline Tariffs
Proposed Effective Date: July 1, 2025
FTS Service Agreement No. 320403-0 – Citadel Energy Marketing LLC
Option Code A

Service Agreement No. 320403

Revision No. 0

FTS SERVICE AGREEMENT

THIS AGREEMENT is made and entered into this 24 day of June, 2025, by and between COLUMBIA GAS TRANSMISSION, LLC ("Transporter") and CITADEL ENERGY MARKETING LLC ("Shipper").

WITNESSETH: That in consideration of the mutual covenants herein contained, the parties hereto agree as follows:

Section 1. Service to be Rendered. Transporter shall perform and Shipper shall receive service in accordance with the provisions of the effective FTS Rate Schedule and applicable General Terms and Conditions of Transporter's FERC Gas Tariff, Fourth Revised Volume No. 1 ("Tariff"), on file with the Federal Energy Regulatory Commission ("Commission"), as the same may be amended or superseded in accordance with the rules and regulations of the Commission. The maximum obligation of Transporter to deliver gas hereunder to or for Shipper, the designation of the points of delivery at which Transporter shall deliver or cause gas to be delivered to or for Shipper, and the points of receipt at which Shipper shall deliver or cause gas to be delivered, are specified in Appendix A, as the same may be amended from time to time by agreement between Shipper and Transporter, or in accordance with the rules and regulations of the Commission.

Section 2. Term. Service under this Agreement shall commence as of July 1, 2025, and shall continue in full force and effect until October 31, 2025. Pre-granted abandonment shall apply upon termination of this Agreement, subject to any right of first refusal Shipper may have under the Commission's regulations and Transporter's Tariff.

Section 3. Rates. Shipper shall pay Transporter the charges and furnish Retainage as described in the above-referenced Rate Schedule, unless otherwise agreed to by the parties in writing and specified as an amendment to this Service Agreement. Transporter may agree to discount its rate to Shipper below Transporter's maximum rate, but not less than Transporter's minimum rate. Such discounted rate may apply to: (a) specified quantities (contract demand or commodity quantities); (b) specified quantities above or below a certain level or all quantities if quantities exceed a certain level; (c) quantities during specified time periods; (d) quantities at specified points, locations, or other defined geographical areas; (e) that a specified discounted rate will apply in a specified relationship to the quantities actually transported (i.e., that the reservation charge will be adjusted in a specified relationship to quantities actually transported); (f) production and/or reserves committed by the Shipper; and (g) based on a formula including, but not limited to, published index prices for specific receipt and/or delivery points or other agreed-upon pricing points, provided that the resulting rate shall be no lower than the minimum nor higher than the maximum applicable rate set forth in the Tariff. In addition, the discount agreement may include a provision that if one rate component which was at or below the applicable maximum rate at the time the discount agreement was executed subsequently exceeds the applicable maximum rate due to a change in Transporter's maximum rate so that such rate component must be adjusted downward to equal the new applicable maximum rate, then other rate components may be adjusted upward to achieve the agreed overall rate, so long as none of the resulting rate components exceed the maximum rate applicable to that rate component. Such changes to rate components shall be applied prospectively, commencing with the date a Commission order accepts revised tariff sections. However, nothing contained herein shall be construed to alter a refund obligation under applicable law for any period during which rates, which had been charged under a discount agreement, exceeded rates which ultimately are found to be just and reasonable.

Section 4. Notices. Notices to Transporter under this Agreement shall be addressed to it at 700 Louisiana

St., Suite 1300, Houston, Texas 77002-2700, Attention: Commercial Operations and notices to Shipper shall be addressed to it at Citadel Energy Marketing LLC, 33 Benedict Place, Greenwich, CT 06830, Attention: Mike Zarolinski, until changed by either party by written notice.

Section 5. Superseded Agreements. This Service Agreement supersedes and cancels, as of the effective date hereof, the following Service Agreement(s): N/A.

CITADEL ENERGY MARKETING LLC

By Mike Zarolinski
Title Midcon Trading
Date 6/24/25

COLUMBIA GAS TRANSMISSION, LLC

By 
Title Director Marketing
Date 06/24/2025

Appendix A to Service Agreement No. 320403
Under Rate Schedule FTS
between Columbia Gas Transmission, LLC ("Transporter")
and Citadel Energy Marketing LLC ("Shipper").

Transportation Demand

| <u>Begin Date</u> | <u>End Date</u> | <u>Transportation Demand Dth/day</u> | <u>Recurrence Interval</u> |
|-------------------|-----------------|--------------------------------------|----------------------------|
| 07/01/2025 | 10/31/2025 | 35,000 | 1/1 - 12/31 |

Primary Receipt Points

| <u>Begin Date</u> | <u>End Date</u> | <u>Scheduling Point No.</u> | <u>Scheduling Point Name</u> | <u>Measuring Point No.</u> | <u>Measuring Point Name</u> | <u>Maximum Daily Quantity (Dth/day)</u> | <u>Minimum Receipt Pressure Obligation (psig) 1/</u> | <u>Recurrence Interval</u> |
|-------------------|-----------------|-----------------------------|------------------------------|----------------------------|-----------------------------|---|--|----------------------------|
| 07/01/2025 | 10/31/2025 | MVPWB | MVP Columbia WB | 843058 | MVP Columbia WB Receipt | 35,000 | | 1/1 - 12/31 |

Primary Delivery Points

| <u>Begin Date</u> | <u>End Date</u> | <u>Scheduling Point No.</u> | <u>Scheduling Point Name</u> | <u>Measuring Point No.</u> | <u>Measuring Point Name</u> | <u>Maximum Daily Delivery Obligation (Dth/day) 1/</u> | <u>Design Daily Quantity (Dth/day) 1/</u> | <u>Minimum Delivery Pressure Obligation (psig) 1/</u> | <u>Recurrence Interval</u> |
|-------------------|-----------------|-----------------------------|------------------------------|----------------------------|-----------------------------|---|---|---|----------------------------|
| 07/01/2025 | 10/31/2025 | P10 | TCO POOL | P10 | TCO POOL | 35,000 | | | 1/1 - 12/31 |

The Master List of Interconnects ("MLI") as defined in Section 1 of the General Terms and Conditions of Transporter's Tariff is incorporated herein by reference for purposes of listing valid secondary interruptible receipt points and delivery points.

_____ Yes ☒ No (Check applicable blank) Transporter and Shipper have mutually agreed to a Regulatory Restructuring Reduction Option pursuant to Section 42 of the General Terms and Conditions of Transporter's FERC Gas Tariff.

_____ Yes ☒ No (Check applicable blank) Shipper has a contractual right of first refusal equivalent to the right of first refusal set forth from time to time in Section 4 of the General Terms and Conditions of Transporter's FERC Gas Tariff.

_____ Yes ☒ No (Check applicable blank) All gas shall be delivered at existing points of interconnection within the MDDOs, ADQs and/or DDQs, as applicable, set forth in Transporter's currently effective Rate Schedule _____ Service Agreement No. _____ Appendix A with Shipper, which are incorporated herein by reference.

_____ Yes ☒ No (Check applicable blank) This Service Agreement covers interim capacity sold pursuant to the provisions of General Terms and Conditions Section 4. Right of first refusal rights, if any, applicable to this interim capacity are limited as provided for in General Terms and Conditions Section 4.

_____ Yes ☒ No (Check applicable blank) This Service Agreement covers offsystem capacity sold pursuant to Section 47 of the General Terms and Conditions. Right of first refusal rights, if any, applicable to this offsystem capacity are limited as provided for in General Terms and Conditions Section 47.

CITADEL ENERGY MARKETING LLC

By Mike Zarolinski
Title Midcon Trading
Date 6/24/25

COLUMBIA GAS TRANSMISSION, LLC

By [Signature]
Title Director Marketing
Date 06/24/2025



Columbia Gas Transmission, LLC
700 Louisiana St., Suite 1300
Houston, Texas 77002

June 23, 2025

Citadel Energy Marketing LLC
33 Benedict Pl, 3rd Floor
Greenwich, CT 06830
Attention: Mike Zarolinski
Email: Michael.Zarolinski@Citadel.com

RE: FTS Service Agreement No. 320403
Negotiated Rate Letter Agreement

Dear Mike:

This Negotiated Rate Letter Agreement ("NRL") between Columbia Gas Transmission, LLC ("Transporter" or "TCO") and Citadel Energy Marketing LLC ("Shipper"), shall set forth the applicable rates and other rate provisions associated with the transportation service provided by Transporter to Shipper pursuant to the above-referenced Service Agreement. Transporter and Shipper may be referred to individually as a "Party" or collectively as the "Parties".

Shipper and Transporter hereby agree:

1. The "Negotiated Reservation Rates" during the term for the transportation service provided shall be those rates and terms agreed upon as set forth in the ATTACHMENT A attached hereto.
2. In addition to payment of the reservation rate as set forth in Paragraph 1, Shipper must pay all applicable commodity charges, commodity surcharges, overrun charges and retainage charges set forth in Transporter's FERC Gas Tariff as they may change from time to time. These charges are allowed costs that shall be included in the calculation mechanisms highlighted under Items 1-3 shown below.
3. Required Approvals. This NRL, together with the Agreement will be filed with the FERC and shall be subject to FERC's acceptance on terms acceptable to Transporter in its sole discretion. If any terms of this NRL are disallowed by any order, rulemaking, regulation or policy of the FERC, Transporter may terminate this NRL with no further notice to Shipper. If any terms of the Agreement are in any way modified by order, rulemaking, regulation or policy of the FERC, Transporter and Shipper may mutually agree to modify this NRL with the goal of ensuring that the original commercial intent of the parties is preserved. If the parties cannot mutually

agree to modifications hereto, Transporter reserves the right to terminate this NRL with no further notice to Shipper. Transporter will have no liability for any costs incurred by Shipper or related to the service rendered or contemplated to be rendered hereunder.

Accepted and agreed to this 24 day of June 2025.

Citadel Energy Marketing LLC

By: Mike Zarolinski

Title: Midcon Trading

Date: 6/24/25

Columbia Gas Transmission, LLC

By: 

Title: Director Marketing

Date: 06/24/2025

JR

DR

DH

ATTACHMENT A

NEGOTIATED RESERVATION RATES

| Primary Receipt Point(s)* | Primary Delivery Point(s)* | Transportation Demand (Dth/day) | Term | Demand Rate | Commodity Rate | Rate Schedule |
|---------------------------|----------------------------|---------------------------------|---------------------------------|-------------|--|---------------|
| MVP Columbia WB (MVPWB) | TCO Pool (P10) | 35,000 Dth/day | July 1, 2025 - October 31, 2025 | */** | Maximum applicable recourse commodity rate as may be amended from time to time | FTS |

* For transportation service from a secondary receipt point to a secondary delivery point or from a primary receipt point to a secondary delivery point, such service shall be subject to the terms and conditions of Transporter's FERC Gas Tariff as amended from time to time, and the Monthly Demand Rate shall be \$4.5625/dth from July 1, 2025 through October 31, 2025.

**For transportation service from a primary or secondary receipt point to a primary delivery point, Shipper agrees to pay to Transporter a Monthly Demand Rate of \$1.521/Dth for the term of July 1, 2025 through October 31, 2025 plus the Daily Index-Based Volumetric Rate set forth in Section 1, unless Transporter and Shipper mutually agree to a Monthly Index-Based Volumetric Rate set forth in Section 2, or an Alternative Volumetric Rate set forth in Section 3.

1. Daily Index-Based Volumetric Rate:

Index-Based Volumetric Rate = Net Daily Spread where:

Shipper agrees to pay Transporter 50% of the value derived from the following spread:

Net Daily Spread = Columbia Gas, App. minus (Transco, station 165 + \$0.15) minus Applicable Retainage minus Applicable Commodity Charges minus Applicable Demand Charges.

Transco, station 165 = The daily Index price for Transco, station 165, as published in Platts Final Gas Daily Price Survey Midpoint for the gas day of scheduled transportation.

Columbia Gas, App. = The daily Index price for Columbia Gas, App. as published in Platts Final Gas Daily Price Survey Midpoint for the gas day of scheduled transportation.

If the amount calculated on any given day results in a negative value, the amount due to Transporter on that day shall not be less than \$0.00. If the amount calculated on any given day results in a negative value, and the Shipper elects to ship, the amount due to Shipper on that day shall not be less than \$0.00. The value calculated each day shall be independent from the value calculated for every other day.

2. Monthly Index-Based Volumetric Rate:

Transporter and Shipper may alternately mutually agree to a Monthly Index-Based Volumetric Rate for all, or a portion of the quantities scheduled under this Agreement.

Index-Based Volumetric Rate = Net Monthly Spread where:

Shipper agrees to pay Transporter 50% of the value derived from the following spread:

Net Monthly Spread = Columbia Gas, Appalachia minus (Transco, station 165 +\$0.15) minus Applicable Retainage minus Applicable Commodity Charges minus Applicable Demand Charges.

Transco, station 165 = The Inside FERC first of month price for Transco, station 165 as published in Platts Inside FERC's Gas Market Report First of Month.

Columbia Gas, Appalachia = The Inside FERC first of month price for Columbia Gas, Appalachia as published in Platts Inside FERC's Gas Market Report First of Month.

If the amount calculated in any given month results in a negative value, the amount due to Transporter for that month shall not be less than \$0.00. The value calculated each month shall be independent from the value calculated for every other month.

3. Alternative Volumetric Rate:

Transporter and Shipper may alternately mutually agree to a positive Alternative Volumetric Rate(s) for all, or a portion of the quantities contracted under this agreement.

Appendix B

Marked Tariff

Columbia Gas Transmission, LLC
FERC Gas Tariff, Original Volume No. 1.1

| <u>Tariff Section</u> | | <u>Version</u> |
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