UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

))

)

Spire STL Pipeline LLC

Docket No. CP17-40-007

REPLY COMMENTS OF ENABLE MISSISSIPPI RIVER TRANSMISSION, LLC

Pursuant to the August 6, 2021 Notice issued in the captioned docket,¹ Enable Mississippi River Transmission, LLC ("MRT") which has previously intervened in this proceeding,² submits the following brief reply comments to address circumstances related to its East Line. Attachment A contains copies of communications between MRT and Spire representatives concerning service available on the East Line.

On June 23, 2021, MRT wrote Spire's representative that MRT's East Line could accommodate "as much as 181,402 Dth" per day for the upcoming winter, explaining several days later that "MRT has expanded its capability of transporting volumes off the East Line through [MRT's] ... reticulated system as part of the Southbound expansion Please let me know if you are interested in subscribing for this East Line capacity." *See* Attachment A, June 28, 2021 4:42 pm email. Two days later MRT confirmed that the entire amount of available East Line capacity could be delivered to a point of interconnection with Spire Missouri about which the latter had inquired.³

¹ Spire STL Pipeline LLC, Docket No. CP17-40-007, "Notice of Application and Establishing Intervention Deadline" (Aug. 6, 2021), p. 2.

See "Motion to Intervene of Enable Mississippi River Transmission, LLC," Spire STL Pipeline LLC, Docket No. CP17-40 (Feb. 2, 2017); "Order Issuing Certificate," Spire STL Pipeline LLC, 164 FERC ¶ 61,085 at P 15 (2018).

³ *Id.*, June 30, 2021, 1:02 pm email ("Based on current system parameters and assumptions . . . MRT could deliver 181,407 Dth[*sic*][per day] to the [relevant] delivery point").

As required by Commission regulations, MRT posted notices of available capacity throughout the summer of 2021, updating available capacity levels, to reflect dynamics of changing market conditions. On August 19, 2021, MRT had posted 174,849 Dth/d of available East Line service, effective December 1, 2021.⁴ In its posting dated September 16, 2021, that identified firm service available starting no earlier than October, 2021, MRT listed 140,849 Dth a day of East Line firm service to Market Zone delivery points effective December 1, 2021. See Attachment B hereto. That level of available service reflected the belief that 34,000 Dth/d of new FT contracts, tendered to an interested party for their execution, would be signed; but on October 4, 2021, MRT learned that contracts for 25,000 Dth of anticipated FT demand would in fact not be executed for service beginning December 1, 2021. MRT's next posting will reflect available capacity, effective December 1, 2021, based on circumstances as of the date of posting. Thus, while portions of previously-unsubscribed firm service had been successfully re-subscribed on a portion of East Line, as of the date of the instant filing, MRT still has 165,849 Dth/d of service available on the East Line.

⁴ MRT posted both summer and winter capacities (the latter reflecting a higher value because maintenance scheduled during warmer weather would be completed by December 1, 2021, and because lower ambient temperatures allow for the transmission of greater volumes within a given pipeline). Information previously provided in September 6, 2021 data responses in this docket referenced the lower summer values, not the higher winter available capacity levels.

Respectfully submitted,

Jonathan Christian Associate General Counsel Enable Midstream Partners, LP 910 Louisiana, Ste. 48040, (48th Floor) Houston, TX 77002 Telephone: (346) 701-2146 Fax: (346) 701-2905 Email:

/s/ Mark F. Sundback

Mark F. Sundback William M. Rappolt Andrew P. Mina Sheppard, Mullin, Richter & Hampton LLP 2099 Pennsylvania Avenue, NW, Suite 100 Washington, D.C. 20006-6801 Telephone: 202.747.1900 Facsimile: 202.747.1901 jonathan.christian@enablemidstream.com Email: msundback@sheppardmullin.com Email: wrappolt@sheppardmullin.com Email: amina@sheppardmullin.com

ATTORNEYS FOR ENABLE MISSISSIPPI RIVER TRANSMISSION, LLC

Lisa D. Yoho Senior Director, Regulatory & FERC Compliance Enable Midstream Partners, LP 910 Louisiana, Ste. 48040, (48th Floor) Houston, TX 77002 Telephone: (346) 701-2539 Email: lisa.yoho@enablemidstream.com

Date: October 5, 2021

Attachment A

Docket No. CP17-40-007 Attachment A Page 1 of 4

From: Stoll, Mike C Sent: Wednesday, June 30, 2021 1:02 PM To: Powers, Justin <<u>Justin.Powers@spireenergy.com</u>> Subject: RE: MRT ML Capacity Available

Good afternoon Justin

Based on current system parameters and assumptions regarding the requested service, our analysis indicates that MRT could deliver all 181,407 Dth to the Arlee/Ivory delivery point on peak day.

Please let me know if you are interested in all or just a portion of this capacity.

Thank you!

Michael Stoll Sr. Director-Commercial T&S



14805 North Outer 40 Road Suite 230 St. Louis, MO 63017 office (636) 812-7121 (NEW) cell (314) 602-9509 mike.stoll@enablemidstream.com

From: Powers, Justin <<u>Justin.Powers@spireenergy.com</u>> Sent: Monday, June 28, 2021 6:01 PM To: Stoll, Mike C <<u>mike.stoll@enablemidstream.com</u>> Subject: Re: MRT ML Capacity Available

EXTERNAL EMAIL

How much of the EL can physically get to lvory?

From: Stoll, Mike C <<u>mike.stoll@enablemidstream.com</u>> Sent: Monday, June 28, 2021 4:42:52 PM To: Powers, Justin <<u>Justin.Powers@spireenergy.com</u>> Subject: RE: MRT ML Capacity Available

Good afternoon Justin,

MRT has expanded its capability of transporting volumes off the East Line through the reticulated system as part of the Southbound expansion that allowed MRT to sell the 80,000 Dth of FT from Spire STL Pipeline to the Spire Mo. aggregate point, allowing MRT to more effectively transport gas from the East Line into the reticulated system.

Please let me know if you are interested in subscribing for this East Line capacity.

If you have any further questions, please don't hesitate to call or email me.

Michael Stoll Sr. Director-Commercial T&S



14805 North Outer 40 Road Suite 230 St. Louis, MO 63017 office (636) 812-7121 (NEW) cell (314) 602-9509 mike.stoll@enablemidstream.com

From: Powers, Justin <<u>Justin.Powers@spireenergy.com</u>> Sent: Friday, June 25, 2021 3:57 PM To: Stoll, Mike C <<u>mike.stoll@enablemidstream.com</u>> Subject: RE: MRT ML Capacity Available

EXTERNAL ENVIL

Mike,

How much could you physically deliver to points south of Chain of Rocks? I didn't think you had the ability to do much.

Thanks,

Justin

From: Stoll, Mike C <<u>mike.stoll@enablemidstream.com</u>> Sent: Wednesday, June 23, 2021 4:33 PM To: Powers, Justin <<u>Justin.Powers@spireenergy.com</u>> Cc: Tramonte, Steven G <<u>steven.tramonte@enablemidstream.com</u>>; Christian, Jon F Good afternoon Justin,

MRT has 568 Dth/d of Main Line capacity of which 321 Dth/d could be sourced on the West line. In addition, MRT could have as much as 181,402 Dth available on the East Line for this winter and this amount assumes a lower delivery pressure from both Trunkline and NGPL which is more in line with what MRT has experienced from both pipes over the last few winters.

Please email or call me if you have further questions regarding this capacity.

Michael Stoll Sr. Director-Commercial T&S



14805 North Outer 40 Road Suite 230 St. Louis, MO 63017 office (636) 812-7121 (NEW) cell (314) 602-9509 mike.stoll@enablemidstream.com

From: Powers, Justin <<u>Justin.Powers@spireenergy.com</u>> Sent: Wednesday, June 23, 2021 2:10 PM To: Stoll, Mike C <<u>mike.stoll@enablemidstream.com</u>> Subject: MRT ML Capacity Available

的新国际公司国家的4月1

Mike,

I am curious how much MRT ML space is available for this upcoming winter?

Thanks,

Justin Powers Director, Gas Supply

700 Market Street 3rd Floor St. Louis, MO 63101 314.452.4167 Mobile 314.658.8466 Fax Jpowers2 ICE

Laclede Gas Company is now Spire. Visit SpireEnergy.com to learn more.



The information contained in this email and any accompanying documents may contain information that is confidential or otherwise protected from disclosure. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message, including any attachments. Any dissemination, distribution or other use of the contents of this message by anyone other than the intended recipient is strictly prohibited.

The information contained in this email and any accompanying documents may contain information that is confidential or otherwise protected from disclosure. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message, including any attachments. Any dissemination, distribution or other use of the contents of this message by anyone other than the intended recipient is strictly prohibited.

The information contained in this small and any accompanying documents may contain information that is confidential or otherwise protocted from disclosure. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by rophy email and then delete this message, including any attachments. Any distribution, distribution or other use of the contents of this message by anyone other than the intended recipient is strictly prohibited.

Attachment B

NOTICE OF AVAILABLE ENABLE-MRT CAPACITY

August 19, 2021

Enable Mississippi River Transmission, LLC ("MRT") is providing notice of the availability of firm capacity. See the table and effective dates below.

Customers and potential Customers interested in obtaining available firm capacity should contact Mike Stoll at (636) 812-7121 Mike.Stoll@EnableMidstream.com or Kathy Kennedy at (346) 701-2154 or John Pawlik (346) 701-2137

MRT will update this posting upon the award of any firm capacity and will continue to accept and review valid requests for any capacity that remains available, or becomes available in the future.

Incremental capacity may also be available between specific receipt and delivery points and/or along specific shorter haul paths. Contact Mike Stoll if you would like to discuss a specific path.

	Available
Location & Path	01-Sep-21
Market Zone; East Line Receipt Points to Certain Market Zone Delivery Points	145,170*
Market Zone; MoGas Receipts to Certain Market Zone Delivery Points	50,000
Market Zone; NGPL Madison Receipts (April though October only) to Certain Market Zone Delivery Points	25,000
Market Zone to Market Zone; Northbound Main Line Capacity	19
Field Zone to Market Zone; Northbound Main Line Capacity to Main Line Field Zone or Market Zone Delivery Points	568
Field Zone Only - Annual Southbound; EGT Glendale Receipt Point, Southbound to Main Line Delivery Points	0
Field Zone Only - Seasonal Southbound; EGT Glendale Receipt Point to Main Line Delivery Points south of EGT Glendale. Available each May 16 through November 15 only.	2
Field Zone Only; Perryville Displacement to Main Line Field Zone Points	394,977
West Line Forward Haul	321
West Line Backhaul Only; Sligo and/or Dixie to AM-200	50,000
* 174,849 dth/d effective December 1, 2021	
Summary of Available Firm Storage	
	Available 01-Sep-21
Annual Capacity - MSQ (Dth)	4,369,18
Maximum Daily Withdrawal - MDWQ (Dth/d)	76,10

NOTICE OF AVAILABLE ENABLE-MRT CAPACITY

September 16, 2021

Enable Mississippi River Transmission, LLC ("MRT") is providing notice of the availability of firm capacity. See the table and effective dates below.

Customers and potential Customers interested in obtaining available firm capacity should contact Mike Stoll at (636) 812-7121 Mike.Stoll@EnableMidstream.com or Kathy Kennedy at (346) 701-2154 or John Pawlik (346) 701-2137

MRT will update this posting upon the award of any firm capacity and will continue to accept and review valid requests for any capacity that remains available, or becomes available in the future.

Incremental capacity may also be available between specific receipt and delivery points and/or along specific shorter haul paths. Contact Mike Stoll if you would like to discuss a specific path.

	Available
Location & Path	01-Oct-21
Market Zone; East Line Receipt Points to Certain Market Zone Delivery Points	136,170*
Market Zone; MoGas Receipts to Certain Market Zone Delivery Points	50,000
Market Zone; NGPL Madison Receipts (April though October only) to Certain Market Zone Delivery Points	25,000
Market Zone to Market Zone; Northbound Main Line Capacity	19
Field Zone to Market Zone; Northbound Main Line Capacity to Main Line Field Zone or Market Zone Delivery Points	568
Field Zone Only - Annual Southbound; EGT Glendale Receipt Point, Southbound to Main Line Delivery Points	0
Field Zone Only - Seasonal Southbound; EGT Glendale Receipt Point to Main Line Delivery Points south of EGT Glendale. Available each May 16 through November 15 only.	2
Field Zone Only; Perryville Displacement to Main Line Field Zone Points	394,977
West Line Forward Haul	321
West Line Backhaul Only; Sligo and/or Dixie to AM-200	50,000
* 140,849 dth/d effective December 1, 2021	
Summary of Available Firm Storage	
	Available 01-Oct-21
Annual Capacity - MSQ (Dth)	4,369,182
Maximum Daily Withdrawal - MDWQ (Dth/d)	76,108

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of October, 2021, via electronic or U.S. mail, caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Mark F. Sundback