

INSIGHTS

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The 501G Process Summary & ROE, Rate Rankings



TABLE OF CONTENTS

501G Process Overview	3
LawIQ Approach and Analysis	ł
FERC Section 5 Investigation Scenarios	5
Pipeline Rankings	5
Current FERC Moratoriums	7

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501G Process Overview

The FERC directed 127 pipeline companies (combined \$23 billion in total revenue) to file a Form 501G. **Only 105 actually did** and those 105 reported revenue of \$16 billion.

Of the 22 pipelines that did not file a Form 501G, 11 received either a complete waiver from FERC or an extension of time beyond the end of 2018, while the other 11 chose to file either a pre-arranged settlement of a Section 4 proceeding or commence a full Section 4 proceeding ("Option 2").

Of the 105 filing pipelines, 15 filed to reduce their current rates through a limited Section 4 filing ("Option 1") or a pre-arranged settlement of a Section 4 proceeding ("Option 2") in an amount ranging from 0.2% to 25%. The practical revenue impact - calculated by adjusting the recourse rate revenue by their individual percentage rate reduction - is approximately \$68 million annually for the 15 pipelines – only 4% of the collective total revenue. This also equates to less than one-half of 1% of the collective annual revenue reported by all 105 filing pipelines.

Despite this proactive rate reduction measure, ten of these fifteen pipelines still remain subject to FERC rate review. After these Option 1 and Option 2 filers, that leaves 90 out of the 127 initial pipelines that chose to avoid proactive action and wait it out.

What will FERC do next? Our data provide some clues.

THE LAWIQ DIFFERENCE



Uncover opportunities and projects, monitor park & loan data, tariff & rate changes, and asset management agreements

Capture opportunities & revenue

Quantify market risks, delays, and pipeline capacities to guarantee gas gets to market **Propel profitability**



Receive unbiased insights & data visuals from on-call experts twice weekly

Increase executive confidence



Drive model-based decision making from teams to board room for best FIDs and ROE

Competitive advantage

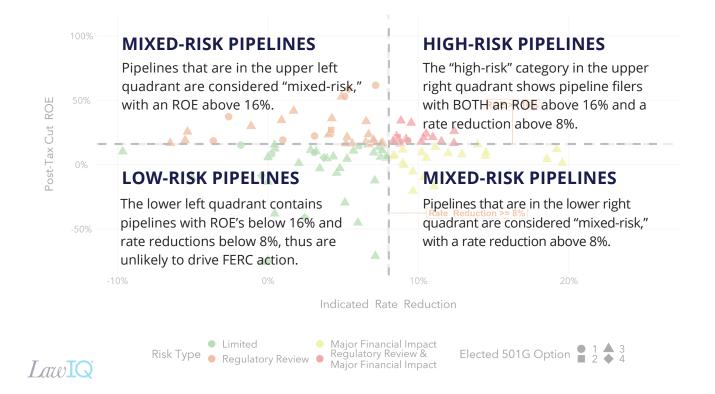


LawIQ Approach and Analysis

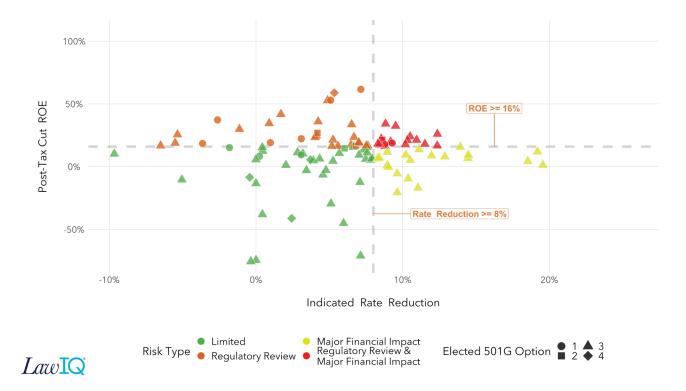
We focus on actual company filed data to spot pipelines at the highest risk of a Section 5 investigation with scenarios depending on possible FERC priorities.

LawIQ extracted each data field from every filed Form 501G, which allows us to analyze the data in those filings across the industry to calculate much more than just rate risk, but industry-wide and company-specific data like administrative costs as a percentage of revenue, average debt ratios, state tax rates, and annual depreciation.

LawIQ's proprietary risk assessment tool divides the pipelines into four graphical quadrants based on two key demarcations, a post-tax cut ROE of +/-16% and an Indicated Rate Reduction of +/-8%.







Having analyzed all available 501G filings and data, we offer the following three primary takeaways:

- 1. As expected, the filings have so far produced a limited impact on the overall shipper cost of service rates and revenue for pipelines, primarily because 86% of those filing chose not to adjust their rates.
- 2. There has been muted reduction in the rates paid by shippers that, so far, have not challenged the pipelines that chose not to adjust their rates.
- 3. FERC must decide whether to investigate those pipelines that chose not to adjust rates at this time. So, moving forward, the "at-risk" pipelines will vary depending upon FERC's strategy, which we detail in this report.



FERC Section 5 Investigation Scenarios

On January 16, 2019, FERC announced Section 5 rate investigations against three of the pipelines from the first wave of 501G filings in October. FERC also announced that nine companies from the first wave of filers "have complied with the filing requirements of Order No. 849" and that FERC was terminating their Form 501G proceedings without any further action. On February 19, 2019, FERC announced a Section 5 investigation against one additional pipeline from the second wave of filings in November, plus terminated proceedings for twenty companies. If FERC continues to launch investigations in that ratio for the third wave filers, there could be 10 to 15 pipelines that face Section 5 rate cases in 2019. There are several scenarios on how FERC will focus its investigatory efforts for the third wave filers and beyond. We consider three scenarios which produce different priority orders of "most at risk" pipelines:

- 1. FERC could review the pipelines with the highest post-tax cut ROE's under the theory that these cases will be the easiest to prove and are most likely to be successful.
- 2. FERC could review the pipelines with the highest Indicated Rate Reduction on their Form 501Gs in the hope of getting the biggest reductions done first.
- 3. FERC could focus on obtaining the biggest real-world results by reviewing the rates of pipelines that have the potential of producing the greatest dollar reduction in recourse tariffs for the benefit of shippers.

Based on the first set of announced FERC investigations, it would appear that our ranking by the greatest dollar reduction in recourse tariffs may be the most predictive.

Pipeline Rankings

Exhibit I - Pipelines ranked by Return on Equity as calculated on the Form 501G

Exhibit II - Pipelines ranked by Indicated Rate Reduction as calculated on the Form 501G

Exhibit III - Pipelines ranked by Revenue Impact. This is a measure of rate reduction taken across total pipeline revenue generated from recourse rate contract bases.

In addition, the rankings note pipelines with notable FERC activity to date, with color-coded indicators:

GREEN	Pipeline with 501G Case "Closed" by FERC with No Action
RED	Pipeline with Active 501G-related Section 5 Rate Investigation
BLUE	Pipeline with Rate Moratorium in effect



EXHIBIT I: Rankings by Filed Return on Equity

501G Case "Closed" by FERC with No Action

Active 501G-related Section 5 Rate Investigation

		Elected 501G	501G Post-Tax	ROE			Elected 501G	501G Post-Tax	ROE
Form 501G Filer	Wave		Cut ROE	Rank	Form 501G Filer	Wave		Cut ROE	Rank
Gulf Shore Energy Partners, LP	2	1	61.7%	1	Dominion Energy Transmission, Inc.	1	3	13.5%	54
Kinetica Energy Express	1	4	58.9%	2	Columbia Gas Transmission LLC	3	3	12.4%	55
North Baia	1	1	53.0%	3	Venice Gathering System, L.L.C.	3	3	11.9%	56
Lake Charles LNG Company, LLC	2	3	52.8%	4	Dominion Energy Questar Pipeline, LLC	2	3	11.7%	57
Black Hills Shoshone Pipeline, LLC	2	3	41.8%	5	Discovery Gas Transmission LLC	2	3	11.3%	58
Tuscarora Gas Transmission Company	3	1	37.3%	6	Trunkline Gas Company, LLC	1	3	11.2%	59
Viking Gas Transmission Company	3	3	36.0%	7	Colorado Interstate Gas Company, L.L.C.	3	3	10.7%	60
MarkWest New Mexico, L.L.C.	2	3	34.5%	8	KPC Pipeline, LLC	2	3	10.3%	61
Southern LNG Company, L.L.C.	2	3	34.2%	9	Chandeleur Pipe Line, LLC	2	3	10.3%	62
Iroquois Gas Transmission System, LP	3	3	33.7%	10	Southeast Supply Header, LLC	2	1	9.5%	63
Trans-Union Interstate Pipeline, L. P.	3	3	32.4%	11	Cheniere Creole Trail Pipeline, LP	3	3	9.4%	64
ETC Tiger Pipeline, LLC	1	3	29.9%	12	Mojave Pipeline Company, L.L.C.	з	3	9.3%	65
White River Hub, LLC	1	2	26.9%	13	Florida Southeast Connection, LLC	3	3	9.2%	66
Equitrans, L.P.	1	3	26.1%	14	UGI Sunbury, LLC.	3	3	8.8%	67
PGPipeline LLC	2	3	25.6%	15	Nautilus Pipeline Company, L.L.C.	3	1	8.3%	68
ANR Storage Company	3	3	24.8%	16	Rockies Express Pipeline LLC	3	3	8.0%	69
Big Sandy Pipeline, LLC	2	3	24.0%	17	Portland Natural Gas Transmission Syster	1	3	7.1%	70
Natural Gas Pipeline Company of America I	3	3	23.5%	18	Cimarron River Pipeline, LLC	3	3	6.8%	71
Fayetteville Express Pipeline LLC	2	3	23.4%	19	Midcontinent Express Pipeline LLC	3	3	6.5%	72
Central Kentucky Transmission	2	1	22.3%	20	Columbia Gulf Transmission, LLC	3	3	6.3%	73
Florida Gas Transmission Company, LLC	3	3	22.2%	21	KO Transmission	3	3	6.2%	74
Kern River Gas Transmission Company	1	2	21.4%	22	Gulf South Pipeline Company, LP	3	3	6.1%	75
El Paso Natural Gas Company, L.L.C.	1	3	21.4%	23	Gulf Crossing Pipeline Company LLC	3	3	6.1%	76
Elba Express Pipeline Company, L.L.C.	2	3	21.3%	24	NGO Transmission, Inc.	3	3	5.7%	77
Horizon Pipeline Company, L.L.C.	1	3	21.1%	25	USG Pipeline Company, LLC	3	4	5.6%	78
Bison Pipeline LLC	2	3	19.9%	26	Cheyenne Plains Gas Pipeline Company, I	3	3	5.3%	79
Wyoming Interstate Company, L.L.C.	3	3	19.2%	27	Ruby Pipeline, L.L.C.	3	3	5.2%	80
East Tennessee Natural Gas Company, LLC	1	1	19.1%	28	Pine Needle LNG Company, LLC	3	3	4.9%	81
Gulfstream Natural Gas System, L.L.C	1	3	18.9%	29	Transwestern Pipeline Company, LLC	3	3	4.5%	82
Southwest Gas Storage Company	2	3	18.8%	30	West Texas Gas, Inc	3	3	4.3%	83
Vector Pipeline L.P.	1	1	18.8%	31	Sabal Trail Transmission, LLC	3	3	1.3%	84
Northern Border Pipeline Company	3	1	18.5%	32	Centra Pipelines Minnesota, Inc.	2	3	1.2%	85
Western Gas Interstate Company	2	3	18.2%	33	Crossroads Pipeline Company	3	3	1.0%	86
MarkWest Pioneer, L.L.C.	3	3	18.0%	34	National Grid LNG LLC	3	3	-0.3%	87
Tallgrass Interstate Gas Transmission, LLC	3	3	17.7%	35	UGI Mt. Bethel Pipeline Company, LLC.	3	3	-2.8%	88
Millennium Pipeline Company, LLC	1	1	17.6%	36	Rover Pipeline LLC	3	3	-2.9%	89
Sierrita Gas Pipeline LLC	3	3	17.5%	37	TransColorado Gas Transmission Compa	3	3	-5.5%	90
ANR Pipeline Company	3	3	17.4%	38	Kinder Morgan Illinois Pipeline LLC	3	3	-6.5%	91
MIGC, LLC	1	3	16.8%	39	Destin Pipeline Company, L.L.C.	1	4	-8.4%	92
Guardian Pipeline, L.L.C.	2	3	16.7%	40	Kinder Morgan Louisiana Pipeline LLC	3	3	-9.6%	93
Southern Star Central Gas Pipeline, Inc.	1	2	16.7%	41	Sabine Pipe Line, LLC	3	3	-10.4%	94
Northern Natural Gas Company	1	3	16.7%	42	WTG Hugoton, LP	3	3	-12.3%	95
Texas Gas Transmission, LLC	1	3	16.6%	43	AMERICAN MIDSTREAM (MIDLA), LLC	3	3	-13.3%	96
Panhandle Eastern Pipe Line Company, LP	1	3	16.4%	44	DBM Pipeline, LLC	3	3	-16.9%	97
PAIUTE PIPELINE COMPANY	3	3	16.4%	45	Dauphin Island Gathering Partners	3	3	-20.5%	98
Bear Creek Storage Company, L.L.C.	1	3	16.3%	46	High Island Offshore System, L.L.C.	3	3	-29.4%	99
Dominion Energy Carolina Gas Transmissic	3	3	15.8%	47	Garden Banks Gas Pipeline, LLC	2	3	-38.0%	100
National Fuel Gas Supply Corporation	3	3	15.6%	48	Kinetica Deepwater Express	1	4	-41.1%	101
Algonquin Gas Transmission, LLC	1	3	15.4%	49	Stingray Pipeline Company, L.L.C.	3	3	-45.0%	102
Enable Gas Transmission	1	3	15.3%	50	Gulf States Transmission LLC	2	3	-71.0%	103
Great Lakes Gas Transmission	3	1	15.2%	51	American Midstream (AlaTenn), LLC	2	3	-74.5%	104
Young Gas Storage Company, Ltd.	2	2	14.6%	52	High Point Gas Transmission, LLC	1	3	-75.5%	105
Golden Pass Pipeline LLC	3	3	13.7%	53					

Exhibit II: Ranking by Filed Indicated Rate Reduction

501G Case "Closed" by FERC with No Action Active 501G-related Section 5 Rate Investigation

Form 501G Filer	Wave	Elected 501G	501G Indicated Rate Reduction	Rate Reduction Rank	Form 501G Filer	Wave	501G	501G Indicated Rate Reduction	Rate Reduction Rank
Sabal Trail Transmission, LLC	3	3	19.6%	1	Natural Gas Pipeline Company of America	3	3	6.7%	54
Venice Gathering System, L.L.C.	3	3	19.0%	2	National Fuel Gas Supply Corporation	3	3	6.6%	55
West Texas Gas, Inc	3	3	18.5%	3	Iroquois Gas Transmission System, LP	3	3	6.5%	56
Florida Southeast Connection, LLC	3	3	14.5%	4	ANR Pipeline Company	3	3	6.5%	57
Cimarron River Pipeline, LLC	3	3	14.5%	5	Young Gas Storage Company, Ltd.	2	2	6.0%	58
Dominion Energy Carolina Gas Transmis		3	13.9%	6	Stingray Pipeline Company, L.L.C.	3	3	6.0%	59
Rockies Express Pipeline LLC	3	3	12.9%	7	Colorado Interstate Gas Company, L.L.C.	3	3	5.7%	60
Equitrans, L.P.	1	3	12.9%	8	PAIUTE PIPELINE COMPANY	3	3	5.6%	61
Guardian Pipeline, L.L.C.	2	3	12.4%	9	Kinetica Energy Express	1	4	5.3%	62
UGI Sunbury, LLC.	3	3	12.4%	10	El Paso Natural Gas Company, L.L.C.	1	3	5.3%	63
MarkWest Pioneer, L.L.C.	3	3	11.5%	11	Transwestern Pipeline Company, LLC	3	3	5.3%	64
Golden Pass Pipeline LLC	3	3	11.3%	12	Panhandle Eastern Pipe Line Company, LP	1	3	5.2%	65
DBM Pipeline, LLC	3	3	11.0%	12		3	3	5.1%	66
Elba Express Pipeline Company, L.L.C.	2	3	11.0%	14	High Island Offshore System, L.L.C. North Baja	1	1	5.1%	67
Ruby Pipeline, L.L.C.	3	3	10.5% 10.5%	15 16	Lake Charles LNG Company, LLC	2	3	4.9%	68 69
Big Sandy Pipeline, LLC	_	-			UGI Mt. Bethel Pipeline Company, LLC.	3	-	4.8%	70
Kinder Morgan Louisiana Pipeline LLC	3	3	10.4%	17 18	Kinder Morgan Illinois Pipeline LLC	3	3	4.6%	
Horizon Pipeline Company, L.L.C.		3	10.3%		Columbia Gulf Transmission, LLC	_	-	4.3%	71
Cheniere Creole Trail Pipeline, LP	3	3	10.2%	19	Viking Gas Transmission Company	3	3	4.2%	72
Tallgrass Interstate Gas Transmission, L		3	10.2%	20	White River Hub, LLC	1	2	4.2%	73
Dauphin Island Gathering Partners	3	3	9.6%	21	ANR Storage Company	3	3	4.1%	74
TransColorado Gas Transmission Comp		3	9.6%	22	Fayetteville Express Pipeline LLC	2	3	4.0%	75
Trans-Union Interstate Pipeline, L. P.	3	3	9.5%	23	Pine Needle LNG Company, LLC	3	3	3.9%	76
Vector Pipeline L.P.	1	1	9.3%	24	USG Pipeline Company, LLC	3	4	3.7%	77
Bison Pipeline LLC	2	3	9.2%	25	Rover Pipeline LLC	3	3	3.4%	78
National Grid LNG LLC	3	3	9.0%	26	KPC Pipeline, LLC	2	3	3.2%	79
Crossroads Pipeline Company	3	3	9.0%	27	Central Kentucky Transmission	2	1	3.1%	80
Dominion Energy Questar Pipeline, LLC	2	3	9.0%	28	Southeast Supply Header, LLC	2	1	3.1%	81
Southern LNG Company, L.L.C.	2	3	8.8%	29	Discovery Gas Transmission LLC	2	3	2.8%	82
Bear Creek Storage Company, L.L.C.	1	3	8.8%	30	Kinetica Deepwater Express	1	4	2.4%	83
Millennium Pipeline Company, LLC	1	1	8.8%	31	Centra Pipelines Minnesota, Inc.	2	3	2.0%	84
Kern River Gas Transmission Company	1	2	8.6%	32	Black Hills Shoshone Pipeline, LLC	2	3	1.7%	85
Florida Gas Transmission Company, LLC		3	8.5%	33	East Tennessee Natural Gas Company, LLC		1	1.0%	86
Sierrita Gas Pipeline LLC	3	3	8.5%	34	MarkWest New Mexico, L.L.C.	2	3	0.9%	87
Portland Natural Gas Transmission Syst		3	8.4%	35	Columbia Gas Transmission LLC	3	3	0.5%	88
Western Gas Interstate Company	2	3	8.3%	36	Garden Banks Gas Pipeline, LLC	2	3	0.4%	89
Midcontinent Express Pipeline LLC	3	3	8.3%	37	Enable Gas Transmission	1	3	0.4%	90
KO Transmission	3	3	7.9%	38	Nautilus Pipeline Company, L.L.C.	3	1	0.2%	91
Gulf South Pipeline Company, LP	3	3	7.9%	39	American Midstream (AlaTenn), LLC	2	3	0.0%	92
Cheyenne Plains Gas Pipeline Company,		3	7.8%	40	AMERICAN MIDSTREAM (MIDLA), LLC	3	3	0.0%	93
Northern Natural Gas Company	1	3	7.6%	41	NGO Transmission, Inc.	3	3	0.0%	94
Trunkline Gas Company, LLC	1	3	7.6%	42	High Point Gas Transmission, LLC	1	3	-0.4%	95
Algonquin Gas Transmission, LLC	1	3	7.6%	43	Destin Pipeline Company, L.L.C.	1	4	-0.4%	96
Texas Gas Transmission, LLC	1	3	7.5%	44	ETC Tiger Pipeline, LLC	1	3	-1.1%	97
Gulf Crossing Pipeline Company LLC	3	3	7.5%	45	Great Lakes Gas Transmission	3	1	-1.8%	98
Dominion Energy Transmission, Inc.	1	3	7.3%	46	Tuscarora Gas Transmission Company	3	1	-2.6%	99
Gulf Shore Energy Partners, LP	2	1	7.2%	47	Northern Border Pipeline Company	3	1	-3.6%	100
Gulf States Transmission LLC	2	3	7.1%	48	Sabine Pipe Line, LLC	3	3	-5.1%	101
WTG Hugoton, LP	3	3	7.1%	49	PGPipeline LLC	2	3	-5.4%	102
Mojave Pipeline Company, L.L.C.	3	3	7.0%	50	Gulfstream Natural Gas System, L.L.C	1	3	-5.5%	103
Southwest Gas Storage Company	2	3	7.0%	51	MIGC, LLC	1	3	-6.5%	104
Wyoming Interstate Company, L.L.C.	3	3	7.0%	52	Chandeleur Pipe Line, LLC	2	3	-9.7%	105
Southern Star Central Gas Pipeline, Inc.	1	2	6.8%	53					



Exhibit III: Rankings by Revenue Impact

501G Case "Closed" by FERC with No Action

Active 501G-related Section 5 Rate Investigation

Form 501G Filer	Wave	Elected 501G Option	501G Indicated Rate Reduction (a)	Total Operating Revenues (b)	Recourse Rate Percentage (c)	Revenue Impact (a x b x c)	lmpact Rank
Dominion Energy Transmission, Inc.	1	3	7.3%	\$787,186,460	79.9%	\$46,174,842	1
Florida Gas Transmission Company, LLC	3	3	8.5%	\$839,275,906	54.6%	\$39,113,113	2
ANR Pipeline Company	3	3	6.5%	\$758,234,722	72.2%	\$35,524,599	3
Northern Natural Gas Company	1	3	7.6%	\$693,438,299	58.1%	\$30,709,264	4
West Texas Gas, Inc	3	3	18.5%	\$109,001,905	100.0%	\$20,201,668	5
Natural Gas Pipeline Company of America LLC		3	6.7%	\$679,479,244	43.3%	\$19,628,533	6
Kern River Gas Transmission Company	1	2	8.6%	\$301,620,227	67.9%	\$17,637,577	7
Algonquin Gas Transmission, LLC	1	3	7.6%	\$504,844,902	41.0%	\$15,661,236	8
Southern Star Central Gas Pipeline, Inc.	1	2	6.8%	\$260,935,801	83.1%	\$14,766,546	9
Southern LNG Company, L.L.C.	2	3	8.8%	\$166,353,190	100.0%	\$14,688,414	10
National Fuel Gas Supply Corporation	3	3	6.6%	\$219,757,692	97.5%	\$14,198,778	11
Dominion Energy Questar Pipeline, LLC	2	3	9.0%	\$171,144,716	88.7%	\$13,591,709	12
Colorado Interstate Gas Company, L.L.C.	3	3	5.7%	\$319,975,450	71.3%	\$12,955,405	13
Gulf South Pipeline Company, LP	3	3	7.9%	\$510,551,393	29.9%	\$11,958,399	14
Panhandle Eastern Pipe Line Company, LP	1	3	5.2%	\$300,084,314	73.1%	\$11,326,800	14
Equitrans, L.P.	1	3	12.4%	\$390,667,455	23.2%	\$11,225,101	16
El Paso Natural Gas Company, L.L.C.	1	3	5.3%	\$648,104,613	30.6%	\$10,401,046	17
1 - 2 - 2	3	3	11.1%		100.0%		18
Golden Pass Pipeline LLC Dominion Energy Carolina Gas Transmission,	3	3		\$92,608,060	95.9%	\$10,298,199	10
Lake Charles LNG Company, LLC	2	3	13.9% 4.9%	\$76,905,646 \$197,031,058	100.0%	\$10,273,424	20
1	- 2					\$9,614,157	
Texas Gas Transmission, LLC	3	3	7.5%	\$500,631,366 \$107,555,769	21.8%	\$8,206,317	21 22
Tallgrass Interstate Gas Transmission, LLC			10.2%		59.7%	\$6,539,916	
Iroquois Gas Transmission System, LP	3 3	3	6.5%	\$193,459,662	47.6%	\$5,999,430	23
Columbia Gas Transmission LLC	3	3	0.5%	\$1,222,290,675		\$4,552,482	24
Rockies Express Pipeline LLC	3	3	12.9%	\$893,171,092	3.8%	\$4,380,204	25
Cimarron River Pipeline, LLC		3 3	14.5% 8.4%	\$24,620,860	100.0%	\$3,558,509	26
Portland Natural Gas Transmission System	1			\$60,172,364	64.8%	\$3,271,845	27
Columbia Gulf Transmission, LLC	3	3	4.3%	\$158,987,036	44.6%	\$3,075,061	28
Southwest Gas Storage Company	2	3	7.0%	\$43,793,154	100.0%	\$3,071,623	29
Wyoming Interstate Company, L.L.C.	3	3	7.0%	\$133,340,691	32.5%	\$3,042,327	30
Trunkline Gas Company, LLC	1	3	7.6%	\$140,272,154	27.0%	\$2,874,926	31
Bear Creek Storage Company, L.L.C.	1	3	8.8%	\$27,585,248	100.0%	\$2,426,491	32
Sabal Trail Transmission, LLC	3	3	19.6%	\$133,678,501	9.2%	\$2,400,883	33
PAIUTE PIPELINE COMPANY	3	3	5.6%	\$40,888,567	99.2%	\$2,264,891	34
Midcontinent Express Pipeline LLC	3	3	8.3%	\$224,685,902	10.7%	\$1,998,685	35
Kinetica Energy Express	1	4	5.3%	\$44,003,927	84.0%	\$1,976,009	36
UGI Sunbury, LLC.	3	3	12.0%	\$14,474,523	100.0%	\$1,733,124	37
Ruby Pipeline, L.L.C.	3	3	10.5%	\$344,539,993	4.6%	\$1,673,218	38
Viking Gas Transmission Company	3	3	4.2%	\$37,342,700	94.3%	\$1,492,701	39
Millennium Pipeline Company, LLC	1	1	8.8%	\$203,945,813	6.1%	\$1,099,503	40
Mojave Pipeline Company, L.L.C.	3	3	7.0%	\$15,718,401	99.2%	\$1,097,088	41
Enable Gas Transmission	1	3	0.4%	\$485,061,874	49.2%	\$1,026,365	42
Transwestern Pipeline Company, LLC	3	3	5.3%	\$208,842,475	8.8%	\$963,531	43
Guardian Pipeline, L.L.C.	2	3	12.4%	\$72,245,343		\$919,304	44
Venice Gathering System, L.L.C.	3	3	19.2%	\$4,739,989	100.0%	\$909,432	45
Rover Pipeline LLC	3	3	3.4%	\$54,793,365	43.5%	\$820,784	46
ANR Storage Company	3	3	4.1%	\$18,681,535	100.0%	\$768,462	47
East Tennessee Natural Gas Company, LLC	1	1	1.0%	\$188,778,324		\$750,968	48
National Grid LNG LLC	3	3	9.0%	\$8,230,444	100.0%	\$743,386	49
KO Transmission	3	3	7.9%	\$8,639,897	100.0%	\$684,170	50
Trans-Union Interstate Pipeline, L. P.	3	3	9.5%	\$6,790,671	100.0%	\$646,606	51
High Island Offshore System, L.L.C.	3	3	5.1%	\$13,493,607	90.5%	\$624,698	52
WTG Hugoton, LP	3	3	7.1%	\$6,975,993	100.0%	\$494,731	53



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Exhibit III: Rankings by Revenue Impact

501G Case "Closed" by FERC with No Action

Active 501G-related Section 5 Rate Investigation

		Elected 501G	501G Indicated Rate Reduction	Total Operating Revenues	Recourse Rate Percentage	Revenue Impact	Impact
Form 501G Filer	Wave	Option	(a)	(b)	(c)	(axbxc)	Rank
Young Gas Storage Company, Ltd.	2	2	6.0%	\$8,116,122	100.0%	\$490,189	54
Pine Needle LNG Company, LLC	3	3	3.9%	\$12,485,211	100.0%	\$487,851	55
North Baja	1	1	5.1%	\$40,159,670	23.0%	\$470,968	56
Kinetica Deepwater Express	1	4	2.4%	\$16,004,431	97.4%	\$378,722	57
Stingray Pipeline Company, L.L.C.	3	3	6.0%	\$7,591,079	74.3%	\$337,014	58
Horizon Pipeline Company, L.L.C.	1	3	10.3%	\$12,666,425	23.4%	\$305,836	59
Gulf Crossing Pipeline Company LLC	3	3	7.5%	\$226,228,651	1.6%	\$268,491	60
Crossroads Pipeline Company	3	3	9.0%	\$2,521,643	100.0%	\$225,670	61
Sierrita Gas Pipeline LLC	3	3	8.5%	\$34,737,221	6.7%	\$196,245	62
Cheyenne Plains Gas Pipeline Company, L.L	3	3	7.8%	\$46,317,148	4.9%	\$178,626	63
Western Gas Interstate Company	2	3	8.3%	\$1,875,223	100.0%	\$156,026	64
White River Hub, LLC	1	2	4.2%	\$11,598,970	31.7%	\$153,828	65
TransColorado Gas Transmission Company	3	3	9.6%	\$18,759,956	7.3%	\$131,339	66
Vector Pipeline L.P.	1	1	9.3%	\$83,462,071	1.5%	\$113,457	67
Discovery Gas Transmission LLC	2	3	2.8%	\$38,209,664	5.4%	\$58,759	68
Gulf Shore Energy Partners, LP	2	1	7.2%	\$815,020	100.0%	\$58,260	69
Elba Express Pipeline Company, L.L.C.	2	3	11.0%	\$136,012,521		\$29,801	70
Dauphin Island Gathering Partners	3	3	9.6%	\$2,877,194	9.8%	\$27,255	71
UGI Mt. Bethel Pipeline Company, LLC.	3	3	4.8%	\$495,145	100.0%	\$23,597	72
Centra Pipelines Minnesota, Inc.	2	3	2.0%	\$1,100,176	100.0%	\$22,391	73
Nautilus Pipeline Company, L.L.C.	3	1	0.2%	\$8,803,753	100.0%	\$20,860	74
Garden Banks Gas Pipeline, LLC	2	3	0.4%	\$4,550,209	100.0%	\$19,980	75
USG Pipeline Company, LLC	3	4	3.7%	\$608,930	62.3%	\$14,053	76
Cheniere Creole Trail Pipeline, LP	3	3	10.2%	\$81,761,865	0.1%	\$10,423	77
Southeast Supply Header, LLC	2	1	3.1%	\$113,371,116		\$8,799	78
Kinder Morgan Louisiana Pipeline LLC	3	3	10.4%	\$368,055	17.2% 0.1%	\$6,557	79
Bison Pipeline LLC	2	3	9.2% 3.1%	\$80,048,407 \$173,746	0.1%	\$6,238	80 81
Central Kentucky Transmission Gulf States Transmission LLC	2	3	7.1%	\$68,650	100.0%	\$5,367 \$4,896	82
Black Hills Shoshone Pipeline, LLC	2	3	1.7%	\$252,900	100.0%	\$4,890	83
Big Sandy Pipeline, LLC	2	3	10.5%	\$40,679,204	0.0%	\$4,300	84
American Midstream (AlaTenn), LLC	2	3	0.0%	\$40,879,204 \$4,291,612	100.0%	\$115	85
AMERICAN MIDSTREAM (MIDLA), LLC	3	3	0.0%	\$2,998,981	100.0%	\$0	86
DBM Pipeline, LLC	3	3	11.0%	32,550,501	100.0%	\$0 \$0	87
ETC Tiger Pipeline, LLC	1	3	-1.1%	\$234,240,204		\$0	88
Fayetteville Express Pipeline LLC	2	3	4.0%	\$167,544,456		\$0	89
KPC Pipeline, LLC	2	3	3.2%	\$9.570.733	0.0%	\$0	90
MarkWest New Mexico, L.L.C.	2	3	0.9%	\$1,181,904	0.0%	\$0	91
MIGC. LLC	1	3	-6.5%	\$7,498.023	0.0%	\$0	92
NGO Transmission, Inc.	3	3	0.0%	\$5,400,461	100.0%	\$0	93
PGPipeline LLC	2	3	-5.4%	\$1,330,011	0.0%	\$0	94
Kinder Morgan Illinois Pipeline LLC	3	3	4.6%	\$3,245,301	0.0%	-\$24	95
MarkWest Pioneer, L.L.C.	3	3	11.5%	\$15,458,564	-0.1%	-\$2,517	96
Sabine Pipe Line, LLC	3	3	-5.1%	\$5,683,586	8.8%	-\$25,347	97
High Point Gas Transmission, LLC	1	3	-0.4%	\$10,174,408	100.0%	-\$35,205	98
Florida Southeast Connection, LLC	3	3	14.5%	\$48,173,070	-0.5%	-\$36,474	99
Destin Pipeline Company, L.L.C.	1	4	-0.4%	\$44,726,699	100.0%	-\$192,658	100
Chandeleur Pipe Line, LLC	2	3	-9.7%	\$4,484,842	100.0%	-\$433,351	101
Tuscarora Gas Transmission Company	3	1	-2.6%	\$23,374,795	100.0%	-\$612,003	102
Great Lakes Gas Transmission	3	1	-1.8%	\$181,486,830		-\$1,113,413	103
Gulfstream Natural Gas System, L.L.C	1	3	-5.5%	\$279,745,153	7.7%	-\$1,182,611	104
Northern Border Pipeline Company	3	1	-3.6%	\$291,396,118	72.3%	-\$7,666,645	105



Current FERC Moratoriums

A Moratorium is a provision of a rate case settlement that establishes a prohibition on any settling party (i.e., pipeline and pipeline shippers) from proposing Section 4 or Section 5 changes to the levels of a pipeline's general rates prior to a future date.

Moratoriums are relevant for assessing the risk from the 501G process because FERC granted waivers of the 501G filing requirement for pipelines with current moratoriums in effect. The following pipelines may not, therefore, face a FERC Section 5 proceeding until these current moratoriums expire.

Form 501G Filer	Elected 501G Option	Moratorium End Date
Tallgrass Interstate Gas Transmission, LLC	3	4/30/19
Columbia Gulf Transmission, LLC	3	7/1/19
ANR Pipeline Company	3	8/1/19
Transwestern Pipeline Company, LLC	3	10/1/19
Venice Gathering System, L.L.C.	3	10/1/19
Florida Gas Transmission Company, LLC	3	2/1/20
KO Transmission	3	2/1/20
Iroquois Gas Transmission System, LP	3	9/1/20
Colorado Interstate Gas Company, L.L.C.	3	10/1/20
Stingray Pipeline Company, L.L.C.	3	11/1/20
Wyoming Interstate Company, L.L.C.	3	1/1/21
Sabine Pipe Line, LLC	3	7/1/21
Columbia Gas Transmission LLC	3	1/31/22
Natural Gas Pipeline Company of America LLC	3	7/1/22
Gulf South Pipeline Company, LP	3	5/1/23



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