



ENERGY TRANSFER

ETC Tiger Pipeline, LLC
711 Louisiana Street, Houston TX 77002-2716
Houston Offices 832-668-1000

June 15, 2010

Ms. Kimberly D. Bose, Secretary
Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: ETC Tiger Pipeline, LLC
FERC Docket No. CP09-460-____

Dear Ms. Bose:

Enclosed herewith for filing with the Federal Energy Regulatory Commission ("Commission") is ETC Tiger Pipeline, LLC's ("ETC Tiger") application pursuant to Section 7(c) of the Natural Gas Act and Subpart A of Part 157 of the Commission's regulations, for limited amendment of the Certificate of Public Convenience and Necessity ("Certificate") issued on April 7, 2010, in Docket No. CP09-460-000, as amended by an Errata Notice issued on April 8, 2010.¹ Through the enclosed Application ETC Tiger seeks to amend its *pro forma* FERC Gas Tariff, as described therein, to provide a methodology for determining the Total Reimbursement Percentages, *i.e.*, Fuel Gas and Lost and Unaccounted For Gas, applicable to interruptible transportation service under Rate Schedule ITS and to Authorized Overrun Service and Unauthorized Overrun Service under Rate Schedules FTS and ITS. No other changes to ETC Tiger's Certificate are proposed.

Provided below are details of the contents of Volume I included with the filing of this Application.

PUBLIC INFORMATION

Volume I

- Transmittal Letter
- Application
- Notice of Application
- Exhibit P Substitute Sheet No. 7

Filing Information

The attached Application is being submitted electronically to the Commission's eFiling website pursuant to the Commission's Order No. 703, Filing via the Internet Guidelines issued on November 15, 2007 in FERC Docket No. RM07-16-000. In addition, in compliance with the Commission's Submission Guidelines dated April 11, 2008, ETC Tiger is providing courtesy copies of its Application to: 1) Office of Energy Projects, Room 61-47; and 2) Office of General Counsel – Energy Projects, Room 101-56.

¹ ETC Tiger Pipeline, LLC, Order Issuing Certificates, 131 FERC ¶ 61,010 (2010).

Ms. Kimberly D. Bose
June 15, 2010
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Any questions or comments regarding this filing should be directed to the undersigned at (281) 714-2042.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joey Mahmoud', is written over a horizontal line.

Joey Mahmoud, Vice President
Regulated Projects

cc: Mr. Emery Biro, Energy Transfer Partners
Mr. Damon Daniels, Energy Transfer Partners
Ms. Lisa Tonery, Fulbright & Jaworski L.L.P.

**UNITED STATE OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

ETC Tiger Pipeline, LLC

§

Docket No. CP09-460-___

**NOTICE OF APPLICATION
(June __, 2010)**

Take notice that on June 15, 2010, ETC Tiger Pipeline, LLC ("ETC Tiger"), 711 Louisiana Street, Houston, Texas 77002, filed an application in Docket No. CP09-460-___ pursuant to Section 7(c) of the Natural Gas Act, as amended, and Part 157, Subpart A of the Commission's Regulations requesting a limited amendment of the Certificate of Public Convenience and Necessity ("Certificate") issued on April 7, 2010, in Docket No. CP09-460-000, as amended by an Errata Notice issued on April 8, 2010. ETC Tiger seeks to amend its *pro forma* FERC Gas Tariff, as described in its application, to provide a methodology for determining the Total Reimbursement Percentages, *i.e.*, Fuel Gas and Lost and Unaccounted For Gas, applicable to interruptible transportation service under Rate Schedule ITS and to Authorized Overrun Service and Unauthorized Overrun Service under Rate Schedules FTS and ITS. No other changes to ETC Tiger's Certificate are proposed.

Any questions regarding the application may be directed to Joey Mahmoud, Vice President, Energy Transfer Partners, L.P., 711 Louisiana Street, Suite 900, Houston, Texas 77002, (832) 668-1242, Joey.Mahmoud@energytransfer.com; or Lisa M. Toney, Fulbright & Jaworski L.L.P., 666 Fifth Avenue, New York, NY 10103, (212) 318-3009, ltoney@fulbright.com.

ETC Tiger's filing is available for review at the Commission in the Public Reference Room or may be viewed on the Commission's website web at <http://www.ferc.gov> using the eLibrary link. Enter the docket number excluding the last three digits in the docket number field to access the document. For assistance, contact FERC at FEROnlinSupport@ferc.gov or call toll-free, (886) 208-3676 or TYY, (202) 502-8659.

There are two ways to become involved in the Commission's review of this project. First, any person wishing to obtain legal status by becoming a party to the proceedings for this project should, on or before the comment date stated below file with the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426, a motion to intervene in accordance with the requirements of the Commission's Rules of Practice and Procedure (18 CFR 385.214 or 385.211) and the Regulations under the NGA (18 CFR 157.10). A person obtaining party status will be placed on the service list maintained by the Secretary of the Commission and will receive copies of all documents filed by the applicant and by all other parties. A party must submit 14 copies of filings made in the proceeding with the Commission and must mail a copy to the applicant and to every other party. Only parties to the proceeding can ask for court review of Commission orders in the proceeding.

However, a person does not have to intervene in order to have comments considered. The second way to participate is by filing with the Secretary of the Commission, as soon as possible, an original and two copies of comments in support of or in opposition to this project. The Commission will consider these comments in determining the appropriate action to be taken, but the filing of a comment alone will not serve to make the filer a party to the proceeding. The Commission's rules

require that persons filing comments in opposition to the project provide copies of their protests only to the party or parties directly involved in the protest.

Persons who wish to comment only on the environmental review of this project should submit an original and two copies of their comments to the Secretary of the Commission. Environmental commentors will be placed on the Commission's environmental mailing list, will receive copies of the environmental documents, and will be notified of meetings associated with the Commission's environmental review process. Environmental commentors will not be required to serve copies of filed documents on all other parties. However, the non-party commentors will not receive copies of all documents filed by other parties or issued by the Commission (except for the mailing of environmental documents issued by the Commission) and will not have the right to seek court review of the Commission's final order.

The Commission strongly encourages electronic filings of comments, protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy regulatory Commission, 888 First Street, NE, Washington, DC. 20426.

Comment Date: _____

Kimberly D. Bose,
Secretary.

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

ETC Tiger Pipeline, LLC

Docket No. CP09-460-___

**ABBREVIATED APPLICATION OF
ETC TIGER PIPELINE, LLC
FOR LIMITED AMENDMENT OF CERTIFICATE AUTHORITY**

Pursuant to Section 7(c) of the Natural Gas Act (“NGA”), as amended,¹ and Part 157 of the Federal Energy Regulatory Commission’s (“Commission”) regulations thereunder,² ETC Tiger Pipeline, LLC (“ETC Tiger”) hereby respectfully submits this Abbreviated Application (“Application”) for limited amendment of the Certificate of Public Convenience and Necessity issued on April 7, 2010, in Docket No. CP09-460-000, as amended by an Errata Notice issued on April 8, 2010 (together, “April 7 Order”).³ The April 7 Order authorized ETC Tiger to construct and operate the Tiger Pipeline, an approximately 175-mile-long, 42-inch-diameter pipeline (the “Base System”) currently under construction in east Texas and Louisiana, with a firm design capacity of 2.0 billion cubic feet per day (“Bcf/d”).

The sole purpose of this Application is to amend ETC Tiger’s *pro forma* FERC Gas Tariff (“Tariff”), as described herein, to provide a methodology for determining the Total Reimbursement Percentages, *i.e.*, Fuel Gas and Lost and Unaccounted For Gas (“L&U”),⁴ applicable to interruptible transportation service under Rate Schedule ITS (“IT Service”) and to Authorized Overrun Service (“AOS”) and Unauthorized Overrun Service (“UAOS”) under Rate

¹ 15 U.S.C. § 717f(c) (2000).

² 18 C.F.R. Part 157, Subpart A (2010).

³ *ETC Tiger Pipeline, LLC, Order Issuing Certificates*, 131 FERC ¶ 61,010 (2010).

⁴ Consistent with ETC Tiger’s Tariff, and in accordance with Commission policy, the reimbursement percentages for Fuel Gas and L&U are tracked and trued-up separately, and the Total Reimbursement Percentage only represents the sum of those two percentages after they have been separately determined in accordance with the Tariff.

Schedules FTS and ITS.⁵ As further described below, ETC Tiger is proposing the methodology herein in accordance with the Commission's policy of assessing fuel usage in the manner that ensures that no costs attributable to an expansion project are charged to existing shippers under circumstances where they do not use or otherwise benefit from those facilities.⁶

ETC Tiger respectfully requests that the authorization requested herein be granted by September 1, 2010, as ETC Tiger anticipates providing transportation service on the Base System facilities as early as December 2010 and no later than the end of the first Quarter 2011. Authorization by September 1, 2010, would allow ETC Tiger sufficient time to file actual tariff sheets that comply with the requirements contained in the April 7 Order no less than 60 days and no more than 90 days prior to the commencement of service.⁷

In support hereof, and pursuant to the Commission's regulations, ETC Tiger respectfully submits the following:

⁵ Concurrent with this filing, ETC Tiger is filing in Docket No. CP10-____-000 an abbreviated application for a Certificate of Public Convenience and Necessity ("Phase I Expansion Application") in connection with the ETC Tiger Pipeline Expansion Project, Phase I ("Phase I Expansion"). The Phase I Expansion will be comprised of approximately 20.5 miles of 42-inch-diameter mainline pipeline looping, 30,565 horsepower ("hp") of additional compression and associated appurtenant facilities. It will provide approximately 400,000 Mcf per day of new firm capacity on the Tiger Pipeline.

⁶ See *Northern Natural Gas Co.*, 100 FERC ¶ 61,306 at P 13 (2002) ("*Northern Natural*") (noting that the Commission's *Certificate Policy Statement* establishes a "threshold requirement that new construction will not be subsidized by existing customers who do not use or otherwise benefit from the new facilities"); *Certification of New Interstate Natural Gas Pipeline Facilities*, 88 FERC ¶ 61,227 (1999), *order on clarification*, 90 FERC ¶ 61,128 (2000), *order on clarification*, 92 FERC ¶ 61,094 (2000) ("*Certificate Policy Statement*"). See also *Texas Eastern Transmission, LP*, 101 FERC ¶ 61,120 at P 37 (2002) ("*Texas Eastern*") (reiterating that, consistent with the Certificate Policy Statement, "the costs of providing a service should be matched to the customers benefiting from that service"). As discussed below, firm shippers on ETC Tiger's system will, in fact, benefit from project expansions, in that those added facilities can serve to enhance system reliability and integrity, improve operational efficiencies, and expand service flexibility. Nevertheless, as explained below, ETC Tiger submits that it is appropriate and reasonable to establish an up-front, baseline rule aimed at ensuring the firm quantities under Base System firm transportation service agreements are insulated from any potential risk of subsidizing fuel usage associated with expansion facilities.

⁷ See Ordering Paragraph G, April 7 Order.

I. BACKGROUND

On April 7, 2010, as amended by an Errata Notice issued April 8, 2010, the Commission issued an “Order Issuing Certificates” in Docket No. CP09-460-000, authorizing ETC Tiger to construct and operate the Base System, which ETC Tiger currently expects to complete and place in service as early as December 2010 and no later than the end of the first Quarter 2011. The Base System, as authorized, will have a firm design capacity of 2.0 Bcf/d, using approximately 119,000 hp through compressors at four locations. As approved, ETC Tiger’s Tariff currently provides for initial Fuel Gas reimbursement percentages, exclusive of L&U, of 1.09% applicable to quantities received at or west of Highway 789, and 0.76% applicable to quantities received east of Highway 789.⁸ The initial L&U charge is 0.15%. Accordingly, the initial Total Reimbursement Percentage for quantities received at or west of Highway 789 shall be 1.24%, while that for quantities received east of Highway 789 shall be 0.91%. Section 36 of the General Terms and Conditions of Service (“GT&C”) of the Tariff provides that ETC Tiger shall track and true-up Fuel Gas, any booster fuel and L&U, such that the fuel recovery mechanism is designed to ensure that ETC Tiger does not derive any financial gain with respect to fuel usage and L&U on its system.⁹ The initial Total Reimbursement Percentages will be in place for the first nine months of ETC Tiger’s system operations. ETC Tiger will then make revised percentages effective, in accordance with GT&C Section 36 of the Tariff and subject to Commission approval, based on actual system usage and the truing-up of any over- or under-recovered Fuel Gas and L&U during the first nine-month period. Thereafter, the then-effective

⁸ The Tariff also provides separate reimbursement percentages during the periods when Interim and Perryville services are available. However, those reimbursement percentages are not impacted by the instant Application.

⁹ While the ETC Tiger Tariff references booster compression, the system configuration for the Tiger Pipeline does not include receipt or delivery point booster compression at this time.

percentages shall be periodically adjusted pursuant to, and in accordance with, ETC Tiger's tracking and true-up mechanism in GT&C Section 36 of the Tariff.

II. INFORMATION REGARDING APPLICANT

ETC Tiger's exact legal name is ETC Tiger Pipeline, LLC. ETC Tiger, a limited liability company, is organized and exists under the Delaware Limited Liability Act. ETC Tiger's corporate offices are located at 3738 Oak Lawn Avenue, Dallas, Texas 75219. ETC Tiger is a wholly-owned subsidiary of Energy Transfer Partners, L.P., a Delaware limited partnership, and was formed to construct, own and operate the Tiger Pipeline.

As reflected above, on April 7, 2010, the Commission issued an "Order Issuing Certificates," authorizing ETC Tiger to construct and operate the Tiger Project. ETC Tiger accepted its certificate authority on April 8, 2010. Construction of the Tiger Project commenced on May 4, 2010, and currently is ongoing. Upon commencement of service on the Tiger Pipeline, ETC Tiger will be subject to the Commission's jurisdiction under the NGA as a natural gas company.

III. COMMUNICATIONS

The persons to whom correspondence and communications concerning this Application should be directed and upon whom service is to be made are as follows:

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**IV.
PROPOSED METHODOLOGY FOR DETERMINING
IT/AOS/UAOS TOTAL REIMBURSEMENT PERCENTAGES**

ETC Tiger hereby requests Commission authorization to implement a proposed methodology for determining the Total Reimbursement Percentages applicable to IT Service, AOS and UAOS.¹² Specifically, as set forth on the proposed Substitute Original Sheet No. 7 in Exhibit P to this Application, ETC Tiger is proposing to establish the Total Reimbursement Percentages for IT Service, AOS and UAOS as the highest Total Reimbursement Percentage set

¹⁰ Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. ETC Tiger respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow ETC Tiger to include each of the designated representatives on the official service list.

¹¹ Designated as the responsible ETC Tiger official under Section 154.7(a)(2) of the Commission's regulations.

¹² As noted above, the reimbursement percentages for Fuel Gas and L&U are tracked and trued-up separately, and the Total Reimbursement Percentage only represents the sum of those two percentages after they have been separately determined in accordance with the Tariff.

forth for firm service, from time to time, on Sheet No. 7 of the Tariff, according to whether the particular quantities are received at or west of Highway 789 or east of Highway 789. Consistent with Commission policy, this proposed methodology will ensure that existing Base System shippers are appropriately insulated from the potential risk of subsidizing fuel costs associated with the use of any expansion-related facilities in the circumstance where they do not use or otherwise benefit from those new facilities.¹³ By filing to amend the Tariff at this time, ETC Tiger is also seeking to provide existing shippers with up-front assurance regarding the mechanism by which ETC Tiger will avoid the potential risk of inappropriately imposing any expansion fuel costs on firm capacity on the Base System.

This Application is especially warranted at this time because, concurrent with this Application, ETC Tiger is also filing the Phase I Expansion Application, as referenced above, requesting authorization to construct, own, operate and maintain certain expansion facilities as detailed therein. The Phase I Expansion will increase the transportation capacity of the Tiger Pipeline to 2.4 Bcf/d by adding approximately 20.5 miles of 42-inch-diameter pipeline looping and 30,565 hp of compression. As set forth in the Phase I Expansion Application, upon ETC Tiger's placing the Phase I Expansion into service, all shippers on ETC Tiger's system will benefit from enhanced access to interruptible services resulting from the new expanded firm design capacity of 2.4 Bcf/d under Rate Schedule ITS,¹⁴ as well as for AOS and UAOS under both Rate Schedules FTS and ITS. The Phase I Expansion will also benefit all shippers by, *inter alia*, enhancing system reliability and security, through system integration of the expansion

¹³ See *Northern Natural* and *Texas Eastern*, *supra* note 6.

¹⁴ See *Rockies Express Pipeline LLC*, 128 FERC ¶ 61,036 at P 16 (2009) ("*Rockies Express*") (observing that the proposed expansion project "will benefit existing customers by creating incremental capacity which they can use on a secondary and interruptible basis").

compression units and looping facilities, and by increasing shipper flexibility on the ETC Tiger system. The estimated in-service date for the Phase I Expansion is the fourth Quarter 2011.

As reflected in the Phase I Expansion Application, ETC Tiger is requesting a predetermination of rolled-in rate treatment for costs of the proposed expansion facilities. To avoid subsidization by existing shippers, however, ETC Tiger is proposing separate reimbursement percentages in the Phase I Expansion Application to recover the incrementally higher Fuel Gas in connection with transportation quantities associated with the proposed Phase I Expansion facilities. The Total Reimbursement Percentages (*i.e.*, Fuel Gas and L&U), as proposed in the Phase I Expansion Application, are 1.76% for quantities received at or west of Highway 789 and 1.43% for quantities received east of Highway 789, which will also be subject to the tracker and true-up mechanism under GT&C Section 36 of ETC Tiger's Tariff.

Pursuant to ETC Tiger's proposed methodology in this Application, by way of illustration,¹⁵ if the Phase I Expansion facilities were approved and placed into service, the initial Total Reimbursement Percentages applicable to all IT Service, AOS and UAOS on the system also would be 1.76% at or west of Highway 789, and 1.43% east of Highway 789, subject to adjustment thereafter in accordance with the Tariff. These Total Reimbursement Percentages correspond to the incremental percentages proposed for the Phase I Expansion as set forth on First Revised Sheet No. 7 in Exhibit P to the Phase I Expansion Application.¹⁶ Assessing those same reimbursement percentages on all quantities for IT Service, AOS and UAOS will avoid the

¹⁵ To be clear, ETC Tiger is not seeking Commission authorization for any specific reimbursement percentages for IT Service, AOS and UAOS. Instead, ETC Tiger seeks authorization only to implement the methodology upon which those reimbursement percentages are to be set, depending upon the facilities that are in service as of any particular time. Accordingly, the initial Total Fuel Percentages for IT Service, AOS and UAOS will remain unchanged from those reviewed and approved by the Commission in the April 7 Order. Any issues regarding the reimbursement percentages associated with a particular expansion project will be appropriately addressed by ETC Tiger in the certificate proceeding for that expansion project.

¹⁶ If the Phase I Expansion Application is approved, prior to commencing commercial operation of the Phase I Expansion facilities, ETC Tiger would file First Revised Sheet No. 7 to become effective upon the in-service date of the Phase I Expansion.

risk that fuel recovery for the interruptible services provided by ETC Tiger could fail to account for utilization of the expansion facilities to provide those services. Absent the mechanism proposed herein, any such under-recovery would, through the tracking and true-up process, inappropriately result in expansion fuel costs being assessed on firm volumes on the Base System. Thus, to protect Base System firm shippers from that result, and thereby to prevent the potential risk of subsidization by Base System firm shippers of any part of the Phase I Expansion, ETC Tiger proposes to utilize the highest Total Reimbursement Percentage for IT Service, AOS and UAOS. This will ensure that ETC Tiger avoids under-recovery of fuel from those shippers who take advantage of the interruptible services that benefit from the expansion facilities.

A clear and definite Tariff fuel recovery methodology that protects existing firm shippers who contracted for Base System capacity from potentially subsidizing fuel usage associated with interruptible quantities that utilize expansion facilities is consistent with the Commission's objectives in the Certificate Policy Statement and a reasonable approach to balancing the various interests among shippers on ETC Tiger's system under the circumstances. As the Commission recognizes, the principle of cost incurrence following cost responsibility should underlie the process of cost allocation and rate design, and while the Certificate Policy Statement regarding expansion facilities is meant to ensure that there is no subsidization of expansion facilities by existing shippers, it is not meant to preclude existing shippers from paying a share of expansion costs to the extent that existing shippers benefit from expansion facilities.¹⁷ As the Commission is also aware, expansion projects often offer substantial benefits to all existing shippers, including existing firm shippers, on a pipeline system, whether by, *inter alia*, enhancing system

¹⁷ See *Texas Eastern*, *supra* note 6; *Certificate Policy Statement*, *supra* note 6, at p. 61,393 ("The Commission's no-subsidy policy recognizes that existing customers should pay the costs of projects designed to improve their service by replacing existing capacity, improving reliability, or providing additional flexibility.").

reliability and integrity, improving operational efficiencies, or expanding service flexibility. Nevertheless, while the specific benefit of additional capacity for IT Service and for AOS and UAOS becomes directly available to all shippers upon placing a system capacity expansion into service (*e.g.*, up to a total system capacity of 2.4 Bcf/d in the case of the Phase 1 Expansion),¹⁸ it is reasonable to establish a process that protects existing firm shippers on the Base System from any potential risk of their existing firm service subsidizing system usage associated with interruptible quantities, given that there is not a comparable automatic increase in the opportunity to transport firm quantities under existing firm contracts because of an expansion project.¹⁹ ETC Tiger’s proposal herein is an effective way of achieving that protection for existing firm shippers on the Base System.²⁰

The protection that would be afforded to existing firm shippers by this Application is made all the more appropriate by the high expected utilization rates on ETC Tiger’s system. For example, if the Phase I Expansion is constructed and placed in service, ETC Tiger expects to provide firm service of over 2.0 Bcf/d on any given day, given that the full 2.4 Bcf/d of proposed firm capacity on the Tiger Pipeline (Base System and Phase I Expansion) is fully subscribed and projected production levels in the Haynesville and Mid-Bossier Shale producing region are

¹⁸ See *Rockies Express*, *supra* note 14. See also *Texas Eastern Transmission Corp.*, 63 FERC ¶ 61,100 at p. 61,437 (1993) (rejecting the notion that interruptible service shippers may be “‘forced’ to subsidize other services.... [.]” stating that, “[f]irst, since IT-1 service is interruptible, it has no reservation charge. Thus, IT-1 customers are not “‘forced” to pay any rate for service. Second, because IT-1 service is discountable, if the rate is perceived to be too high, the shippers are free to negotiate a lower rate”).

¹⁹ Firm capacity does, of course, result from many expansion projects, including the Phase I Expansion. The opportunity for existing firm shippers to transport quantities on a firm basis under their existing contracts, however, does not automatically expand in a manner that is comparable to the increased opportunity that becomes available for all shippers to transport interruptible quantities because of the expanded system capacity.

²⁰ Procedurally, ETC Tiger is submitting its proposed methodology as a limited amendment to the approved Tariff to ensure that existing firm shippers who contracted for capacity on the Base System are insulated from any potential risk of inappropriately subsidizing expansion fuel usage immediately upon any expansion facilities being placed into service.

extremely robust, even at the historically low market prices that exist today.²¹ Therefore, IT Service, AOS and UAOS are even more likely to utilize expansion capacity and to fall higher on the fuel curve of ETC Tiger's system, and the potential risk for subsidization of fuel costs related to interruptible services by firm shippers on the Base System will be much higher, unless ETC Tiger's proposed methodology herein is approved. For this reason, ETC Tiger respectfully submits that it is just and reasonable that a fuel methodology be adopted on ETC Tiger's system to reflect the operational reality of fuel usage associated with IT Service, AOS and UAOS, given that the quantities received under those interruptible services are likely to be associated with the utilization of expansion facilities with incrementally higher Fuel Gas usage. Such an approach is also supported by the fact that it will establish a clear and concrete rule to protect Base System

²¹ Major producers in the Haynesville and Mid-Bossier Shale producing region continue to report outstanding results, particularly in terms of production output from further refinements and advancements in the hydraulic fracturing process and from improved drilling rig performance and well practices. *See, e.g.*, Chesapeake Energy Corporation's June 2010 Investor Presentation at p. 11, 13-14 (June 6, 2010) (noting estimated average reserves per well of 6.5 Bcfe for its Haynesville Shale holdings, with approximately 4,500 risked net undrilled wells, in addition to total proved reserves of approximately 2,503 Bcfe and total risked unproved resources of approximately 20,000 Bcfe, based on 10-Year average NYMEX strip prices at March 31, 2010), *available at* <http://phx.corporate-ir.net/External.File?item=UGFyZW50SU09NDg1ODV8Q2hpbGRJRDR0tMXxUeXBIPtM=&t=1>; EnCana Corporation's Investor Day 2010 Presentation at p. 21-30 (USA Division) (March 18, 2010) (providing overall summary of regional production and summarizing results from Haynesville Shale as "exceeding predictions" and early Mid-Bossier results are "encouraging"), *available at* <http://www.encana.com/investors/presentations/investorday/pdfs/usa-division-overview.pdf>; Royal Dutch Shell PLC's Presentation at Credit Suisse 2010 Energy Summit at p. 12 (February 5, 2010) (providing updated data on increasing initial production rates and net production rates from wells in the Haynesville Shale), *available at* http://www-static.shell.com/static/investor/downloads/presentations/2010/odum_cc_energy_summit_05022010.pdf; BG Group 2010 Strategy Presentation at p. 48-51 (February 5, 2010) (citing declining drilling times in drilling Haynesville Shale wells, even at greater depths, with "excellent" initial production rates for wells between 20 MMcf/d and 30 MMcf/d, and noting further potential of the Mid-Bossier Shale), *available at* http://www.bg-group.com/InvestorRelations/Results/Documents/2009/BG-Group_Q42009_Results_PPT.pdf; Questar Corporation's First Quarter 2010 E&P Operations Update at p. 3-4 (April 16-28, 2010) (highlighting that Questar increased its position in the core of the Haynesville Shale and reporting, as of December 31, 2009, proved reserves of 592 Bcf, with expected ultimate recovery per well of between 6 Bcf and 7 Bcf, with 48 producing wells and 276 proved undeveloped locations), *available at* http://files.shareholder.com/downloads/STR/939675734x0x368940/7d4c4eb8-c10d-46db-b6b8-6a712b69a9bb/QEP_Ops_Update_SlidesFinal_042610.pdf; Petrohawk Energy Corporation's Analyst Day Presentation (May 24, 2010) (highlighting resource potential for company's Haynesville and Mid-Bossier Shale holdings and reviewing, *inter alia*, improved stability in production growth through restricted rate production practices at the well), *available at* http://www.petrohawk.com/pdf_files/section2.pdf.

firm shippers at this point, and thereby provide up-front certainty and clarity to all parties on ETC Tiger's system about this important aspect of fuel usage.

Finally, as discussed above, GT&C Section 36 of ETC Tiger's Tariff includes a Fuel Gas and L&U tracking and true-up mechanism, which is designed to ensure that ETC Tiger does not derive any financial gain with respect to fuel usage and L&U on its system. ETC Tiger's reimbursement percentages will be adjusted pursuant to the periodic adjustments under GT&C Section 36 of the Tariff, so that any under- or over-recoveries of fuel are corrected through the true-up process. In sum, ETC Tiger's proposed methodology serves to protect existing Base System firm shippers and appropriately balances the interests of all shippers on its system, with no risk of over-recovery of fuel by ETC Tiger.

**V.
REQUIRED EXHIBITS**

ETC Tiger submits this abbreviated Application pursuant to Section 157.7 of the Commission's regulations. Accordingly, ETC Tiger has omitted certain material as inapplicable or otherwise unnecessary to disclose fully the nature and extent of the changes proposed herein. To the extent the Commission deems Exhibits not included herewith to be relevant, ETC Tiger hereby incorporates by reference such Exhibits submitted with its underlying application on August 31, 2009.

Exhibit P § 157.14(a)(18)	Substitute Sheet No. 7 is provided. A redline version showing the proposed revisions also is provided.
Notice	Attached hereto is a form of notice suitable for publication in the <i>Federal Register</i> .

**VI.
CONCLUSION**

For the foregoing reasons, ETC Tiger requests that the Commission issue an order approving the proposed amendment to its certificate authority to reflect the proposed methodology for determining the Total Reimbursement Percentages applicable to service under Rate Schedule ITS and to AOS or UAOS under Rate Schedules FTS and ITS no later than September 1, 2010.

Wherefore, for the foregoing reasons, ETC Tiger respectfully requests that the Commission grant ETC Tiger any other authorizations that may be required and grant ETC Tiger waiver of any and all Commission rules, regulations and orders, including any of ETC Tiger's Tariff provisions that may be necessary to implement the proposal set forth herein and issue an order granting the instant Application.

Respectfully submitted,

ETC TIGER PIPELINE, LLC

/s/ Joey Mahmoud

Joey Mahmoud

Dated this 15th day of June, 2010.

Vice President, Regulated Projects
Energy Transfer Partners, L.P.
711 Louisiana Street, Suite 900
Houston, Texas 77002
Phone: 832-668-1242
Email: Joey.Mahmoud@energytransfer.com

VERIFICATION

State of Texas)
) SS.
County of Harris)

Joey Mahmoud, being duly sworn upon his oath says that he is the Vice President, Regulated Projects of Energy Transfer Partners, L.P., that he has read the foregoing Application of ETC Tiger Pipeline, LLC for a Limited Amendment of Certificate Authority and knows the contents thereof, that the facts therein stated are true to the best of his knowledge and belief, and that the information on the paper copies of this filing is the same information as contained on the electronic version.

/s/ Joey Mahmoud

Joey Mahmoud

Subscribed and sworn to before me
this __ day of _____, 2010

Notary Public

CURRENTLY EFFECTIVE REIMBURSEMENT PERCENTAGES

REIMBURSEMENT PERCENTAGES FOR FUEL GAS
 AND LOST AND UNACCOUNTED FOR GAS: 4/

	Fuel Gas		L&U 3/	Total
	-----		-----	-----
Receipts at or West of Highway 789	1.09	1/	0.15	1.24%
Receipts East of Highway 789	0.76	2/	0.15	0.91%

1/ Fuel Gas (West of Highway 789):	Current	1.09 %
	Deferred	. %
	Total	1.09 %
2/ Fuel Gas (East of Highway 789):	Current	0.76 %
	Deferred	. %
	Total	0.76 %
3/ Lost and Unaccounted For Gas (L&U):	Current	0.15 %
	Deferred	. %
	Total	0.15 %

4/ The Total Reimbursement Percentage (including L&U) applicable to Shippers under Rate Schedule ITS, and to any Authorized Overrun Service or Unauthorized Overrun Service under Rate Schedules FTS and ITS, shall be the highest Total Reimbursement Percentage set forth on this Sheet No. 7 according to whether the particular quantities are received by TIGER at Point(s) located at or West of Highway 789 or East of Highway 789.

CURRENTLY EFFECTIVE REIMBURSEMENT PERCENTAGES

REIMBURSEMENT PERCENTAGES FOR FUEL GAS
AND LOST AND UNACCOUNTED FOR GAS: 4/

	Fuel Gas		L&U 3/	Total
	-----		-----	-----
Receipts at or West of Highway 789	1.09	1/	0.15	1.24%
Receipts East of Highway 789	0.76	2/	0.15	0.91%

1/ Fuel Gas (West of Highway 789):	Current	1.09 %
	Deferred	. %
	Total	1.09 %
2/ Fuel Gas (East of Highway 789):	Current	0.76 %
	Deferred	. %
	Total	0.76 %
3/ Lost and Unaccounted For Gas (L&U):	Current	0.15 %
	Deferred	. %
	Total	0.15 %

4/ The Total Reimbursement Percentage (including L&U) applicable to Shippers under Rate Schedule ITS, and to any Authorized Overrun Service or Unauthorized Overrun Service under Rate Schedules FTS and ITS, shall be the highest Total Reimbursement Percentage set forth on this Sheet No. 7 according to whether the particular quantities are received by TIGER at Point(s) located at or West of Highway 789 or East of Highway 789.