

Rover Pipeline LLC
FERC Docket No. CP15-93-000
Rover Pipeline Project
Response to FERC Data Request dated July 17, 2015
Filed July 24, 2015

1. The Commission issued a data request on June 11, 2015 which requested that Rover provide workpapers underlying its Exhibit P. Rover's Exhibit P, page 3, line 8, identifies an estimated cost of service of \$1,030,928,152. However, in Rover's response dated July 1, 2015, Rover provided workpapers that show on Exhibit P, page 3, line 8, an estimated cost of service of \$1,002,760,749.
 - a. Identify which cost of service figure Rover is proposing to recover through its proposed initial rates.
 - b. Reconcile Rover's cost of service provided in its July 1, 2015 response with its proposed cost of service, including, as necessary, revised Exhibits K, O, and N. The reconciliation should show the line item changes by account and zone, as appropriate.

Response:

- a. Rover is proposing to recover the estimated cost of service included in its response dated July 1, 2015, of \$1,002,760,749. See also response to 1.b. below.
- b. See Attachment_Staff-Rover-1.b_Revised Exhibit K.xlsx, Attachment_Staff-Rover-1.b_Revised Exhibit O.xlsx, and Attachment_Staff-Rover-1.b_Revised Exhibit N.xlsx, and Attachment_Staff-Rover-1.b_Revised Exhibit P.xlsx. Rover has recalculated its AFUDC for the various segments' separate in-service dates. As a result of this recalculation, the overall plant and depreciation amounts have been changed, along with return and taxes. The Revised Exhibit N reflects all these changes. In addition, Revised Exhibit O reflects the new plant amount used to calculate depreciation expense. Finally, Revised Exhibit P reflects the revised rates, based on the revised cost of service, to be effective either December 1, 2016, or June 1, 2017, depending on the in-service dates of the various segments.

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2. The Commission's June 11, 2015 data request stated that Rover provide workpapers underlying its proposed rate design and proposed initial reservation and usage charges. Rover's Exhibit P, page1, lines 1-3, proposed a single initial rate for the Supply Area. However, in Rover's response dated July 1, 2015, Rover provided workpapers that show on Exhibit P, page 1, lines 1-3, two sets of initial rates for the Supply Zone reflecting the phasing into service of facilities in the Supply Zone. Identify which set of rates Rover is proposing as initial rates.

Response:

Rover is proposing rates beginning December 1, 2016 for the Supply Area (Early In-Service), Mainline Area, and the Market Area-South. On June 1, 2017, Rover would propose the rates shown for the total Supply Area, and the Market Area-North. See also Attachment_Staff-Rover-1.b_Revised Exhibit P.xlsx.

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3. The Commission's June 11, 2015 data request included a request that Rover identify and support reservation, usage and fuel charges applicable to backhauls. Rover's July 1, 2015 data response stated that the information was "Submitted herein under Attachment 8A is: Attachment_Staff-Rover-8.pdf."
- a. Attachment_Staff-Rover-8.pdf does not appear in the Commission's records. Please refile this document.
 - b. Rover submitted pro forma tariff records that appear to propose reservation, usage and fuel charges for various forward haul transportation paths. Are the charges reflected on these pro forma tariff records Rover's revised proposed initial rates?
 - c. The Commission's June 11, 2015 data request included requests for Rover to identify its proposed reservation, usage and fuel charges for forward and backhaul transportation capacity paths. Please respond to these questions.

If Rover is proposing to modify its cost of service, rate design and initial rate proposals as contained in its application, all exhibits that reflect the modified proposal should be clearly identified as revised exhibits. Any revised exhibit that reflect calculations should also be filed in spreadsheet format consistent with the instructions for electronic filing provide in the June 11, 2015 data request.

Response:

- a. See attached file: Data Request Response_07012015_8.pdf.
- b. Yes, the revised proposed rates reflect the changes to the proposed costs of service for the various areas/segments, as well as the two different in-service dates of either December 1, 2016, or June 1, 2017.
- c. See the revised proposed tariff sheets which, depending on the proposed effective date, reflect the proposed reservation, usage and fuel charges for forward and backhaul for each of the various areas/segments.

Rover has revised its cost of service, rate design and initial rates that were contained in its application, and has included in response to Data Request No. 1, Revised Exhibits K, N, O, and P.

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