

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Revised Filing and Reporting Requirements
For Interstate Natural Gas Company
Rate Schedules and Tariffs

Docket No. RM21-18

Comment of Public Citizen, Inc.

Established in 1971, Public Citizen is a national, not-for-profit, non-partisan, research and advocacy organization representing the interests of household consumers. Public Citizen is active before FERC promoting just and reasonable rates, and supporting efforts for utilities to be accountable to the public interest. Financial details of our operations are available on our website.¹

We support the proposed rulemaking's efforts to improve disclosures required for rate proceedings for the 145 Commission-jurisdictional natural gas pipelines.

However, additional disclosure improvements are required to ensure the public has access to accurate information about the companies that secure shipping capacity on these pipelines. Currently, the Commission's regulations at 18 CFR § 284.13(b) delegates such reporting to the pipelines, allowing pipeline companies to post shipper's information on their "Internet web site", rather than having the Commission publish such information in a centralized format on FERC's web site. Pipeline compliance with this rule appears to be haphazard, with pipeline companies prioritizing their own web site content and making it difficult, and sometimes impossible, to find the FERC-required disclosures. In addition, the Commission's rules only require limited archived information of up to 90 days, and most pipeline companies charge the public money to access material older than 90 days, which impedes the public interest—for example, if journalists or the public seek information on shippers that had pipeline capacity during a significant pricing emergency (such as with last year's winter storm Uri), access to basic data may be subject to onerous fees charged and payable to pipeline companies. This is an unreasonable barrier that is inconsistent with the public interest.

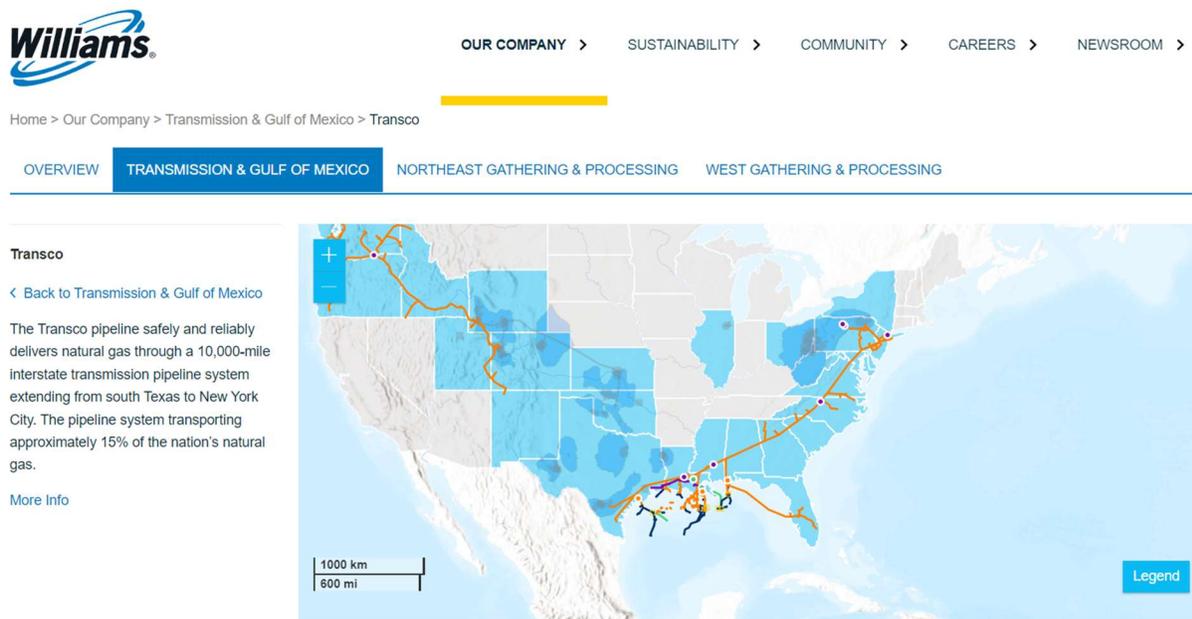
¹ www.citizen.org/about/annual-report/

Therefore, we ask the Commission to expand this proposed rulemaking to overhaul pipeline company reporting requirements to be replaced with FERC posting shippers' and other information on the government's web site, and provide the public with free archival access.

The Commission's rules that rely upon pipeline owners to make information available about shippers and other critical disclosure information per 18 CFR § 284.13(b) is haphazard and ineffective. Some pipeline companies' information is impossible to locate, while others keep the required information on domains and websites separate from their primary corporate website, making it difficult for the general public to locate the information as required by FERC.

Let's take Williams Company, which operates a number of FERC-jurisdictional pipelines. Despite FERC regulations requiring Williams to post information on its website, we are unable to find it. When a user Google's Williams Transco pipeline, you are typically sent to this landing page

www.williams.com/our-company/operations/



But this website contains no links or information to get shippers information, as required by FERC's regulations. Perhaps Williams posts it elsewhere on some other operations website, but it is not clearly linked from the main Williams pipeline operations page, and we have been unable to find it.

Enbridge’s web site has a similar problem. The primary website – www.enbridge.com/about-us/natural-gas-transmission-and-midstream – does not provide any easy-to-find link to the shipper’s information. Instead, the shipper information is hosted on an entirely different domain that does not readily come up in google searches: <https://infopost.enbridge.com/>

Kinder Morgan features a convoluted process to obtain information required by FERC. The user starts at the Kinder Morgan home page www.kindermorgan.com and from there the user must select the “Operations” tab, and if the user then clicks on “Tariffs”, you have to scroll all the way to the bottom of the page which announces: "To view tariffs for interstate natural gas pipelines, please visit our Interactive Website (EBB)." This link brings the user to a different domain: <https://pipeline.kindermorgan.com/>

Now let’s take TransCanada’s ANR Pipeline. When a user googles that, they are directed to this website: www.tcenergy.com/operations/natural-gas/anr-pipeline/ . The “Documents and Maps” section contains no shipper information, and neither does the “Regulations” link. Instead, the user has to unintuitively scroll to the very bottom of the TC page, to a link “Customer Portal”—marked by us with a red circle in this screenshot:



Clicking on “Customer Central” sends the user to this URL

www.tcenergy.com/customer-central/

From there, the user can choose the pipeline of interest, so let’s take ANR, which then takes the user to this link: https://www.anrpl.com/company_info/

From THAT link, you then have to click on “Informational Postings”, which then directs the user to yet another, separate domain: <http://ebb.anrpl.com/>

This is an absurd path for the general public to access information required by federal regulators.

In conclusion, we ask at the Commission expand this proposed rulemaking to modify 18 CFR § 284.13(b) to have the Commission post the reporting requirements on FERC's web site, rather than delegating to the pipeline companies.

Respectfully submitted,

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