

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

Enable Gas Transmission, LLC)

Docket No. CP14-____-000

**ABBREVIATED APPLICATION FOR
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AND ORDER PERMITTING AND APPROVING CONSTRUCTION &
ABANDONMENT**

Pursuant to Sections 7(b) and 7(c) of the Natural Gas Act (“NGA”) and Subpart A of Part 157 of the Federal Energy Regulatory Commission’s (“Commission”) regulations, Enable Gas Transmission, LLC (“EGT”) hereby requests authority for the Central Arkansas Pipeline Enhancement Project (“Project”) to abandon and replace certain facilities in order to provide continued safe, reliable, and efficient transportation of natural gas service to the towns of Conway, Mayflower, Maumelle, North Little Rock, and Little Rock; all located in Pulaski and Faulkner Counties, Arkansas. Specifically, EGT proposes to construct approximately 28.5 miles of 12-inch pipeline (new Line BT-39), approximately 230 feet of 4-inch pipeline (new Line BT-40), and approximately 1,400 feet of 4-inch pipeline (new Line BT-41), as well as the installation of delivery points and necessary appurtenant facilities. In conjunction with the construction, EGT proposes to retire an approximately 21.7 mile-long segment of existing Line B, abandon by sale an approximately 12.4 mile-long segment of existing Line BT-14 and the entire line BT-19 (consisting of 1,024 feet) to EGT’s affiliated distribution business, CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Arkansas Gas (“CERC”), abandon in its entirety existing Line BM-1, and reconfigure Line BM-21.

EGT estimates that the capital cost of the Project will be approximately \$55 million, which will be financed by available funds and/or short term borrowings (see Exhibit K). If EGT

is able to obtain certificate authority to construct and operate the Project from the Commission by February 2014, EGT anticipates being able to place the Project in service by October 2014. Any delay in EGT's receipt of certificate authorization to construct and operate the Project will result in an equal delay in the anticipated in-service date of the proposed facilities. In support of this application, EGT submits the following:

I.

COMMUNICATIONS

All correspondence and communications with respect to this application are to be sent to the following:

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* It is requested that these persons be included on the Commission's official service list pursuant to Section 385.2010(c) of the Commission's Regulations, and it is requested that all of the parties

listed herein be included on the service roster and sent copies.

II.

GENERAL INFORMATION

EGT's exact legal name is Enable Gas Transmission, LLC.¹ EGT is a limited liability corporation organized and existing under the laws of the state of Delaware. Its principal office is located at 1111 Louisiana Street, Houston, Texas 77002. EGT is a wholly-owned subsidiary of Enable Midstream Partners, LP (“Enable Midstream”), which is a limited partnership jointly owned by CenterPoint Energy, Inc., OGE Energy Corp. and ArcLight Capital Partners, LLC. Enable Midstream is a midstream company with complementary transmission, gathering, processing, compression and storage assets.

EGT is a natural gas company within the meaning of the NGA and is subject to the Commission's regulatory jurisdiction. EGT provides open access transportation services pursuant to a certificate issued by the Commission in Docket No. CP88-820-000 and the Commission's Regulations found at 18 C.F.R. Part 284. EGT, on behalf of various shippers, transports and delivers natural gas to distributors for resale and ultimate public consumption, to industrial customers for their own use and consumption, to gas-fired power generators, and to third party pipeline interconnects located in the states of Arkansas, Kansas, Louisiana, Mississippi, Missouri, Oklahoma, Tennessee and Texas.

III.

BACKGROUND

Line BT-14 was constructed in 1954 for petrochemical service and was converted to provide natural gas service prior to EGT’s predecessor acquiring the line. The line was acquired

¹ On July 30, 2013, CenterPoint Energy Gas Transmission Company, LLC changed its name to Enable Gas Transmission, LLC.

in 1987 to receive additional gas supply from the Arkoma Basin and was certificated in Docket No. CP87-445.² Currently, Line BT-14 consists of 129 miles of 12-inch pipe located in the following counties in Arkansas: Sebastian, Franklin, Logan, Yell, Pope, Conway, and Faulkner. The existing pipeline transports natural gas from the western side of Arkansas, near the city of Fort Smith, eastward where it terminates and connects with EGT's Line JM-30 at the point of interconnection with Enable Mississippi River Transmission, LLC's Line A-294 near Vilonia, AR, delivering gas to the cities of Russellville, Morrilton, Plumerville, Menifee, Conway and Little Rock along the way. The maximum allowable operating pressure ("MAOP") of Line BT-14 is 901 psig.

A segment of Line BT-14 is located within the City of Conway, AR, and traverses multiple subdivisions, several golf courses, the University of Central Arkansas campus, industries, and the Conway airport. When EGT originally acquired Line BT-14, the pipeline was not located along highly populated areas. However, over the past several decades the City of Conway has grown and significant residential, commercial, and industrial encroachment has occurred. Due to this encroachment and to ensure safe operations, EGT has operated this segment of Line BT-14 at pressures lower than the line's certificated MAOP. Currently, EGT reduces the pressure on the line upstream of Conway, AR and holds the pressure around 545 psig going through the city.

Within the same vicinity, as depicted in Exhibit F, EGT also operates Line B, which was certificated in Docket No. G-252³ to transport natural gas from northwest Arkansas producing areas to the Little Rock area. Currently, Line B consists of approximately 86 miles of 10-inch, mostly bare-coupled pipe located in Johnson, Pope, Conway, Faulkner, and Pulaski Counties,

² See *Arkla Energy Resources*, 44 F.E.R.C. ¶61,020 (1988).

³ See *Arkansas Louisiana Gas Company*, 3 FPC 910 (1943).

Arkansas. The existing pipeline primarily delivers natural gas to CERC's distribution systems serving the towns of Clarksville, Knoxville, Atkins, Morrilton, Plumerville, Menifee, Conway, Mayflower, and Little Rock, along with other small towns in northern Arkansas. The MAOP of Line B is 500 psig.

The proposed Project will provide for the continued safe, reliable, and efficient transportation of natural gas to the central Arkansas cities and towns of Conway, Mayflower, Maumelle, North Little Rock, and Little Rock. The Project provides EGT with the opportunity to install new pipeline facilities to more efficiently operate its pipeline system, better serve its current customers, and remediate encroachment issues, while also laying the groundwork for additional pipeline capacity to meet future growth, as needed. As part of the Project, EGT will also retire from service some existing pipeline assets and transfer ownership of some other existing pipeline infrastructure to CERC. Such realignment and repurposing of existing pipeline infrastructure will provide for cost savings and more efficient delivery of natural gas in the Project area, all of which should benefit EGT's customers.

IV.

DESCRIPTION OF FACILITIES

A. Facilities Relating to the Abandonment of Segment of Line BT-14

In order to remediate encroachment issues and more efficiently operate its pipeline system, EGT proposes to abandon by sale a 12.4 mile segment of Line BT-14, extending from station 5835+00 to 6481+99, to CERC along with appurtenant facilities. CERC will incorporate this segment of pipe into its existing low-pressure distribution system. Due to the abandonment by sale of the 12.4 mile section of Line BT-14 and to accommodate associated system reconfigurations, EGT will also abandon, construct, or modify the following facilities:

Facility	Description	Location	Method
Line BM-21 ⁴	Abandon 2,000 feet of 4-inch Line BM-21 and the connecting 4-inch tap on Line B	Currently, Line BM-21 receives gas from Line B (at line plus location 1402+66). The system reconfiguration will connect Line BM-21 to Line BT-14 on the west side of Conway, AR, at the Highway 64 TBS	Abandon the segment in place and remove the OPP regulator station at the beginning of the line
Conway TBS No. 6	Abandon 4-inch metering facilities Certificated in Docket No. CP82-384	Line BT-14 (at line plus location 6162+31)	Aboveground metering facilities will be removed, and the meter lot will be sold to CERC.
Line BT-19 ⁵	Abandon entire line consisting of 1,024 ft. of 6-inch pipe	This line extends between the section of Line BT-14 at line plus 5942+30 and Line BM-1	Line BT-19 and interconnecting tap will be sold to CERC. Aboveground facilities will be removed.
Shoemaker Road TBS	Install 4-inch metering facilities, pig receiver, 6-inch tap and appurtenances to serve CERC	BT-14 (at line plus 6482+15)	Modification and expansion of existing block valve site
Hwy 64 TBS	Install BT-39 pig launcher, BT-14 pig receiver, 4-inch tap off of Line BT-14 along with overpressure protection to serve BM-21, and a 6-inch tap off of new Line BT-39 along with 4-inch metering facilities and appurtenances to serve CERC	Extending from a new interconnect with Line BT-14 on the west side of the city of Conway (at line plus 5835+00); this is the origin of new Line BT-39 pipeline.	New Installation of above ground facilities

⁴ Line BM-21 was certificated in Docket No. CP68-334. *See Arkansas Louisian Gas Company*, 40 F.P.C. 349 (1968).

⁵ Line BT-19 was originally certificated under Docket No. CP98-401 and currently serves as a supplemental feed to EGT's Line BM-1, which feeds the Conway TBS No. 1.

B. Facilities Relating to the Construction of New Line BT-39 and the Associated

Abandonment of a Section of Line B

EGT proposes to abandon a portion of Line B (approximately 21.7 miles of 10-inch pipeline and appurtenances) from 273+23 to 1428+20 in place as depicted on the Project map submitted in Exhibit F and replace this segment with a new larger diameter pipeline, 12-inch Line BT-39, which will be installed using new right of way. Line BT-39 will consist of approximately 28.5 miles of 12-inch pipeline with an MAOP of 901 psig to be located in Faulkner and Pulaski Counties, Arkansas, and will provide replacement transmission service for a portion of EGT’s Lines B and BT-14. Line BT-39 will begin at an interconnection with the higher pressure Line BT-14 on the west side of Conway, AR, at the Highway 64 TBS mentioned above and will extend to Line B’s current termination point north of Little Rock at the Oak Grove TBS. In conjunction with the replacement of the portion of Line B, the following facilities will be abandoned, constructed, or modified:

Facility	Description	Location	Method
Line BT-40	Install a delivery lateral consisting of 230 feet of 4-inch steel pipe with an MAOP of 901 psig	Extending from a 4-inch tap (at line plus 1447+66) on proposed Line BT-39 to the new James Road TBS	New installation
Line BT-41	Install a delivery lateral consisting of 1,400 feet of 4-inch steel pipe with an MAOP of 901 psig	Extending from a 4-inch tap (at line plus 1246+30) on proposed Line BT-39 to the existing Morgan TBS	New Installation
Bryant Road TBS #2	Install 12-inch Mainline valve (MLV) setting, 6-inch tap and 4-inch metering facilities to serve CERC for the city of Conway .	Line plus 409+51 on proposed Line BT-39	New Installation

HWY 365 TBS	Install 12-inch Mainline valve (MLV) setting, 6-inch tap and two 2-inch metering facilities to serve CERC for the cities of Maumelle and Mayflower .	Line plus 907+10 on proposed Line BT-39	New Installation
James Rd TBS	Install 2-inch metering facility serving CERC for the city of North Little Rock	End of proposed Line BT-40	New Installation
Morgan TBS	Install 2-inch metering facility serving CERC for the city of North Little Rock	End of proposed Line BT-41	Modification of existing station
Oak Grove TBS	Install 12-inch pig receiver, filter separator, 6-inch tap and 6-inch meter station serving North Little Rock and Little Rock, AR.	End of Proposed Line BT-39	Modification of existing station
Line BM-1 ⁶	Abandon entire line consisting of 797 ft. of 6-inch pipe along with the Line B interconnect and overpressure protection regulation	This line extends between a section of Line B to be retired (at line plus 1299+09) and Conway TBS No. 1	Removing above ground facilities
Conway TBS No. 1	Abandon 4-inch station includes: check meter, overpressure protection, regulation, and measurement Certificated in Docket No. G-252 ⁷	End of Line BM-1	Removing above ground facilities

Additional town border stations, rural extensions, and domestic delivery points along the segment of Line B to be replaced and a domestic delivery point located on Line BM-1 will be abandoned pursuant to Section 157.216(a) of the Commission's Regulations (18 C.F.R.

⁶ Line BM-1 was originally certificated under Docket No. G-252 [See *Arkansas Louisiana Gas Company*, 3 F.P.C. 910 (1943)] and currently serves as a supplemental feed to the Conway TBS No. 1.

⁷ See *Arkansas Louisiana Gas Company*, 3 F.P.C. p. 910 (1943).

§157.216(a)) once the Project is complete; all service will continue via the delivery taps described above, will be abandoned based on written consent from the customer, or has been inactive for over 12 months.

The flow diagrams and data included in Exhibits G through G-II attached hereto in Volume III reflect the proposed new facilities impact on existing operational capabilities and conditions of EGT's system.

IV.

PUBLIC CONVENIENCE AND NECESSITY

The Project's design was selected based an evaluation of logical tie-in points, landowner concerns, minimization of environmental impacts, and proximity to EGT and CERC's existing pipeline system/footprint. The proposed Project will enhance EGT's ability to reliably and safely continue to provide service to residential and industrial customers in the central Arkansas area and accommodate future growth. EGT verifies that the proposed activity for which approval is requested complies with the requirements of Part 157 of the Commission's Regulations. The facilities described herein will not adversely affect any customers or service.

EGT submits that the significant benefits of the instant proposal clearly outweigh any minimal adverse impacts. Thus, the Commission should find that the replacement of the facilities by abandonment and construction described herein serves the public convenience and necessity.

V.

ENVIRONMENTAL MATTERS

A. Overview of NEPA Pre-Filing Process

On March 18, 2013, EGT filed to commence the Pre-Filing ("PF") process on the Project under Docket No. PF13-10. The Commission Staff accepted EGT's request on March 28, 2013.

The PF process provided EGT with opportunities to introduce the Project to Commission Staff and to stakeholders, discuss issues, and identify material issues or concerns before filing this application. To facilitate stakeholder communication and public involvement, EGT conducted an open house on May 21, 2013; which included an overview of the proposed Project and opportunities for discussions with company personnel. Further, pursuant to the Commission's Notice of Intent to prepare an Environmental Assessment,⁸ the Commission established a scoping period for the Project which ended on June 28, 2013. The Commission and EGT encouraged affected parties to comment on their areas of concern. The FERC received several comments from affected landowners, and EGT formally addressed those comments in a response submitted to the Commission on July 12, 2013. Additionally, the Osage National Historic Preservation Office requested an opportunity to review the cultural resources reconnaissance survey report for the Project, and EGT has provided that tribe with the requested information.

B. Overview of the Environmental Impacts

EGT has designed the Project to minimize adverse environmental impacts identified during the development, route selection, and PF process. EGT performed environmental studies, conducted cultural research, performed detailed field investigations, implemented the Commission's primary parameters for major route selection, and developed localized reroutes to avoid specific impacts. Through this process, EGT has developed a proposed route that avoids or minimizes adverse impact on any threatened or endangered species. EGT ensures compliance with the Commission's Upland Erosion Control Revegetation and Maintenance Plan ("Plan") and Wetland and Waterbody Construction and Mitigation Procedures ("Procedures") in order to

⁸ On May 29, 2013, the Commission Issued a *Notice of Intent to Prepare an Environmental Assessment For the Planned Central Arkansas Pipeline Enhancement Project and Request For Comments on Environmental Issues*.

limit any adverse impacts. Additionally, the Project will have minimal impact on landowners or surrounding communities.⁹

Pursuant to the provisions of the Pipeline Safety Improvement Act of 2002, EGT certifies that the facilities proposed herein will be constructed, operated and maintained in accordance with the requirements of Title 49, Part 192, of the Code of Federal Regulations and any superseding federal or state safety code applicable to such facilities. In accordance with 18 C.F.R. Part 380 of the Commission's Regulations, EGT submits herewith, in Volumes I through IV, the environmental data Exhibits relating to the construction and abandonment of the proposed facilities. EGT will comply with all applicable environmental and safety regulations. EGT also submits that the Project will be constructed in a manner intended to minimize any adverse environmental impacts, and that its Environmental Report included herewith as Exhibit F-1 supports the conclusion that the proposal will not have a significant environmental impact and that the requested authorization will not constitute a major federal action significantly affecting the quality of the human environment.

VI.

EXHIBITS

Pursuant to the rules for abbreviated applications under Section 157.7 of the Commission's Regulations (18 C.F.R. §157.7), the following lists the exhibits required for this Application under the Commission's Regulations. Such exhibits are attached or omitted for the stated reasons.

Exhibit A **Articles of Incorporation and By-Laws**
Submitted herewith.

⁹ EGT has notified the affected landowners of the proposed Project. In accordance with Section 157.6(d) of the Commission's Regulations (18 C.F.R. §157.6(d)), EGT will also make a good faith effort to again notify all affected landowners once the Commission issues its Notice of EGT's application for the Project.

- Exhibit B** **State Authorizations**
Submitted herewith.
- Exhibit C** **Company Officials**
Submitted herewith.
- Exhibit D** **Subsidiaries and Affiliations**
EGT is a wholly-owned subsidiary of Enable Midstream Partners, LP
- Exhibit E** **Other Pending Applications and Filings**
Omitted. Not applicable. EGT does not have applications or filings currently pending under Sections 1, 3, 4, 7 of the Natural Gas Act that directly and significantly affect this Application.
- Exhibit F** **Location of Facilities**
Submitted herewith.
- Exhibit F-1** **Environmental Report**
Environmental Resource Reports are submitted herewith.
- Exhibit G** **Flow Diagrams Showing Daily Design Capacity and Reflecting Operation of Applicant’s System Before Construction**
CEII data submitted in Volume III – Do Not Release
- Exhibit G-1** **Flow Diagrams Showing Daily Design Capacity and Reflecting Operation of Applicant’s System After Construction**
CEII data submitted in Volume III – Do Not Release
- Exhibit G-II** **Flow Diagram Data**
CEII data submitted in Volume III – Do Not Release
- Exhibit H** **Total Gas Supply Data**
Omitted. Not applicable.
- Exhibit I** **Market Data**
Omitted. Not applicable.
- Exhibit J** **Federal Authorizations**
Submitted herewith.
- Exhibit K** **Cost of Facilities**
Submitted herewith.
- Exhibit L** **Financing**
Omitted. The facilities proposed herein will be financed from available funds and/or short-term borrowings.

- Exhibit M** **Construction, Operation, and Management**
Omitted. Construction will be done by EGT and/or one or more independent construction firms under the direct supervision of EGT personnel. EGT will manage and operate the facilities.
- Exhibit N** **Revenues—Expenses—Income**
Omitted. Not applicable.
- Exhibit O** **Depreciation and Depletion**
Omitted. EGT will depreciate the facilities proposed herein using its existing depreciation rate for transmission plant as adjusted from time to time.
- Exhibit P** **Tariff**
Omitted. Not applicable.
- Exhibit T** **Related Applications**
Omitted. There are no other related applications pending before the Commission.
- Exhibit U** **Contracts and Other Agreements**
Submitted herewith.
- Exhibit V** **Flow Diagrams**
See Exhibits G through G-II
- Exhibit W** **Impact on Customers Whose Service Will Be Terminated**
Omitted. Not applicable.
- Exhibit X** **Effect of the Abandonment on Existing Tariffs**
Omitted. Not applicable.
- Exhibit Y** **Accounting Treatment of Abandonment**
Attached hereto is the accounting entry reflecting the proposed abandonments.
- Exhibit Z** **Location of Facilities**
See Exhibits F & F-1.
- Exhibit Z-1** **Federal Register Notice**
Attached.

VII.

CONCLUSION

For the above reasons EGT requests that, as expeditiously as possible, the Commission issue an order granting the abandonment and construction authorization requested by EGT herein and that the Commission grant such other authority as may be necessary and appropriate.

Respectfully submitted,
Enable Gas Transmission, LLC



B. Michelle Willis
Manager - Regulatory and Compliance

Dated: November 25, 2013