



Oil Pipeline Filing

SFPP, L.P.

December 7, 2020

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington DC 20426

Dear Secretary Bose:

In accordance with the requirements of the Interstate Commerce Act (“ICA”) and the Rules and Regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”), SFPP, L.P. (“SFPP”) submits for filing the following tariff, effective January 1, 2021:

- FERC Tariff No. 197.16.0, a local tariff covering interstate transportation from El Paso and Diamond Junction, Texas, to Lordsburg, New Mexico, and Tucson and Phoenix, Arizona (SFPP’s “East Line”). The Tariff cancels FERC Tariff No. 197.15.0.

Contemporaneously with this filing, SFPP is also submitting to the Commission a joint offer of settlement pursuant to Rule 602, 18 C.F.R. § 385.602 (2020) that will be noticed in FERC Docket Nos. IS09-437 *et al.*, which, if approved, shall resolve all disputes pending before the Commission as to SFPP’s East Line rates (“East Line Settlement”). SFPP has requested expedited consideration of the East Line Settlement.

Under the terms of the East Line Settlement, SFPP has committed to file FERC Tariff No. 197.16.0, which significantly reduces its East Line rates, and to make this rate reduction filing contemporaneously with submission of the East Line Settlement to the Commission. In the hope that Commission approval of the East Line Settlement may be obtained on an expedited basis, SFPP respectfully requests that FERC Tariff No. 197.16.0 be effective January 1, 2021.

SFPP recognizes that, because it is filing its reduced East Line rates in advance of the Commission’s review of, and opportunity to act upon, the East Line Settlement, FERC Tariff No. 197.16.0 cannot properly be submitted under Rule 602. Therefore, SFPP presents FERC Tariff No. 197.16.0 as a filing under 18 C.F.R. § 342.3(a) to reduce SFPP’s East Line rates below the current ceiling levels applicable to such rates. If the Commission approves the East Line Settlement prior to January 1, 2021, then SFPP shall make a subsequent filing to reduce the ceiling levels to the level of the reduced rates provided for in the settlement under Rule 602. If the East Line Settlement has not been approved prior to January 1, 2021, then SFPP will withdraw FERC Tariff No. 197.16.0 and resubmit the reduced rates under Rule 602 if and when the Commission has so approved.

SFPP requests special permission to submit FERC No. 197.16.0 on twenty-four days’ notice under authority of 18 C.F.R. §341.14 and §341.2, in order to have the settlement rates go into effect on January 1, 2021. SFPP submits that good cause exists for granting this request because permitting FERC No. 197.16.0 to become effective on less than thirty days’ notice will benefit its shippers because it will permit SFPP to

begin offering lower rates to shippers as soon as possible. Permitting SFPP to submit FERC No. 197.16.0 on twenty-four days' notice is also consistent with the Commission's May 8th policy statement supporting prompt action in addressing adverse pandemic impacts and specifically encouraging resolution of controversies between oil pipelines and their customers. *Commission Action to Address Effects of COVID-19 on Oil Pipelines*, Docket No. PL20-6, 171 FERC ¶ 61,108, at PP 2, 4 & 7 (2020). SFPP acknowledges that this tariff publication is conditionally accepted subject to refund pending a thirty-day review period.

SFPP is also making administrative changes to FERC Tariff No. 197.16.0 largely to align it with the East Line Settlement. Specifically, SFPP is (1) revising the cover page to reflect the regulation under which this tariff filing is being made, (2) cancelling language on the cover page that indicates the rates set forth were calculated according to certain previous Commission orders, (3) revising the cover page to reflect a new issuer, (4) removing the suspension notice from the body of the tariff because it will be inapplicable upon the Commission's approval of the East Line Settlement. SFPP is making no other changes to FERC Tariff No. 197.16.0.

I hereby certify that copies of this filing have been sent, on or before this date, by means of transmission agreed upon, to all subscribers on the SFPP subscriber list.

In accordance with 18 C.F.R. § 343.3(a), SFPP hereby requests that any protest of the attached tariff be emailed to SFPP in care of the undersigned at Tariff_Group@kindermorgan.com.

If you have any questions regarding this tariff filing, please contact me at (713) 420-4687.

Sincerely,

A handwritten signature in black ink that reads "Bruce Reed". The signature is written in a cursive, slightly slanted style.

Bruce Reed
Director-Tariffs and Regulatory Affairs