



Cardinal Pipeline Company, LLC  
2800 Post Oak Boulevard  
P. O. Box 1396  
Houston, Texas 77251-1396

December 20, 2018

Ms. M. Lynn Jarvis  
Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

Reference: Docket No. M-100, Sub 148 – The Federal Tax Cuts and Jobs Act  
Docket No. G-39, Sub 42

Dear Ms. Jarvis:

On October 25, 2018, Cardinal Pipeline Company, LLC (“Cardinal”) filed its proposal to adjust its rates to reflect a reduction in the federal corporate income tax rate from 35% to 21% effective January 1, 2018 in compliance with the North Carolina Utilities Commission (“NCUC” or “Commission”) Order Addressing the Impacts of the Federal Tax Cuts and Jobs Act on Public Utilities issued on October 5, 2018 in Docket No. M-100, Sub 148. On November 9, 2018, Cardinal filed a revised proposal based on its discussions with the Public Staff to properly reflect the reduction in the federal corporate income tax (“November 9 Filing”). On December 17, 2018, the NCUC issued, in Docket No. M-100, Sub 148 and Docket No. G-39, Sub 42, an Order Requiring Filing of Revised Proposal (“December 17 Order”) directing

Cardinal to refile its proposal to provide for interest since January 1, 2018 on the provisionally collected revenues. The December 17 Order also grants Cardinal's request for a waiver of time to flow back the federal EDIT until March 15, 2022.

In compliance with the December 17 Order, Cardinal now submits for filing revised calculations, which reflect interest on the provisionally collected revenues as described further herein. Also included in the instant filing are the following revised tariff sheets to adjust its rates to reflect a reduction in the federal corporate income tax rate from 35% to 21% effective January 1, 2018: Twenty-Fourth First Revised Sheet No. 1, effective January 1, 2018 and Twenty-Fifth First Revised Sheet No. 1, effective April 1, 2018. Cardinal respectfully requests approval of its revised calculations and the revised tariff sheets to reflect the decrease in the federal corporate income tax rate as further described herein.

Any communications regarding this filing should be sent to:

Cardinal Pipeline Company, LLC  
c/o Cardinal Operating Company, LLC  
Charlotte A. Huston  
Director, Rates & Regulatory  
P.O. Box 1396  
Houston, Texas 77251  
Telephone: (713) 215-4060  
Email: [charlotte.a.hutson@williams.com](mailto:charlotte.a.hutson@williams.com)

Cardinal Pipeline Company, LLC  
c/o Cardinal Operating Company, LLC  
Carolyn K. McCormick  
Attorney  
P.O. Box 1396  
Houston, Texas 77251  
Telephone: (713) 215-4197  
Email: [carolyn.mccormick@williams.com](mailto:carolyn.mccormick@williams.com)

### **Calculation of Refund and Interest**

In the December 17 Order, the NCUC directed Cardinal to refile its proposal to reflect new calculations revising its rates to provide for interest on the provisionally collected revenues within 10 days of the issuance of the order. Cardinal hereby submits the attached Second Revised Exhibit C which shows the calculation of the proposed refund, including

interest at the overall weighted cost of capital, by shipper.

Page 1 of the Second Revised Exhibit C provides a summary by month of the calculation of the difference in revenue under Cardinal's current rates and under the rates proposed by Cardinal in the November 9 Filing and the associated interest. In total, Cardinal is refunding \$901,265.84. Of the \$901,265.84, the provisionally collected revenue amount is \$872,048.69 and the interest amount is \$29,217.15. Page 2 of the Second Revised Exhibit C provides the difference in original and revised invoice amounts and the associated interest by customer for Piedmont Natural Gas Company and Public Service Company of North Carolina. Piedmont Natural Gas Company will be refunded a total of \$477,503.22 and Public Service Company of North Carolina will be refunded a total of \$423,762.62. Cardinal will retroactively re-compute its transportation invoices to reflect use of the rates proposed in the November 9 Filing, and will expeditiously refund to customers the difference between customers' original invoice amounts and the revised invoice amounts for the period from January 1, 2018 to December 31, 2018. The difference between customers' revised invoice amounts and original invoice amounts, including interest, will be refunded as a credit to their transportation invoice.

**Revised Tariff Sheets**

The Twenty-Fourth First Revised Sheet No. 1 contained herewith is proposed to be effective January 1, 2018 and reflects the impact of the January 1, 2018 federal corporate income tax rate change on Cardinal's rates, as proposed by Cardinal in the November 9 Filing. Additionally, Cardinal is submitting Twenty-Fifth First Revised Sheet No. 1, which is proposed to be effective April 1, 2018, to incorporate the proposed rate change with the annual tracked fuel and electric power rate changes made effective April 1, 2018. For comparative

purposes a redline version of these tariff sheets denoting changes to the previously approved rates are provided.

**Conclusion**

Cardinal respectfully requests that the Commission approve its proposal to adjust its rates to reflect the change in the federal corporate income tax as described in the November 9 Filing, the revised calculations submitted herein to include interest on the provisionally collected revenues and the revised tariff sheets submitted herein, and that such approval occur by December 31, 2018.

Respectfully submitted,

/s/ Scott A. Hallam

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Scott A. Hallam  
Email: [scott.hallam@williams.com](mailto:scott.hallam@williams.com)  
Vice President, Cardinal Operating Company, LLC  
(713) 215-2100

**CARDINAL PIPELINE COMPANY, LLC**  
**Summary - Refund Calculation Pursuant to Docket No. M-100, Sub 148**

**2018 Federal Income Tax Change to 21%**  
**Effective January 1, 2018**

| Line No. | Month          | Original Invoice Amount | 1/ | Revised Invoice Amount | 1/ | Difference        | Interest         | Cumulative Refund Balance |
|----------|----------------|-------------------------|----|------------------------|----|-------------------|------------------|---------------------------|
|          | (A)            | (B)                     |    | (C)                    |    | (D)               | (E)              | (F)                       |
|          |                | \$                      |    | \$                     |    | \$                | \$               | \$                        |
| 1        | January 2018   | 1,076,378.90            |    | 1,002,314.49           |    | 74,064.41         | 207.69           | 74,272.10                 |
| 2        | February 2018  | 972,213.20              |    | 905,316.31             |    | 66,896.89         | 602.97           | 141,771.95                |
| 3        | March 2018     | 1,076,378.90            |    | 1,002,314.49           |    | 74,064.41         | 998.25           | 216,834.61                |
| 4        | April 2018     | 1,040,795.40            |    | 969,120.17             |    | 71,675.24         | 1,406.93         | 289,916.77                |
| 5        | May 2018       | 1,133,360.00            |    | 1,001,424.17           |    | 74,064.41         | 1,815.60         | 365,796.78                |
| 6        | June 2018      | 1,040,795.40            |    | 969,120.17             |    | 71,675.24         | 2,224.28         | 439,696.30                |
| 7        | July 2018      | 1,075,488.58            |    | 1,001,424.17           |    | 74,064.41         | 2,632.96         | 516,393.67                |
| 8        | August 2018    | 1,075,488.58            |    | 1,001,424.17           |    | 74,064.41         | 3,048.34         | 593,506.42                |
| 9        | September 2018 | 1,040,795.40            |    | 969,120.17             |    | 71,675.24         | 3,457.02         | 668,638.67                |
| 10       | October 2018   | 1,075,488.58            |    | 1,001,424.17           |    | 74,064.41         | 3,865.69         | 746,568.77                |
| 11       | November 2018  | 1,040,795.40            |    | 969,120.17             |    | 71,675.24         | 4,274.37         | 822,518.38                |
| 12       | December 2018  | 1,075,488.58            |    | 1,001,424.17           |    | 74,064.41         | 4,683.05         | 901,265.84                |
| 13       |                | <u>12,723,466.92</u>    |    | <u>11,793,546.81</u>   |    | <u>872,048.69</u> | <u>29,217.15</u> |                           |

1/ Includes electric power.

**CARDINAL PIPELINE COMPANY, LLC**  
**Summary - Refund Calculation Pursuant to Docket No. M-100, Sub 148**

**2018 Federal Income Tax Change to 21%**  
**Effective January 1, 2018**

| Line No. | Month                        | Original Invoice Amount | 1/ | Revised Invoice Amount | 1/ | Difference        | Interest         | Cumulative Refund Balance |
|----------|------------------------------|-------------------------|----|------------------------|----|-------------------|------------------|---------------------------|
|          | (A)                          | (B)                     |    | (C)                    |    | (D)               | (E)              | (F)                       |
|          |                              | \$                      |    | \$                     |    | \$                | \$               | \$                        |
| 1        | Piedmont Natural Gas Company | 6,673,564.40            |    | 6,211,540.83           |    | 462,023.57        | 15,479.65        | 477,503.22                |
| 2        | Public Service Company of NC | 6,049,902.52            |    | 5,582,005.98           |    | 410,025.12        | 13,737.49        | 423,762.62                |
| 3        | Total Refund                 | <u>12,723,466.92</u>    |    | <u>11,793,546.81</u>   |    | <u>872,048.69</u> | <u>29,217.15</u> | <u>901,265.84</u>         |

Rates and Charges Applicable to  
 Rate Schedule CFT

| Monthly Billing Determinants | <u>Mcf/day</u> | <u>dt/day</u> |  |
|------------------------------|----------------|---------------|--|
| Zone 1A                      | 60,000         | 62,100        |  |
| Zone 1B                      | 70,000         | 72,450        |  |
| Zone 2                       | 332,270        | 343,900       |  |

  

|                            | <u>Monthly<br/>Rate<br/>(Mcf)</u> | <u>Monthly<br/>Rate<br/>(dt)</u> | <u>Daily<br/>Rate<br/>(dt)</u> |
|----------------------------|-----------------------------------|----------------------------------|--------------------------------|
| Reservation Charges (1)    |                                   |                                  |                                |
| Zone 1A                    | \$ 0.79026                        | \$ 0.76354                       | \$ 0.02510                     |
| Zone 1A Electric Power (4) | \$ 0.01480                        | \$ 0.01430                       | \$ 0.00047                     |
| Zone 1A Total Rate         | \$ 0.80506                        | \$ 0.77784                       | \$ 0.02557                     |
| Zone 1B                    | \$ 1.22568                        | \$ 1.18424                       | \$ 0.03893                     |
| Zone 1B Electric Power (4) | \$ 0.01480                        | \$ 0.01430                       | \$ 0.00047                     |
| Zone 1B Total Rate         | \$ 1.24048                        | \$ 1.19854                       | \$ 0.03940                     |
| Zone 2                     | \$ 2.53828                        | \$ 2.45244                       | \$ 0.08063                     |
| Zone 2 Electric Power (4)  | \$ 0.01480                        | \$ 0.01430                       | \$ 0.00047                     |
| Zone 2 Total Rate          | \$ 2.55308                        | \$ 2.46674                       | \$ 0.08110                     |

  

| Excess CFT Service (\$/dt) (2) | <u>Base<br/>Rate</u> | <u>Electric (4)<br/>Power<br/>Rate</u> | <u>Total<br/>Rate</u> |
|--------------------------------|----------------------|--|-----------------------|
| Zone 1A                        | \$ 0.02510           | \$ 0.00047                             | \$ 0.02557            |
| Zone 1B                        | \$ 0.03893           | \$ 0.00047                             | \$ 0.03940            |
| Zone 2                         | \$ 0.08063           | \$ 0.00047                             | \$ 0.08110            |

  

| Fuel Retention Percentage (3) |       |
|-------------------------------|-------|
| Zone 1A                       | 0.92% |
| Zone 1B                       | 0.92% |
| Zone 2                        | 0.92% |

- (1) Zone 1A Cost of Service = 35.5937% of Total Zone 1 Cost of Service; Zone 1B = 64.4063% of Total Zone 1 Cost of Service.
- (2) The applicable rate multiplied by the excess CFT quantity delivered during that month.
- (3) Transporter shall retain from the volume of gas received on behalf of Shipper for transportation service under Rate Schedule CFT a percentage of such gas for fuel and line loss make-up. Transporter will evaluate the Fuel Retention Percentage on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Fuel Retention Adjustment set forth on Original Sheet No.2 of Transporter's NCUC tariff.
- (4) Transporter will evaluate the Electric Power Rates on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Electric Power Cost Adjustment set forth on Original Sheet Nos. 3 and 4 of Transporter's NCUC tariff.

| Rates and Charges Applicable to<br>Rate Schedule CFT  |                                   |                                  |                                |
|---|-----------------------------------|----------------------------------|--------------------------------|
| Monthly Billing Determinants  | <u>Mcf/day</u>                    | <u>dt/day</u>                    |                                |
| Zone 1A   | 60,000                            | 62,100                           |                                |
| Zone 1B   | 70,000                            | 72,450                           |                                |
| Zone 2  | 332,270                           | 343,900                          |                                |
|   | <u>Monthly<br/>Rate<br/>(Mcf)</u> | <u>Monthly<br/>Rate<br/>(dt)</u> | <u>Daily<br/>Rate<br/>(dt)</u> |
| Reservation Charges (1)   |                                   |                                  |                                |
| Zone 1A   | \$ 0.79026                        | \$ 0.76354                       | \$ 0.02510                     |
| Zone 1A Electric Power (4)  | \$ 0.01302                        | \$ 0.01258                       | \$ 0.00041                     |
| Zone 1A Total Rate  | \$ 0.80328                        | \$ 0.77612                       | \$ 0.02551                     |
| Zone 1B   | \$ 1.22568                        | \$ 1.18424                       | \$ 0.03893                     |
| Zone 1B Electric Power (4)  | \$ 0.01302                        | \$ 0.01258                       | \$ 0.00041                     |
| Zone 1B Total Rate  | \$ 1.23870                        | \$ 1.19682                       | \$ 0.03934                     |
| Zone 2  | \$ 2.53828                        | \$ 2.45244                       | \$ 0.08063                     |
| Zone 2 Electric Power (4)   | \$ 0.01302                        | \$ 0.01258                       | \$ 0.00041                     |
| Zone 2 Total Rate   | \$ 2.55130                        | \$ 2.45602                       | \$ 0.08104                     |
| Excess CFT Service (\$/dt) (2)  |                                   | Electric (4)                     |                                |
|   | <u>Base<br/>Rate</u>              | <u>Power<br/>Rate</u>            | <u>Total<br/>Rate</u>          |
| Zone 1A   | \$ 0.02510                        | \$ 0.00041                       | \$ 0.02551                     |
| Zone 1B   | \$ 0.03893                        | \$ 0.00041                       | \$ 0.03934                     |
| Zone 2  | \$ 0.08063                        | \$ 0.00041                       | \$ 0.08104                     |
| Fuel Retention Percentage (3)   |                                   |                                  |                                |
| Zone 1A   | 1.05%                             |                                  |                                |
| Zone 1B   | 1.05%                             |                                  |                                |
| Zone 2  | 1.05%                             |                                  |                                |
| (1) Zone 1A Cost of Service = 35.5937% of Total Zone 1 Cost of Service; Zone 1B = 64.4063% of Total Zone 1 Cost of Service.   |                                   |                                  |                                |
| (2) The applicable rate multiplied by the excess CFT quantity delivered during that month.  |                                   |                                  |                                |
| (3) Transporter shall retain from the volume of gas received on behalf of Shipper for transportation service under Rate Schedule CFT a percentage of such gas for fuel and line loss make-up. Transporter will evaluate the Fuel Retention Percentage on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Fuel Retention Adjustment set forth on Original Sheet No.2 of Transporter's NCUC tariff. |                                   |                                  |                                |
| (4) Transporter will evaluate the Electric Power Rates on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Electric Power Cost Adjustment set forth on Original Sheet Nos. 3 and 4 of Transporter's NCUC tariff.   |                                   |                                  |                                |

| Rates and Charges Applicable to<br>Rate Schedule CFT |   |                                     |                                     |
|--|---|-------------------------------------|-------------------------------------|
| Monthly Billing Determinants                         | <u>Mcf/day</u>  | <u>dt/day</u>                       |                                     |
| Zone 1A  | 60,000  | 62,100                              |                                     |
| Zone 1B  | 70,000  | 72,450                              |                                     |
| Zone 2   | 332,270   | 343,900                             |                                     |
|  | <u>Monthly<br/>Rate<br/>(Mcf)</u>   | <u>Monthly<br/>Rate<br/>(dt)</u>    | <u>Daily<br/>Rate<br/>(dt)</u>      |
| Reservation Charges (1)                              |   |                                     |                                     |
| Zone 1A  | \$ 0. <del>84205</del> <u>79026</u>   | \$ 0. <del>81358</del> <u>76354</u> | \$ 0. <del>02675</del> <u>02510</u> |
| Zone 1A Electric Power (4)                           | \$ 0.01480  | \$ 0.01430                          | \$ 0.00047                          |
| Zone 1A Total Rate                                   | \$ 0. <del>85685</del> <u>80506</u>   | \$ 0. <del>82788</del> <u>77784</u> | \$ 0. <del>02722</del> <u>02557</u> |
| Zone 1B  | \$ 1. <del>30602</del> <u>22568</u>   | \$ 1. <del>26185</del> <u>18424</u> | \$ 0. <del>04149</del> <u>03893</u> |
| Zone 1B Electric Power (4)                           | \$ 0.01480  | \$ 0.01430                          | \$ 0.00047                          |
| Zone 1B Total Rate                                   | \$ 1. <del>32082</del> <u>24048</u>   | \$ 1. <del>27615</del> <u>19854</u> | \$ 0. <del>04196</del> <u>03940</u> |
| Zone 2   | \$ 2. <del>73079</del> <u>53828</u>   | \$ 2. <del>63844</del> <u>45244</u> | \$ 0. <del>08674</del> <u>08063</u> |
| Zone 2 Electric Power (4)                            | \$ 0.01480  | \$ 0.01430                          | \$ 0.00047                          |
| Zone 2 Total Rate                                    | \$ 2. <del>74559</del> <u>53808</u>   | \$ 2. <del>65274</del> <u>46674</u> | \$ 0. <del>08721</del> <u>08110</u> |
| Excess CFT Service (\$/dt) (2)                       |   | Electric (4)                        |                                     |
|  | <u>Base<br/>Rate</u>  | <u>Power<br/>Rate</u>               | <u>Total<br/>Rate</u>               |
| Zone 1A  | \$ 0.02675 <u>02510</u>   | \$ 0.00047                          | \$ 0. <del>02722</del> <u>02557</u> |
| Zone 1B  | \$ 0.04149 <u>03893</u>   | \$ 0.00047                          | \$ 0. <del>04196</del> <u>03940</u> |
| Zone 2   | \$ 0.08674 <u>08063</u>   | \$ 0.00047                          | \$ 0. <del>08721</del> <u>08110</u> |
| Fuel Retention Percentage (3)                        |   |                                     |                                     |
| Zone 1A  | 0.92%   |                                     |                                     |
| Zone 1B  | 0.92%   |                                     |                                     |
| Zone 2   | 0.92%   |                                     |                                     |
| (1)  | Zone 1A Cost of Service = 35.5937% of Total Zone 1 Cost of Service; Zone 1B = 64.4063% of Total Zone 1 Cost of Service.   |                                     |                                     |
| (2)  | The applicable rate multiplied by the excess CFT quantity delivered during that month.  |                                     |                                     |
| (3)  | Transporter shall retain from the volume of gas received on behalf of Shipper for transportation service under Rate Schedule CFT a percentage of such gas for fuel and line loss make-up. Transporter will evaluate the Fuel Retention Percentage on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Fuel Retention Adjustment set forth on Original Sheet No.2 of Transporter's NCUC tariff. |                                     |                                     |
| (4)  | Transporter will evaluate the Electric Power Rates on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Electric Power Cost Adjustment set forth on Original Sheet Nos. 3 and 4 of Transporter's NCUC tariff.   |                                     |                                     |

| Rates and Charges Applicable to<br>Rate Schedule CFT |   |                             |                             |
|--|---|-----------------------------|-----------------------------|
| Monthly Billing Determinants                         | Mcf/day   | dt/day                      |                             |
| Zone 1A  | 60,000  | 62,100                      |                             |
| Zone 1B  | 70,000  | 72,450                      |                             |
| Zone 2   | 332,270   | 343,900                     |                             |
|  | Monthly<br>Rate<br>(Mcf)  | Monthly<br>Rate<br>(dt)     | Daily<br>Rate<br>(dt)       |
| Reservation Charges (1)                              |   |                             |                             |
| Zone 1A  | \$ 0. <del>8420579026</del>   | \$ 0. <del>8135876354</del> | \$ 0. <del>0267502510</del> |
| Zone 1A Electric Power (4)                           | \$ 0.01302  | \$ 0.01258                  | \$ 0.00041                  |
| Zone 1A Total Rate                                   | \$ 0. <del>8550780328</del>   | \$ 0. <del>8261677612</del> | \$ 0. <del>0271602551</del> |
| Zone 1B  | \$ 1. <del>3060222568</del>   | \$ 1. <del>2618518424</del> | \$ 0. <del>0414903893</del> |
| Zone 1B Electric Power (4)                           | \$ 0.01302  | \$ 0.01258                  | \$ 0.00041                  |
| Zone 1B Total Rate                                   | \$ 1. <del>3190423870</del>   | \$ 1. <del>2744319682</del> | \$ 0. <del>0419003934</del> |
| Zone 2   | \$ 2. <del>7307953828</del>   | \$ 2. <del>6384445244</del> | \$ 0. <del>0867408063</del> |
| Zone 2 Electric Power (4)                            | \$ 0.01302  | \$ 0.01258                  | \$ 0.00041                  |
| Zone 2 Total Rate                                    | \$ 2. <del>7438155130</del>   | \$ 2. <del>6510245602</del> | \$ 0. <del>0871508104</del> |
| Excess CFT Service (\$/dt) (2)                       |   | Electric (4)                |                             |
|  | Base<br>Rate  | Power<br>Rate               | Total<br>Rate               |
| Zone 1A  | \$ 0. <del>0267502510</del>   | \$ 0.00041                  | \$ 0. <del>0271602551</del> |
| Zone 1B  | \$ 0. <del>0414903893</del>   | \$ 0.00041                  | \$ 0. <del>0419003934</del> |
| Zone 2   | \$ 0. <del>0867408063</del>   | \$ 0.00041                  | \$ 0. <del>0871508104</del> |
| Fuel Retention Percentage (3)                        |   |                             |                             |
| Zone 1A  | 1.05%   |                             |                             |
| Zone 1B  | 1.05%   |                             |                             |
| Zone 2   | 1.05%   |                             |                             |
| (1)  | Zone 1A Cost of Service = 35.5937% of Total Zone 1 Cost of Service; Zone 1B = 64.4063% of Total Zone 1 Cost of Service.   |                             |                             |
| (2)  | The applicable rate multiplied by the excess CFT quantity delivered during that month.  |                             |                             |
| (3)  | Transporter shall retain from the volume of gas received on behalf of Shipper for transportation service under Rate Schedule CFT a percentage of such gas for fuel and line loss make-up. Transporter will evaluate the Fuel Retention Percentage on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Fuel Retention Adjustment set forth on Original Sheet No.2 of Transporter's NCUC tariff. |                             |                             |
| (4)  | Transporter will evaluate the Electric Power Rates on an annual basis to determine if changes are appropriate and will make any necessary filings with the NCUC, in accordance with the Electric Power Cost Adjustment set forth on Original Sheet Nos. 3 and 4 of Transporter's NCUC tariff.   |                             |                             |