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April 10, 2025

Regulatory Commission of Alaska  
701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501

Subject:           Oliktok Pipeline Company  
Tariff Advice Letter No. TL54-334

Dear Commissioners:

The tariff filing described below is transmitted to you for filing in compliance with the Pipeline Act (AS 42.06) and 3 AAC 48.200 — 3 AAC 48.430.

Tariff Sheet Number		Cancels Sheet Number		Schedule or Rule Number
Original	Revised	Original	Revised	
37	7th	37	6th	Schedule "A" Rate

By this filing, Oliktok Pipeline Company ("OPC") submits an update to its annual revision to its rates for the intrastate transportation of natural gas, as required under the variable tariff methodology set forth in the Oliktok Settlement Agreement accepted by the Commission in Order No. P-24-007(2) (May 16, 2024) ("Order P-24-007(2)"). By Letter Order No. L2400407 (Dec. 23, 2024), the Commission approved revised rates for transportation to the Gas Hydrates Project and Kuparuk River Unit Central Processing Facility #1 ("KRU (CPF #1)") delivery points effective January 1, 2025 (TL53-334). OPC's 2025 rates must be updated to (1) include a rate for natural gas transportation to a new delivery point at the Gas Spur Pipeline operated by Oil Search (Alaska), LLC ("OSA"), and (2) reduce the rates for transportation to the Gas Hydrates Project and KRU (CPF #1) delivery points to reflect allocation of costs to serving the new Gas Spur Pipeline delivery point.

On January 5, 2024, the Commission approved a new OPC connection to the Gas Spur Pipeline and the associated connection agreement. *See* Order Nos. P-23-009(2)/P-23-010(2). Construction of the connection is now nearly complete and OSA expects to begin tendering natural gas for transportation to the Gas Spur Pipeline delivery point on or about June 1, 2025. The rates proposed in this filing must be approved by that time to allow commencement of transportation to the new delivery point.

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The proposed updated 2025 rates for transportation from the Prudhoe Bay Unit (Skid 50) receipt point to the three delivery points are: Gas Hydrates Project—\$0.290 per thousand standard cubic feet (“mscf”); KRU (CPF #1)—\$0.472 per mscf; and Gas Spur Pipeline—\$0.453 per mscf. The updated rates represent a reduction to the approved January 1, 2025, rates, which were Gas Hydrates Project—\$0.343 per mscf; and KRU (CPF #1)—\$0.559.

The updated rates were calculated in accordance with the Oliktok Settlement Methodology (“OSM”) set forth in the Oliktok Settlement Agreement. These rates reflect the same total OPC OSM revenue requirement that was used to calculate the January 1, 2025, rates, but reflect additional, new projected volumes for transportation to the Gas Spur Pipeline delivery point. Thus, the only change from the 2025 OSM rate calculations approved by the Commission is allocating the same costs over greater volumes and to three delivery points instead of two.

OPC requests that the enclosed revisions to OPC’s Tariff Sheet No. 37 (Exhibit 1) be approved effective June 1, 2025. Under the approved OSM, OPC is required to file revised annual rates 30 days prior to the proposed effective date of the revised rates (filing by December 1 for rates to become effective January 1). *See* Oliktok Settlement Agreement § I-4(b). In its April 19, 2024, Petition for Acceptance of the Oliktok Settlement Agreement, OPC notified the Commission that “[p]rior to commencing deliveries to the Gas Spur Pipeline connection, OPC will determine the OSM maximum rate for that delivery point and request approval to add that rate to Tariff Sheet No. 37.” Page 8. OPC also included a “Future Delivery Point 1” placeholder in its OSM cost of service model attached as Exhibit G to the approved Oliktok Settlement Agreement.

Thus, if the new Gas Spur Pipeline connection had been completed prior to January 1, 2025, OPC would have included the Gas Spur Pipeline rate in its annual OSM rate filing that was filed on November 27, 2024 (TL53-334) for approval effective January 1, 2025. For this instant filing, a June 1, 2025, effective date is 52 days from the date of this filing, more than the 30 days from the filing date to the effective date for rate revisions under the OSM. For these reasons, OPC believes that the 90-day notice period for “initial” pipeline rates that are not subject to an annual rate adjustment methodology under an approved settlement agreement does not apply to this update of OPC’s 2025 annual rate filing. However, if the Commission determines that the 90-day notice period does apply, OPC respectfully requests a waiver of that requirement pursuant to 3 AAC 48.300 based on the unique circumstances of this revision. Given that OPC’s rates are determined annually under the Oliktok Settlement Agreement, that the OSM revenue requirement is not changing, and that prompt approval will expedite *reductions* to existing rates and increased throughput on and utilization of the Oliktok Pipeline, OPC believes no legitimate public interest would be served by delaying the effective date of the proposed rate changes by an addition 38 days.

Section I-4(b) of the Oliktok Settlement Agreement requires OPC to file by December 1 of each year its revised intrastate rates for the following calendar year, which rates may not exceed the maximum rates calculated using the OSM. Neither the Oliktok Settlement Agreement nor Order No. P-24-007(2) requires OPC to file its maximum rate calculation or supporting data with the Commission. Instead, Section 1-5(a) of the agreement requires OPC to

provide the parties to the agreement (collectively “Non-OPC Parties”) the OSM maximum rate calculation and supporting data at the same time as, or before, OPC files its revised rates with the Commission. That section further requires the parties to seek to resolve any questions or disputes regarding the rate calculations under the OSM during the 30-day period after the annual filing of revised rates. In compliance with the Oliktok Settlement Agreement, OPC is providing the required information to the Non-OPC Parties and OSA contemporaneously with this filing. OPC counsel will e-mail the Excel files of the rate calculations to Commission Staff upon request under 3 AAC 48.040(b)(10).

In compliance with 3 AAC 48.270(a), OPC provides the following information:

*3 AAC 48.270(a) – Name and return address of the filing utility:*

Oliktok Pipeline Company  
P.O. Box 100360  
Anchorage, Alaska 99510-0360

*3 AAC 48.270(a) – Name, return address, and electronic mail address of the utility’s representative authorized to issue tariffs:*

Raj Choudhury  
Vice President  
Oliktok Pipeline Company  
P.O. Box 100360  
Anchorage, AK 99510-0360  
E-mail: Raj.Choudhury@conocophillips.com

*3 AAC 48.270(a)(1) – List the tariff advice letter number:*

See page 1.

*3 AAC 48.270(a)(2) – Specify the statutes, regulations or commission order that the filing is made under:*

See page 1.

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*3 AAC 48.270(a)(3) – List the tariff sheets, special contracts, agreements, or other documents required by commission order that are being filed:*

See page 1.

*3 AAC 48.270(a)(4) – Summarize the proposed tariff revisions, including an explanation about whether the filing proposes to implement rules, rates, or both:*

The proposed tariff revisions will add a rate for transportation to the Gas Spur Pipeline delivery point and reduce the transportation rates for the other two delivery points.

*3 AAC 48.270(a)(5) – Include a statement setting out whether the filing will impact any current customers and the estimated number of customers or shippers that will be affected:*

The customers that will be affected by the proposed changes are all OPC's intrastate shippers (which typically consist of fewer than five shippers).

*3 AAC 48.270(a)(6) – If applicable, include a request for the tariff filing to take effect before the end of the statutory notice period:*

See page 2.

*3 AAC 48.270(a)(7) – If applicable, include a request for interim approval:*

Not applicable.

Please direct any questions regarding this filing to Sandra Pierce at (907) 265-6316.

Sincerely yours,

KEMPPPEL, HUFFMAN AND ELLIS, P.C.  
Attorneys for Oliktok Pipeline Company

/s/ Dean D. Thompson

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Enclosure: Exhibit 1, Tariff Sheet No. 37

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EXHIBIT 1

OLIKTOK PIPELINE COMPANY

TARIFF SHEET NO. 37

7th Revision Canceling 6th Revision

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The attached Tariff Sheet does not have exhibit or page numbers

RCA No. 334      SEVENTH REVISION      Sheet No. 37

Cancelling      SIXTH REVISION      Sheet No. 37

OLIKTOK PIPELINE COMPANY

Schedule "A"  
Rate  
Gas Transportation Service

Application

This rate applies to regular Pipeline service for Gas as set forth in Carrier's tariff.

Rate

<u>From</u>	<u>To</u>	<u>Rate</u> <u>Dollars and Cents</u> <u>per mscf*</u>	
PBU (Skid 50)	Gas Hydrates Project	\$0.290	R
PBU (Skid 50)	KRU (CPF #1)	\$0.472	R
PBU (Skid 50)	Gas Spur Pipeline	\$0.453	N

\* mscf – Thousand standard cubic feet

Tariff Advice No. TL54-334

Effective: June 1, 2025

Issued by: OLIKTOK PIPELINE COMPANY

By: /s/ Raj Choudhury  
Raj Choudhury

Title: Vice President