

April 29, 2020

## **VIA ELECTRONIC FILING**

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

> Re: GridLiance Heartland LLC Docket No. ER20-1039

> > GridLiance Heartland LLC Docket No. ER19-2092

GridLiance Heartland LLC GridLiance High Plains LLC GridLiance West LLC Docket Nos. ER18-2342-000, ER18-2342-001, ER18-2342-002 EL19-29-000 ER19-2488-000 – Compliance Filing

Dear Secretary Bose:

In its January 31, 2020 Order in Docket No. ER19-2092, the Federal Energy Regulatory Commission (Commission) approved GridLiance Heartland LLC's (GridLiance Heartland) Annual Transmission Revenue Requirement (ATRR), subject to the submission of additional compliance filings as required to incorporate any revisions necessary to conform to the Unopposed Offer of Settlement and Settlement Agreement (Settlement) filed by GridLiance Heartland, GridLiance High Plains LLC, and GridLiance West LLC (collectively, GridLiance Transcos).<sup>1</sup> The Settlement, filed on July 29, 2019, and approved on December 19, 2019, resolved the sole issue set for hearing and settlement procedures in the consolidated dockets, Docket No. ER18-2342 and EL19-29.<sup>2</sup> Pursuant to Section 6.8 of the filed Settlement, GridLiance Transcos committed to submit compliance filings with the Commission in the second quarter of 2020 to seek Commission authorization to implement a 53.29 percent income tax allowance in the formula rate template of each GridLiance Transco, effective July 1, 2020.

In compliance with both the January 31 Order and the Settlement's terms and conditions, GridLiance Heartland submits revised tariff records in eTariff format. This filing modifies GridLiance Heartland's ATRR formula rate template, as required by the Settlement, to implement a fixed income tax allowance of 53.29 percent. This tariff record reflects an effective date of July 1, 2020.



<sup>&</sup>lt;sup>1</sup> GridLiance Heartland LLC, 170 FERC ¶ 61,074 (2020) (January 31 Order).

<sup>&</sup>lt;sup>2</sup> GridLiance Heartland LLC, GridLiance High Plains LLC, and GridLiance West LLC, 169 FERC ¶ 61,206 (2019) (Letter Order).

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## I. Documents Submitted

GridLiance Heartland encloses the following documents:

- 1. This transmittal letter;
- 2. Clean version of GridLiance Heartland's Attachment R, transmission formula rate template, reflecting the revisions discussed herein (Attachment 1);
- 3. Redlined version of GridLiance Heartland's Attachment R, transmission formula rate template, reflecting the revisions discussed herein (Attachment 2); and
- 4. A clean Attachment R, transmission formula rate template, in native Excel file format (Attachment 3).

#### II. Correspondence

Copies of correspondence regarding this filing should be served to the following persons:

William D. DeGrandis Carlos E. Clemente Paul Hastings LLP 875 15<sup>th</sup> Street, N.W. Washington, D.C. 20005 Telephone: (202) 551-1720 <u>billdegrandis@paulhastings.com</u> <u>carlosclemente@paulhastings.com</u> Kathryn L. Patton Gregory D Jones GridLiance Heartland LLC 201 E. John Carpenter Freeway, Suite 900 Irving, TX 75062 Telephone: (972) 476-0154 kpatton@gridliance.com gjones@gridliance.com

#### III. Service List

GridLiance Heartland will electronically serve a copy of this filing on all persons on the official service list in these proceedings.

#### IV. Description of Proposed Tariff Changes

Section 2.2 of the Settlement provides that the Income Tax Allowance (ITA) in each of GridLiance Transco's transmission formula rate template be fixed at 72.13% effective through June 30, 2020. Beginning July 1, 2020, the ITA for each GridLiance Transco will change to 53.29 percent, but will remain fixed. Section 2.3 of the Settlement provides that a moratorium will apply to these Settled ITA Percentages, such that they may not be challenged or changed through Rate Year 2021, except in limited circumstances as specified in the Settlement. In accordance with the Settlement, GridLiance Heartland has modified its Attachment R formula rate template to use a fixed ITA component of 53.29 percent, effective July 1, 2020.

To incorporate this change into the formula rate template, GridLiance Heartland has revised fixed ownership values in Attachment 10 to yield the required fixed ITA of 53.29 percent, as noted above. During annual updates, the formula in Attachment 10 calculates a corresponding effective tax rate using the populated inputs including tax rates and plant proportions by state.

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## V. Effective Date

Consistent with the Settlement, the above described changes become effective on July 1, 2020.

## VI. Conclusion

Wherefore, for the foregoing reasons, GridLiance Heartland respectfully requests that the Commission accept the amended tariff records filed herein.

Respectfully submitted,

\_/s/\_Kathryn L Patton\_

Kathryn L Patton Gregory D. Jones GridLiance Heartland LLC 201 E. John Carpenter Freeway Suite 900 Irving, TX 75062 972-476-0154 kpatton@gridliance.com gjones@gridliance.com

Counsel for GridLiance Heartland LLC

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# **CERTIFICATE OF SERVICE**

Pursuant to Rule 2010 of the Commission's Rule of Practice and Procedure, I hereby certify that I

have this day served a copy of this filing on all persons designated on the official service list compiled by

the Secretary in this proceeding.

Dated at Irving, TX, this 29th day of April 2020.

<u>/s/ Kathryn L Patton</u> GridLiance Heartland LLC