

Pipeline Tariff Mechanics — Working Summary

Prepared for OMNGC · June 12, 2026 · Dekacern
Sources: live tariff postings of Southern Star Central and Panhandle Eastern (every claim verified against the posted tariff text), ONEOK's posted OGT Statement of Operating Conditions (eff. Sep 1, 2024), and Energy Transfer operational notices. Verification status is marked on every section.

Why this matters: these are the rules that price every imbalance, every cold-snap shortfall, and every missed nomination across the coalition's four supply pipelines. They are now loaded into Dekacern's per-pipeline ruleset registry, where the decision engine reads them. Three items need OMNGC's help to finish — listed at the end.

Southern Star Central — fully verified from the posted tariff

Mechanic	Terms
Balancing	Monthly. Imbalances may be resolved through the END of the FOLLOWING month by: trading with other shippers in the same area, netting into your Southern Star storage account , adjusting nominations, or cash-out. GT&C §9.7
Cash-out tolerance	Greater of 1,000 Dth or $\pm 5\%$ of actual deliveries. Beyond it, tiered: pipeline buys your excess at $0.7\times/0.6\times/0.5\times$ of the Platts Gas Daily Southern Star index (5–10% / 10–15% / over 15%); you buy back shortfalls at $1.3\times/1.4\times/1.5\times$. GT&C §9.7(c), Sheets 244–245
Nomination cycles	Standard NAESB clocks (Central time): Timely 1:00 pm day-ahead · Evening 6:00 pm · Intraday-1 10:00 am · Intraday-2 2:30 pm · Intraday-3 7:00 pm (no bumping). GT&C §9.1(e)
OFO penalties	Standard OFO: greater of \$5.00/Dth or $2.5\times$ index. Emergency OFO: greater of \$10.00/Dth or $5\times$ index , per Dth per day. Issued by noon, normally effective the second gas day. GT&C §10.1/§10.3
Pooling	Formal Pooling Service (paper pool points): transfers between pool members are permitted, with no transport charge and no fuel on pooled quantities. Oklahoma pools include Oklahoma-Other, South Edmond, Edmond-Blackwell, Straight-Blackwell, Canadian-Blackwell. Rate Schedule PS §3(a)
Storage	On-system storage (the no-notice TSS service bundles transport + storage). Injection season Apr–Oct, withdrawal Nov–Mar; capacity = $33\times$ max daily withdrawal; injection rights ratchet down as inventory fills (0.75% of capacity/day below 62.5% full, stepping to 0.25%/day above 87.5%) — this is why a deep winter draw takes most of a season to refill. FSS Rate Schedule §3
Park & loan	Available (PLS), daily commodity up to $\sim \$0.29/\text{Dth}$. A short-term imbalance-parking alternative.
Fuel retention	Two posted sheet vintages conflict (storage injection 3.67% vs 3.24%) — we will confirm the live tracker value before it enters any cost calculation.

Panhandle Eastern (PEPL) — balancing verified; cycle clocks NAESB-standard (assumed)

Mechanic	Terms
Monthly tolerance	Maximum Accumulated Imbalance = greater of $1.5\times$ contract MDQ or 1,000 Dt — the " $\pm 1,000$ units" your schedulers know is confirmed, in dekatherms, as the floor of this monthly formula (not a daily band). Carried without charge up to that quantity. GT&C §12.11(a)
Cash-out	Tiered on the NGW Mid-Continent (Panhandle) monthly average: excess gas bought from you at $0.9\times$ down to $0.5\times$; shortfalls bought by you at $1.1\times$ up to $1.5\times$ (tiers at 5/10/15/20%). GT&C §12.11(a)(1)/(2)
Imbalance trading	

	Post-month: positions posted by the 9th business day, tradable with other shippers through at least the 17th business day — usually the cheapest exit. GT&C §12.11(d)(2)
Daily scheduling	Separate from the monthly band: daily deliveries may vary from scheduled by 10% or 100 Dt (whichever greater) at the delivery point, with a location-level safe harbor. GT&C §12.11(h)(1)
OFO penalties	Notice ordinarily by 10:30 am the day before. Tolerance cut to 5%; penalties = greater of 2× the highest of three Gas Daily indices or tiers of \$25 / \$50 / \$100 / \$200 per Dt as the deviation grows. GT&C §12.17(d)–(f)
Mid-month true-up	None in this tariff (see open items).

OGT — ONEOK Gas Transportation — operating statement extracted; the contract is the ruleset

ONEOK's posted Statement of Operating Conditions (Section 311 service, eff. Sep 1, 2024) contains **no published tolerance band, no cash-out schedule, no penalty rates, and no fixed nomination clocks**. It requires "commercially reasonable efforts... as near to zero imbalance as practicable," passes through any upstream/downstream transporter penalties to the customer, and reserves the right to set nomination deadlines per "common industry practices." Gas day 9:00 am Central.

Implication: the 3% tolerance and pooling-with-member-transfers your schedulers work with are **contractual** — they live in the coalition's own OGT transport/pooling agreements, not in any public document. Those agreements are the missing source of truth for the largest group of coalition towns.

EGT — Enable Gas Transmission — tariff text pending; standing alert in force

The tariff (FERC-filed; balancing in GT&C §20, cash-out mechanism in §8) sits behind Energy Transfer's portal and is still being obtained. One finding is operational today:

Standing operational alert since December 1, 2025 (Critical Notice 6224): EGT is providing **no tolerance for short imbalance positions** and is not scheduling long-imbalance paybacks. For Roland, Granite, and Hulbert this means a short day currently has no tariff cushion at all — under-supply on EGT is materially riskier than the same shortfall on Southern Star or PEPL until this alert lifts.

What we need from OMNGC

1. Copies of the OGT transport and pooling agreements (and the SWE pooling arrangement, if separate). For OGT, the contract is the entire ruleset — tolerance, pooling rights, and deadlines all live there.

2. Which counterparty performs the mid-month true-up? Neither the Southern Star nor the PEPL tariff contains one — so the mid-month true-up the schedulers described must come from OGT, EGT, or a bilateral supplier arrangement. Knowing which one changes how long an imbalance can safely ride.

3. Confirmation items: Copan's June price of \$3.90 (vs. the \$2.37 Southern Star group price); the OGT/ONG blended-rate worksheet (~\$2.745); whether "Our Price" in the monthly email is OMNGC's cost from the supplier or the towns' rate.

currently posted); ONEOK Gas Transportation Statement of Operating Conditions eff. Sep 1, 2024; Energy Transfer EGT operational notices. Tariff provisions change by filing — values should be reconfirmed before contractual reliance. This summary is operational guidance, not legal advice.