

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Gulf South Pipeline Company, LLC)	CP25-__-000
Texas Gas Transmission, LLC)	CP25-__-000

**JOINT ABBREVIATED APPLICATION FOR
CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY,
ABANDONMENT AUTHORIZATION AND RELATED AUTHORIZATIONS**

Pursuant to Sections 7(b), 7(c) and 7(e) of the Natural Gas Act (“NGA”), 15 U.S.C. § 717f(b), § 717f(c), § 717f(e), and Part 157 of the regulations of the Federal Energy Regulatory Commission (“Commission” or “FERC”), 18 C.F.R. Part 157, Gulf South Pipeline Company, LLC (“Gulf South”) and Texas Gas Transmission, LLC (“Texas Gas”) (collectively referred to herein as “Applicants”) submit this abbreviated application for certificates of public convenience and necessity and abandonment authority (“Application”) allowing each Applicant to undertake the requested activities that comprise the Kosciusko Junction Pipeline Project (“Project”).

The proposed Kosciusko Project is designed to create an effective operational loop of Gulf South’s existing 42-inch-diameter pipeline to provide firm transportation of new gas supplies from the Midcontinent, Marcellus, and Fayetteville supply basins to Gulf South delivery markets in the Southeast United States, which are experiencing significant natural gas demand growth, including electric power generation growth. The proposed Project will create approximately 1.175 billion cubic feet per day (“Bcf/d”) of new pipeline capacity, which is essentially fully-subscribed by the Project’s shippers who have entered into binding precedent agreements for 1.1 Bcf/d of the total 1.175 Bcf/d of Project capacity. Advanced negotiations are ongoing with an additional shipper for the remaining 75,000

Dth/d of Project capacity. The proposed Project will provide access to new gas supplies that were previously not directly accessible from Gulf South's system, the Project will help meet the fuel diversity and reliability needs of the Project's shippers, support electric reliability in the Southeast, and enhance the operational flexibility of Gulf South's system.

The Project is designed to limit environmental and landowner impacts by repurposing existing underutilized pipeline infrastructure. Gulf South is proposing to acquire from Texas Gas the existing, underutilized Greenville Lateral and Isola Compressor Station, which will reduce, by approximately 98 miles, the amount of greenfield pipeline construction needed for the Project. Gulf South further proposes to (i) construct two new natural gas pipelines, the Kosciusko Junction Pipeline and the Columbia Gulf Lateral, totaling approximately 111 miles of 36-inch-diameter pipe; (ii) install six new gas-fired compressor units at two new and one existing compressor stations; and (iii) construct four (4) new receipt and delivery meter and regulator ("M&R") stations at four locations.

The Applicants are proposing two lease arrangements associated with the proposed Project. Gulf South is proposing to acquire, from Texas Gas, through a lease, 420,000 Dth/d of short-haul capacity on the Texas Gas mainline system to allow Project shippers access to certain receipt points on Texas Gas' mainline system. After acquisition of the Greenville Lateral by Gulf South, Texas Gas is proposing to acquire, through a lease, up to 595,000 Dth/d of capacity from Gulf South on the Greenville Lateral, which will allow Texas Gas to maintain continuity of service to its firm shippers on the Greenville Lateral for the remainder of the existing contract terms. Texas Gas' lease will terminate once those

contracts expire. Gulf South and Texas Gas are seeking the certificate and abandonment authorizations necessary for each of these leases.

To help facilitate the delivery of additional volumes from Texas Gas onto the Greenville Lateral, Texas Gas is proposing to expand its existing Greenville Compressor Station by installing a new gas-fired compression unit and gas cooling and auxiliary facilities. Texas Gas is also proposing to modify the existing check meters within the Greenville Compressor Station to establish custody transfer measurement between Texas Gas and Gulf South.

Through participation in the Commission's pre-filing review process, the Applicants have developed a significant record of environmental data and public comments and have incorporated that information in the preparation and review of draft environmental reports. As a result of this coordinated effort with Commission Staff, state and federal environmental agencies, and affected landowners, this Application and its accompanying environmental reports are complete and ready for Commission review.

Specifically, Applicants request the Commission to:

- (1) authorize Gulf South to acquire the Greenville Lateral and to operate it as part of Gulf South's existing facilities;
- (2) authorize Texas Gas to abandon by sale the Greenville Lateral and all of its associated jurisdictional facilities to Gulf South;
- (3) authorize Gulf South to construct two new natural gas pipelines, the Kosciusko Junction Pipeline and the Columbia Gulf Lateral, totaling approximately 111 miles of 36-inch-diameter pipe including six new gas-fired compressor units at

two new and one existing compressor stations and four (4) new receipt and delivery M&R stations at four locations;

- (4) authorize Texas Gas to add a new gas-fired compressor unit at the Greenville Compressor Station,
- (5) grant Gulf South's request to include the Project facilities in a new rate zone of the Gulf South system;
- (6) authorize Gulf South to acquire, from Texas Gas, through a lease, 420,000 Dth/d of short-haul capacity on the Texas Gas mainline system;
- (7) authorize, after acquisition of the Greenville Lateral by Gulf South, Texas Gas to acquire, through a lease, up to 595,000 Dth/d of transportation capacity from Gulf South on the Greenville Lateral; and
- (8) issue any and all additional authorizations or waivers necessary to complete the proposed acquisition, construction, and leases of capacity.

The Applicants request that the Commission issue an order granting the requested authorizations no later than September 17, 2026, to allow time for Applicants to construct and place the Project in-service no later than April 1, 2029, as specified in the precedent agreements supporting the Project.

In support of this Application, the Applicants submit the following:

I.
EXECUTIVE SUMMARY

The Applicants seek a certificate of public convenience and necessity authorizing the construction, operation, ownership and maintenance of the proposed Kosciusko Project. The Project will create an effective operational loop of Gulf South's existing 42-inch-diameter pipeline to provide firm transportation of new gas supplies from the Midcontinent,

Marcellus, and Fayetteville supply basins to Gulf South's delivery markets, which are experiencing significant natural gas demand growth including electric power generation growth. The Project will increase firm transportation capacity to meet the needs of the Project shippers, enhance system reliability, and add operational flexibility to allow Gulf South to deliver new gas supplies that were previously not directly connected to Gulf South's system to the critical Southeast energy corridor. The Project's infrastructure enhancements will further remove bottlenecks and increase the supply diversity/reliability available to Gulf South's customers to help meet the region's growing energy needs in an efficient, reliable and environmentally responsible manner.

A. The Project Will Help Meet the Demand for Additional Firm Transportation Capacity to Serve the Southeast United States

The proposed Kosciusko Project is designed to provide new firm transportation capacity to meet the needs of the Project shippers and will enhance reliability/diversity of cost-effective natural gas supplies in the Southeast United States. The Project has strong market support, as demonstrated by the binding precedent agreements for 1.1 Bcf/day of firm transportation capacity executed by three shippers, Southern Company Services, Inc. ("Southern Company")¹, Florida Power & Light Company ("FP&L"), and PowerSouth Energy Cooperative ("PowerSouth").

Each of the Project shippers require additional firm natural gas transportation capacity to support their critical power generation needs. The Project's largest customer, Southern Company has entered into a 20-year firm precedent agreement for 800,000

¹ Southern Company Services, Inc., serves as fuel procurement agent for its electric generating affiliates Alabama Power Company, Georgia Power Company, Mississippi Power Company and Southern Power Company, and executes transportation arrangements with parties such as Applicants consistent with the multi-party construct authorized by the Commission in Order No. 809 in Docket No. RM14-2-000.

dekatherms per day (Dth/d) of Project capacity. Southern Company is experiencing and forecasting significant load growth, particularly in Georgia, Alabama, and Mississippi, associated with economic development, electrification, as well as expanded customer operations, each of which brings increased electric service requirements to the Southern Company electric system. The Project will support Southern Company's long-term fuel supply strategy and ensure access to diverse, cost-effective natural gas sources. FP&L, which has entered into a binding precedent agreement for 200,000 Dth/d of Project capacity, seeks access to diverse, cost-effective gas suppliers to meet its natural gas-fired generation demand. PowerSouth, which has entered into a binding precedent agreement for 100,000 Dth/d of Project capacity, is experiencing rapid load growth. This growth is driven by regional economic expansion and consistent residential load growth leading to increased winter peak demands. To meet this demand, PowerSouth is constructing an additional natural gas combustion turbine that will be sited at the existing Lowman Energy Center, which will be served by the Project. PowerSouth, like FP&L, further seeks access to diverse, reliable cost-effective gas suppliers to meet its natural gas fired generation demand.

The Project will deliver substantial public benefits including bolstered energy infrastructure, economic growth, and improved supply diversity that is intended to enhance the reliability of gas infrastructure and the electric power grid. By proposing a new rate zone for the Project facilities, the Applicants will ensure that the costs of the Project are borne solely by the Project customers benefiting from the new capacity, preventing any subsidization by existing customers. This approach aligns with the requirements of

FERC's 1999 Certificate Policy Statement, guaranteeing that the Project will not adversely impact existing customers, pipelines, or their captive customers.

To further demonstrate the need for the Project, the Applicants commissioned an independent, comprehensive market study, prepared by S&P Global Commodity Insights ("SPGCI") dated September 2025, and the results of which are detailed in Exhibit Z-1 of this Application. The findings of SPGCI's study confirm that the Project is needed to address the increasing demand for reliable natural gas transportation services and that the Project is vital for electric generation companies such as the Project's customers that require diverse, affordable and reliable supplies of natural gas to meet their growing electric demands and reliability needs.

B. Minimizing Community Impact

The Applicants have designed the Project to meet the growing demand for natural gas in the Southeast region of the United States and to provide essential infrastructure to support the significant economic development in the region. The Project has been planned to reduce any adverse effects on the environment and local communities. The Project's use of the existing Greenville Lateral and Isola Compressor Stations will repurpose existing, underutilized infrastructure, reducing the need for new construction and minimizing the associated environmental, landowner, and community impacts. Gulf South has further reduced impacts by routing significant portions of the Project's new pipeline along existing energy easements to further limit land disturbance and reduce community burden. Approximately 3 miles (37 percent) of the proposed Columbia Lateral and approximately 41 miles (40 percent) of the new proposed Kosciusko Pipeline will be co-

located with existing rights-of-way, helping to reduce impacts on landowners, sensitive habitats, and surrounding communities.

The Applicants participated in the Commission's pre-filing process for the Project and have conducted extensive outreach with local officials and other Project stakeholders to discuss Project details and potential benefits for the impacted counties. Multiple community meetings were held to foster engagement with landowners and the community, including local community leaders. At these meetings, the Applicants provided Project details, addressed concerns, and described how they would use best practices for environmental protection and noise reduction. During the pre-filing stage of the Project, Applicants successfully secured survey permission for 100% of the Project's pipeline route. The Applicants also agreed to several minor pipeline route deviations based on input and feedback from Project stakeholders. Gulf South has already acquired 33% of the Project's rights-of-way through private negotiations and will continue to work to secure the rest of the right-of-way by the time it receives its certificate of public convenience and necessity from the Commission.

The Applicants have analyzed the Project's potential impacts on air quality and will implement measures to minimize and mitigate these impacts, in compliance with federal, state, and local regulations. The proposed new units installed at the existing Greenville and Isola Compressor Stations and at the new Holmes and Kosciusko Compressor Stations will use Solar Inc's SoLoNOx combustion technology, featuring the 9 ppm nitrogen oxides ("NOx") option for low emissions. The Applicants will install an electric seal gas booster pump at each proposed unit to reduce methane emissions. Emissions from the proposed units and new ancillary sources are below the Prevention of Significant Deterioration

(“PSD”) major source threshold, so the Project will not require PSD permitting. The proposed new Solar units at each compressor station will be constructed and packaged in a manufacturer-provided enclosure. The Applicants conducted detailed analyses to determine the potential impacts the Project would have on air and noise quality in Project areas. To minimize and mitigate for the impacts identified in the analyses, the Applicants will implement measures designed to reduce air and noise emissions during construction and operation of the Project facilities. All measures would be implemented in accordance with all applicable federal, state, and local regulations. The construction of the new compressor units will meet FERC's requirements, ensure compliance with all relevant noise regulations, and demonstrate the Applicant's commitment to minimizing the impact on local residents.

C. Continuity of Service and Assurance of Non-Subsidization

The Kosciusko Project has been strategically structured to minimize impacts on existing customers. The Greenville Lateral and Isola CS will be abandoned by sale from Texas Gas to Gulf South, allowing Gulf South to utilize these facilities without disrupting service or requiring new construction and eliminating a future burden to Texas Gas shippers for underutilized facilities. To ensure continuity of service, Texas Gas will lease capacity on Gulf South's system, enabling it to maintain service obligations without adversely affecting its existing firm transportation customers for their remaining contract terms. A new Greenville transfer point is being created to enable Texas Gas shippers to nominate for subsequent redelivery downstream on Gulf South's system. Gulf South is proposing to include all Project facilities in a new rate zone on Gulf South's system, ensuring that Gulf South's existing customers do not subsidize the costs associated with

the acquisition or development of the Project. The proposed leases between Gulf South and Texas Gas further ensure that each pipeline's existing system shippers will not subsidize the Project.

The Project will play a critical role in meeting energy needs in the Southeast United States. Applicants' commitment to reliability, safety, and community engagement underscores the Project's value, including meeting the needs of the Project shippers, promoting economic growth, and providing for the transportation of diverse new natural gas supplies needed to support the region's energy needs. The Commission should conclude that the Project is required by the public convenience and necessity and grant the Applicants the requested authorizations no later than September 17, 2026, to allow sufficient time for Gulf South to construct and place the Project in-service no later than April 1, 2029, as specified in the precedent agreements supporting the Project.

II. **APPLICANTS**

The exact legal name of Gulf South is Gulf South Pipeline Company, LLC, and its principal place of business is 9 Greenway Plaza, Suite 2800, Houston, Texas 77046. Gulf South is a limited liability company organized and existing under the laws of the State of Delaware. Gulf South is engaged in the business of transporting natural gas in interstate commerce and is a "natural-gas company" as defined by Section 2(6) of the NGA. Gulf South is authorized to do business in the States of Texas, Oklahoma, Louisiana, Mississippi, Alabama, and Florida. Gulf South is an open-access pipeline company that provides transportation and storage services pursuant to Part 284 of the Commission's regulations.

The exact legal name of Texas Gas is Texas Gas Transmission, LLC, and its principal place of business is 9 Greenway Plaza, Suite 2800, Houston, Texas 77046. Texas Gas is a limited liability company organized and existing under the laws of the State of Delaware. Texas Gas is engaged in the business of transporting natural gas in interstate commerce and is a “natural-gas company” as defined by Section 2(6) of the NGA. Texas Gas is authorized to do business in the States of Texas, Louisiana, Arkansas, Mississippi, Tennessee, Kentucky, Indiana, Illinois, and Ohio. Texas Gas is an open-access pipeline company that provides transportation and storage services pursuant to Part 284 of the Commission’s regulations.

The names, titles, and mailing addresses of the persons to whom communications and correspondence regarding this filing should be addressed are:

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Each of these persons is designated to receive service in accordance with 18 C.F.R. § 385.203(b)(3). The Applicants request the Commission to place these persons on the official service list for this proceeding pursuant to 18 C.F.R. § 385.2010. The Applicants request that the Commission waive Rule 203(b)(3) to allow designated service to each of these persons.

III.
PROJECT OVERVIEW

A. Proposed Facilities

Gulf South requests certification authorization pursuant to NGA Section 7(c) to acquire from Texas Gas the Greenville Lateral and Isola Compressor Stations, and Texas Gas seeks corresponding authorization pursuant to NGA Section 7(b) to concurrently abandon these facilities to Gulf South by sale.

Gulf South further seeks certificate authorization under NGA Section 7(c) to construct and operate: (i) the Kosciusko Junction Pipeline consisting of 103 miles of new 36-inch pipeline, (ii) four M&R stations (Kosciusko, Columbia Gulf, Southern Natural, Destin Check Measurement); (iii) the Columbia Gulf Lateral consisting of 8 miles of new 36-inch pipeline; (iv) one new Solar Mars 100 compressor unit and one Taurus 60 compressor unit, for a total horsepower (“HP”) of 22,993², and auxiliary appurtenant facilities, at the existing Isola CS in Humphreys County, Mississippi; (v) one new Solar Titan 250 compressor unit, one Solar Mars 100 compressor unit, and one Solar Taurus 70 compressor unit, for a total HP of 51,554³, and auxiliary appurtenant facilities, at the new Kosciusko CS in Attala County, Mississippi; and (vi) the new Holmes CS consisting of a Solar Titan 130 compressor unit with a HP of 20,952⁴ and auxiliary appurtenant facilities in Holmes County, Mississippi.

Texas Gas seeks certificate authorization under NGA Section 7(c) to construct and operate one new Solar Titan 130 compressor unit with a HP of 20,952⁵ and auxiliary appurtenant facilities, at the existing Greenville CS in Washington County, MS. Texas Gas further proposes modifying the existing check meters within the existing Greenville CS to establish custody transfer measurement between Texas Gas and Gulf South.

² The listed HP in this Application is based on National Electrical Manufacturers Association (“NEMA”) rating; ISO rating is 23,558 HP; site rating is 19,842 HP.

³ The listed HP in this Application is based on NEMA rating; ISO rating is 58,792 HP; site rating is 47,308 HP.

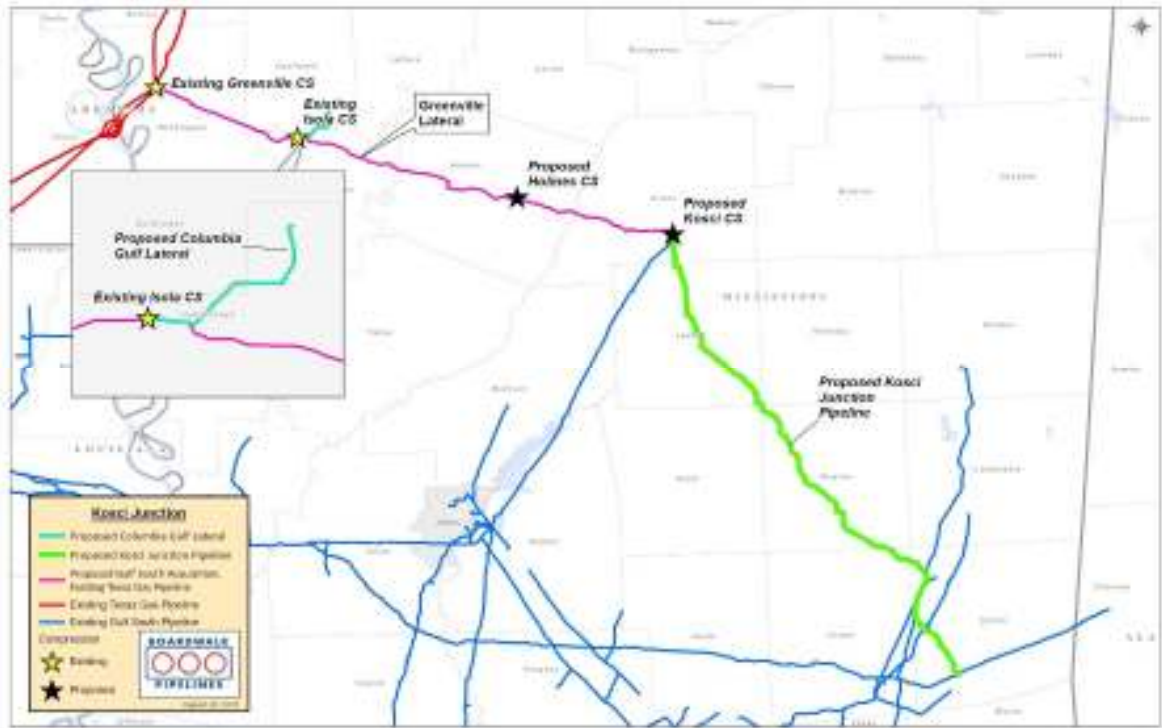
⁴ The listed HP in this Application is based on NEMA rating. ISO rating is 23,442 HP; site rating is 19,584 HP.

⁵ The listed HP in this Application is based on NEMA rating. ISO rating is 23,442 HP; site rating is 19,727 HP.

Table 1 below provides the overall construction components for Gulf South and Texas, and Figure 1 below is a map representing the location of the Project facilities to be constructed.

Table 1 Proposed Kosciusko Junction Pipeline Construction Components		
Facility	Facility Description	Location (MS)
Gulf South Pipeline Company, LLC		
New Kosciusko Pipeline	103 miles of new 36-inch pipeline, and three new meter & regulator stations	Attala, Leake, Newton, Jasper & Clarke Counties
New Columbia Gulf Lateral	8 miles of new 36-inch pipeline and one meter & regulator station	Humphreys & Sunflower Counties
Existing Isola Compressor Station	Two new gas-fired compressor units totaling 22,993 HP	Humphreys County
New Kosciusko Compressor Station	New compressor station facility with three gas-fired compressor units totaling 51,554 HP	Attala County
New Holmes Compressor Station	New compressor station facility with one gas-fired compressor unit totaling 20,952 HP	Holmes County
Texas Gas Transmission, LLC		
Existing Greenville Compressor Station	New gas-fired compressor unit totaling 20,952 horsepower (hp)	Washington County

Figure 1 – Map of Project Facilities



B. Capacity Leases

1. Gulf South's Lease on Texas Gas' System

Gulf South also seeks authorization pursuant to NGA Section 7(c) to acquire, by lease, short-haul capacity on the Texas Gas system so that Gulf South can provide Project shippers with direct access to specified receipt points on Texas Gas' existing system ("Gulf South Lease"). Specifically, the proposed lease would allow Gulf South to acquire 114,000 Dth/d of transportation capacity on the Texas Gas mainline system from the Trunkline Dyersburg receipt point and 193,000 Dth/d from the Texas Gas Lula receipt point. Both of these points are located north of the Greenville CS that will be delivered to the Texas Gas interconnection with the Greenville Lateral. Additionally, the proposed lease will include 113,000 Dth/d of transportation capacity from a new interconnect point with ANR Pipeline that is located south of the Greenville CS that will also be delivered to the interconnection

with the Greenville Lateral (“Gulf South Lease Capacity”). The total leased capacity is 420,000 Dth/d. Texas Gas seeks corresponding abandonment authorization pursuant to NGA Section 7(b) to abandon the Gulf South Lease Capacity to Gulf South. The Gulf South Lease is attached as Exhibit U, Volume II, of this Application and is filed with a request for Privileged Treatment under 18 C.F.R. § 388.112 (2025) and marked “CUI//PRIV” and **“Contains Privileged Information – Do Not Release.”** Subject to Gulf South and Texas Gas obtaining all necessary governmental authorizations, and subject to the satisfaction or waiver of conditions precedent, Texas Gas shall make the Gulf South Leased Capacity available to Gulf South on January 1, 2031.

The Gulf South Lease provides Gulf South the right to transport up to 420,000 Dth/d, exclusive of fuel between the specified primary receipt and delivery points. Gulf South will pay Texas Gas a monthly lease charge consisting of a Monthly Demand Charge and a Commodity Charge, described more fully below. Gulf South will have the right to use the Gulf South Lease Capacity on a primary firm basis and will use it to provide open access transportation service to its customers pursuant to its FERC NGA Gas Tariff. Texas Gas will maintain operational control of the facilities used to provide the leased capacity. The primary term of the Gulf South Lease is twenty (20) years, subject to an evergreen term for two (2) additional terms of five (5) years each unless terminated by either Gulf South or Texas Gas by providing the other party with no less than 365 days prior written notice. Upon termination of the Gulf South Lease Agreement, all of the leased capacity will revert to Texas Gas and the Applicants will make all necessary filings with the FERC for Gulf South to abandon and Texas Gas to reacquire the Gulf South Lease Capacity.

Section 4.1 of the Gulf South Lease Agreement provides that Gulf South will pay a monthly lease charge as detailed in Section VI below. The total rate per Dth will be multiplied by the applicable volumes multiplied by the number of days in the month. The quantity of fuel gas required for deliveries to the Primary Delivery Point from the Primary Receipt Points of the Gulf South Lease, including lost and unaccounted for gas, shall be the effective fuel retention percentage (“EFRP”) for FT/STF/IT Rate Schedules for the Receipt/Delivery Zones listed in Table 2 in Section VI below, as stated in Texas Gas’ FERC NGA Gas Tariff, Fourth Revised Volume 1, Section 4.18.1 (which is also the same as all similar Texas Gas transportation customers are assessed). The EFRP shall be charged on all gas quantities delivered for the account of Gulf South via the Gulf South Lease Capacity for redelivery to the Primary Delivery Point(s).

2. Texas Gas’ Lease on Gulf South’s Greenville Lateral

The Greenville Lateral, which Gulf South will acquire from Texas Gas as part of the Project, is currently significantly underutilized, although Texas Gas has remaining firm shippers with firm service on the Greenville Lateral. Texas Gas proposes pursuant to NGA Section 7(c) to lease back a portion of the Greenville Lateral capacity from Gulf South after acquisition so that Texas Gas can continue to provide service to the remaining shippers (“Texas Gas Lease”). The proposed Texas Gas Lease would allow Texas Gas to provide up to 595,000 Dth/d of existing transportation capacity on the Greenville Lateral system from the Texas Gas interconnect with the Greenville Lateral to two new interconnection points on the Kosciusko Pipeline with Texas Eastern Transmission Pipeline and Southern Natural Gas Company, L.L.C. (“Southern Natural”) (“Texas Gas Lease Capacity”). Gulf South seeks corresponding authorization pursuant to section 7(b) of the NGA to abandon

the Texas Gas Lease Capacity. The Texas Gas Lease is attached as Exhibit U, Volume II, of this Application and is filed with a request for Privileged Treatment under 18 C.F.R. § 388.112 (2025) and marked “CUI//PRIV” and “**Contains Privileged Information – Do Not Release**”. Subject to the Applicants obtaining all necessary governmental authorizations, and subject to the satisfaction or waiver of conditions precedent, Gulf South shall make the Texas Gas Lease Capacity available to Texas Gas on the first day of the first month following the date the Applicants receive authorization from the Commission approving the Project

The proposed Texas Gas Lease provides Texas Gas the right to transport up to 595,000 Dth/d, exclusive of fuel, between specified receipt and delivery points on the Greenville Lateral. Texas Gas will pay Gulf South a monthly lease charge consisting of a Monthly Demand Charge and a Commodity Charge, described more fully in Section VI below. Texas Gas will have the right to use the Texas Gas Lease Capacity on a firm basis and will use it to provide open-access transportation service to its customers pursuant to its FERC NGA Gas Tariff. Gulf South will maintain operational control of the facilities used to provide the leased capacity. The Texas Gas Lease will be effective until end of gas day on December 31, 2030, unless terminated earlier by either Gulf South or Texas Gas by providing the other party with no less than 365 days prior written termination notice. Upon termination of the Texas Gas Lease, all of the leased capacity will revert to Gulf South and the Applicants will make all necessary filings with the FERC for Texas Gas to abandon the Texas Gas Lease Capacity and Gulf South to reacquire such leased capacity.

Section 4.1 of the Texas Gas Lease Agreement provides that Texas will pay a monthly lease charge consisting of a demand charge and a commodity charge as detailed in

Table 3 in Section VI below. The quantity of fuel gas required for deliveries to the Primary Delivery Point, including lost and unaccounted for gas, shall be the EFRP for transportation applicable to Greenville Lateral that will be reflected in Gulf South’s FERC NGA Gas Tariff, Seventh Revised Volume 1 (“Tariff”), Section 4.22. The EFRP shall be charged on all gas quantities delivered for the account of Texas Gas via the Texas Gas Lease Capacity for delivery to the Primary Delivery Point(s) associated with the Texas Gas Lease.

These coordinated lease arrangements represent an efficiency-driven approach, allowing both parties to leverage existing assets to meet contractual obligations, minimize duplicative infrastructure development, and enhance system reliability and flexibility. This strategic collaboration supports the broader objectives of the Project by facilitating seamless integration of supply and delivery capabilities.

C. Participation in the FERC Pre-Filing Process

On February 7, 2025, the Applicants filed a request to utilize the Commission’s pre-filing review process for the proposed Kosciusko Project in Docket No. PF25-6-000, as further discussed in Section VIII below. Commission Staff accepted the Applicants’ request on February 27, 2025. Throughout the pre-filing process, the Applicants have worked closely with Commission Staff, the Commission’s third-party environmental contractor, and all interested stakeholders.

D. Projected Construction Schedule

Subject to receiving all required authorizations and approvals, the Applicants anticipate commencing construction of the Project as early as winter 2026-2027 and placing the Project in-service no later than April 1, 2029. The Applicants request that the Commission complete its review of the Application and grant the requested authorizations

in this Application no later than September 17, 2026. Receipt of an order by September 17, 2026, will allow time for certain post-certificate compliance activities needed to maintain the overall Project schedule. The Applicants must complete construction and place the facilities in service no later than April 1, 2029 to fulfill their obligations to meet the in-service requirements of the Project shippers. The Applicants' commitment to meet this in-service date is a critical contractual component of the precedent agreements executed with the Project shippers. The Applicants could potentially commence construction earlier depending on construction windows available at the time after a Certificate Order is issued. Early commencement of construction would mitigate risks associated with seasonal flooding, hurricane activity, and other adverse weather conditions that are prevalent along portions of the proposed route. Establishment of contractor yards, access roads, and other preparatory infrastructure, under favorable conditions would facilitate efficient mobilization and reduce the potential for delays during full-scale construction. The ability to commence construction at the earliest possible date will also enhance access to the right-of-way, support workforce and equipment staging, and ensure the Project remains on schedule to meet market demand and regulatory milestones. These measures are prudent and will help ensure the safe, timely, and efficient execution of the Project to meet both market demand in the Southeast and needs of the Project's shippers.

The Applicants will devote the resources necessary to respond promptly to any requests for additional data or information to assist the Commission in its review of this Application.

IV.
EXISTING FACILITIES TO BE USED AS PART OF THE PROJECT, OPEN SEASON, & PRECEDENT AGREEMENTS

A. Description of Existing Facilities to Be Used As Part of the Project

1. The Existing Greenville Lateral

The Greenville Lateral was certificated by the Commission on May 2, 2008, under Docket No. CP07-417-000.⁶ Texas Gas placed an initial segment of the Greenville Lateral in-service on March 3, 2009, with remaining segments placed in-service on March 27, 2009. The Greenville Lateral consists of 96.6 miles of 36-inch diameter natural gas pipeline (GRK 36-1), 0.8 miles of 36-inch diameter pipeline (KOS 36-1), 0.3 miles of 20-inch-diameter pipeline (KSN 20-1), and auxiliary facilities. An additional 0.2 miles of 12-inch-diameter pipeline (ENA 12-1) and delivery meter, to accommodate Entergy Power Plant, was installed under Texas Gas' Annual Report of Blanket Certificate Activities under Docket No. CP12-276-000 and placed in-service June 23, 2011.

2. The Existing Isola Compressor Station

The Isola Compressor Station, originally designed to provide 13,330 NEMA HP, was certificated by the Commission on April 16, 2009, under Docket No. CP08-467-000.⁷ Pursuant to this authorization, Texas Gas installed one Solar Mars 100 unit with a total of 13,330 NEMA HP, placing the unit in-service on January 23, 2010.

3. The Existing Greenville Compressor Station

The Greenville CS is located in Washington County, Mississippi. The station was originally certificated by the Federal Power Commission ("FPC") on March 30, 1949 in

⁶ *Texas Gas Transmission, LLC* 123 FERC ¶ 61,118 (2008), *Order Amending Certificate*, 125 FERC ¶ 62,030 (2008), *Order Amending Certificate*, 125 FERC ¶ 62,148 (2008), *Order Amending Certificate*, 126 FERC ¶ 62,008 (2009).

⁷ *Texas Gas Transmission, LLC*, 127 FERC ¶ 6261,046 (2009).

Docket No. G-859.⁸ Subsequent, additional reciprocating engines were installed pursuant to Docket Nos. G-6854, G-15320, CP62-195, CP67-198, CP84-720, and CP00-81.⁹ In 2006, Texas Gas was authorized in Docket CP00-81-000 to install one 12,936 HP¹⁰ turbine driven compressor. The Greenville CS is currently equipped with 43,026 total installed horsepower, consisting of three 2,600 HP Clark HBA-10 compressor engines; four 1,550 HP Clark HBA-6 compressor engines; two 2,000 HP Clark TLA-6 compressor engines; one 12,090 General Electric turbine; and one 12.936 HP Solar Mars 100 turbine.

B. Open Season

Gulf South entered into a precedent agreement with Southern Company, the Project's Anchor shipper for 800,000 Dth/d, and in accordance with General Terms & Conditions Section 6.11[2] of its Tariff, Gulf South conducted a binding Open Season to determine additional interest in the Project.¹¹ The Open Season was posted from September 26, 2024 through November 12, 2024, and sought binding commitments for additional firm transportation capacity for delivery to the Southeast United States. Following the Open Season, Gulf South continued to solicit additional bids for the Project capacity, and Gulf South subsequently entered into additional binding precedent agreements with FP&L for 200,000 Dth/d and with PowerSouth for 100,000 Dth/d of the Project capacity.

⁸ *Texas Gas Transmission Corporation*, 8 FPC 190 (1949).

⁹ *Texas Gas Transmission Corporation*, 9 FPC 1062 (1950), 14 FPC 632 (1955), 20 FPC 545 (1958), 22 FPC 378 (1959), and 36 FPC 55 (1966).

¹⁰ NEMA rated.

¹¹ To qualify as an Anchor Shipper for the Project, a party must have bid, by submitting a binding precedent agreement, on 200,000 Dth/d or more of Project capacity and for a term of at least twenty (20) years.

C. Precedent Agreements

The binding precedent agreements executed the Applicants and the Project's shippers provide that the shippers will execute conforming service agreements, under Gulf South's Rate Schedule Firm Transportation Service ("FTS"), as described in more detail below. Gulf South is filing pro forma tariff sheets, included as Exhibit P, to reflect the recourse rate for the Project. The precedent agreements between the Project shippers and Gulf South are included in Exhibit I, Volume II, of this Application and is filed with a request for Privileged Treatment under 18 C.F.R. § 388.112 (2025) and marked "CUI//PRIV" and "Contains Privileged Information – Do Not Release".

1. Southern Company Services, Inc.

The precedent agreement with Southern Company provides that Southern Company will enter into a service agreement under Rate Schedule FTS for 800,000 Dth/d of the Project's capacity for transportation service ("FTS Agreement") to a primary delivery point on Gulf South's existing system (Rock Springs/Scott Mtn (Transco)) and a new delivery point to Southern Natural Gas Company, L.L.C. ("Southern Natural"). Southern Company will have access to other markets on Gulf South's system on a non-primary basis or can modify their initial primary delivery points and add other Gulf South delivery points listed on Exhibit A of the FTS Agreement on a primary basis. Southern Company's FTS agreement will have a term of twenty (20) years, subject to an evergreen term,¹² and shall be effective upon the later of (A) April 1, 2029, or (B) the in-service date of the Project. Southern Company's precedent agreement states that Gulf South will provide the proposed service under its Rate Schedule FTS service at a discounted rate.

¹² Upon written notice, the agreement shall continue for an evergreen term for two (2) additional terms of five (5) years each.

Firm transportation service will be provided by means of an executed, conforming FTS agreement and in accordance with Gulf South's existing Rate Schedule FTS and its Tariff. The Project capacity secured by the precedent agreement will help ensure that Southern Company can access diverse, affordable and reliable gas supplies to meet growing energy demands, maintain reliability, achieve environmental goals, and support economic growth in the Southeast United States.

2. Florida Power & Light Company

The precedent agreement with FP&L provides that FP&L will enter into a Rate Schedule FTS agreement for 200,000 Dth/d of Project capacity at discounted rates to two primary delivery points on Gulf South's existing system (Destin Clarke County and Rock Springs/Scott Mtn (Transco)). FP&L's FTS agreement will have a term of fifteen (15) years, subject to an evergreen term,¹³ and shall be effective upon the later of (A) April 1, 2029, or (B) the in-service date of the Kosciusko Project. Firm transportation service will be provided by means of an executed, conforming FTS agreement and in accordance with Gulf South's existing Rate Schedule FTS and its Tariff. By securing additional firm transportation capacity from Gulf South, FP&L can access the gas supplies needed to continue to meet the energy needs of its customers, enhance reliability, support economic growth in Florida and benefit from supply diversity.

3. PowerSouth Energy Cooperative

The precedent agreement with PowerSouth provides that PowerSouth will enter into a service agreement under Rate Schedule FTS for 100,000 Dth/d of the Project's capacity at discounted rates for transportation service ("FTS Agreement") to a primary

¹³ Upon written notice, the agreement shall continue for an evergreen term for two (2) additional terms of five (5) years each.

delivery point on Gulf South's existing system (Nextera Lowman). PowerSouth's FTS agreement will have a term of twenty (20) years, subject to an evergreen term,¹⁴ and shall be effective upon the later of (A) April 1, 2029, or (B) the in-service date of the Kosciusko Project. Firm transportation service will be provided by means of an executed, conforming FTS agreement and in accordance with Gulf South's existing Rate Schedule FTS and its Tariff. Securing additional firm transportation capacity from Gulf South will help ensure that PowerSouth can access gas supplies to meet growing energy demands, maintain reliability, achieve environmental goals, and support economic growth in the Southeast United States.

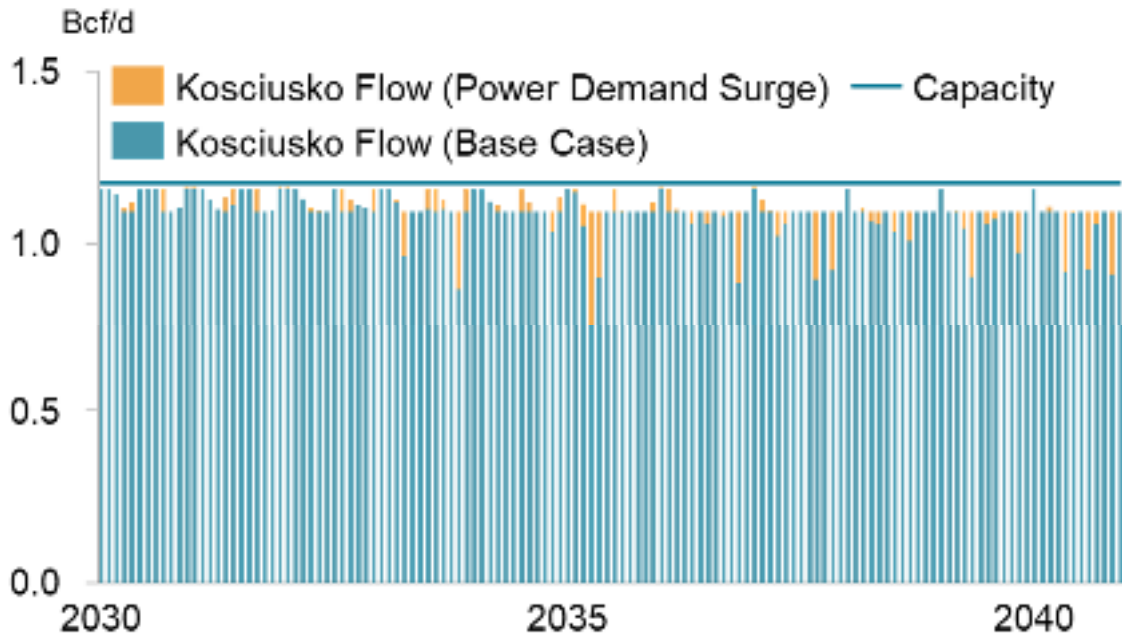
D. Diverse Gas Supply to Southeast United States

The proposed Kosciusko Project is strategically aligned with evolving United States natural gas market dynamics, as outlined in the SPGCI Market Study. The Kosciusko Project will provide a necessary conduit for Southeast customers to access additional supply from Appalachia, Fayetteville, Midcontinent and Haynesville and will be heavily utilized throughout the forecast period. The supply optionality provided by the Project will become increasingly important as LNG exports grow. Growth in LNG exports requires additional supply from Gulf Coast basins such as the Haynesville, Eagle Ford, and Permian and will increase competition for the gas supplies needed by Southeast consumers. In addition to demand growth, increasing intra-day volatility is occurring with limited high deliverability gas storage available within the region. In the short term, the demand for natural gas to serve electric power producers is increasing in the Southeast, and over the long-term, power demand in the Southeast is expected to be the most resilient of all regions

¹⁴ Upon written notice, the agreement shall continue for an evergreen term for two (2) additional terms of five (5) years each.

in the United States due to weaker expectations surrounding solar capacity and significant coal retirements.

Figure 2 – Modeled Kosciusko Project Flow



Source: S&P Global Commodity Insights.

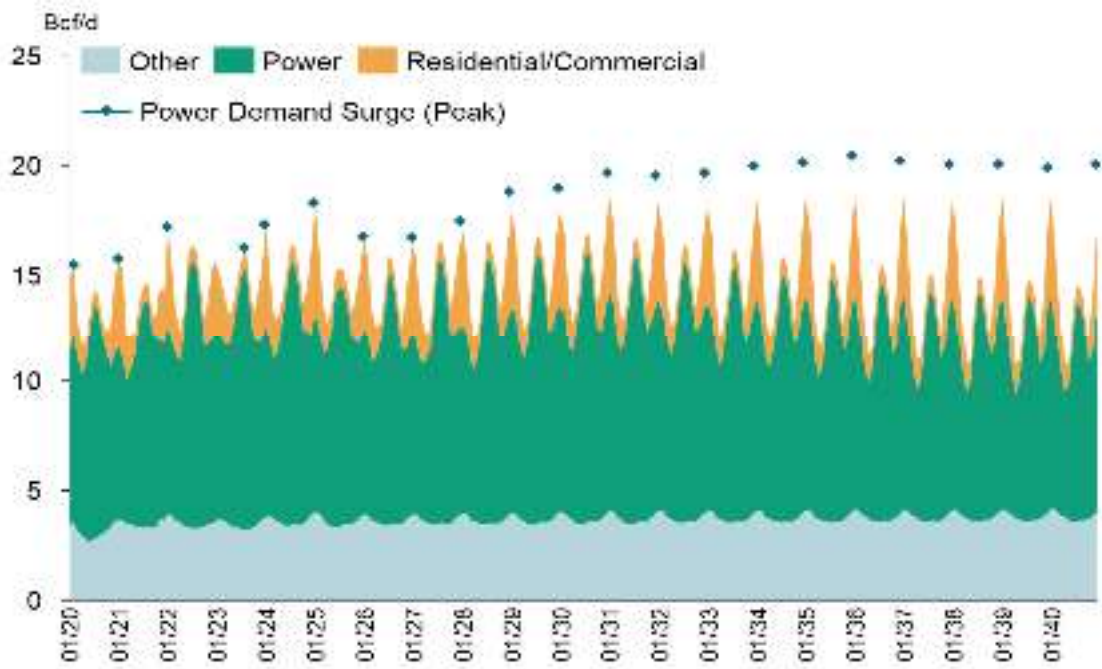
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The SPGCI Market Study explains that, given the highly dynamic forecasting environment due to the pace of change regarding artificial intelligence data center announcements and other large industrial loads, infrastructure owners must consider a range of plausible scenarios to ensure reliability. SPGCI modeled a “Power Demand Surge” scenario which forecasts incremental power demand in the Southeast of 1.0 Bcf/d in 2030, rising to 1.4 Bcf/d by 2040 beyond the Base Case.¹⁵

¹⁵ SPGCI’s Base Case forecast is considerably lower than those from regional utilities, highlighting both the uncertainty and need to plan for upside risk. SPGCI notes that this scenario provides important context when reviewing the need for incremental firm transport capacity in the region.

The SPGCI Market Study shows that, irrespective of scenario, peak month gas demand is projected to grow to 2040 to support renewables variability implying that Southeast utilities will require additional gas supply sources and firm pipeline transportation capacity. Southeast markets have historically been served by the Transcontinental Gas Pipeline (“Transco”) which transports Marcellus and Utica gas supply from the northern United States, and several pipelines transporting gas from the west offer critical incremental supply diversity and reliability to Southeast markets, including Florida and Georgia. SPGCI forecasts that due to gas demand growth for power generation, both pipeline corridors will see high utilization year-round and likely face constraints in peak winter months despite announced expansions, even more so if expansion projects are delayed or are not brought into service at all.

Figure 3 – Southeast Monthly Natural Gas Demand



Source: S&P Global Commodity Insights.

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The SPGCI Market Study shows that an important shift is occurring in gas and power markets that is forecast to accelerate over time. The increase of solar generation in the Southeast power mix means that peak power demand from the gas perspective is moving from summer to winter, which will drive the growth of peak month demand even as annual demand begins to decline. The coincident peak demand between the power and residential/commercial sectors will place additional strain on the pipeline grid and require incremental firm transportation capacity to be developed as market participants will no longer be able to rely on excess capacity being made available in off-peak seasons. SPGCI forecasts that the Kosciusko Project utilization approaches 100% into the Southeast almost every year during peak demand under normal weather conditions.

V.
AUTHORIZATIONS REQUESTED AND
DESCRIPTION OF FACILITIES

A. Acquisition of the Greenville Lateral by Gulf South

Gulf South seeks certificate authorization pursuant to NGA Section 7(c) to acquire by sale (i) Texas Gas' existing Greenville Lateral, as detailed in Section IV above; and (ii) Texas Gas' existing Isola CS, located in Humphreys County, Mississippi with one existing Mars 100 compressor unit currently rated at 13,330 HP, along with associated gas cooling, suction and discharge piping, and other necessary appurtenant, auxiliary facilities. The Isola CS is the only compressor station currently located on the Greenville Lateral.

Texas Gas also requests any necessary authorization pursuant to NGA Section 7(b) to abandon by sale the Greenville Lateral and Isola CS to Gulf South. The proposed abandonment by sale of the Greenville Lateral will not adversely impact existing Texas Gas customers. The Greenville Lateral is currently a separate rate zone on Texas Gas

system, so its acquisition by Gulf South will not adversely affect the rates of Texas Gas' existing mainline shippers. Texas Gas also proposes to lease capacity on the Greenville Lateral from Gulf South to ensure continued service allowing Texas Gas to fully honor all existing contractual obligations to its customers without interruption or degradation of service quality. Texas Gas remains committed to maintaining reliable and efficient service throughout its system. The proposed accounting treatment for the abandonment in place of the Greenville Lateral and Isola CS is submitted as Exhibit Y to this Application.

B. Proposed Gulf South Facilities

Gulf South seeks authorization under Section 7(c) of the NGA to expand the capacity of the Greenville Lateral that it will acquire by sale from Texas Gas by (i) adding one new Solar Mars 100 gas-fired compressor unit rated at 14,189 HP and one Solar Taurus 60 unit rated at 6,804 HP at the existing Isola CS and (ii) installing one new Solar Titan 130 gas-fired compressor unit totaling 20,952 HP at a new greenfield compressor station in Holmes County, Mississippi – the Holmes CS. Gulf South will also install other necessary appurtenant, auxiliary facilities at the Isola CS and Holmes CS.

Gulf South also proposes to construct the Columbia Gulf Lateral and a new interconnect (“Columbia Gulf Lateral”), which will consist of approximately 8 miles of 36-inch-diameter pipeline located in Humphreys and Sunflower Counties, Mississippi. The proposed Columbia Gulf Lateral will be co-located with the rights-of-way of other existing pipelines and powerlines for approximately 37% of the proposed route. The proposed Columbia Lateral will tie-in to the Greenville Lateral at the Isola CS and connect to a new Receipt Meter and Regulator (“M&R”) Station that Gulf South will construct near

an existing compressor station owned by Columbia Gulf in Humphreys County, Mississippi.

Gulf South also proposes to construct the Kosciusko Pipeline (“Kosciusko Pipeline”), consisting of approximately 103 miles of 36-inch-diameter pipeline located in Attala, Leake, Newton, Jasper and Clarke Counties, Mississippi. The proposed Kosciusko Pipeline will extend from the terminus of the Greenville Lateral in Attala County, Mississippi and terminate in Clarke County, Mississippi at Gulf South’s existing Destin CS. The Kosciusko Pipeline will have three interconnects as detailed below.¹⁶ The proposed Kosciusko Pipeline, along with the Greenville Lateral, will essentially create an operational loop of Gulf’s South existing 42-inch pipelines that substantially extends Gulf South’s system to provide access to new gas supplies that can be transported to both new delivery and existing Gulf South delivery points. The proposed Kosciusko Pipeline will be co-located with the rights-of-way of existing pipelines and powerlines for approximately 40% of the proposed route.

Gulf South also seeks authorization to construct the new Kosciusko CS, to include three gas-fired compressor units totaling approximately 51,554 HP. The units to be installed at the proposed new Kosciusko CS include the following: one Solar Titan 250 unit rated at 27,677 HP, one Solar Mars 100 unit rated at 14,189 HP, and one Solar Taurus 70 unit rated at 9,688 HP, which will be sited on property owned by Gulf South in Attala County, Mississippi, located near the beginning of the Kosciusko Junction Pipeline. Gulf

¹⁶ Texas Gas is intends to construct under its blanket certificate authorization in Docket No. CP82-407-000, receipt points with ANR Pipeline Company and Tennessee Gas Pipeline Company, LLC on its existing mainline system.

South will also install associated gas cooling, suction and discharge piping, and other necessary appurtenant, auxiliary facilities at the Kosciusko CS.

Gulf South proposes to construct as part of the Project four new M&R stations (including metering, tap, flow control and communication facilities) at interconnect locations along the proposed Columbia Lateral and Kosciusko Junction Pipeline. The new Columbia Gulf Meter Station will be installed at the beginning of the Columbia Lateral and within an existing compressor station owned by Columbia Gulf Transmission, LLC in Humphreys County, Mississippi. The new Kosciusko Meter Station and Destin Check Meter Station will be located along the proposed Kosciusko Pipeline and will be installed directly adjacent to the Kosciusko CS and the existing Destin CS in Attala and Clarke counties, Mississippi, respectively. The new Southern Natural Meter Station will be located along the proposed Kosciusko Pipeline in Clarke County, Mississippi.

E. Proposed Texas Gas Facilities

Texas Gas seeks authorization to expand its existing Greenville CS by adding one new gas-fired Solar Titan 130 compressor unit rated at 20,952 HP located in Washington County, Mississippi. Texas Gas will also install associated gas cooling facilities, suction and discharge piping, blowdown silencer and other necessary appurtenant, auxiliary facilities at the Greenville CS. As a result of the Greenville Lateral sale, Texas Gas will modify the existing check meters within the existing Greenville CS to establish custody transfer measurement between Texas Gas and Gulf South. The additional Greenville CS facilities will increase Texas Gas' ability to deliver additional supplies from its existing mainline system onto the Greenville Lateral that benefits both Project Shippers, who will have the ability to access existing receipt points on Texas Gas' system via the Gulf South

Lease, and Texas Gas shippers who will be able to make increased deliveries into the Greenville Lateral.

D. Capacity Leases

Applicants further seek the necessary certificate and abandonment authorizations pursuant to NGA Sections 7(b) and 7(c) to enter the Gulf South Lease and Texas Gas Lease as described in Section 3(B) above. Gulf South seeks approval under NGA Section 7(c) to lease 420,000 Dth/d of transportation capacity on Texas Gas' system, enabling direct access to short-haul receipt and delivery points for project shippers. Gulf South requests corresponding authorization under Section 7(b) of the NGA to abandon the capacity to be leased to Gulf South.

Separately, Texas Gas proposes to lease back up to 595,000 Dth/d of capacity on the underutilized Greenville Lateral from Gulf South to continue serving existing shippers. Gulf South requests corresponding authorization under Section 7(b) of the NGA to abandon the capacity to be leased to Texas Gas.

The proposed lease arrangements offer substantial benefits to existing shippers on the Gulf South and Texas Gas systems. The Gulf South Lease will provide Project shippers with direct access to certain receipt points on Texas Gas' existing system without the need to enter into multiple service agreements or submit multiple nominations. The Texas Gas Lease will allow Texas Gas to maintain continuity of service to the remaining firm shippers on the Greenville Lateral.

E. Projected Construction Schedule

Subject to obtaining all necessary authorizations and approvals, the Applicants anticipate commencing construction of the Project as early as winter 2026-2027 with a

targeted in-service date no later than April 1, 2029. Completion and timely placement of the facilities into service by this date are essential to fulfilling the contractual obligations to the Project's customers.

F. Flow Diagrams

The flow diagrams illustrate that the additional compression at the existing stations and the new Holmes Compressor Station will allow Gulf South to increase its supply of the Greenville Lateral to 1.315 Bcf/d and the capacity of the Kosciusko Junction Pipeline is 1.175 Bcf/d. The flow diagrams and data demonstrate both daily design and the maximum capability of the Project facilities. The Project facilities' maximum design flow will result in 75,000 Dth/d of unsubscribed capacity on the existing Greenville Lateral and the proposed Kosciusko Pipeline. Advanced negotiations are ongoing with a potential shipper for the additional 75,000 Dth/d of Project capacity. To the extent any unsubscribed capacity exists when the Project goes in-service, that capacity will be offered in accordance with Gulf South's Tariff. The flow diagrams demonstrate that the Project will have no adverse impacts on Gulf South's existing customers.

Exhibits G, G-1, and G-II are provided in Volume III, of this Application and filed under a request for treatment as Critical Energy Infrastructure Information ("CEII") under 18 C.F.R. §388.112 (2025) and are marked "**CUI/CEII**" and "**Contains Critical Energy Infrastructure Information - Do Not Release**".

The Project proposed herein will be constructed in compliance with all applicable rules and regulations and operated in accordance with the applicable federal pipeline safety regulations of the U.S. Department of Transportation.

VI.
THE COMMISSION'S LEASE POLICY

The Commission will approve a lease “if it finds that: (i) there are benefits from using a lease arrangement; (ii) the lease payments are less than, or equal to, the lessor’s firm transportation rates for comparable service over the terms of the lease; and (iii) the lease arrangement does not adversely affect existing customers.”¹⁷ Applicants propose two leases as part of the Project: (1) the Gulf South Lease through which Gulf South would lease 420,000 Dth/d of mainline capacity on specified portions of the Texas Gas system so that Gulf South can provide Project shippers with direct access to receipt points on Texas Gas that would not otherwise be accessible from the Project facilities; and (2) the Texas Gas Lease through which would lease back 520,000 Dth/d of Greenville Lateral capacity from Gulf South so that, after the Greenville Lateral is transferred to Gulf South, Texas Gas can continue to provide service to the remaining Texas Gas shippers with firm service on the Greenville. Both of the proposed leases satisfy all three prongs of the Commission’s lease policy.

A. The Gulf South Lease

1. Lease Benefits

The Commission should find that the proposed Gulf South Lease will result in substantial benefits. The proposed Gulf South Lease will enable Gulf South to provide Project shippers with direct access to receipt points that are currently connected to Texas Gas’ system. The Gulf South Lease will allow Gulf South’s shippers to source gas supplies from the Midcontinent, Marcellus and Fayetteville production areas that are available via

¹⁷ Tennessee Gas Pipeline Co., 178 FERC ¶ 61,199 at P 53 (2022). *See also Gulf Crossing Pipeline Company LLC, Gulf South Pipeline Company, LP and Enogex, Inc*, 123 FERC ¶ 61,100 at P 111 (2006).

these receipt points.¹⁸ Providing Project shippers access to these receipt points via the Gulf South Lease is substantially cheaper and will result in fewer environmental impacts than if Gulf South were to construct new facilities for this purpose. Texas Gas will require only a modest upgrade to the facilities at its existing Greenville Compressor Station to support the lease capacity whereas Gulf South would be required to construct: (i) approximately 80 miles of new 20-inch-diameter pipeline, which would extend from the western terminus of the Greenville Lateral to the Lula area, including a new compressor station with one Solar Taurus 60; and (ii) approximately 130 miles of new 16-inch-diameter pipeline, which would extend from Lula area to the Dyersburg area along with the construction of a new compressor station consisting of one Solar Taurus 60, to provide access to the Texas Gas receipt points, Texas Gas Lula and Trunkline Dyersburg, respectively. The costs of the upgrades to Texas Gas' system to provide the lease costs are estimated to be \$79.5 million as compared to the costs of \$654 million that would be required if Gulf South were to construct the required facilities, which means that approximately \$574.5 million of costs would be avoided as a result of the proposed Gulf South Lease.

The Gulf South Lease will also significantly reduce environmental impacts by allowing Gulf South to avoid construction of its own expansion facilities. Texas Gas will provide the lease capacity using primarily existing unutilized capacity, and Texas Gas' only construction activities needed to support the lease capacity consists of the installation of an additional compressor unit at the existing Greenville Compressor and other minor auxiliary station facilities. The environmental impacts from Texas Gas' proposed

¹⁸ The capacity under the Gulf South Lease will take advantage of the current Texas Gas hydraulics given the location of these three receipt points in relationship to the Greenville Lateral. The use of this pocket of capacity is not adversely affecting other shippers on Texas Gas. (Juan/Shannon please share this footnote with Buzz and Michael Hagan to make sure they are comfortable with it)

construction activities are substantially less than the impacts that would result from Gulf South's construction of 210 miles of new 20 and 16-inch pipelines that would otherwise be required to duplicate the lease facilities.

By avoiding the construction of largely-duplicative facilities, the Gulf South Lease will also reduce the number of landowners affected by the development of needed infrastructure. The Gulf South Lease will further result in administrative efficiencies for the Project Customers who will be able to use the lease Capacity to directly access new supplies via Gulf South system using a single service agreement pursuant to the terms of Gulf South's Tariff without having to enter into an additional service agreement on Texas Gas and further avoiding the need to submit nominations on both pipelines.

2. Lease Payments

The Commission should find that Gulf South' lease payments under the Gulf South Lease will be less than Texas's Gas firm transportation rates for comparable service over the terms of the lease.

Section 4.1 of the Gulf South Lease Agreement provides that Gulf South will pay a monthly lease charge as detailed in Table 2 below all of which are below the comparable maximum applicable rate for FT service on Texas Gas. The total rate per Dth will be multiplied by the applicable volumes multiplied by the number of days in the month. The quantity of fuel gas required for deliveries to the Primary Delivery Point from the Primary Receipt Points of the Gulf South Lease, including lost and unaccounted for gas, shall be the EFRP for FT/STF/IT Rate Schedules for the Receipt/Delivery Zones listed in Table 2 below as stated in Texas Gas' FERC NGA Gas Tariff, Fourth Revised Volume 1, Section 4.18.1 (which is also the same as all similar Texas Gas transportation customers are assessed).

The EFRP shall be charged on all gas quantities delivered for the account of Gulf South via the Gulf South Lease Capacity for redelivery to the Primary Delivery Point(s).

Table 2 – Gulf South Lease on Texas Gas’ System

Receipt SLN	Receipt Point Name	MDQ	Total Rate per Dth/day ¹⁹	Transportation Receipt - Delivery Zone	Fuel Receipt/Delivery Zone FT/STF/IT Rate Schedules
8124	Dyersberg	114,000	\$ 0.0500	2-1 Backhaul	Middle/South
9715	Lula-Mainline	193,000	\$ 0.0500	1-1	South/South
TBD	ANR (new point south of Greenville)	113,000	\$ 0.0500	1-1	South/South

3. No Adverse Effect on Existing Customers

The Commission should conclude that the Gulf South Lease will not adversely affect either Gulf South’s or Texas Gas’ existing customers. During the term of the lease, Texas Gas will not be permitted to reflect in its system rates any of the costs associated with the lease capacity, and, upon termination of the lease, Texas Gas will need to obtain Commission authorization before reacquiring the leased capacity. After the capacity is reacquired, Texas Gas’ customers would have the ability to challenge, in a section 4 rate proceeding, any proposal by Texas Gas to include costs previously associated with the capacity in its system rates, and Texas Gas would bear the burden of proof that doing so would not result in subsidization by existing system customers. Texas Gas will further separately account for the costs and revenues associated with the leased facilities and segregate those costs and revenues from its other system costs for the specific purpose of insulating existing system customers from any effects of the lease, consistent with the

¹⁹ Each of these rates is less than Texas Gas’ maximum applicable rates for comparable service. See Texas Gas’ FERC Gas Tariff at Section 4.1.

requirements of section 154.309 of the Commission’s regulations.²⁰ There will also be no subsidization of fuel or lost-and-unaccounted-for gas that results from the lease, as Gulf South will be required to pay Texas Gas’ stated fuel rate. These various protections ensure that Texas Gas’ existing customers will not be adversely affected by the lease.

Gulf South’s existing customers will likewise not be adversely affected by the lease. All of the leased capacity will be used to provide Project shippers direct access to the Project’s new receipt points on the Texas Gas system. The leased capacity will be included in Gulf South’s proposed new Kosciusko Zone so that only the customers using the Project facilities will be subject to the lease costs, thereby ensuring that Gulf South’s existing shippers do not subsidize the lease. Gulf South will also make any unused capacity available to its customers pursuant to its Tariff. These factors all prevent any adverse impact to Gulf South’s existing customers.

A. The Texas Gas Lease

1. Lease Benefits

The Commission should find that the proposed Texas Gas Lease will result in substantial benefits. The Texas Gas Lease is designed to allow Texas Gas to lease back up to 595,000 Dth/d of Greenville Lateral capacity from Gulf South after the Greenville Lateral is transferred to Gulf South, which will enable Texas Gas to provide service to the remaining two Texas Gas shippers with firm service on the Greenville Lateral without the need for duplicative infrastructure investment. By leveraging Gulf South’s ownership and operational capabilities, Texas Gas ensures continuity of service while optimizing system efficiency. The lease reflects a strategic use of existing assets to preserve reliability,

²⁰ 18 C.F.R. § 154.309 (2025).

minimize environmental and permitting impacts. If not for the proposed lease, Texas Gas would be required to spend approximately \$586.2 million to (i) construct approximately 98-miles of 36-inch pipeline to parallel the Greenville Lateral from the Greenville CS to the Kosciusko CS, (ii), install one additional Mars 100 compressor unit at the existing Isola Compressor Station; and (iii) install additional metering facilities, in order to maintain the capability to serve the remaining Texas Gas shippers on the Greenville Lateral. These construction costs would be fully avoided by the Texas Gas Lease

The Texas Gas Lease will also eliminate the environmental impacts that would be caused by the duplicative greenfield pipeline construction by Texas Gas. By avoiding the construction of duplicative facilities, the Texas Gas Lease will also reduce the number of landowners affected by the Project.

2. Lease Payments

The Commission should find that Texas Gas' lease payments under the Texas Gas Lease will be less than Gulf South's firm transportation rates for comparable service over the term of the lease. The proposed Texas Gas Lease provides Texas Gas the right to transport up to 595,000 Dth/d, exclusive of fuel, between specified receipt and delivery points on the Greenville Lateral. Texas Gas will pay Gulf South a monthly lease charge consisting of a Monthly Demand Charge and a Commodity Charge, described more fully in Table 3 below.²¹ Texas Gas has the right to use the Texas Gas Lease Capacity on a firm basis, and will use it to provide open access transportation service to its customers pursuant to its FERC NGA Gas Tariff. Gulf South will maintain operational control of the facilities

²¹ The rates reflected in Table 4 reflect the existing contract rate under the existing firm transportation agreements. Using the existing transportation rates to develop the lease rate is consistent with the Applicants commitment to honor the existing agreements.

used to provide the leased capacity. The Texas Gas Lease will be effective until December 31, 2030 unless terminated earlier by either Gulf South or Texas Gas by providing the other party with no less than 365 days prior written termination notice. Upon termination of the Texas Gas Lease, all of the leased capacity will revert to Gulf South and the Applicants will make all necessary filings with the FERC for Texas Gas to abandon the Texas Gas Lease Capacity and Gulf South to reacquire such leased capacity.

Section 4.1 of the Texas Gas Lease Agreement provides that Texas will pay a monthly lease charge consisting of a demand charge and a commodity charge as detailed in Table 4 below. These rates are less than the proposed demand charge of \$0.4207 per Dth for Gulf South’s proposed Kosciusko Zone that will be created to encompass the Project Facilities.

Table 3 -

Texas Gas Lease Quantities and Rates (assuming 100% Load Factor) by Year				
	2027	2028	2029	2030
Texas Gas Lease MDQ (Dth/d)	595,000	545,000	520,000	495,000
Demand Rate	\$0.0232	\$0.0219	\$0.0212	\$0.0205
Commodity Rate	\$0.0140	\$0.0152	\$0.0159	\$0.0167

The quantity of fuel gas required for deliveries to the Primary Delivery Point, including lost and unaccounted for gas, shall be the EFRP for transportation applicable to Greenville Lateral that will be reflected in Gulf South’s FERC NGA Gas Tariff, Seventh Revised Volume 1, Section 4.22. The EFRP shall be charged on all gas quantities delivered for the account of Texas Gas via the Texas Gas Lease Capacity for delivery to the Primary Delivery Point(s) associated with the Texas Gas Lease.

3. No Adverse Effect on Existing Customers

The Commission should conclude that the Texas Gas Lease will not adversely affect either Gulf South's or Texas Gas' existing customers. During the term of the lease, Gulf South will not be permitted to reflect in its system rates any of the costs associated with the Lease Capacity, and, upon termination of the lease, Gulf South will need to obtain Commission authorization before reacquiring the leased capacity. After the capacity is reacquired, Gulf South's customers would have the ability to challenge, in a section 4 rate proceeding, any proposal by Gulf South to include costs associated with the capacity in its system rates, and Gulf South would bear the burden of proof that doing so would not result in subsidization by existing system customers. Gulf South will further separately account for the costs and revenues associated with the leased facilities and segregate those costs and revenues from its other system costs for the specific purpose of insulating existing system customers from any effects of the lease, consistent with the requirements of section 154.309 of the Commission's regulations.²² There will also be no subsidization of fuel or lost-and-unaccounted-for gas that results from the lease, as Texas Gas will be required to pay Gulf South's stated fuel rate. These various protections ensure that Gulf South's existing customers will not be adversely affected by the lease.

Texas Gas' existing customers will likewise not be adversely affected by the lease. All of the leased capacity will be used to provide continuity of service to the remaining Texas Gas firm shippers holding capacity and the Greenville Lateral and the capacity will continue to be offered, as available on a secondary firm and interruptible basis to Texas Gas' other shippers pursuant to the terms of the Texas Gas tariff. Texas Gas is also not

²² 18 C.F.R. § 154.309 (2025).

proposing any changes to its tariff or to its existing general system rates in this proceeding to recover the costs of the lease capacity. These factors all prevent any adverse impact to Texas Gas' existing customers.

VII. **PROPOSED RATE ZONE FOR KOSCIUSKO ZONE**

A. Cost Inclusion and Rate Design for the Kosciusko Zone

To effectuate the integration of the Kosciusko Project into the existing Gulf South system, Gulf South proposes to establish a new, separate rate zone to be called the Kosciusko Zone which will encompass the Gulf South Project facilities including the Greenville Lateral facilities to be acquired by Gulf South as part of the Project. The new zone will provide for a typical zone-gate rate structure similar to Gulf South's existing Coastal Bend and Gulf Crossing Zones. The use of a new rate zone for the Project facilities is consistent with Commission policy and judicial precedent that permits new rate zones for substantial new facilities acquired by an existing pipeline²³ as well as for costly new expansion facilities that extend the reach of a pipeline.²⁴

To calculate the Kosciusko Zone rate, Gulf South has projected the rate base value of the existing Greenville Lateral at the projected in-service date of the project considering adjustments to accumulated depreciation and accumulated deferred income taxes occurring between the filing of this application and the projected in-service date. Gulf South has then

²³ *Gulf Crossing Pipeline Company LLC*, 169 FERC ¶ 61,169 at P 32 (2019) (accepting Gulf South's proposals to acquire the Gulf Crossing facilities and to create a new rate for the acquired facilities).

²⁴ *Texas Eastern Transmission, LP*, 139 FERC ¶ 61,138 at Order Paragraph (H) (2012) (holding that a pipeline may propose to establish a separate rate zone with incremental firm and interruptible rates for a 15.2-mile extension). *See also Gulf South Pipeline Co., LP v. FERC*, 955 F.3d 1001 (2020) ("FERC should have offered Gulf South the same opportunity to charge incremental-plus rates—whether through the *creation of a new rate zone* or as an additional rate.") (emphasis added).

combined that projected rate base with the construction Project costs reflected on page 1 of Exhibit K to develop the total cost of service for the Kosciusko Zone calculated in Exhibit N. The components of the cost of service are separately identified for the new construction and the transferred assets on supporting schedules of the Exhibit N. In determining the cost of service for the Kosciusko Zone, Gulf South has utilized the last approved capital structure, debt and equity costs for Gulf South along with the existing Gulf South system depreciation rate of 2.18% which includes a negative salvage component of 0.10%. Exhibit N also develops the proposed maximum applicable demand and commodity rates of the new Kosciusko Zone reflecting the combination of the existing Greenville Lateral costs and the new build associated with the Project. As reflected in Exhibit N, Gulf South has calculated a demand rate of \$0.4201 and commodity rate of \$0.0037 for the Kosciusko Zone.

The proposed new rate zone will ensure that only customers using the Project will pay the Project rates. If a customer utilizes the Kosciusko Zone, then that customer will be responsible for the applicable Kosciusko Zone rate. The Kosciusko Zone rates will apply only to customers that utilize the Kosciusko Facilities. The Kosciusko Zone will be available for use by Gulf South's existing customers who elect to use the Kosciusko Facilities, and the Kosciusko Zone rate will be shown as a separate zone rate for each applicable Gulf South transportation service, similar to how existing Gulf South shippers can choose to reach back into the Gulf Crossing zone for additional supplies.

With the addition of the new Kosciusko Zone, Gulf South shippers would have the ability to nominate on a supplemental basis for any points outside the zone of their primary rights. When a shipper flows gas beyond the zone of their primary rights on a supplemental

basis, the customer will be assessed the applicable maximum recourse rate for the zone(s) utilized outside of their primary rights, unless another rate is mutually agreed upon.

B. Request for Predetermination of Rolled-In Rate Treatment for Facilities Constructed by Texas Gas

As discussed earlier, Texas Gas is adding compression and other appurtenant facilities as part of the project. The costs of these facilities associated are reflected in Exhibit K of the application.

As shown in the attached Exhibit N, the stand-alone, incremental cost-based transportation rates for the added facilities on Texas Gas spread across the incremental billing determinants created because of the constructed facilities on Texas Gas is less than Texas Gas's existing maximum applicable transportation rates for comparable service.

The Texas Gas facilities qualify for a pre-determination of rolled-in rate treatment. Under Commission precedent and policy, a predetermination of rolled-in rate treatment for a proposed project's costs is generally appropriate when the revenues to be generated by a project's services exceed the costs of the project.²⁵ The incremental cost-based transportation rates calculated on a stand-alone basis for the Texas Gas facilities would be less than Texas Gas' existing approved maximum transportation rate for comparable service. A predetermination of rolled-in rate treatment will lower rates for all of Texas Gas' customers across the system in a future rate proceeding since Texas Gas' rates will be reduced because of rolling-in the costs of the mainline facilities into the currently approved rates. The proposed mainline facilities are physically integrated with the Texas

²⁵ See, e.g., *Gulf South Pipeline Co., LP*, 155 FERC ¶ 61,287, at P 28 (2016) and *Gulf South Pipeline Co., LP*, 161, FERC ¶ 61,032, at P 19 (2017).

Gas Mainline System. Rolling the costs of the mainline facilities into the existing Mainline rates will not adversely affect any customer.

C. Fuel

Gulf South will maintain a separate fuel rate for the Kosciusko Zone. As with all other fuel rates included in Gulf South's fuel tracker, Gulf South will utilize actual fuel consumption and actual volumes flowed to derive the rate associated with the Kosciusko Zone. Because a portion of the compression being added by Texas Gas at the Greenville CS will be utilized to move gas into the Kosciusko Zone, the Gulf South Lease contains a provision that it will remit fuel to Texas Gas based on actual utilization during each fuel tracker period. Fuel attributable to the Gulf South Lease will be combined with fuel consumed by compressor stations in the Kosciusko Zone to develop a fuel rate for the Kosciusko Zone to be assessed on Kosciusko Zone shippers. Conversely, the Texas Gas Lease contains a provision that Texas Gas will remit fuel to Gulf South based on actual utilization during each fuel tracker period for volumes associated with Texas Gas' existing contracts that have access to the Greenville Lateral. These reciprocal fuel arrangements in Gulf South's and Texas Gas' respective leases ensure that neither Texas Gas nor Gulf South are harmed or unduly burdened due to the lease arrangements.

As reflected in the pro forma tariff records submitted with this Application, Gulf South proposes to file to establish, in its Tariff, a zone fuel rate for the Project based on estimated throughput and projected fuel consumed. Table 4 below shows the projected fuel rate as calculated based on current system operating conditions and projected throughput for the Project:

Table 4		
Projected Kosciusko Pipeline Fuel Retention Rate		
Fuel Consumption and Throughput, Kosciusko Pipeline Exhibit G, Page 4, Proposed Maximum Capability	Daily Mcf/d	Annual Mcf
<i>Isola Compressor Station Fuel</i>	<i>3,800</i>	<i>1,387,000</i>
<i>Holmes Compressor Station Fuel</i>	<i>3,000</i>	<i>1,095,000</i>
<i>Kosciusko Compressor Station Fuel</i>	<i>7,000</i>	<i>2,555,000</i>
Total Kosciusko Pipeline Projected Fuel Use	13,800	5,037,000
Projected Throughput	1,312,000	478,880,000
Projected Fuel Retention Percentage	1.05%	1.05%
Projected LAUF	0.00%	0.00%
Projected Fuel Retention Percentage, Inclusive of LAUF	1.05%	1.05%

Note: For calculation purposes, Gulf South assumed that 1 Mcf = 1 Dth. As heating factors can vary across the system, this conservative ratio ensures that Gulf South recovers the estimated daily fuel consumption.

D. Tariff Changes for the Project

To effectuate the Project, Texas Gas and Gulf South are each providing three sets of pro forma tariff records. The first set of pro forma tariff records will be filed when Gulf South acquires the Greenville Lateral from Texas Gas and the Texas Gas Lease commences to continue service to its existing contracts on the Greenville Lateral. The first set of tariff records will ensure that Texas Gas is able to continue to provide such service to those existing shippers and provide service to any secondary services and/or interruptible services on the Greenville Lateral associated with the lease capacity, as available and applicable. Gulf South's first set of records will reflect the transfer of ownership to Gulf South of the Greenville Lateral and include the currently approved firm and interruptible rates and the applicable fuel percentage rate from Texas Gas' tariff for firm and interruptible

service on any available capacity reflecting the status of the Greenville Lateral prior to the Kosciusko project being placed into service.²⁶

The second set of pro forma tariff records will be filed when the Kosciusko Project is complete and placed in-service. At this time, it is anticipated that Texas Gas will still maintain a lease of certain capacity from Gulf South on the Greenville Lateral.²⁷ The second set of pro forma records will reflect the new Kosciusko Zone rates and applicable updates throughout to expand the previous language limited to the Greenville Lateral to encompass the entire new Kosciusko Zone.

The final pro forma tariff record sets for Texas Gas and Gulf South reflect the termination of Texas Gas' lease of capacity on Gulf South's Greenville Lateral. This final set of tariff records will remove all references to Greenville Lateral from Texas Gas' Tariff and will remove the lease fuel rate from Gulf South's Tariff. All three sets of the pro forma tariff records are included in Exhibit P of this Application.

VIII. **ENVIRONMENTAL MATTERS**

A. Overview of Pre-Filing Process and Stakeholder Outreach

On February 7, 2025, the Applicants filed a request to utilize the Commission's pre-filing review process for the proposed Project in Docket No. PF25-6-000. Commission Staff accepted the Applicants' request on February 7, 2025. Throughout the pre-filing

²⁶ For interruptible service on Gulf South, Gulf South has calculated the 100% load factor rate of the firm transportation rate on Texas Gas since Gulf South does not have seasonal firm rates. In addition, Gulf South will establish Area 28 associated initially with the Greenville Lateral, but ultimately this area will encompass the new Kosciusko Zone.

²⁷ In addition to the new Kosciusko Zone fuel rates, Gulf South will continue to maintain an applicable fuel percentage rate for the Greenville Lateral lease in Section 4.22. This will provide certainty regarding the fuel rate applicable to the Texas Gas lease of capacity from Gulf South.

process, the Applicants have worked closely with Commission Staff, the Commission's third-party environmental contractor, and all interested stakeholders.

As part of the pre-filing process, the Applicants notified affected landowners and other stakeholders, and initiated consultations with relevant federal, state and local governmental agencies. The Applicants conducted a series of agency meetings and participated in several interagency conference calls with Commission Staff from March 2025 through September 2025. These meetings provided an opportunity to introduce the project, discuss issues and build working relationships between the Applicants and these agencies.

The Applicants developed and implemented a comprehensive public outreach plan as part of the pre-filing process. From December 2024 through June 2025, the Applicants conducted a series of outreach activities to engage stakeholders early and often. On December 13, 2024, the Applicants hosted a stakeholder meeting for local elected officials and community leaders to introduce the Project, outline anticipated timelines, and gather initial feedback. This early engagement helped shape subsequent outreach efforts and ensured that key voices were included from the outset.

In April 2025 the Applicants hosted seven open house events, in Attala, Leake, Scott, Newton, Clarke, Holmes, and Washington Counties, Mississippi. On March 13, 2025, the Applicants sent letters of invitation for the open house meetings directly to landowners potentially affected by the proposed facilities. In addition, municipal, county, state, and federal elected officials and other state governmental stakeholders received detailed information including formal open house invitations to provide those governmental stakeholders with advance notice should they receive inquiries from the

public. To allow for citizen participation, open houses were held at various times between 4:00 p.m. and 6:30 p.m. Comments at the open houses touched on several topics including landowner and property rights, how to support the Project, environmental, construction and contractor questions, and community involvement opportunities. The Applicants provided, and continue to provide, contact information on the Project website to allow interested parties to connect with the Applicants' representatives via dedicated Project hotlines for landowners (844-557-5463) or other stakeholders (866-648-2308), via the Project website address (KOSCI.gulfsouthpl.com) or directly to Applicants' Land Manager regarding inquiries or concerns. The Applicants also established a "community voices" email address (BWP_Kosci_feedback@insigniaenv.com) to provide a dedicated channel for community feedback and input. The Applicants remain committed to addressing stakeholder inquiries throughout the duration of the Project.

The Commission's Notice of Intent to prepare an Environmental Impact Statement²⁸ established three scoping meetings for the Project. The Notice of Intent was sent to affected landowners; federal, state and local government agencies; elected officials; environmental and public interest groups; Native American tribes; other interested parties; and local libraries and newspapers. The Commission and Applicants encouraged these parties to provide comments on any areas of concern. The Notice of Intent included information on the locations of the site visit and scoping meetings, as well as information on how to provide comments to the Commission about the proposed Project. The scoping meetings, designed to provide additional opportunity for the interested public to offer

²⁸ On May 7, 2025, the Commission issued a *Notice of Intent to Prepare an Environmental Impact Statement For the Proposed Kosciusko Junction Pipeline Request For Comments on Environmental Issues, and Notice of Public Scoping Sessions* ("Notice of Intent.")

comments on the proposed Project, were conducted in Decatur, Mississippi on May 20, 2025, in Carthage, Mississippi on May 21, 2025, and in Lexington Mississippi on April May 22, 2025.

On June 30, 2025, the Applicants filed responses to comments received during the Commission's scoping period for the Project,²⁹ and on July 11, 2025, submitted responses to additional comments received after the conclusion of the scoping period.³⁰ The Applicants' response filed on July 11, 2025, specifically addressed concerns from landowners regarding noise emissions from existing compressor stations. In that response the Applicants noted that the Project would include the installation of gas blowdown silencers on all compressor units to be installed at Project sites, to mitigate potential noise disturbances associated with planned unit blowdown events.

On July 30, 2025, the Commission issued comments on the Applicants' draft Resource Reports 1 through 12 that the Applicants submitted during the pre-filing process for the Project. In these comments, the Commission requested that the Applicants incorporate the requested information in the Certificate Application and include a matrix that identifies the specific locations in the resource reports where the information requested in these comments may be found. A matrix that includes the Applicants' responses to the Commission's comments on the draft resource reports, and that identifies the specific location of information responsive to the comments (or a date by which the information will be filed with the Commission) is attached as Exhibit Z-3 to this Application.

The Applicants have proposed facilities that seek to balance landowner and community concerns, environmental resource issues, and Project requirements. The

²⁹ Response to Scoping Comments, Docket No. PF25-6-000 (Jun. 20, 2025).

³⁰ Response to Scoping Comments – Updated, Docket No. PF25-6-000 (Jul. 11, 2025).

Applicants have worked to address concerns raised by stakeholders during the design phase of the Project, such as shifting the proposed pipeline route to address landowner concerns raised during the pre-filing process. The Applicants remain committed to engaging with landowners and community members throughout the application process.

B. Overview of Environmental Impacts

The Applicants' principles include protecting biodiversity and mitigating risks to the ecosystem. The Applicants attempt to minimize impacts on the ecosystems and habitats where we operate. Fundamental to this approach is a thorough vetting of construction project components and their potential impact on natural resources. During project development, multiple risk assessments are conducted to reduce or potentially avoid biodiversity impacts. Internal specialists engage with a variety of contractors and consultants, as well as public and private stakeholders, regarding specific environmental conditions that may be present and provide ample time for planning, construction, and any necessary mitigation. Project development teams review proposed actions based on size and complexity to develop ways to avoid or minimize adverse impacts to sensitive ecosystems, including critical habitats, high biodiversity areas, threatened and endangered species, migratory birds, floodplains and essential fish habitats, and sensitive surface waters, including natural, recreational, or wild and scenic areas. The Applicants have designed the proposed Project facilities to minimize new land disturbances, avoid or minimize adverse impacts on sensitive resources and any threatened or endangered species, or any cultural resources, to the extent possible, as further detailed in the Environmental Report ("ER"), attached as Exhibit F-I, Volume I-A.

The proposed construction will incorporate proven construction techniques and mitigation procedures and will result in no significant impact to the quality of human health, the environment, and affected landowners. Utilizing construction and restoration methods that comply with the Commission's May 2013 Upland Erosion Control Revegetation and Maintenance Plan ("Plan") and Wetland and Waterbody Construction and Mitigation Procedures ("Procedures") will ensure that any adverse impacts will be limited and temporary.

Copies of the applicable agency consultation letters necessary under the Endangered Species Act, the National Historic Preservation Act, the Clean Air Act, and the Clean Water Act are included in the attached ER. The Applicants have engaged in consultations and coordination with the affected federal, state, and local government agencies, and appropriate federally-recognized tribes in Mississippi concerning the proposed construction activities associated with the Project, and will continue to discuss specific concerns or requirements should they be raised.

To minimize the Project footprint, Gulf South proposes to acquire the Greenville Lateral facilities from Texas Gas and repurpose those facilities for use in the Project. The use of the Greenville Lateral reduces the amount of greenfield pipeline construction necessary for the Project by approximately 98 miles. Gulf South further proposes to collocate approximately 41 miles (40 percent) of the new Kosciusko Pipeline and approximately 3 miles (37 percent) of the new Columbia Lateral along existing easements, as discussed in Section 1.1.2 of Resource Report 1 in the Environmental Report.

Construction of the proposed Project will require the use of approximately 2,252 acres of land, resulting in both temporary and permanent land disturbance. Following

construction activities, approximately 1,584 acres of land consisting of those areas necessary to facilitate construction, including the construction right-of-way, storage yard, temporary workspaces at aboveground facilities and additional temporary workspaces will be restored to preconstruction conditions. Permanent impact areas associated with the operation of the proposed facilities, totaling approximately 668 acres, will be associated with the new maintained pipeline right-of-way along the proposed Columbia Gulf Lateral and the new Kosciusko Junction Pipeline, as well as the aboveground facilities located at Greenville CS, Isola CS, the new Kosciusko CS, the four proposed new M&R Stations, and new permanent access roads.

As part of the cumulative impact analysis presented in Resource Report 1, Section 1.9 and Appendix 1H, the Applicants have assessed potential cumulative effects associated with the construction and operation of the Project in conjunction with other identified projects, including Tennessee Gas Pipeline Company, LLC's ("TGP") Mississippi Crossing Project ("MSX Project"), which is pending before the Commission in Docket No. CP25-514-000. These cumulative impacts are further addressed in the applicable resource reports and in the alternatives analysis provided in Resource Report 10, Section 10.4.2. There is strong public need for both Applicants' Kosciusko Project and Tennessee's MSX Project as both of these projects are essentially full-subscribed.³¹ Each project is also separately owned and operated and each serves a different basket of shippers (with only minimal overlap) that have different needs, as indicated by the fact that the Kosciusko Project includes shippers who have elected to utilize existing on-system Gulf South

³¹ See Tennessee Gas Pipeline Company, LLC, Application at 5, Docket No. CP25-514-000 (Jun. 30, 2025) (explaining that the pipeline has executed precedent agreements for approximately 90 percent of the MSX Project's capacity).

markets for their Project capacity. Each project also connects to different receipt points for the gas supplies that will be transported on the respective projects. The two projects have their own independent utility and are fully economically supported as reflected by the binding precedent agreements identified in their respective certificate applications.

Site plans of the compressor stations and aerial photographs are included in Appendix 1A, in Resource Report 1. The compressor station plot plans are depicted in Appendix 1B, Resource Report 1. Due to the engineering specifics and building identification, the compressor station site plot plans have been designated and labeled as “CUI//CEII” and “**Contains Critical Energy Infrastructure Information-Do Not Release**” and included in Volume III of this Application. In accordance with Section 388.112 of the Commission’s regulations, 18 C.F.R. § 388.112 (2025), the Applicants respectfully request confidential treatment of this information.

C. Sound Surveys

1. Existing Compressor Stations

The proposed new compressor units at the existing Greenville and Isola Compressor Stations will be constructed and packaged in manufactured-provided enclosures supplied by the original equipment manufacturer. In May and June 2025, the Applicants conducted a comprehensive noise study for the existing compressor stations with the addition of the new Solar units. The results of these studies, based on detailed acoustical analysis, support that the projected noise levels at each of the proposed new

compressor stations post-project completion, will be in compliance with all federal, state, and local regulations.³²

As noted in the Applicants' response to comments received during the Commission's scoping period during the pre-filing phase of the Project, Gulf South and Texas Gas will install blowdown silencer equipment on the new and modified compressor units proposed as part of the Project. The sound surveys for the existing Greenville and Isola Compressor Stations are provided in Appendix 9O of Resource Report 9. Certain figures provided in the sound survey contain detailed compressor station information; therefore, Gulf South requests these figures be designated as "CUI//CEII" and "**Contains Critical Energy Infrastructure Information – Do Not Release**" as defined in 18 C.F.R. § 388.113(c) of the Commission's regulations.

2. Holmes Compressor Station

The proposed new Solar Titan 130 compressor unit at the new Holmes Compressor Station will be constructed and packaged in a manufactured-provided enclosure supplied by the original equipment manufacturer. In May 2025, Applicants conducted a comprehensive noise study for the proposed Holmes Compressor Station. The results of this study, based on detailed acoustical analysis, support that the projected noise levels from the compressor station, post-project completion, will be at or below the required Ldn of 55 dBA at the nearest NSA, which is consistent with the standard conditions set forth by the Commission that require noise from the operation of station equipment at full

³² Sound levels from existing compression equipment in service before the implementation of the FERC noise criterion may continue to exceed FERC noise limits for new compressor stations. *See, e.g., Columbia Gas Transmission, LLC*, 172 FERC ¶ 61,107 at P 22 (2020) (explaining that "it is Commission policy that the overall noise from entire, modified compressor stations should not exceed the existing ambient noise levels for compressor stations with existing, vintage compressor units that predate the Commission's noise criteria of 55 dBA Ldn at the nearest NSAs.").

capacity (i.e., full load operation of all authorized units) not exceed an Ldn of 55 dBA at any nearby existing NSA. The proposed Holmes Compressor Station will meet FERC's requirements and will comply with all relevant noise regulations. The sound survey for the Holmes Compressor Station is provided in Appendix 9O of Resource Report 9.

3. Kosciusko Compressor Station

The proposed new Solar Mars 100, Taurus 70, and Titan 250 units at the proposed new Kosciusko Compressor Station will be constructed and packaged in a manufactured-provided enclosure supplied by the original equipment manufacturer. In June 2025, Applicants conducted a comprehensive noise study for the proposed Kosciusko Compressor Station. The results of this study, based on detailed acoustical analysis, support that the projected noise levels from the compressor station, post-project completion, will be at or below the required Ldn of 55 dBA at the nearest NSA, which is consistent with the standard conditions set forth by the Commission that require noise from the operation of station equipment at full capacity (i.e., full load operation of all authorized units) not exceed an Ldn of 55 dBA at any nearby existing NSA. The proposed Kosciusko Compressor Station will meet FERC's requirements and ensures compliance with all relevant noise regulations. The sound survey for the Kosciusko Compressor Station is provided in Appendix 9O of Resource Report 9.

D. Air Emissions

The Applicants conducted required analyses to determine the potential impacts the Project would have on air quality in the Project area. To minimize and mitigate for the impacts identified in the analyses, Gulf South will implement measures designed to reduce air emissions during construction of the Project facilities. All measures would be

implemented in accordance with all applicable federal, state, and local regulations. See Resource Report 9, Sections 9.2.7 and 9.2.8.

Minimizing Environmental Impact Through Low-Emissions Unit Selection

The new units proposed at each of the compressor stations are manufactured by Solar and equipped with Solar's patented SoLoNO_x combustion technology that is integral to its design. Gulf South has selected Solar's 9 ppm NO_x option for all the units being proposed for installation at each of the stations, which is Solar's lowest emitting option. The Solar units achieve low emissions of NO_x using a lean-premix combustion technology. Gulf South is installing additive electric seal gas booster pumps across its compressor stations to maintain seal pressurization when the units are idle. This innovative approach significantly reduces methane emissions during startup and shut down phases, aligning with Gulf South's commitment to environmental stewardship.

The selection of these units is consistent with the efforts that that the Applicants' parent company, Boardwalk Pipelines, LP ("Boardwalk"), has taken to reduce emissions across its entire system. In 2023, Boardwalk reported that since 2021 it has achieved a 24% reduction in Scope 1 greenhouse gas emissions and a 68% decrease in Scope 1 methane emissions. These efforts include replacing older compression equipment with low-emission units, conducting annual leak surveys, and utilizing optical gas imaging cameras to detect and address leaks in real time. Boardwalk's proactive measures demonstrate its dedication to minimizing environmental impact while maintaining reliable energy infrastructure.

Potential emissions from the proposed units and new ancillary sources associated with the Project are discussed in Sections 9.2.3 to 9.2.6 of the ER. The Isola Compressor

Stations is an existing minor PSD sources since each has potential emissions less than 250 tons per year (“tpy”) for each criteria pollutant. As reflected in Sections 9.2.3 through 9.2.6 of the ER, the potential emissions from each compressor station are less than the PSD major source threshold of 250 tpy for each criteria pollutant. None of the compressor stations impacted by the Project will be subject to the requirements of the PSD permitting program. The potential emissions associated with construction and operation of Project components are discussed further in Sections 9.2.3 through 9.2.7. The turbines proposed for installation at the Greenville, Isola, Holmes and Kosciusko Compressor Stations will be subject to the Federal Standards of Performance for Stationary Combustion Turbines (“Turbine NSPS”). The proposed turbines will comply with the emission standards contained in the Turbine NSPS (40 CFR 60, Subpart KKKK). The Applicants will also ensure that all monitoring, recordkeeping, and reporting requirements from this rule are met in accordance with the specified timeframes.

The Greenville Compressor Station is an existing major PSD source since it has potential emissions of criteria pollutants above 250 tpy. The emissions changes associated with the Project must be reviewed to determine if a significant increase and a significant net increase in emissions both occur. Prior to the Project changes, the Applicants will convert this station from producing its own power onsite using natural gas-fired power generators to using power purchased from the local electric utility. As they are previously uncounted, the emissions decreases associated with this conversion will be factored into the Project emissions changes for the purposes of PSD applicability. As outlined in Section 9.2.3 and the air permit application to be found in Appendix 9A of the final Resource Report 9, the emissions changes associated with the Project are below the PSD significant

levels. As such, the planned changes at the Greenville Compressor Station are not subject to PSD review.

As described in Sections 9.2.1 and 9.2.2 of Resource Report 9, the Greenville Compressor Station is located in an attainment area, and the emission increases associated with the Project will be below significant levels that would trigger PSD permitting requirements. Gulf South has submitted an application to Mississippi Department of Environmental Quality for a minor modification to the station's Title V permit to authorize construction and operation of the new sources at the Greenville Compressor Station. As shown in Appendix 9I of the ER, the potential emissions of criteria pollutants from the Greenville Compressor Station will remain above Title V major source thresholds but below PSD major source thresholds. An air dispersion modeling analysis for the Tallulah Compressor Station can be found in Appendix 9H of the ER. As shown in the dispersion modeling analysis, the modeled concentrations for each criteria pollutant to be emitted by new sources at the Greenville Compressor Station are below the significant impact levels ("SILs") established by the Environmental Protection Agency ("EPA"). As outlined in Section 9.2.3 of the ER, the planned changes at the Greenville Compressor Station are deemed to not cause or contribute to an exceedance of a national ambient air quality standards ("NAAQS"), and no further modeling is required per EPA guidance.

As described in Sections 9.2.1 and 9.2.2 of the ER, the existing Greenville and Isola Compressor Stations and the proposed Holmes and Kosciusko Compressor Stations are located in attainment areas, and the emission increases associated with the Project will be below Title V threshold and the significant levels that would trigger PSD permitting requirements. The Applicants have submitted an application to Mississippi Department of

Environmental Quality for a minor source permit to authorize construction and operation of the Greenville and Isola Compressor Stations and the proposed Holmes and Kosciusko Compressor Stations. An air dispersion modeling analysis for the Greenville and Isola Compressor Stations and the proposed Holmes and Kosciusko Compressor Stations can be found in Appendix 9E, Appendix 9F, Appendix 9G, and Appendix 9H of Resource Report 9, respectively. As shown in the dispersion modeling analysis, the modeled concentrations for each criteria pollutant to be emitted by new sources at each of the compressor stations are below the SILs established by the EPA. As outlined in Section 9.2.3 of the ER, the planned changes at each of the compressor stations are deemed to not cause or contribute to an exceedance of a NAAQS, and no further modeling is required per EPA guidance. A detailed discussion of the SIL concept is provided in Section 9.2.3 of the ER.

Applicants have further provided an estimate of the greenhouse gas (“GHG”) emissions from the construction and operation of the Project in Appendix 9N of Resource Report 9. Consistent with its recent practice, the Applicants also provide in Section 9.2 of the ER a “full burn” estimate of the GHG emissions associated with the maximum amount of natural gas that could be transported and delivered by the Project, despite recognizing that this is an over-estimate of such emissions. Applicants note that the Supreme Court, has recently held that “[a]n agency may decline to evaluate environmental effects from separate projects upstream or downstream from the project at issue.”³³ In applying the Supreme Court’s holding, the Commission has explained that NEPA “does not require the Commission to analyze downstream effects from separate projects” and that agencies “are not required to analyze the effects of projects over which they do not exercise regulatory

³³ *Seven Cnty. Infrastructure Coal. v. Eagle Cnty., Colorado*, 145 S. Ct. 1497, 1518 (2025).

authority.”³⁴ Consistent with *Seven County*, the Commission should decline to evaluate upstream or downstream GHG emissions related to the Project.

D. Alternatives

1. No-Action Alternative

Under the No-Action Alternative, the Applicants would not construct the proposed Project facilities. If the proposed facilities were not constructed, the adverse impacts identified in the resource reports would be avoided and the beneficial impacts of implementing the proposed Project would not occur, including the Applicants’ ability to increase firm transportation capacity, enhance system reliability, and add operational flexibility to deliver new gas supplies that were previously not directly-connected to Gulf South’s system to the critical Southeast energy corridor, which is experiencing substantial electric power generation growth. If not constructed, the Project’s infrastructure enhancements would not be available to meet the needs of the Project’s customers or provide the supply diversity necessary to help meet the region’s growing energy needs in an efficient, reliable and environmentally responsible manner. The No-Action Alternative would not meet the purpose and need of the Project, as existing facilities are not adequate to supply additional pipeline capacity for transportation of natural gas to meet customer demand.

2. Applicants’ System Alternatives

During the initial phase of developing the Project, the Applicants evaluated potential system alternatives to constructing the proposed Holmes CS and Kosciusko CS. The Applicants considered a system alternative that would reduce the number of new

³⁴ *East Tennessee Natural Gas, LLC*, 192 FERC ¶ 61,153 at P 28 (2025) (citing *Seven County*

aboveground facilities, requiring only the installation of additional compression at the existing Greenville CS and Isola CS, as well as construction of the new Kosciusko CS. This system alternative, as depicted on the maps provided in Appendix 10A to Resource Report 10, would avoid construction of the 8-mile Columbia Lateral as well as preclude the need for the sale of the existing Greenville Lateral by Texas Gas to Gulf South. This system alternative would still require construction of the proposed Kosciusko Junction Pipeline, consisting of approximately 103 miles of new 36-inch-diameter natural gas pipeline, and require the construction of *an additional approximately 99 miles of new greenfield natural gas pipeline* from the existing Greenville CS to the proposed Kosciusko CS. This system alternative would avoid construction of the new Holmes CS but require additional construction of approximately 90 miles of natural gas pipeline compared to the proposed Project.

3. Other System Alternatives

A detailed analysis of potential system alternatives that involve other pipelines cannot be conducted, because the Applicants do not have access to proprietary information related to the design and excess capacity of other pipeline systems, as they are owned and operated by separate and distinct entities. The Applicants evaluated the presence of other company systems in the region and attempted to assess current capacity and available infrastructure on these systems as compared to the Project's purpose and need. The Applicants utilized the U.S. Energy Atlas to identify existing foreign natural gas pipeline infrastructure in the Project region, including Tennessee Gas Pipeline Company, L.L.C ("TGP"), Transco, Columbia Gulf Transmission, LLC ("CGT"), Southern Natural., and Midcontinent Express Gas Pipeline. Based on further review of corresponding information

regarding unsubscribed firm transportation along these systems, the Applicants determined that sufficient capacity is not available on these existing systems to meet the Project purpose and need (U.S. Energy Information Administration, 2025). The Applicants cannot speculate on what facility modifications, such as additional compression, would be required on other companies' systems to accommodate the necessary capacity to meet the purpose and need of the Project.

TGP's proposed MSX Project has been proposed in the same general region as Applicants' Kosciusko Project. The MSX Project involves the construction of approximately 206 miles of new natural gas pipeline and associated facilities in Mississippi and Alabama to transport natural gas from TGP's 100 Line CS 54 near Greenville, Mississippi to Transco's south mainline and Station 85 in Clark County, Mississippi and Choctaw County, Alabama, respectively. There is only limited physical overlap between the two projects as the MSX Project's mainline and the proposed Kosciusko Pipeline traverse a similar route for approximately 1 mile near the Kosciusko CS at milepost 0.00 in Attala County (Applicants' proposed Columbia Gulf Lateral is in proximity to and crosses over the MSX Project proposed CGT Lateral route in Humphreys and Sunflower counties). According to TGP's certificate application for the MSX Project, the MSX Project is essentially fully subscribed, with long-term binding precedent agreements for approximate 1,825,000 Dth/d of that project's capacity of approximately 2,060,000 Dth/d.³⁵ The MSX Project alternative was not evaluated further given that there is not sufficient capacity available on the MSX Project to meet the needs of the Kosciusko Project's shippers, who have subscribed for 1.1 Bcf/d of the Project's 1.175 Bcf/d of firm

³⁵ See Tennessee Gas Pipeline Company, LLC, Application at 1, 5, Docket No. CP25-514-000 (Jun. 30, 2025).

transportation capacity, and the MSX Project does not provide access to some of Gulf South's desired delivery points on the Gulf South system.

4. Site Locations

The Applicants propose the installation of new units at the existing Greenville and Isola Compressor Stations rather than seeking alternative sites adjacent to or near these stations for several key reasons. Use of the existing compressor stations for the Project allows Applicants to maximize the efficiency of their existing infrastructure by leveraging the already established operational systems, utility connections, and transportation networks. Developing entirely new adjacent or nearby sites would require additional land acquisitions, permitting, and construction efforts resulting in increased costs and greater environmental impacts. By concentrating the new units at existing stations, the Applicants avoid unnecessary land disturbance and reduce the need for duplicative infrastructure. Utilization of existing compressor station sites minimizes the Project's overall footprint while maintaining compliance with environmental and noise standards. This approach reflects the Applicants' commitment to efficient resource use, cost management, and adherence to regulatory and community considerations.

New Proposed Compressor Station Sites

a. Holmes Compressor Station

Gulf South considered two alternative locations for the proposed Holmes CS. The proposed sites and the two alternative sites were evaluated and chosen based on the need to provide pressure management and ensuring adequate delivery pressures to provide the necessary compression to create the firm transportation capacity required by the Project customers. The proposed site and alternative locations were evaluated based on their

proximity to the existing Greenville Lateral, ability to negotiate with landowners, site accessibility, and environmental impacts such as floodplains, and sensitive environmental resources.

The alternative sites were not selected for several reasons. Gulf South eliminated Alternative Site 1 because the site was not hydraulically suitable, may pose safety hazards and would have required costly mitigation measures. That land parcel was also not currently for sale. Gulf South determined that Alternative Site 2 was not viable due to the land parcel not being currently for sale. By choosing the proposed site which is located adjacent to the existing Greenville Lateral at milepost 68.7, which will reduce the amount of required suction/discharge piping at the site and provide a significant open area as a buffer for adjacent landowners, Gulf South demonstrated a proactive approach to minimize the overall environmental impact and landowner impacts of the Project. This property was also listed for sale by the owner. This approach aligns with broader efforts to support broad climate goals and address community concerns about air quality and the local environment, while further enhancing public perception of the Project's commitment to operating in a prudent manner.

b. Kosciusko Compressor Station

Gulf South considered two alternative locations for the proposed Kosciusko CS. The proposed sites and the two alternative sites were evaluated based on the need to provide pressure management and ensuring adequate delivery pressures to provide the necessary compression to create the firm transportation capacity required by the Project customers. The proposed site and alternative locations were evaluated based on proximity to the

existing Greenville Lateral, ability to negotiate with the landowner, site accessibility, and environmental impacts such as floodplains, and sensitive environmental resources.

The alternative sites were not selected for several reasons. Gulf South eliminated the Alternative 1 site because the impacts associated with the site would be greater than those for the proposed site, since the Alternative Site 1 include a greater number of noise sensitive areas (“NSAs”) located within 1 mile of the site and would also have a greater impact on floodplains/floodways and prime farmland. Alternative Site 1 was removed from consideration due to its proximity to an RV park and its distance from existing roads, which would require a permanent access road in excess of 0.5 mile. Alternative Site 1 would have further required 0.75 miles of two, 36-inch diameter suction/discharge pipelines to connect to the proposed Kosciusko Meter Station site, thereby increasing Project costs and overall construction impacts.

Gulf South determined that Alternative Site 2 was not viable due to the necessity for extensive tree clearing requirements at the site, its proximity to residential properties, and greater impacts on floodplains/floodways and prime farmland. Alternative Site 2 would require approximately 1.50 miles of two, 36-inch diameter pipelines to connect to the proposed Kosciusko Meter Station, thereby increasing overall construction impacts. The selection of the proposed site, which is located adjacent to the existing Greenville Lateral at milepost 68.7, will reduce the amount of required suction/discharge piping at the site, consistent with Gulf South’s proactive approach to minimizing overall environmental and landowner impacts.

Alternative Site 3 was rejected due to its proximity to an existing third-party compressor station, which could have led to increased cumulative air emissions and

environmental impacts. Even with the installation of low-emitting compressor units, there are still considerations regarding cumulative emissions associated with the operation of a compressor station at the Alternative Site 3 location. By selecting the proposed site, Gulf South aims to minimize environmental impacts, avoid the complexities associated with floodplain construction, and minimize air quality issues for the surrounding areas. This selection of the proposed site aligns with the Project's purpose and need, ensuring a sustainable and efficient solution for natural gas transportation.

5. *Electric Compression Alternative*

The Applicants considered electric motor-driven compression as an alternative to the proposed natural gas-fired turbine engines at each of the compressor stations, as reflected in Resource Report 10, Section 10.8. To meet the Project commitments, Spartan Solar electric motor-driven compression units with equivalent HP would be required at each of the compressor stations. Implementing an electric drive alternative would have required construction of new substations to step down 115 or 230 kV transmission lines to 15 kV for each compressor station. Each substation would occupy approximately four acres and include components such as a 20–40 MVA oil-filled transformer, dead-end structure, and disconnect devices—resulting in roughly 16 acres of additional ground disturbance. Beyond the environmental impact, this alternative would introduce significant cost, design and construction complexity, and require installation of up to six miles of new power lines. These factors, combined with typical utility construction timelines do not align with the Project's schedule.

The use of electric motor driven turbines would increase the risk of long-term outages associated with electric motor-driven system components not being readily

available and the inability to operate the units during periods of utility power failure such as from hurricanes. Replacements of damaged electric motors can take months to years to obtain, whereas replacements for natural gas turbine compressor packages, as proposed herein, may be obtained relatively quickly given that replacement turbines are typically stocked by Solar. The Project location in Mississippi increases the susceptibility of Gulf South's operations to hurricanes and other severe weather, which frequently disrupt electric power infrastructure, posing a risk to the operation of electric compression systems during critical times. In contrast, natural gas compression remains resilient and operational, allowing for uninterrupted service during critical times. This reliability is especially vital for the Project customers, whose natural gas-fired electric generation infrastructure supports millions of electric customers across the Southeast United States. By utilizing natural gas compression, Gulf South will help ensure that the Project customers' essential infrastructure can maintain reliable operations during weather events while also meeting their growing energy demands with minimal disruptions. Due to relative unit availability, reliability, ease of repair, availability of replacement parts, and smaller environmental footprint, natural gas-fired compression was ultimately selected instead of electric motor-driven compression at each of the compressor stations.

IX.
PUBLIC CONVENIENCE AND NECESSITY

The proposed Kosciusko Project provides substantial public benefits and satisfies the criteria for justifying a new project under the Commission's Certification of New Interstate Natural Gas Pipeline Facilities Policy Statement ("Certificate Policy

Statement”).³⁶ The Project will allow the Applicants to make the required modifications to the Gulf South and Texas Gas systems and to construct new facilities that will meet the growing demand for natural gas in the Southeast region of the United States consistent with the NGA and the Commission’s regulations and policies.

The Commission has recently recognized the heightened need for new natural gas infrastructure, both to support increased natural gas exports and electric reliability.³⁷ The Commission explained that the “domestic demand for electricity, the largest share of which comes from natural gas generation” is “anticipated to grow robustly between 2025 and 2029” and noted that electric grid operators have explained that “new natural gas infrastructure is essential for improved gas-electric coordination, energy security, and reliability.”³⁸ The Commission added that “[c]onstrained natural gas pipeline capacity and storage availability is also having increasing impacts on domestic manufacturing where manufacturing is facing a growing crisis due to inadequate natural gas pipeline capacity.”³⁹ The Project will help address these concerns by transporting new gas supplies into the Southeast United States to help meet the needs of the Project’s shippers, who are primarily electric generators. The proposed Project is further consistent with recent Executive Orders, which, as the Commission has recognized, “emphasize the Administration’s policy priorities to facilitate the efficient development of reliable, necessary energy infrastructure

³⁶ Certification of New Interstate Natural Gas Pipeline Facilities, Statement of Policy, 88 FERC ¶ 61,227, at p. 61,748 (1999), *Order Clarifying Statement of Policy*, 90 FERC ¶ 61,128 (2000), *Order Further Clarifying Statement of Policy*, 92 FERC ¶ 61,094 (2000).

³⁷ *Removal of Regulations Limiting Authorizations to Proceed with Construction Activities Pending Rehearing*, 90 Fed. Reg. 26,771 at PP 15-16 (Jun. 24, 2025) (“June NOPR”).

³⁸ *Id.* at P 16.

³⁹ *Id.*

to protect the country’s national and economic security.”⁴⁰ The Commission should hold that the proposed is required by the public convenience and necessity as discussed below.

A. The Kosciusko Project Meets the Needs of Project Shippers

The proposed project will create 1.175 Bcf/d of firm transportation capacity. The increased capacity will support critical power generation customers, as detailed in Table 5 below. As of the date of this filing, 1.1 Bcf/d of the total 1.175 Bcf/d capacity has been subscribed, demonstrating strong market support and confirming that the Project is nearly fully subscribed. Advanced negotiations are ongoing with a shipper for the additional 75,000 Dth/d of Project capacity.

Table 5 Summary of Kosciusko Project Customers				
Shipper	Volume (Dth/d)	Term (Years)	End Use	State
Southern Company	800,000	20 ^a	Power generation	MS / AL
FP&L	200,000	15 ^a	Residential/ Commercial/ Power generation	MS / AL
PowerSouth	100,000	20 ^a	Power generation	AL
^a Upon written notice, the agreement shall continue for an evergreen term for two (2) additional terms of five (5) years each.				

Texas Gas’ proposed abandonment of the Greenville Lateral and Isola CS to Gulf South also meets the needs of the Project shippers because it will allow Gulf South to repurpose these underutilized facilities to provide service to the Project shippers who will fully utilize the fallow capacity. The abandonment of Greenville facilities by Texas Gas will not harm Texas Gas’ existing shippers as Texas Gas will provide continuity of service to its remaining Greenville Lateral shippers via the Texas Gas Lease.

⁴⁰ *Id.* at 17 (citing Exec. Order No. 14,154, 90 FR 8353 (Jan. 20, 2025) and Exec. Order No. 14,156, 90 FR 8433 (Jan. 20, 2025)).

B. The Project Will Provide Substantial Public Benefits

The Commission has explained in its Certificate Policy Statement⁴¹ that, “[i]n determining whether to issue a certificate of public convenience and necessity, the Commission will weigh the public benefits of a proposal, the most important of which is the need that will be served by the project, against its adverse impacts.”⁴² The Project provides substantial public benefits, and fully satisfies the other criteria for justifying a new project under the Certificate Policy Statement. The Commission should conclude that the Project is required by the public convenience and necessity and grant the Applicants the authorizations pursuant to Sections 7(b) and 7(c) of the NGA necessary to undertake the Project.

The SCPCI Market Study highlights the public benefits of the Project. Due to the fast-changing landscape driven by artificial intelligence data center developments and other major industrial projects, infrastructure owners need to prepare for a variety of possible future scenarios to maintain system reliability. The SPGCI Market Study developed a “Power Demand Surge” scenario that projects an additional power demand in the Southeast of 1.0 billion cubic feet per day (Bcf/d) by 2030, increasing to 1.4 Bcf/d by 2040—above the SPCGI Base Case forecast.⁴³ The SPGCI Market Study further projects that, irrespective of scenario, peak month gas demand grows to 2040 to support renewables variability implying that Southeast utilities will require additional gas supply sources and

⁴¹ *Certification of New Interstate Natural Gas Pipeline Facilities, Statement of Policy*, 88 FERC ¶ 61,227, at p. 61,748 (1999) (“Certificate Policy Statement”), *Order Clarifying Statement of Policy*, 90 FERC ¶ 61,128 (2000), *Order Further Clarifying Statement of Policy*, 92 FERC ¶ 61,094 (2000).

⁴² See Certificate Policy Statement at 61,747.

⁴³ Although SPGCI’s Base Case is significantly lower than projections from regional utilities, emphasizing both the uncertainty in forecasting and the importance of planning for higher-than-expected demand, SPGCI states that this surge scenario is a key factor when evaluating the need for expanded firm transport capacity in the Southeast United States.

firm pipeline capacity, and further projects that the Project's utilization into the Southeast will reach 100% practically each year during peak demand under weather-normal conditions.

The Project's public benefits are further demonstrated by the precedent agreements for substantially all of the 1.175 Bcf/d of Project capacity that Gulf South has executed with the Project customers, which consists of three electric utility serving end-use customers. The Project will allow the customers to avoid potential constraints on the existing north-to-south supply corridor by allowing their demand to be served from the west, increasing their access to diverse gas supplies and improving their resilience and reliability. The Project will provide the firm transportation capacity that will allow the Project customers to access cost-effective, diverse natural gas supplies that can be transported into the Southeast United States, including supplies from the mid-continent, Fayetteville Shale, and Marcellus Shale production areas. The Commission should conclude that the Project will result in substantial public benefits.

a. Growing Energy Needs of Electric Generation Market

The Southeast United States continues to experience significant growth in electricity demand, driven by population increases, industrial expansion, and the electrification of transportation and other sectors. Natural gas-fired generation remains a cornerstone of the region's long-term energy mix due to its reliability, cost-effectiveness, and lower emissions compared to coal. The Project will deliver firm transportation capacity to support the Project Shippers, ensuring access to consistent and scalable fuel supplies to meet demand. By connecting new supply sources from the Midcontinent,

Marcellus, and Fayetteville basins, the Project will enable electric utilities to secure long-term fuel contracts, supporting grid stability and planning certainty.

b. Electric Reliability

Reliable access to cost-effective natural gas is essential for maintaining electric grid stability, especially during periods of high demand or supply disruptions. The Project enhances system reliability by creating an effective operational loop that substantially extends Gulf South's system to provide access to new natural gas supplies to increase redundancy and reduce the risk of service interruptions.

c. Supply Diversity

The Kosciusko Project is poised to play a critical role in connecting Southeast consumers to additional natural gas supplies from Appalachia, the Midcontinent, and Haynesville, and is expected to remain heavily utilized throughout the forecast period. As LNG exports continue to rise, this supply flexibility will become even more vital. Increased LNG activity will drive demand for gas from Gulf Coast basins—including Haynesville, Eagle Ford, and Permian—intensifying competition for resources in the Southeast. In addition, new infrastructure is needed to enable added Marcellus and Utica supply to displace higher-cost production and to mitigate volatility and delivery risk.

Beyond rising demand, the region is also experiencing greater intra-day volatility, compounded by limited access to high-deliverability gas storage. In the near term, power-related gas demand in the Southeast is climbing. Over the long term, the Southeast is projected to have the most resilient power demand in the United States, due to slower weakened expectations regarding solar capacity and the retirement of significant coal-fired generation.

d. Facilitate Economic Growth

Reliable energy infrastructure is a foundational element of economic development. The Project will support job creation during construction and provide the energy capacity needed to attract and retain industrial, commercial, and residential development.

B. The Project Meets the Requirements of the Commission’s Certificate Policy Statement.

Pursuant to the Certificate Policy Statement, the threshold requirement for a pipeline proposing a new project is that the pipeline must be prepared to financially support the project without relying on subsidization from its existing customers. Once the no-subsidization requirement has been met, the next inquiry is whether the Project has adverse effects on (i) the Applicants’ existing customers, (ii) existing pipelines in the market and their captive customers, or (iii) landowners and communities affected by the route of the new pipeline. If residual adverse effects on these interest groups are identified after efforts have been made to minimize them, the Commission will evaluate the project by balancing the evidence of public benefits to be achieved against these residual adverse effects. The Commission has stated that this essentially is an economic test.⁴⁴ Only when the benefits outweigh the adverse effects on economic interests will the Commission proceed to complete the environmental analysis. The proposed Project satisfies all of the Certificate Policy Statement’s requirements.

1. Existing Customers Will Not Subsidize the Project

The Project meets the Certificate Policy Statement’s threshold “no subsidization” requirement because the Applicants will financially support the Project without relying on

⁴⁴ *Id.* at p. 61,745.

subsidization from existing customers.⁴⁵ As discussed above in Section IV, the Project is essentially fully subscribed and supported with binding precedent agreements with three shippers, committing each Project shipper to enter into firm transportation agreements for a period of either fifteen (15) years or twenty (20) years that will cover the costs of the Project.

Gulf South is proposing a new rate zone for the Project facilities to ensure that the costs associated with the Project are borne solely by the Project shippers benefiting from the Project capacity. This approach guarantees that existing customers will not subsidize the Project. The proposed rates for the new Kosciusko Rate Zone are designed to cover the full cost of the new facilities and modifications that Gulf South will construct as part of the Project, including construction, operation, and maintenance, preventing any financial burden on current ratepayers. This rate structure ensures that the Project is financially self-sustaining and aligns with FERC's 1999 Certificate Policy Statement, which mandates that existing customers should not subsidize new projects.

The Commission should conclude that the Project will not rely on any subsidization from existing customers.

2. ***The Project Will Have No Adverse Impacts on Existing Customers and Existing Pipelines in the Market and Their Captive Customers.***

Once the no-subsidization requirement has been met, the next inquiry under the Commission's Certificate Policy Statement is whether the Project will have adverse effects on (i) the Applicants' existing customers, (ii) existing pipelines in the market and their captive customers, or (iii) landowners and communities affected by the Project.

⁴⁵ *Id.* at p. 61,745.

The Project will also have no impact on Gulf South's ability to provide natural gas transportation or storage service to its existing customers. Rather than adversely impacting Gulf South's existing customers, the proposed Project facilities will enhance the Applicants' infrastructure in central and southern Mississippi; improve access to new supplies of natural gas; serve new market demand; enhance competition within the United States for natural gas transportation and supply; and provide additional receipts, transportation, and outlets for Gulf Coast natural gas supplies. The Project will also have no adverse effects on existing pipelines or their captive customers.⁴⁶

Gulf South's proposed lease on Texas Gas' facilities ensures that Texas Gas' customers will not face any adverse financial impacts from the Project.⁴⁷ Texas Gas' proposed lease on the Greenville Lateral ensures that the Project will also have no negative impact on Texas Gas' ability to continue to provide natural gas transportation service to its existing customers. The Applicants are not proposing any tariff changes that would restrict in any way existing customers' rights on these facilities. Rather than adversely impacting its existing customers, the proposed Project facilities will enhance the Applicants' infrastructure and repurpose underutilized facilities.

The Commission should conclude that the Project is consistent with the Certificate Policy Statement as it will have no adverse effects on existing customers, existing pipelines, or their captive customers.

⁴⁶ The Commission has recognized that it need not protect competitors from competition. Instead, the goal is to ensure fair competition. *Id.* at p. 61,748.

⁴⁷ See above at Sections VI. and X.B.1.

3. ***Gulf South Has Minimized Potential Impacts on Landowners and Surrounding Communities.***

The Applicants have taken comprehensive measures to minimize potential impacts on landowners and surrounding communities. The Applicants have sited the location of the proposed new compressor units within existing Greenville and Isola Compressor Stations to minimize the impact on landowners, and have completed acquisition the site of the proposed new Holmes Compressor Station. Similarly, Gulf South will construct the proposed new Kosciusko Compressor Station entirely on property owned by Gulf South.

In order to further minimize the Project footprint and minimize potential impacts, Gulf South proposes to co-locate approximately 3 miles (37 percent) of the new Columbia Lateral and approximately 41 miles (40 percent) of the new Kosciusko Pipeline along existing easements. Gulf South has been working with, and will continue to work with, affected landowners, local officials, and other stakeholders to minimize any concerns regarding the access, easements, and temporary workspace needed to construct this Project. Gulf South has secured survey permission on the entire route and to date has secured right-of-way on 33% of the route through good faith negotiations. The Applicants have also implemented best practices to mitigate potential noise and emissions, to minimize impacts to the community. Through these proactive efforts, initiated during the pre-filing process, Gulf South has demonstrated a strong commitment to engaging with landowners and fostering positive relationships with the surrounding communities. The Commission should conclude that the Applicants have taken significant steps to minimize impacts to landowners and communities.

4. **Project Benefits Outweigh Residual Adverse Impacts**

Through the design of the Project, the Applicants have minimized potential impacts of the facilities on their existing customers, other pipelines and their captive customers, and landowners and communities. To the extent that adverse impacts still occur, the benefits of the Project substantially outweigh those impacts. The Project benefits include providing the necessary capacity to meet long-term demand into the Southeast United States, ensuring a reliable energy supply for consumers, alleviating constraints, ensuring reliability and affordability of supply from diverse supply sources to promote economic growth and development and to benefit local communities and businesses. The Commission should conclude that the proposed Project is required by the present and future public convenience and necessity.

X.
ENERGY EFFICIENCY

The Applicants considered the potential for energy efficiency in connection with major pipeline infrastructure projects. The Applicants have designed the Project to enhance operational efficiencies while limiting air emissions. The Applicants have selected compressor units for overall efficiency and that meet applicable air and noise regulatory requirements. The 9 ppm NO_x engine compressor units that are proposed for installation as part of the Project are equipped with Solar's patented SoLoNO_x combustion technology which achieves low emissions of NO_x and is currently Solar's lowest emitting technology. To further reduce emissions, the Applicants have included additive electric seal gas booster pumps to keep the compressor seals pressurized when the units are not running which will further reduce methane emissions. According to Solar, its equipment is designed to minimize emissions and meet the toughest environmental standards and

reduces turbine NO_x emissions by up to 90% and carbon monoxide by up to 30%.⁴⁸ The Applicants will employ the recommended maintenance schedule to maintain efficiency on the new and modified compressor units.

The Applicants have considered waste heat and co-generation opportunities, considering the white paper on waste heat published by the Interstate Natural Gas Association of America (“INGAA”) in February 2008.⁴⁹ The INGAA white paper identifies initial threshold criteria for determining whether waste heat generation is feasible. Candidate compressor stations should have a total of 15,000 HP provided by gas turbine compressor units and these units should operate for a total of 5,250 hours per year (60 percent load factor).

The Applicants cannot state with certainty whether waste heat cogeneration is feasible or not. It is not part of the Applicants’ business plan to study, develop, construct, own, or operate waste heat recovery facilities as waste heat generated is not useful for any of the processes or operational parameters of a typical gas transmission facility. Actual operating data, after the facilities are placed into service and operating under normal conditions, is needed to further evaluate potential waste heat cogeneration. After operation of these facilities for a period of time, data can be provided and reviewed to determine the economic viability of the cogeneration. The Applicants provide information in their waste heat recovery postings available on the Applicants’ websites.

⁴⁸ Energy Solutions For the Oil and Gas Industry. Solar Turbines Inc. (<https://s7d2.scene7.com/is/content/Caterpillar/CM20150703-52095-53056>).

⁴⁹ Hedman, Bruce A. *Waste Heat Recovery Opportunities for Interstate Natural Gas Pipelines*. Interstate Natural Gas Association of America, Feb. 2008. (<https://ingaa.org/stay-current/waste-heat-recovery-opportunities-for-interstate-natural-gas-pipelines/>).

XI.
OTHER APPLICATIONS AND FILINGS

The Applicants are not aware of any other application to supplement or effectuate this Application that must or will be filed by the Applicants, their customers, or any other person with any Federal, State, or regulatory body in order to complete the Project.

XII.
NOTICES

Pursuant to 18 C.F.R. §§ 157.6 and 157.9 of the Commission's Regulations, a form of notice of this Application, suitable for publication in the *Federal Register*, is attached. Pursuant to 18 C.F.R. § 157.10 of the Commission's Regulations, the Applicants will provide a complete copy of this Application to a central public library in each county in the Project area within three business days of the filing of this Application.

Pursuant to 18 C.F.R. § 157.6(d), the Applicants will make a good faith effort to notify all landowners, towns, communities, and local, state, and federal governments and agencies involved in the Project in accordance with this section.

XIII.
DESCRIPTION OF EXHIBITS

This is an abbreviated application filed pursuant to Section 157.7 of the Commission's regulations under the NGA.⁵⁰ Listed are the exhibits required under 18 C.F.R. § 157.14(a).⁵¹ Gulf South omitted the exhibits and data that are inapplicable or are unnecessary for this Application. The following exhibits relevant to this Application are attached, incorporated by reference, or omitted for the reasons stated.

⁵⁰ 18 C.F.R. § 157.7.

⁵¹ 18 C.F.R. § 157.14(a).

- Exhibit A Articles of Incorporation and By-laws
Omitted. Texas Gas filed as Exhibit A in Docket No. CP04-373-000, et al. and incorporated herein by reference. Gulf South filed as Exhibit A in Docket No. CP19-490-000 and is incorporated herein by reference.
- Exhibit B State Authorization
Omitted. Texas Gas filed as Exhibit B in Docket No. CP04-373-000, et al. and incorporated herein by reference. Gulf South filed as Exhibit B in Docket No. CP02-155-000 and is incorporated herein by reference.
- Exhibit C Company Officials
Submitted herewith.
- Exhibit D Subsidiaries and Affiliation
Submitted herewith.
- Exhibit E Other Pending Applications and Filings
Omitted. Applicants have no other applications pending before the Commission at the time of the filing of this Application that directly and significantly affect the Application filed.
- Exhibit F Location of Facilities
Submitted herewith.
- Exhibit F-I Environmental Report
Submitted herewith in Volume I-A.
- Exhibit G, G-I Flow Diagrams
Submitted herewith. Information for Exhibits G, and G-I is included in Volume III, and labeled as “CUI//CEII” and “CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE” as defined in 18 C.F.R. §388.113(c).
- Exhibit G-II Flow Diagram Data
Submitted herewith. Information for Exhibit G-II is included in Volume III, and labeled as “CUI//CEII” and “CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE” as defined in 18 C.F.R. §388.113(c).
- Exhibit H Total Gas Supply Data
Omitted.

- Exhibit I Market Data
Submitted herewith. The precedent agreements are submitted in Volume II and designated as “CUI//PRIV” and “PRIVILEGED INFORMATION – DO NOT RELEASE” as they contain sensitive commercial information.
- Exhibit J Federal Authorizations
Submitted herewith.
- Exhibit K Cost of Facilities
Submitted herewith.
- Exhibit L Financing
Omitted. The Applicants will finance the proposed construction with funds generated internally, through borrowings, bond offerings, and/or equity offerings.
- Exhibit M Construction, Operation and Management
Omitted. The Applicants will construct or cause to be constructed, owned, operated, and maintained the proposed facilities.
- Exhibit N Revenues - Expenses - Income
Submitted herewith.
- Exhibit O Depreciation and Depletion
Omitted. Depreciation is reflected in Exhibit N.
- Exhibit P Tariff
Pro Forma tariff records for the Texas Gas Tariff and Gulf South Tariff are submitted herewith. Three sets of pro forma records are included, as previously discussed.
- Exhibit Z-1 SPGCI Market Study
Submitted herewith.
- Exhibit Z-2 Response Matrix to Address the Commission’s Comments on Draft Resource Reports 1 through 12 issued on July 30, 2025
Submitted herewith.
- Exhibit Z-3 Form of Protective Agreement
Submitted herewith.

In accordance with Section 157.16 of the Commission’s regulations⁵², and the Commission’s regulations for filing an abbreviated application under Section 157.7,⁵³ the following exhibits are relevant to Gulf South’s acquisition of facilities owned by Texas Gas as discussed herein.

- Exhibit Q Effect on Existing Contracts and Tariffs
Omitted. The facilities proposed in this application will not affect any existing contracts or tariffs.
- Exhibit R Acquisition Contracts
Submitted herewith. The Master Distribution and Contribution Agreement is submitted in Volume II and designated as “**CUI//PRIV**” and “**PRIVILEGED INFORMATION – DO NOT RELEASE**” as they contain sensitive commercial information.
- Exhibit S Accounting Treatment of Acquisition
Submitted herewith.

In accordance with Section 157.18 of the Commission’s regulations⁵⁴, and the Commission’s regulations for filing an abbreviated application under Section 157.7,⁵⁵ the following exhibits are relevant to the Applicants’ abandonment request.

- Exhibit T Related Applications
The facilities for which Texas Gas seeks abandonment authorization was/were originally certificated by the Commission in Docket No(s). CP07-417 and CP12-276. The facilities for which Gulf South seeks abandonment authorization are proposed to be acquired by Gulf South from Texas Gas in the instant docket.
- Exhibit U Contracts and Other Agreements
The lease agreements between Gulf South and Texas are submitted in Volume II and designated as “**CUI//PRIV**” and “**PRIVILEGED INFORMATION – DO NOT RELEASE**” as they contain sensitive commercial information.

⁵² 18 C.F.R. § 157.16.

⁵³ 18 C.F.R. § 157.7.

⁵⁴ 18 C.F.R. § 157.18.

⁵⁵ 18 C.F.R. § 157.7

- Exhibit V Flow Diagram Showing Daily Design Capacity and Reflecting Operation of Applicant's System After Abandonment
Omitted. Gulf South's system will not be affected by the abandonment of capacity by the capacity lease agreement.
- Exhibit X Effect of Abandonment on Existing Tariffs
Omitted. See Exhibit P for the tariff changes necessary for the Project.
- Exhibit Y Accounting Treatment of Abandonment
Submitted herewith.

XIV.
WAIVER

Pursuant to Rules 801 and 802 of the Commission's Rules of Practice and Procedure,⁵⁶ the Applicants request that the intermediate decision procedure be omitted and waives oral hearing and opportunity for filing exceptions to the decision of the Commission. Under these procedures, the decision of the Commission will be final, but subject to reconsideration by the Commission upon request for rehearing, as provided by statute.

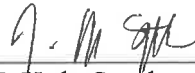
⁵⁶ *Id.* at §§ 385.801 and 385.802.

XV.
CONCLUSION

WHEREFORE, the Applicants request that the Commission review the proposal contained herein and issue an order by September 17, 2026: (i) authorizing, pursuant to Sections 7(b) and 7(c) of the NGA, the abandonment by sale of the Greenville Lateral and Isola CS from Texas Gas to Gulf South; (ii) granting, under Section 7(c) of the NGA, authorization to construct, install, modify, operate, and maintain the proposed Project facilities; (iii) approving the proposed transportation capacity leases between Texas Gas and Gulf South; (iv) approving Texas Gas's request for rolled-in rate treatment and Gulf South's request for establishment of a new rate zone. The Applicants seek any and all additional authorizations or waivers deemed necessary by the Commission to accomplish the purpose of this Application.

GULF SOUTH PIPELINE COMPANY, LLC

TEXAS GAS TRANSMISSION, LLC



J. Kyle Stephens

Vice President, Regulatory Affairs