

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Bear Creek Storage Company L.L.C.

§

Docket No. RP12-121-000

**MOTION TO INTERVENE
OF
TENNESSEE GAS PIPELINE COMPANY, L. L. C.**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. Sections 385.212 and 385.214, Tennessee Gas Pipeline Company, L.L.C. ("Tennessee") hereby respectfully moves to intervene the above referenced proceeding. Tennessee respectfully states as follows:

I.

The exact legal name of Tennessee is Tennessee Gas Pipeline Company, L.L.C. Tennessee is a limited liability company organized and existing under the laws of the State of Delaware. The location of Tennessee's principal place of business is 1001 Louisiana Street, Houston, Texas 77002. The names, titles, addresses, and email addresses of the persons to whom communications concerning this motion are to be addressed are as follows:

*James D. Johnston
Associate General Counsel
Tennessee Gas Pipeline Company, L.L.C.
1001 Louisiana
Houston, TX 77002
(713) 420-4998
(713) 420-1601(fax)
james.johnston@elpaso.com

* Milton Palmer, Jr.
Director, Rates and Regulatory Affairs
Tennessee Gas Pipeline Company, L.L.C.
1001 Louisiana
Houston, TX 77002
(713) 420-3297
(713) 420-1605 (fax)
milton.palmer@elpaso.com

(*Persons designated to receive service pursuant to Section 385.203 of the Commission's Rules of Practice and Procedure.)

II.

Tennessee is a natural gas transmission company engaged primarily in the business of transporting natural gas in interstate commerce, under authority granted by and subject to the jurisdiction of the Commission. Tennessee's main transmission system extends in a northeasterly direction from its primary sources of supply in Texas, Louisiana, and the Gulf of Mexico, through the states of Texas, Louisiana, Arkansas, Mississippi, Alabama, Tennessee, Kentucky, West Virginia, Ohio, Pennsylvania, New York, New Jersey, Massachusetts, New Hampshire, Rhode Island, and Connecticut.

III.

BACKGROUND

On November 17, 2011, the Commission issued an Order Instituting Investigation and Setting Matter for Hearing Pursuant To Section Five of the Natural Gas Act ("November 17 Order") in the referenced Bear Creek Storage Company L.L.C. ("Bear Creek") FERC docketed proceeding. The Commission stated that based upon the its review of publicly available information on file with the Commission, it appears that Bear Creek's currently effective tariff rates may be unjust and unreasonable.

In the November 17 Order, the Commission stated that persons wishing to become a party must move to intervene and receive intervenor status pursuant to Section 385.214. Accordingly, Tennessee hereby requests that it be permitted to intervene in the referenced matter and to become a party to this proceeding.

V.

STATEMENT OF INTEREST

Tennessee is an owner and customer of Bear Creek Storage Company L.L.C. Therefore, Tennessee has an interest in this proceeding which may be affected by any Commission action and which interests cannot be adequately represented by any other party. Tennessee is an interested party within the meaning of Rule 214 at Section 385.214(b)(2)(ii) of the Commission's Rules of Practice and Procedure.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Houston, Texas, this 9 day of December, 2011.

By _____/s/ James D. Johnston
James D. Johnston
Associate General Counsel