

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

**PennEast Pipeline Company, LLC**

)

**Docket No. CP15-558-000**

**MOTION TO INTERVENE AND SUPPORTING COMMENTS OF  
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2015), Consolidated Edison Company of New York, Inc. ("Con Edison") hereby moves for leave to intervene and submits these comments in support of the application of PennEast Pipeline Company, LLC ("PennEast") for a certificate of public convenience and necessity and related authorizations, filed September 24, 2015 in the above-referenced docket.

**I. BACKGROUND**

On September 24, 2015, under Section 7(c) of the Natural Gas Act, PennEast submitted an Application for a certificate of public convenience and necessity to construct, own and operate a new greenfield pipeline project that will provide up to 1,107,000 Dth/d of new firm natural gas transportation capacity on a year-round basis (hereinafter "Project"). The Project consists of approximately 114 miles of 36-inch diameter mainline transmission pipeline originating in Luzerne County, Pennsylvania, and extending to Mercer County, New Jersey.

The Project accesses multiple upstream supply sources located at various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC ("Transco") and gathering systems

operated by UGI Energy Services, LLC, Williams Partners L.P., and Energy Transfer Partners L.P., all in Luzerne County, Pennsylvania. As explained more fully in the Application, the Project extends from these receipt points to various delivery point interconnections in the center of major northeastern natural gas-consuming markets, including interconnections with Columbia Gas Transmission, LLC (“Columbia”), Texas Eastern Transmission, LP (“Texas Eastern”), and Algonquin Gas Transmission, LLC (“Algonquin”). The Project will terminate at a delivery point with Transco in Mercer County, New Jersey. Application at 11-12.

PennEast requests that the Commission issue all required authorizations and waivers by August 1, 2016, so that PennEast may meet its target in-service date of November 1, 2017, as set forth in agreements with PennEast’s foundation shippers. Application at 2.

Con Edison participated in the Open Season for the Project held August 11- 29, 2014, and as a Project foundation shipper has executed a long-term precedent agreement with PennEast for 100,000 Dth/d, as shown on Table 1.1-1 of the Application’s Resource Report 1.

## **II. COMMENTS IN SUPPORT**

As explained by PennEast, the Project was developed in response to market demands and interest from shippers, such as Con Edison, that require additional firm transportation capacity to meet increased demand in its service territory on a reliable and cost-effective basis. Application at Resource Report 1, Section 1.1 (Purpose and Need). To that end, the Project is designed to bring low cost natural gas produced in the

Marcellus Shale region in northern Pennsylvania, to homes and businesses in New Jersey, Pennsylvania and New York. As a Project foundation shipper that serves over one million customers in the New York City and Westchester County markets of New York State, Con Edison has subscribed to Project capacity in order to provide its customers with an alternative source of gas that would displace currently more expensive supplies from the Gulf of Mexico and from supply sources in the Northeast region accessed through the New York Market Area. The physical design of the project, with direct connections to Algonquin, Texas Eastern, Columbia and Transco, will provide Con Edison with the flexibility to access multiple downstream delivery options on pipelines already serving the New York market.

For these reasons, Con Edison supports the Project and urges the Commission to issue all necessary authorizations and waivers by August 1, 2016, in order that PennEast may commence construction on a timely basis and meet its targeted in-service date of November 1, 2017.

### **III. MOTION TO INTERVENE**

Con Edison, a combination gas, electric, and steam utility company whose rates and services are regulated by the Public Service Commission of the State of New York, serves over one million gas customers in New York City and Westchester County in New York State. As a foundation shipper on the proposed PennEast Project, Con Edison has direct and substantial interests in these proceedings and may be affected by its ultimate determination. Con Edison will not be represented adequately by any other party and may be adversely affected or bound without opportunity to present its positions unless it is permitted to participate in the proceedings.

#### **IV. NOTICE AND CORRESPONDENCE**

The names, titles and addresses of the persons to whom communications with respect to these proceedings should be addressed are:

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#### **V. CONCLUSIONS**

WHEREFORE, Con Edison respectfully requests that it be permitted to intervene in and be a party to these proceedings. Con Edison further requests that the Commission authorize the PennEast Project by August 1, 2016, in order that PennEast may commence construction on a timely basis and place the Project into service by November 1, 2017.

Respectfully submitted,

CONSOLIDATED EDISON COMPAN  
OF NEW YORK, INC.

By:  /s/  
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Its Attorneys

Dated: October 29, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 29th day of October 2015, served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

/s/  
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