

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

In The Matter Of:)
)
PennEast Pipeline Company, LLC) **Docket No. CP15-558-000**

**MOTION TO INTERVENE OF
PIVOTAL UTILITY HOLDINGS, INC.
d/b/a ELIZABETHTOWN GAS
AND COMMENTS IN SUPPORT**

Pursuant to Rule 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §385.214, Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas (“ETG”) hereby moves for leave to intervene and submits comments in support of the September 24, 2015 application filed by PennEast Pipeline Company, LLC (“PennEast”) in the above captioned proceeding.

Motion For Leave To Intervene

1. ETG is a local gas distribution company regulated by the New Jersey Board of Public Utilities. ETG serves more than 282,000 residential, commercial, and industrial natural gas customers in the State of New Jersey, in a service territory located in Union, Middlesex, Sussex, Warren, Hunterdon, Morris, and Mercer counties.

2. ETG is a wholly-owned subsidiary of AGL Resources Inc., an Atlanta-based energy services holding company.

3. ETG designates the following individuals to receive service of all filings made in this proceeding:

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4. On September 24, 2015, PennEast filed an application for authority to construct, own, and operate a new natural gas pipeline system, including pipeline facilities, a compressor station, metering and regulating stations, and appurtenant facilities in Pennsylvania and New Jersey (collectively the “project”). Specifically, PennEast seeks authorization to construct, own and operate a new pipeline system comprising 114 miles of 36-inch diameter mainline transmission pipeline from Luzerne County, Pennsylvania to Mercer County, New Jersey; a 2.1 mile, 24-inch lateral in Northampton County, Pennsylvania; a 0.6 mile, 12-inch diameter lateral in Hunterdon County, New Jersey; a 1.4 mile, 36-inch diameter lateral in Hunterdon County, New Jersey; a 47,700 horsepower compressor station in Carbon County, Pennsylvania; and various aboveground facilities, including interconnects, launchers, receivers and mainline block valves. PennEast further requests blanket certificates pursuant to Part 157, Subpart F, and Part 284, Subpart G of the Commission’s regulations; approval of PennEast’s *pro forma* gas tariff; and other appropriate authorizations and waivers.

5. ETG has executed a precedent agreement with PennEast for 100,000 dekatherms per day of firm transportation service for a primary term of 15 years. As such, ETG has an interest in, and will be directly affected by, the outcome of this proceeding. ETG’s interests

will not be adequately represented or protected by any other party to this proceeding. Accordingly, ETG respectfully moves for leave to intervene in and become a party to this proceeding.

Comments In Support

6. ETG strongly support PennEast's application and requests that the Commission approve it within the timeframe requested so that PennEast can meet the target in-service date of November 1, 2017. The project will enable PennEast to provide additional firm transportation service to ETG and other customers and will enable ETG to assure its access to geographically proximate, incremental supplies of natural gas at market-competitive prices. The project will enable ETG to continue to grow its markets, improve reliability, and enhance operating flexibility. The continued growth of ETG's business provides both economic and environmental benefits to ETG's customers and the State of New Jersey as a result of the displacement of more expensive, less environmentally friendly alternate energy sources with natural gas. Certification of the PennEast project is clearly in the public interest.

Conclusion

WHEREFORE, ETG respectfully requests that the Commission:

- a. issue an order permitting ETG to intervene in this proceeding with full rights as a party hereto;
- b. establish a process that will enable the Commission to approve PennEast's application in a manner that will permit PennEast to meet its November 1, 2017 target in-service date; and

- c. grant ETG such other and further relief as may be required to protect its interests and the interests of the gas consumers it serves.

Respectfully submitted,

Pivotal Utility Holdings, Inc.
d/b/a Elizabethtown Gas

/s/ Kenneth T. Maloney

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Dated: October 28, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties to this proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 28th day of October, 2015.

/s/ Kenneth J. Maloney

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