

Submission Description: (doc-less) Motion to Intervene of Hopewell Valley Citizens Group, Inc. under CP15-558-000.

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Dockets

CP15-558-000 Application of PennEast Pipeline Company, LLC for Certificates of Public Convenience and Necessity and Related Authorizations

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	
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Basis for Intervening:

The value of being a student of the history of science is that it provides a rational methodology for recognizing paradigm shifts in a particular area of science. When a paradigm shift occurs, related national policies also change to reflect the paradigm shift. We have experienced a paradigm shift in the field of energy necessitated by national security. The FERC needs to follow the lead of our American military leaders and revise its policies for proof of public need for new interstate gas pipelines.

In 1938 when the Natural Gas Act was passed it was rational for the FERC to have a policy of using contracts for gas as proof of public need for proposed new interstate gas pipelines. For 40 years natural gas was accepted as being cleaner and preferable to coal. Of course coal mining companies resisted, and continue to resist, the shift to natural gas. Clean renewables - solar and wind- were not yet available. Climate change was not yet identified as a major threat to national security. Now in 2015, 75 years later, the threat to national security from climate change is driving the paradigm shift to sustainable and renewable sources of energy. Natural gas is no longer consistent with protecting the country from climate change because we understand that pipelines emit and release large amounts of methane, a major contributing cause of climate change. It is unreasonable to approve energy sources that cause climate change. Of course the natural gas industry is resisting the paradigm shift to renewables.

I urge the FDERC to review and revise its policies on proof of public need. The policy of reliance on a pipeline company's contracts (and of reliance on a pipeline company's willingness to accept liability for not having contracts as in the El Paso applications) is no longer rational. The FERC's policies should be consistent with the data on gas consumption and need documented by the US EIA.

If we look at the US EIA data for New Jersey, contrary to the unsupported promises made by PennEast, its proposed pipeline will not benefit the public. No additional gas is needed in New Jersey. According to the US

EIA demand for natural gas in NJ has been flat for 14 years. Approximately 30% of the gas currently shipped into NJ is shipped out. All short term needs for more capacity during a possible polar vortex time period or for resiliency may be fulfilled via energy efficiency programs, renewables and storage.

Precedent contracts are no longer proof of public need. Data compiled by the US EIA documents that New Jersey and the surrounding region do not need more natural gas. Pricing for gas in NJ is at an all time record low; PennEast's claims of providing New Jersey residents and businesses with lower gas prices is false and should not be accepted by the FERC. What do precedent contracts evidence? These contracts prove midstream shippers and equity partners have a plan to profit from midstream transactions at the expense of ratepayers in New Jersey. The need for the proposed PennEast pipeline is not a public need as required by the FERC approval procedure: it is a private interest in setting up the opportunity for midstream transactions paid for by New Jersey's ratepayers.

Furthermore, the right to exercise eminent domain should not be granted for a private interest. The US EIA data proves that there is no public need for the proposed PennEast pipeline. The FERC should not grant the Certificate.