

providing for the construction of approximately 375 single family homes. To date, more than 100 homes have been constructed. The current proposed PennEast pipeline route, as set forth in PennEast's application to the Commission, has the pipeline going directly through the Trio Fields property. The proposed pipeline route, taken in conjunction with local township zoning ordinances and pipeline setback requirements, will prohibit Kay Trio from constructing roughly 13 or 14 of the homes permitted under the subdivision plan in one of the most prime locations on the site.

Accordingly, Kay Trio has standing to intervene in this matter because it has interests that stand to be directly affected by the outcome of this proceeding and the construction of the proposed pipeline. More specifically, the pipeline's direct path across Trio Fields, aside from destroying numerous lots and any profits associated therewith, will likely affect sales, interest, operation and the overall success of the development as a whole. As a result of these negative impacts, Kay Trio does not support the Project and takes the position that this Project is not required by public convenience and necessity.

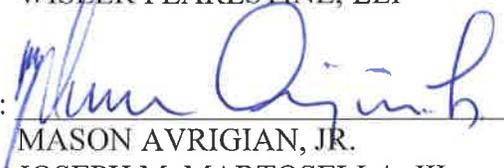
III. CONCLUSION

For the foregoing reasons, Kay Trio, LLC respectfully requests that the Commission grant its Motion to Intervene as a party with full rights to participate in all proceedings.

Respectfully submitted,

Dated: October 28, 2015

WISLER PEARLSTINE, LLP

By: 

MASON AVRIGIAN, JR.
JOSEPH M. MARTOSELLA, III
*Attorneys for Movant,
Kay Trio, LLC*

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of FERC's Rules of Practice and Procedure, 18 C.F.R. § 385.210, I, Mason Avrigian, Jr., 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.

Respectfully submitted,

Dated: October 28, 2015

WISLER PEARLSTINE, LLP

By: 
MASON AVRIGIAN, JR.
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