



October 4, 2024

The Honorable Willie L. Phillips
Chairman

The Honorable Mark C. Christie
Commissioner

The Honorable David Rosner
Commissioner

The Honorable Lindsey S. See
Commissioner

The Honorable Judy W. Chang
Commissioner

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Application for Temporary Emergency Certificate, Transcontinental Gas Pipe Line Company, LLC,
Docket No. CP21-94-004

Dear Chairman Phillips and Commissioners:

Thank you for your commitment to reliable, affordable, and sustainable energy for all Americans.

The Northeast Gas Association (NGA) is an energy trade association, with offices in Massachusetts and New Jersey, representing members with natural gas interests from throughout the Northeast U.S. region. These companies deliver safe, reliable, and affordable natural gas to 14 million customers, from homes and businesses to schools, hospitals, and power plants. Our members safely and reliably deliver natural gas to some of the most vital institutions throughout the northeast, and any interruption in supply would directly impact the region's energy security and economy.

We commend FERC for its continued focus on reliability, especially in the infrastructure-constrained Northeast, and the Commission's work to recognize that high-demand winter seasons put stress on all energy delivery systems. Indeed, we were pleased to see FERC visit New England last year to highlight the importance of gas-electric coordination in the region. As you know, the interrelation of fuels in the Northeast energy market means that actions taken on one delivery system can have repercussions for others. It is for this reason that NGA co-chairs the Electric/Gas Operations Committee with ISO-New



1800 West Park Drive, Suite 340, Westborough, MA 01581
NYSEARCH: 20 Waterview Boulevard, 4th Floor, Parsippany, NJ 07054

Phone: 781.455.6800
Fax: 781.455.6828



England, and hosts our Gas Supply Task Force, which helps facilitate communications and coordinate adequate gas supply for the region during high demand winters.

For natural gas delivery, the Regional Energy Access (REA) project was recently put into service to increase reliability and keep costs lower for millions of New Jersey and Pennsylvania homes and businesses. Yet we understand the permit for this project was recently vacated by the D.C. Circuit Court.

To keep this project in service, NGA supports the project's application for a Temporary Emergency Certificate to enable the transportation of over two billion cubic feet ("Bcf") of natural gas per day on Transco's pipeline. As we head into the winter heating season, this natural gas is vital to keeping people both warm and safe across the region.

As you know, the region is highly reliant on natural gas for both heating and electricity generation. According to EIA, in New Jersey, about 73% of households rely on natural gas as their primary heating fuel. Natural gas is also the primary fuel source for electricity generation in the PJM Interconnection, and in 2022, natural gas accounted for about 49% of New Jersey's total electricity generation. A disruption of the REA's transportation creates reliability risk for both heating and electric generation consumers.

Further, the REA project also keeps costs down for people across the region. According to the application for a temporary certificate, placing incremental REA capacity into service in October of 2023 supported a savings of about \$280 million in costs for people across the Mid-Atlantic and Northeast last winter. Removal of the REA facilities could significantly increase the cost of gas this winter.

Accordingly, NGA urges the Commission to issue the requested emergency certificate to ensure that the REA facilities are not removed from service following issuance of the D.C. Circuit Court's mandate.

Sincerely,

José Costa,
President and CEO, Northeast Gas Association

