UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Inquiry Regarding the Commission's Policy for Determining Return on Equity	))	**Docket No. PL19-4-000**

JOINT COMMENTS OF
PROCESS GAS CONSUMERS GROUP AND
AMERICAN FOREST & PAPER ASSOCIATION

On March 21, 2019, the Federal Energy Regulatory Commission ("FERC" or "Commission") issued a Notice of Inquiry ("NOI") seeking information and stakeholder views regarding whether, and if so how, it should modify its policies concerning the determination of the return on equity ("ROE") to be used in designing jurisdictional rates charged by public utilities.[1] Accordingly, Process Gas Consumers Group ("PGC") and American Forest & Paper Association ("AF&PA") (collectively, ("PGC/AF&PA") hereby respectfully submit their joint comments.

I. EXECUTIVE SUMMARY

In the NOI, the Commission also seeks comment on whether any changes to its policies concerning public utility ROEs should be applied to interstate natural gas and oil pipelines. PGC/AF&PA's comments in this proceeding support continued sole reliance on the Commission's existing Discounted Cash Flow ("DCF") methodology in setting ROEs for natural gas pipelines.[2] As discussed in more detail below, there is no indication that current ROEs are too low to attract investor capital to the pipeline industry. To the contrary, as demonstrated below, there is a steady stream of new natural gas pipeline projects being proposed and constructed. Absent any evidence that current ROE levels produced by the DCF analysis are resulting in unjust and unreasonably

[1] *Inquiry Regarding the Commission's Policy for Determining Return on Equity*, 166 FERC ¶ 61,207 (2019) ("NOI").

[2] PGC/AF&PA are not addressing methods for setting ROEs for the electric industry in these comments. Also, PGC/AF&PA do not address all of the questions posed by the Commission in the NOI, but reference the questions posed that each comment responds to in the discussion.

low returns, there is no justification for moving to a different methodology for natural gas pipelines.

The lack of refund authority under Section 5 of the Natural Gas Act ("NGA") provides another basis for differentiating natural gas and electric industries. The increased costs to shippers of having to analyze pipeline ROE results of multiple models, and the resulting protracted settlement discussions and/or litigation to determine just and reasonable rates for pipelines that are over-earning, will delay relief to natural gas customers. Due to the lack of refund authority, natural gas consumers can only obtain relief from unjust and unreasonable rates through establishing lower rates on a prospective basis in such proceedings.

Additionally, PGC/AF&PA submit that the Commission should retain its existing criteria for Proxy Group composition, but allow flexibility based on record evidence in individual proceedings where required to achieve a sufficient number of comparable pipelines, and should not add companies who do not have comparable risk profiles, such as unregulated entities.

Finally, in connection with the Commission's invitation in the NOI to address other issues related to establishing a just and reasonable return, PGC/AF&PA are concerned about the many pipelines that showed high equity ratios along with high ROEs in their Form 501-G proceedings. PGC/AF&PA request that the Commission consider the cost to consumers of the many pipelines showing equity ratios in the 60% and higher range, and set lower ROEs reflecting the reduced risk of such pipelines.

II. BACKGROUND

The NOI follows the decision of the U.S. Court of Appeals for the District of Columbia Circuit ("D.C. Circuit") in *Emera Maine v. FERC ("Emera Maine")*,[3] reversing and vacating Opinion No. 531.[4] In *Emera Maine*, the D.C. Circuit held, among other things, that the Commission had failed to justify its decision under Section 206 of the Federal Power Act ("FPA") to set the ROE of the New England Transmission Owners at the midpoint of the upper half of the zone of reasonableness produced by the two-step DCF analysis.[5] While the court did not expressly question the Commission's finding that anomalous capital market conditions justified an ROE above the midpoint of the DCF zone of reasonableness, the court concluded that the Commission failed to point to record evidence supporting the conclusion that its solution to the anomalous capital market conditions—setting the base ROE at the upper midpoint rather than the midpoint—was just and reasonable.[6]

Following *Emera Maine*, the Commission issued orders in which it proposed a methodology to determine base ROE by giving equal weight to four financial models instead of relying primarily on the DCF.[7] Although the Commission has used the DCF model to determine ROEs for public utilities and natural gas pipelines since the 1980s, the Commission noted that investors use other financial models in addition to the DCF to evaluate investments. Thus, the Commission proposed to consider other financial models in setting ROE in light of what it considered to be anomalous market conditions after the financial crisis, including low yields on

---

[3] *Emera Maine v. FERC*, 854 F.3d 9, 23 (D.C. Cir. 2017).

[4] *Coakley, Mass. Attorney Gen. v. Bangor Hydro-Elec. Co.("Coakley")*, Opinion No. 531, 147 FERC ¶ 61,234, *order on paper hearing*, 149 FERC ¶ 61,032 (2014), *order on reh'g*, 150 FERC ¶ 61,165 (2015).

[5] In Opinion 531, the upper midpoint of the 7.03 percent to 11.74 percent zone of reasonableness was 10.57 percent. (*See* Opinion 531, 147 FERC ¶61,234 at P 142.)

[6] *Emera Maine*, 854 F. 3rd at 28-29.

[7] *See e.g., Martha Coakley v. Bangor Hydro-Elec. Co.*, 165 FERC ¶61,030 at PP 34-36 (2018).

bonds, which left the Commission less certain about the results of the DCF. These other models include the Capital Asset Pricing Model, Expected Earnings Model, and Risk Premium method.

In the NOI, the Commission states that it recognizes the potentially significant and widespread effect of its ROE policies upon public utilities, and that the importance of the ROE policy for public utilities extends beyond the particular interests of the parties to the *Emera Maine* proceeding. Accordingly, the NOI seeks further information as the Commission re-evaluates its ROE policies following the *Emera Maine* decision.

The Commission seeks comment on several issues in the NOI, including: (1) the role of base ROE in investment decision-making and what objectives should guide the Commission's approach to its base ROE policy apart from the basic *Hope/Bluefield* standard[8]; (2) whether to apply a single ROE policy across electric, interstate natural gas and oil pipeline industries; (3) performance of the DCF model over time and under differing investment conditions; (4) the appropriate guidelines for proxy group composition, elimination of outliers, and placement of base ROE within a zone of reasonableness; (5) whether the Commission should weigh certain financial models over other models based on their respective characteristics; (6) the mismatch between market-based ROE determinations and book value rate base and whether this mismatch is a problem, and how the Commission should address this issue; (7) how the Commission determines whether an existing ROE is unjust and unreasonable under the first prong of FPA Section 206 and whether the quartile approach that the Commission proposed in the *Coakley* Briefing Order is reasonable; and (8) general issues that affect multiple models, such as the underlying data that the models rely on, and also the mechanics specific to each of the four respective models.

[8] *See FPC v. Hope Nat. Gas Co. ("Hope*"), 320 U.S. 591 (1944); *Bluefield Waterworks & Improvement Co. v. Pub. Serv. Comm'n of W. Va. ("Bluefield")*, 262 U.S. 679 (1923).

III. COMMUNICATIONS

PGC/AF&PA request that the following individuals be placed on the Commission's official service list and that all correspondence and communications in these proceedings be addressed to the following individuals:

Andrea J. Chambers
DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Telephone: (202) 799-4130
Email: andrea.chambers@dlapiper.com

Jonathan Wright
DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Telephone: (202) 799-4541
Email: jonathan.wright@dlapiper.com

IV. PGC AND AF&PA INTERESTS

PGC is a trade association that represents energy-intensive large industrial and manufacturing natural gas consumers who have the potential to benefit from the low-cost energy prices brought about by the shale revolution. PGC members own and operate hundreds of manufacturing plants and facilities in virtually every state in the nation and consume natural gas delivered through interstate natural gas pipeline systems throughout the United States. PGC members hold transportation capacity on numerous interstate pipelines. The certification of new interstate natural gas pipeline facilities is critically important to ensure that PGC members can continue to receive the requisite gas to operate their facilities at reasonable and competitive costs in the global marketplace.

AF&PA serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative - Better Practices, Better Planet 2020. The forest products industry accounts for approximately 4 percent of the total U.S. manufacturing GDP, manufactures over

$200 billion in products annually, and employs more than 900,000 men and women. The industry meets a payroll of approximately $50 billion annually and is among the top 10 manufacturing sector employers in 45 states. AF&PA members own and operate facilities that consume natural gas delivered through the numerous interstate natural gas pipelines.

As such, both PGC and AF&PA members have substantial interest in this proceeding, and respectfully submit these initial comments on the NOI to encourage the Commission to proceed cautiously in revising its ROE policy with respect to interstate natural gas pipelines.

V. COMMENTS

A. PGC/AF&PA Strongly Encourage the Commission Not To Abandon the DCF Analysis When Determining the ROE for Natural Gas Pipelines Given the Lack of Evidence that Current ROEs are Failing to Attract Investor Capital.

In the NOI, the Commission asks if it departs from the sole use of a two-step DCF methodology for public utilities, whether the new method or methods should also be used to determine natural gas and oil pipeline ROEs.[9] PGC/AF&PA strongly encourage the Commission to not abandon the two-step DCF methodology when determining the ROE for natural gas pipelines, for the reasons explained below.

With respect to natural gas pipelines, PGC/AF&PA note that the Commission has not identified any justification for abandoning the two-step DCF methodology. The impetus for the NOI, in large part, arose from the D.C. Circuit's decision in *Emera Maine*.[10] In *Emera Maine*, the Commission set the ROE at the upper end of the zone of reasonableness produced by the DCF rather than the mid-point of the zone of reasonableness, due to what the Commission considered to be anomalous capital market conditions driving down returns for electric public utilities. The

[9] *See NOI*, 166 FERC ¶ 61,207 at Question B.1, ROEs for different Commission-regulated industries.

[10] *See id.* at PP 2-3.

court vacated and remanded the Commission's order because it did not adequately explain how its selection of the upper end of the zone of reasonableness was a just and reasonable solution to anomalous capital market conditions.[11] The court did not directly address the validity of the Commission's two-step DCF methodology itself, and certainly did not require that the Commission abandon the DCF model with respect to natural gas pipelines. Likely due in large part to the prevalence of "black-box" settlements in natural gas rate proceedings, the Commission has not identified a single natural gas rate proceeding in the NOI where use of the two-step DCF methodology has led to an unjust and unreasonable result. Given the lack of clear evidence to support a departure from the DCF methodology based on the Commission's own precedent, any departure from the DCF methodology that the Commission may adopt for public utilities should not be applicable to natural gas pipelines.

The Commission also asks what differences between public utilities and natural gas pipelines would justify taking a different approach to determining investor ROEs.[12] PGC/AF&PA note that there is no lack of investment in new natural gas pipelines which would raise any concern that investors require additional return to invest in natural gas pipelines—similar to the concerns raised by some parties in the electric industry over the perceived lack of incentive for investment in interstate electric transmission projects. To the contrary, pipeline companies have been proposing numerous, substantial interstate pipeline projects in recent years.[13] Each of these proposed projects require significant time and money from planning to operation—burdens that would be unreasonable for companies to accept if the current returns for pipeline investment were

[11] *Id.* at PP 19-23.

[12] *See id.* at Question B.4.

[13] *See* Appendix A showing pipeline projects from 2016-2019 as posted on the FERC website.

inadequate. This is further evidence that investors have determined the DCF methodology to be a sufficient method for establishing a pipeline's ROE.

B. PGC/AF&PA Submit that Requiring Additional ROE Models to be Considered Will Likely Lead to Increased Costs to Participate in Rate Proceedings Without any Commensurate Benefits.

In the NOI, the Commission also asks whether the ROE methodology described in the *Coakley* order (involving additional models besides the DCF model) would impact the predictability of ROE determinations, the costs for market participants in such proceedings and the ability of participants to propose, contest and settle base ROEs—as compared to using only the DFC methodology.[14] With regard to natural gas pipeline proceedings, PGC/AF&PA assert that adopting additional methodologies to use in concert with the DCF methodology would almost certainly result in greater litigation between pipeline and shippers, without commensurate benefits. Using multiple methodologies to determine the return required by investors would increase the cost and complexity of rate proceedings for all parties. Each party's rate consultants will need to secure different data for each of the models. Some of the data required for certain models will need to be purchased from private companies, who charge subscriptions for viewing the data, and who will want to charge more due to the requirement for the data. Furthermore, utilizing multiple methodologies would also likely increase the number of and intensity of the issues over which parties disagree, thus making reaching a timely settlement in rate proceedings much less probable.

The reality of natural gas pipeline rate proceedings, particularly in the Section 5 context where the Commission lacks refund authority and the only relief available to ratepayers is prospective, is that time is of the utmost essence for shippers. The recently filed Form 501-G informational filings appear to indicate that numerous pipelines may be significantly overearning

[14] *See NOI*, 166 FERC ¶ 61,207 at Questions A.1 and A.2.

allowed returns. For the handful of pipelines for which the Commission has initiated Section 5 proceedings, the pipelines have a rational interest in prolonging these proceedings as long as possible in order to maintain their current earnings levels due to the lack of refund authority under Section 5. A policy requiring the use of multiple methodologies by the Commission to set allowed ROEs would place even greater pressure on shippers to settle in order to avoid more protracted litigation, and is likely to make settlement more difficult and costly to achieve.

C. The Commission Should Retain Existing Criteria for Proxy Group Composition, but Allow Flexibility Based on Record Evidence in Individual Proceedings.

In the NOI, the Commission asks several questions related to proxy group composition and the zone of reasonableness for a public utility's ROE.[15] PGC/AF&PA acknowledge that the Commission has encountered some difficulties in determining proxy group composition, the elimination of outliers, and the placement of base ROE within a zone of reasonableness in several proceedings. However, PGC/AF&PA assert that establishing a new set of criteria for proxy groups across-the-board in an NOI or generic rulemaking is not likely to result in fewer challenges to the Commission's determination in any given future proceeding.

PGC/AF&PA do not believe it is possible for the Commission to predict how many companies will fit the criteria for appropriate proxy companies for every future rate proceeding in any single rulemaking proceeding—with no record evidence of the impact of such changes. Therefore, PGC/AF&PA assert that it would be most appropriate to rely on the Commission's existing criteria to determine the suitable proxy group and zone of reasonableness, but allow for flexibility in each proceeding on a case-by-case basis, where the parties can examine the universe of companies that meet the existing criteria and argue for any changes needed if there is not a

---

[15] *See id.* at Questions D.1-D.11.

sufficient number of qualified companies. This approach will enable the Commission to support its proxy group determination based on record evidence in the event that the issue is litigated.

However, with respect to the Commission's question regarding including unregulated businesses in a natural gas pipeline's proxy group, PGC/AF&PA strongly encourage the Commission not to adopt such a scheme. The entire exercise of determining an ROE for a pipeline is only necessary because said pipeline is a regulated entity, subject to the jurisdiction of the Commission, which is charged with ensuring that rates are just and reasonable. Unregulated companies, by nature of the risks associated with the investments that they undertake without the guarantee of an opportunity to recover their costs, historically enjoy higher returns on the capital that they deploy. Regulated entities like natural gas pipelines, on the other hand, "have not assumed the risks associated with unregulated markets when they make investments."[16] Unlike unregulated companies, the rate-making process guarantees natural gas pipelines "the opportunity to receive a reasonable return of—and on—its prudent investments."[17] Therefore, the investments of unregulated companies, and the returns that they receive on them, are not an appropriate proxy for what a regulated natural gas pipeline should have the opportunity to earn, and the Commission should not entertain efforts to blur these distinctions.

D. The Commission Should Take into Account the High Equity Ratios for Natural Gas Pipelines in Determining if Their ROEs are Just and Reasonable Pursuant to the *Hope* and *Bluefield* Standards.

PGC/AF&PA appreciate the Commission's effort to investigate the prudence of continuing to apply the two-step DCF methodology when determining a just and reasonable ROE. As noted

---

[16] *New England Power Co.*, 42 FERC ¶ 61,016 at 13 (1988).

[17] *El Paso Nat. Gas Co.*, 139 FERC ¶ 63020 at P 53 (2012), *aff'd in part, El Paso Nat. Gas Co.*, 139 FERC ¶ 63,020 (2012), *order on reh'g, El Paso Nat. Gas Co.*, 145 FERC ¶ 61,040 (2013).

in the NOI, for the past decade, the Commission has grappled with whether the methodology continues to produce ROEs for public utilities consistent with the *Hope* and *Bluefield* capital attraction standards.[18] However, keeping in mind that the entire goal of the Commission's ROE exercise is to determine a level of return that affords the utility the opportunity to attract capital, as an initial matter, the Commission should closely examine the extent to which a utility, particularly any given natural gas pipeline, needs to attract additional equity in order to maintain its financial integrity.

The Commission has long-recognized that a capital structure with too high an equity ratio affords a public utility a return that is unjust and unreasonable to ratepayers.[19] PGC/AF&PA assert that one of the issues that has plagued the natural gas industry in determining the appropriate rate of return for interstate pipelines is establishing a just and reasonable equity ratio in their capital structure for ratemaking purposes.

In Order No. 849, the Commission stated that the established policy in rate cases following Opinion No. 414 *et. seq.* is that a company may use its actual capital structure only if it "(1) issues its own debt without guarantees, (2) has its own bond rating, and (3) has a capital structure within the range of capital structures approved by the Commission."[20] Where these requirements are not met, the Commission will use the consolidated capital structure of the parent company or a hypothetical capital structure. For instance, in Order No. 849, the Commission held that Form 501-G would request the respondent's FERC Form Nos. 2 or 2-A equity related balance sheet

---

[18] *NOI*, 166 FERC ¶ 61,207 at P 18.

[19] *See, e.g.*, *Transcontinental Gas Pipe Line Corp*., Opinion No. 414-A, 84 FERC ¶ 61,084, at n. 27, *reh'g denied*, Opinion No. 414-B, 85 FERC ¶ 61,323 (1998), *petition for review denied sub nom. N.C. Utils. Comm'n v. FERC*, D.C. Cir. Case No. 99-1037 (Feb. 7, 2000) (per curiam).

[20] *See Interstate and Intrastate Natural Gas Pipelines; Rate Changes Relating to Federal Income Tax Rate, 164 FERC ¶ 61,031 at P 107 (2018)* ("Order No. 849").

items. However, if that data did not satisfy the three-part test of Opinion No. 414, the form provided alternative data entries to reflect parent or hypothetical capital structures consistent with Opinion No. 414.[21] If neither the pipeline's own capital structure nor its parent's capital structure satisfied the Commission's policy, Form 501-G required a default equity ratio of 57%, the average capital structure of the proxy group of the last litigated ROE decision in *El Paso*.[22]

While the three-part test of Opinion No. 414 reflects the general policy of the Commission to use a pipeline's actual capital structure for ratemaking purposes, it also requires that a pipeline's equity ratio be within the range approved by the Commission as a safeguard against ratepayers paying unjust and unreasonable rates due an excessive equity ratio, as explained above. To the extent that the Commission revaluates its ROE policy with respect to natural gas pipelines, it should closely examine whether this standard continues to be the most useful benchmark, and, if so, closely examine the interplay between a pipeline's equity ratio and its permitted ROE.[23] Specifically, the Commission should explicitly acknowledge the inverse relationship of equity thickness to risk, and should authorize returns for pipelines that closely correspond with their current high equity ratios. Stated differently, the higher the pipeline's equity ratio, rationally, the less new capital the pipeline needs to attract, and thus, a lower ROE is warranted not only to meet the *Hope* and *Bluefield* standards, but also to ensure just and reasonable rates for ratepayers.

[21] *See* Order 849-1, *Order on Rehearing* at PP 106-108

[22] *Id*. at P 115.

[23] *See, e.g., Aera Energy LLC v. FERC*, 789 F.3d 184, 194 (D.C. Cir. 2015) (observing that, in general, "the higher the proportion of equity capital, the lower the financial risk . . . and thus, in this respect, the lower the necessary rate of returns on equity") (quoting *Missouri Pub. Serv. Comm'n v. FERC*, 215 F.3d 1, 2 (D.C. Cir. 2000)).

Many pipelines showed equity ratios near the upper limit allowed by FERC in the Form 501-G proceedings.[24] For example, in the proceedings where pipelines voluntarily reduced their rates in conjunction with filing Form 501-G or where the Commission initiated a Section 5 investigation into a pipeline's rates, a number of the pipelines reported equity ratios of greater than 60 percent.[25] PGC/AF&PA strongly urge the Commission to consider a benchmark for equity ratios of closer to 50% when determining whether the use of a pipeline's or its parent's actual capital structure for ratemaking purposes. Any equity ratios above the benchmark should be considered anomalous and a hypothetical should be imputed to appropriately balance risk between pipelines and ratepayers. To the extent that the Commission declines to establish such a benchmark and pipeline equity ratios continue to rise, as explained above, the Commission should set lower ROE levels that just and reasonable rates require.

VI. CONCLUSION

For these reasons, PGC/AF&PA support the continued use of the Commission's existing DCF model for setting ROEs for natural gas pipelines.

[24] The FERC Form 501-G showed large variances between the capital structure based on balance sheet versus what was used in the Form 501-G for some pipelines. Some examples include Northern Border balance sheet 39.76% equity (Form 501-G, page 4, line 17) and for justification of return purposes 61.88% equity (Form 501-G, page 4, line 10) (Docket No. RP19-411-000); El Paso balance sheet equity 46.80% (Form 501-G, page 4, line 17) and for justification of return purposes 61.29% (Form 501-G, page 4, line 10) (Docket No. RP19-73-000).

[25] *See supra* n.23; Great Lakes Gas Limited Partnership, Form 501-G, Docket No. RP19-399-000.

Respectfully submitted,

/s/ Andrea J. Chambers

Andrea J. Chambers
Jonathan Wright
DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Telephone: (202) 799-4130
Email: andrea.chambers@dlapiper.com

Attorneys for
Process Gas Consumers Group and
American Forest and Paper Association

Dated June 26, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing document to be served upon each person designated on the Service List for this docket compiled by the Secretary in accordance with the Commission's Rules of Practice and Procedure.

Dated at Washington, DC, this 26th day of June, 2019.

/s/ Andrea J. Chambers
Andrea J. Chambers

Attorney for
Process Gas Consumer Group and
American Forest and Paper Association

Appendix A

Major Pipeline Projects Pending (Onshore)

TEXT SIZE S M L

Data as of March, 2019

These items include major projects that add capacity. The items listed do not include abandonments, minor projects that do not include any facilities, projects under the blanket program, storage projects or LNG projects.

Predefined eLibrary searches
Click on the categories below to view additional information.

2019 | 2018 | 2017 | 2016

<

2019

Docket No.	Company/Project	Capacity (MMcf/d)	Miles of Pipe	Compression (HP)	States	Filing Date
CP19-125-000	Gulf South Pipeline Company, LP; Index 99 Expansion Project	500.00	22.00	0	TX, LA	03/29/19
CP19-99	Natural Gas Pipeline Company of America, Gulf Coast Southbound Project	328.00	0.00	72,840	TX	02/28/19
CP19-52	Natural Gas Pipeline Company of America, Lockridge Extension Project	500.00	16.84	0.00	TX	01/18/19

CONTACT

General Information
Office of External Affairs
Telephone: 202-502-8004
Toll-free: 1-866-208-3372
Email: customer@ferc.gov

Updated: May 24, 2019

Major Pipeline Projects Pending (Onshore)

TEXT SIZE S M L

Data as of March, 2019

These items include major projects that add capacity. The items listed do not include abandonments, minor projects that do not include any facilities, projects under the blanket program, storage projects or LNG projects.

Predefined eLibrary searches
Click on the categories below to view additional information.

2019 | 2018 | 2017 | 2016

2018

Docket No.	Company/Project	Capacity (MMcf/d)	Miles of Pipe	Compression (HP)	States	Filing Date
P19-26-000	Dominion Energy Transmission, Inc., West Loop Project	150.00	5.10	0	PA, OH	12/18/18
CP19-14, PF18-4	Mountain Valley Pipeline, LLC, Southgate Project	375.00	73.00	28,915	NC, VA	11/06/18
CP19-7	Tennessee Gas Pipeline Company, L.L.C., 261 Upgrade Projects	72.40	2.10	4,418	CT, MA	10/19/18
CP18-548	Eastern Shore Natural Gas Company, Del-Mar Energy Pathway Project	14.30	19.47	0	MD, DE	09/14/18
CP18-538	Sendero Carlsbad Gateway, LLC, Limited Jurisdiction Certificate	400.00	23.28	0	NM, TX	08/09/18
CP18-525	Gulf South Pipeline Company, LP, Willis Lateral Project	200.00	19.00	15,876	TX	07/13/18
CP18-512, CP18-513, PF15-26	Cheniere Corpus Christi Pipeline, L.P., Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage III, L, Stage 3 LNG Facilities, Stage 3 Pipeline	1,500.00	21.00	44,000	TX	06/28/18
CP18-487	Natural Gas Pipeline Company of America, SPL Project	400.00	0	22,490	LA	05/18/18
CP18-332	El Paso Natural Gas Company, L.L.C., South Mainline Expansion Project	321.00	17.00	26,440	AZ, NM, TX	04/26/18
CP18-186	Transcontinental Gas Pipe Line Company, Southeastern Trail Project	296.38	7.72	60,720	VA, SC, GA, LA	04/11/18
CP18-137, PF17-6	Columbia Gas Transmission, LLC, Buckeye XPress Project	275.00	66.20	0	OH, WV	03/26/18
CP18-102, CP18-103	Cheyenne Connector, LLC, Rockies Express Pipeline LLC, Cheyenne Connector Pipeline Project	600.00	70.00	32,100	CO	03/05/18
CP18-46	Adelphia Gateway, LLC, Adelphia Gateway Pipeline	850.00	4.75	11,250	PA, DE	01/12/18
CP18-45	Dominion Energy Transmission, Inc., Sweden Valley Project	120.00	4.90	0	PA, OH	01/10/18

CONTACT

General Information
Office of External Affairs
Telephone: 202-502-8004
Toll-free: 1-866-208-3372
Email: customer@ferc.gov

Updated: May 24, 2019

Major Pipeline Projects Pending (Onshore)

Data as of March, 2019

These items include major projects that add capacity. The items listed do not include abandonments, minor projects that do not include any facilities, projects under the blanket program, storage projects or LNG projects.

Predefined eLibrary searches
Click on the categories below to view additional information.

2019 | 2018 | 2017 | 2016

2017

Docket No.	Company/Project	Capacity (MMcf/d)	Miles of Pipe	Compression (HP)	States	Filing Date
CP17-494, CP17-495	PACIFIC CONNECTOR GAS PIPELINE, LP, Jordan Cove Energy Project L.P., Pacific Connector Pipeline, Jordan Cove LNG	1,200.00	229.00	62,200	OR	09/21/17
CP17-178, PF14-21	Alaska Gasoline Development Corporation, Alaska Gasline Development Corporation, Alaska LNG Project	3,100.00	871.00	344,000	AK	04/17/17
CP17-66, CP17-67, PF15-27	Venture Global Plaquemines LNG, LLC, Venture Global Gator Express, LLC, Gator Express, Plaquemines LNG	3,940.00	26.8	0	LA	02/28/17

CONTACT

General Information
Office of External Affairs
Telephone: 202-502-8004
Toll-free: 1-866-208-3372
Email: customer@ferc.gov

Updated: May 24, 2019

Major Pipeline Projects Pending (Onshore)

Data as of March, 2019

These items include major projects that add capacity. The items listed do not include abandonments, minor projects that do not include any facilities, projects under the blanket program, storage projects or LNG projects.

Predefined eLibrary searches
Click on the categories below to view additional information.

2019 | 2018 | 2017 | 2016

2016

Docket No.	Company/Project	Capacity (MMcf/d)	Miles of Pipe	Compression (HP)	States	Filing Date
CP16-454, CP16-45, PF15-20	Rio Bravo Pipeline Company, LLC, Rio Grande LNG, LLC, Rio Bravo Pipeline Company LLC, Rio Grande LNG Terminal and Pipeline System Project, Rio Grande LNG Terminal, Rio Bravo Pipeline Project	4,500.00	139.40	600,000	TX	05/05/16

Updated: May 24, 2019

Document Content(s)