

Submission Description: (doc-less) Motion to Intervene of NATURAL RESOURCES DEFENSE COUNCIL and SUSTAINABLE FERC PROJECT, et. al. under PL19-4-000.

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PL19-4-000 Notice of Inquiry

Filing Party/Contacts:

Filing Party	Signer (Representative)
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Basis for Intervening:

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Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (Commission), 18 C.F.R. § 385.214(b), the Natural Resources Defense Council (NRDC) and the Sustainable FERC Project (SFP) respectfully move to intervene in the above-captioned proceeding. This motion is timely pursuant to the Notice of Inquiry (NOI) published in the Federal Register on March 28, 2019. For the reasons stated below, the Commission should grant this motion to intervene because this proceeding may materially affect the core missions of NRDC and SFP.

#### COMMUNICATIONS

Communications should be directed to the following individuals:

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#### POSITION

Pursuant to Rule 214, 18 C.F.R. § 385.214(b)(1), NRDC and SFP outline their initial positions on the NOI, as well as a statement of interests. NRDC and SFP commend the Commission for issuing the NOI. As discussed further in our substantive comments, FERC's practice of routinely granting a 14 percent Return on Investment for new gas pipelines is a key

driver in incentivizing the overbuild of gas infrastructure. Of particular concern is the context in which the pipeline developer and its shipper customer are affiliates that both have a financial stake in the pipeline, and the affiliated customer is also a monopoly utility entity that will pass high pipeline costs onto its captive ratepayers.

NRDC is a national non-profit membership organization with more than 3 million members and engaged community participants worldwide. NRDC is committed to the preservation and protection of the environment, public health, and natural resources. To this end, NRDC conceives and develops policies that reduce greenhouse gas emissions and other forms of pollution and that accelerate the deployment of energy efficiency and renewable energy. NRDC has a longstanding and active interest in ensuring need-driven and efficient energy resource development, protecting consumers from pipeline overbuild and stranded assets, expanding clean energy resources, and protecting the public from environmental threats. NRDC further advances cost-effective environmental solutions to our energy needs. For the reasons set forth above, NRDC has an interest which may be materially affected by the outcome of this proceeding, and no other parties can represent its interest. These interests are further shared by the public at large. Accordingly, NRDC moves to intervene pursuant to Rule 214, 18 C.F.R. §§ 385.214(b)(2)(ii)-(iii).

SFP is an education and advocacy initiative that represents a consortium of national and regional environmental, consumer, and energy policy non-governmental organizations with members throughout the United States. SFP focuses its efforts on accelerating the development of renewable energy. SFP also has a record of advocating for need-based and data driven energy development and for cost-effective policies that remove barriers for clean energy development. For the reasons set forth above, SFP has an interest which may be materially affected by the outcome of this proceeding, and no other parties can represent its interest. These interests are further shared by the public at large. Accordingly, SFP moves to intervene pursuant to Rule 214, 18 C.F.R. §§ 385.214(b)(2)(ii)-(iii).

Document Content(s)

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