February 4, 2016

The Honorable Norman C. Bay
FERC Chairman
888 First Street NE
Washington, D.C. 20426

Dear Chairman Bay:

The American Sustainable Business Council (ASBC) opposes the proposed PennEast Pipeline (Docket No. CP15-558-000), the proposed 114 mile pipeline project starting in Luzerne County, PA and terminating in Mercer County, NJ that would transport 1 billion cubic feet of gas a day. In light of the plethora of natural gas pipelines recently constructed and proposed to transport Marcellus Shale gas throughout the Northeast region, the project can't be fairly evaluated in the absence of a programmatic environmental impact statement (herein "PEIS") that fully and comprehensively assesses public need, cumulative environmental impacts, and clean-energy alternatives. There is also more work that needs to be done to asses the economic value of pursuing such project versus pursuing a renewable energy and energy efficiency plan for the state.

ASBC is the leading business organization working to implement market shifts and public policies that build a sustainable economy. Through our national member network we represent more than 200,000 businesses and more than 325,000 entrepreneurs, executives, managers and investors a number of which are in New Jersey. We are strongly in favor of the development of safe, abundant, affordable, renewable energy, and recognize that on average renewable energy creates, per unit of energy, three times the number of jobs created by fossil fuels. This is of particular concern in the Pennsylvania and New Jersey region, where solar and wind energy has the potential to jumpstart hometown industries that would bolster the economy.

Furthermore, the businesses we represent, and many more like them, recognize the importance of a safe and sustainable energy policy for the United States. This means an energy policy that (1) keeps prices low today, and (2) shifts us toward fuels that do not burden the economy with externalities that necessitate higher taxes or other negative economic impacts. Based on those criteria, solar and wind are clearly preferential to natural gas. We also know that renewable energy sources do not have the same price volatility as natural gas.

As states will be required to meet the Clean Power Plan's (CPP) goals, FERC needs to evaluate renewable energy alternatives in any review of fossil fuel infrastructure projects. This is especially applicable to projects in states, such as New Jersey, that have to transition away from gas power plants in order to reduce emissions. New Jersey's carbon emissions from gas power plants increased 17% in 2014, causing the State's total emissions to reach 17 million tons of CO_2. This is clearly the wrong direction for New Jersey to be moving if it is to be in compliance with the 2030 CPP target of 16.5 tons of carbon per year.

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There is a legitimate question as to the public need for the gas that would be transported through the proposed PennEast Pipeline. In short, there are already numerous pipelines delivering or soon to deliver natural gas to various endpoints in the same region. FERC's own State of the Market 2014 report demonstrates that FERC anticipates there will be excess pipeline capacity. A study by Labryinth Consulting concluded that PennEast would result in a 53% surplus of gas beyond the current demand in the region that it is purported to serve. This does not make economic sense.

Finally, no business lasts long unless it understands its costs correctly. We consider energy costs to consist of three important components: (1) the direct cost we pay via the utility bill each month; (2) the externalized cost we pay for military presence to secure access to Middle-East energy sources; and (3) the externalized cost we are already paying as a result of climate change. Those costs include hardening our shorelines, rebuilding storm-damaged infrastructure, and realigning food production to cope with changing temperatures and rainfall.

In New Jersey, where Hurricane Sandy was estimated to cause over $29 billion in damages, New Jersey businesses understand all too well how climate change impacts their communities and the economy. We know that shale gas contains methane, which has over 70 times the climate impacts of carbon dioxide over a 20-year period. In independent polling of small business owners, the results found that 87% of business owners named one or more consequences of climate change as potentially harmful to their businesses. 57% said that the biggest carbon emitters should make the biggest reductions in carbon emissions and bear most of the costs of reduction efforts. 53% think extreme weather has, or will have, negative impact on their businesses. One in five has already been hurt. It is key to remember that 50% of the respondents were Republic and 37% Democratic and the rest independent. So this issue is clearly helping our understanding that the impacts on business are non-partisan.

We cannot in good conscience support the PennEast project that will have such a major impact on our climate in a state that is still struggling to rebuild from the ravages of Hurricane Sandy, from an economic perspective or from a moral perspective.

We trust that you will make the responsible choice for our businesses and not approve the proposed PennEast Pipeline project in the absence of a thorough and comprehensive assessment of public need, cumulative impacts and alternatives, including renewables. This is necessary and proper in order for FERC to determine whether this project is in the public interest. A comprehensive PEIS would ensure that this proposal receives the proper level of assessment that is warranted, given what it is at stake to the future of this region.

Together we can build an economy that is vibrant but also protects the well being of our communities and health of our environment. This is in best interest of business

Sincerely,

David Levine
CEO

Richard Eidlin
Vice President for Policy