

Submission Description: (DOC-LESS)Motion to Intervene under CP15-558-000.

Submission Date: 8/10/2016 2:28:23 PM

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Dockets

CP15-558-000 Application of PennEast Pipeline Company, LLC for Certificates of Public Convenience and Necessity and Related Authorizations

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	
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LAMBERTVILLE, CITY OF	cityclerk@lambertville.nj.org

Basis for Intervening:
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MOTION OF THE CITY OF LAMBERTVILLE, NJ FOR LEAVE TO INTERVENE OUT-OF-TIME

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's (FERC) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, the City of Lambertville (Lambertville or the City), files this motion to intervene out-of-time in response to PennEast Pipeline Company, LLC's (PennEast) Application for Certificates of Public Convenience and Necessity and Related Authorizations

I. Communications and Service

All communications, pleadings, and orders associated with this proceeding should be sent to:

David M. Del Vecchio, Mayor
City of Lambertville
18 York Street
Lambertville, NJ 08530
email: cityclerk@lambertville.nj.org

II. Description of Movant and Its Interests

The City of Lambertville wishes to declare intervenor status on Docket Number CP15-558, Pen-nEast Pipeline, because as a municipality in the impacted community, in the County of Hunter-don, and in the State of New Jersey, this project would deleteriously impact public land, environmental resources, and the infrastructure of the City of Lambertville.

The City of Lambertville was built in the early 1700's and is a 1.3 square mile community located on the Delaware River. Our residents and businesses depend on drinking water emanating from a reservoir, maintained by SUEZ Water, which located on the border of the proposed route of the PennEast Pipeline. The removal of the trees incurred in this project would add volumes of water to an already hard-to-manage run-off problem, causing flash flooding and potentially damaging the dam at SUEZ Water, washing out roadways (as the City experienced from run-off from Hurricane Irene, 2011), and damaging the historic infrastructure of the City of Lambertville.

Further, the pipeline's crossing of the Delaware River upstream from the City of Lambertville poses a significant threat to the City's natural environment and secondary water source should a rupture in the pipeline occur.

As a municipality, the City of Lambertville has a stakeholder interest in the

project for the residents and businesses that pay taxes in the State of New Jersey.

Given these facts, the City of Lambertville is uniquely qualified to comment on these issues, and clearly cannot be adequately represented by any other individual or group in this matter.

Therefore, Lambertville makes this motion on its own behalf.

III. Good Cause for Intervention Out-Of-Time

Lambertville has good cause to intervene out-of-time. The City was not aware of the many route changes, the proximity of the preferred route to the town, and the many potential impacts of the proposed project on the City. When these potential issues were identified, Lambertville promptly filed this motion out-of-time to intervene.

Finally, Lambertville will not delay the proceedings. This motion is filed prior to any decision by FERC on PennEast's application. Therefore, intervention at this stage is sufficiently early in FERC's proceedings. See 18 C.F.R. § 385.214; Venice Gathering Sys., LLC, 152 FERC ¶ 61245, 62161 n.6 (Sept. 29, 2015).

IV. Conclusion

Wherefore Lambertville respectfully requests FERC grant a Motion for Leave to Intervene Out-Of-Time as a party with full rights to participate in all future proceedings.

Respectfully Submitted,

David M. Del Vecchio, Mayor
City of Lambertville
18 York Street
Lambertville, NJ 08530