

Submission Description: (doc-less) Motion to Intervene of SUEZ Water New Jersey Inc. under CP15-558-000.

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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)
SUEZ Water New Jersey Inc.	John.Dillon@suez-na.com	

#### Basis for Intervening:

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission"), 18 C.F.R. §§ 385.212 and 385.214, SUEZ Water New Jersey Inc. ("SWNJ"), as intervenor hereby moves to intervene as a party to this proceeding.

On September 24, 2015, PennEast Pipeline Company, LLC ("PennEast") filed an application under section 7(c) of the Natural Gas Act ("NGA"), requesting authorization to construct and operate a new natural gas pipeline system, including pipeline facilities, a compressor station, metering and regulating stations and appurtenant facilities in Pennsylvania and New Jersey. PennEast specifically sought, among other things, authorization to construct, own and operate a new pipeline system comprising 114 miles of 36-inch diameter mainline transmission pipeline from Luzerne County, Pennsylvania to Mercer County, New Jersey (Docket No. CP15-558-000). The PennEast Pipeline as proposed, will cross SWNJ's property in Hunterdon County, New Jersey, directly transecting and/or coming into close proximity with the critical infrastructure that SWNJ relies upon to provide essential water services to its customers. Due to the location of the proposed pipeline, SWNJ moves that it be granted leave to intervene in the above referenced proceeding.

SWNJ is a water purveyor and property owner in the location of a portion of the proposed PennEast pipeline. SWNJ's Lambertville Water Treatment Facility provides water to approximately 4,000 residents and businesses in the City of Lambertville and Town of West Amwell, in Hunterdon County, New Jersey. SWNJ relies upon the critical infrastructure associated with the Lambertville Water Treatment Facility – namely the Swan Creek Reservoir (the "Reservoir"), the Raw Water Intake Pipe from the Reservoir (the "Intake Pipe"), and the Lambertville Dam (the "Dam") – to provide such essential water service to the area. The PennEast proposed pipeline project will directly transect the Intake Pipe and be located approximately 350 feet away from the Dam. SWNJ is concerned about the safety of its critical infrastructure given the close proximity of the proposed pipeline to the Dam and the fact that the pipeline, as proposed, will transect the Intake Pipe. SWNJ is also concerned about the effects the installation of the proposed pipeline may have on the natural state of the property surrounding the Reservoir.

Accordingly, the Commission's actions in this proceeding, which relates to the construction and operation of the proposed PennEast pipeline, directly, and immediately affect SWNJ, and no other party can adequately represent SWNJ's interests. By intervening in this proceeding, SWNJ will be able to monitor all developments in this matter that may affect SWNJ's interests including the potential effects of the proposed pipeline's location, construction, and operation in the event PennEast's application is approved. The Commission, therefore, should allow SWNJ to intervene in these proceedings.