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September 12, 2016

VIA ELECTRONIC SUBMISSION

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Comments on Draft EIS – FERC Docket CP15-558-000 – Proposed PennEast Pipeline Project

Dear Secretary Bose:

SUEZ Water New Jersey Inc. (“SWNJ”) writes to submit to the Federal Energy Regulatory Commission (“FERC”) its comments regarding the above-referenced DEIS and potential impacts from the proposed PennEast Pipeline Project (the “Proposed Project”) to SWNJ’s critical infrastructure, namely the Lambertville Water Treatment Facility, Swan Creek Reservoir, Raw Water Intake from Swan Creek Reservoir, and the Lambertville Dam. SWNJ takes no position regarding the Proposed Project aside from, as a water purveyor and property owner, its potential impact on SWNJ’s Lambertville operations and critical infrastructure.

SWNJ’s Lambertville Water Treatment Facility provides water to approximately 4,000 residents and businesses in the City of Lambertville and the Town of West Amwell. SWNJ’s ability to continuously provide water is critical to the health, safety, and welfare of the area’s residents and businesses. Thus, the safe and reliable operation of the Lambertville Dam¹ (the “Dam”) is vital. As proposed, the PennEast Pipeline will be located approximately 350 feet from the Dam, which retains water in the Swan Creek Reservoir. The Dam is classified as Class I (High-Hazard Potential) by the New Jersey State Department of Environmental Protection (“NJDEP”), which means that “failure of [the Dam] may cause the probable loss of life or extensive property damage.” N.J.A.C. 7:20-1.8(a)(1).

SWNJ has three principal concerns that it believes need to be addressed given their significance, as follows:

¹ United Water Lambertville Dam #2, NJ File 27-2, Fed ID #NJ775



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1. Dam Safety: The Dam's close proximity to the proposed pipeline location raises significant safety concerns. Blasting, and all forms of aggressive rock removal, raise concerns that will have to be addressed to the satisfaction of both SWNJ and NJDEP Dam Safety.
2. Intake Safety: Given that the pipeline will transect the Swan Creek Reservoir Raw Water Intake pipe, which is approximately 100 years old, SWNJ has significant concerns regarding potential service disruption and loss of water from the Swan Creek Reservoir in the event an accident occurs during or after construction. SWNJ believes that a reasonable and cost-effective solution for PennEast would be to install an intake bypass pipe and shut-off valves on either side.
3. Tree Removal: SWNJ has significant concerns about the amount of tree removal that is contemplated in the DEIS – particularly for temporary spoils storage and a temporary construction easement. The pipeline location is in close proximity to a public water supply reservoir and so every reasonable step will have to be taken to minimize tree loss.

Additionally, details related to ingress and egress to its Property during the construction phase, safety protocols and training, project sequencing, and adequate pipeline markers, all of which are reasonably anticipated for this type of Project, will have to be addressed.

To be clear, PennEast sought to educate itself and gain an understanding of the issues detailed above and, as indicated in the attached letter, has expressed its commitment to work collaboratively and reach reasonable solutions that will be memorialized in a formal agreement.

While no agreement is in place, SWNJ has every reason to believe that PennEast has the commitment and technical expertise available to reach an agreement that will favorably address the above issues. SWNJ will provide updates to FERC and stakeholders as appropriate.

Thank you for your attention to this matter. Should you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John T. Dillon".

John T. Dillon
Senior Corporate Attorney – Utility Operations
SUEZ

Encl.

cc: Service List
John H. Moyle, PE, NJDEP



Mr. John Dillon
Senior Corporate Attorney – Regulated Operations
SUEZ Environment North America
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Dear Mr. Dillon:

Thank you for meeting with representatives of PennEast Pipeline Company, LLC on September 6th to discuss the PennEast Pipeline project. (the “Project”). In our meeting, SUEZ successfully identified for PennEast areas of potential impacts to the Lambertville water supply complex, known as the Swan Creek Reservoir.

The priorities SUEZ identified include:

1. Dam safety
2. Intake safety
3. Workspace and restoration

PennEast is committed to working collaboratively with SUEZ to develop a framework to reasonably address these concerns. As with all infrastructure owners that PennEast proposes to cross, coordination with the owner is a paramount concern to eliminate any adverse impacts.

PennEast understands that SUEZ takes seriously its commitment and responsibility to ensure a safe and reliable water supply for its customers and we are confident that these priorities can and will be addressed through modern engineering techniques and responsible construction and operation of the PennEast Pipeline.

Sincerely

A handwritten signature in black ink, appearing to read "Jeff England", is written over a light gray rectangular background.

Jeff England
Project Manager