



1776 K Street, NW, Suite 720 • Washington, D.C. 20006
Telephone (202) 223-1420 • www.ieca-us.org

June 28, 2022

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

***RE: Mountain Valley Pipeline, LLC Docket Nos. CP16-10-000, CP21-57-000, and CP19-477-000,
Request for Extension of Time***

On behalf of the Industrial Energy Consumers of America (IECA), we strongly support the requested extension of time until October 13, 2026 to complete construction of the Mountain Valley Pipeline project and urge the Federal Energy Regulatory Commission to act promptly to extend the deadline.

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.1 trillion in annual sales, over 11,700 facilities nationwide, and with more than 1.8 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.

We have manufacturing companies in both West Virginia and Virginia who need this pipeline capacity to invest in expansion of existing and new facilities that create jobs and economic growth. Manufacturing workers in the U.S. earned \$92,832 on average, including pay and benefits. For every \$1.00 spent in manufacturing, there is a total impact of \$2.68 to the overall economy.

These manufacturing facilities are dependent upon natural gas to operate. They have invested hundreds of billions of dollars in equipment that can only operate on natural gas. Very few have backup alternatives like coal or fuel oil and those options emit higher levels of GHGs and criteria emissions. Therefore, use of those options is not desirable.

We strongly support this pipeline project to increase natural gas supply and the benefits this project can provide to ensuring access to reliable, low-cost natural gas for industrial energy consumers in the state and region.

Manufacturing equipment is very diverse due to the significant array of consumer and national defense products that we produce. For equipment that is designed for use of natural gas, switching to electricity is not an option for two reasons. First, in many cases the producers of the equipment used by manufacturers cannot design the equipment for use of electricity. Secondly, historically, a Btu of electricity is much more expensive than a Btu from natural gas. Therefore, electricity is not a cost-effective option. Since manufacturers compete with fierce global competition, keeping costs low is critical to sustaining these manufacturing jobs.

Reliability of natural gas supply is critical. If there is inadequate pipeline capacity and therefore inadequate supply of natural gas, manufacturing facilities may be forced to reduce production or possibly shutdown. Reducing production or shutting down a facility can cost 10s of millions of dollars per day, including potential loss of jobs. Reliability of natural gas supply is also essential for the supply of natural gas-fired power generation.

Without the assurance of natural gas pipeline capacity, manufacturing company executives would have no choice but to locate manufacturing facilities to other states. Without assurance of supply, expansion of manufacturing facilities would not be possible.

We urge you to promptly approve the extension of time.

Sincerely,

Paul N. Cicio

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President & CEO