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June 28, 2022

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

Re: Motion to Intervene in Transcontinental Gas Pipe Line Company LLC's Application for the Southside Reliability Enhancement Project (CP22-461-000)

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("FERC" or the "Commission"), the Industrial Energy Consumers of America (IECA) requests to intervene in CP22-461-000 in support of the Southside Reliability Enhancement Project (the "Project").

The IECA 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. 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, independent oil refining, and cement.

The IECA has hundreds of manufacturing facilities in North Carolina who employ tens of thousands of employees and generates billions in state GDP and tax revenues. 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 in North Carolina 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. The project will provide an additional 423,400 dekatherms per day (dt/d) of gas capacity, enabling economic growth and future expansion of the manufacturing sector.

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 tens 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 in North Carolina.

As an advocate for manufacturing companies, IECA is committed to ensuring the availability of low-cost energy for American manufacturers. This infrastructure improvement will enhance the local and state economy and as an advocate for the business interests in this area, we believe our participation is in the public interest pursuant to 385.214(b)(1)(iii).

We encourage the Commission to promptly conduct a thorough and timely review of the application and after careful consideration of the benefits of the project, issue a certificate of public convenience to the applicant so that this project may advance.

Sincerely,

Paul N. Cicio

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President & CEO