

October 2, 2023

Kimberly D. Bose, Secretary
Office of the Secretary
Federal Energy Regulatory Commission
888 First Street NE Washington, D.C. 20426

Subject: Docket No. CP19-14-002, MVP Southgate Request for Extension of Time

Dear Secretary Bose:

The organizations below represent hundreds of manufacturing facilities in North Carolina and are writing to express our strong support for the Federal Energy Regulatory Commission's (FERC) extension of the Certificate of Public Convenience and Necessity for the MVP Southgate pipeline project. Manufacturing in North Carolina contributes \$110.5 billion in GDP and provides 479,400 high paying jobs. Without increased pipeline capacity, these jobs become at risk.

North Carolina manufacturers have already been harmed because of inadequate natural gas pipeline supply. The lack of pipeline capacity in North Carolina has caused industries to endure higher natural gas costs and increasingly restricted supplies has made their operations less competitive. Additionally, companies that want to expand have been unable to do so, forcing them to shutter plants. Investments and jobs have already moved out of the state, and those jobs are not moving back. Without more pipeline capacity, the trend will continue.

In peak demand periods, manufacturing companies are regularly curtailed, and their operations are forced to reduce production or shut down altogether. This happened in the winter of 2021-2022, but it will become unsustainably more frequent without significant capacity additions.

Manufacturing companies use natural gas as a fuel, feedstock, and, in some cases, to generate power and steam for use in their operations. We do not have an alternative to natural gas. Most manufacturing processes that use natural gas cannot be switched to electricity. Plus, using electricity as a replacement for natural gas would more than double our energy costs.

More natural gas supply is also needed to transition away from coal-fired power generation. Natural gas generation is a cleaner alternative than coal, and it is a preferred source of electric generation in support of wind and solar electric generation sources. If more pipeline capacity is not added, electric utilities will consume all the available natural gas, leaving nothing for manufacturing facilities.

We support the MVP Southgate project as a regional necessity and respectfully ask that the Commission approve Mountain Valley's request for an extension of time to complete its work and bring the pipeline into service.

Sincerely,

Paul N. Cicio

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President & CEO

Industrial Energy Consumers of America

Kevin Martin

Kevin Martin

Executive Director

Carolina Utility Customers Association

cc: Members of Congress from North Carolina