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THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350
www.dps.ny.gov

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Acting Secretary

July 1, 2013

SENT VIA ELECTRONIC FILING
Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Room 1-A209
888 First Street, N.E.
Washington, D.C. 20426

Re: Docket No. CP13-502-000
Iroquois Gas Transmission System, LP

Dear Ms. Bose:

Attached please find the Notice of Intervention and Comments of the New York Public Service Commission in the above-entitled proceeding. Should you have any questions, please feel free to contact me at (518) 474-1585.

Very truly yours,

Alan T. Michaels
Assistant Counsel

Attachment

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Iroquois Gas Transmission System, LP) Docket No. CP13-502-000

**NOTICE OF INTERVENTION AND COMMENTS
OF THE NEW YORK PUBLIC SERVICE COMMISSION**

Pursuant to Rules 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (FERC or the Commission), 18 CFR 385.214 (2006), and in accordance with the Regulations under the Natural Gas Act (NGA) 18 CFR 157.10, the New York Public Service Commission (NYPSC) hereby submits its notice of intervention and comments in the above-captioned proceeding.

I. INTRODUCTION

Iroquois Gas Transmission System, LP (Iroquois or the Company) seeks a certificate of public convenience and necessity to construct, install, own, operate, and maintain certain new compression facilities to be located in Wright, New York, and to modify certain existing facilities at the same location, and approval to lease the incremental capacity associated with these facilities to Constitution Pipeline Company, LLC (Constitution) (the Project). According to the Company's application, if granted authorization, the Project will allow Iroquois to establish a new receipt interconnection with Constitution, a proposed 122-mile interstate transmission pipeline concurrently seeking authorization under Docket Number CP13-499-000. The Project is designed to provide 650,000 dekatherms per day of primary firm transportation service from the proposed point of interconnection with Constitution to interconnections with Iroquois' mainline system and Tennessee Gas Pipeline Company, LLC (Tennessee).

II. BACKGROUND

On June 13, 2013, Iroquois filed an application under Section 7(c) of the NGA and Part 157 of the Commission's Rules and Regulations requesting authorization to construct and operate the Project. It should be noted that the accompanying matter of Constitution's proposed interstate pipeline has been initially reviewed in the pre-filing process (PF12-9-000), which commenced on April 5, 2012, when Constitution filed its request to initiate a National Environmental Policy Act Pre-Filing review of the Project pursuant to Section 157.21(b) of the Commission's regulations under the NGA. On April 16, 2012, FERC Staff granted Constitution's request to utilize the pre-filing process. Numerous comments were presented and recommendations made under the pre-filing docket. On June 26, 2013, the Commission issued its Notice of Application, and stated that the Pre-Filing Process ended, and the proceeding shall be conducted under the Docket Number CP13-499-000.

In its request for pre-filing review, Constitution describes the Project as approximately 121 miles of 30-inch diameter pipeline and related facilities beginning from Susquehanna County, Pennsylvania to points of interconnection with Iroquois Gas Transmission at the Wright Compressor Station and with Tennessee Gas Pipeline, both located in Schoharie County, New York. In addition, the proposed Constitution pipeline calls for the construction of one Greenfield compressor station, four meter stations, valves, piping, and associated appurtenant facilities.

Iroquois did not have a pre-filing review. However, the Project is directly related with Constitution. Therefore, any comments from Constitution's pre-filing should also be considered here.

III. NOTICE OF INTERVENTION

The NYPSB is a regulatory body established under the laws of the State of New York with jurisdiction to regulate rates or charges for the sale of natural gas to consumers within the

State. It is, therefore, a State Commission as defined in section 2(8) of the NGA, 15 U.S.C. §717a(8), and 18 C.F.R. § 1.101(k). Accordingly, NYPSC hereby provides its notice of intervention pursuant to Rule 214(a)(2), 18 C.F.R. § 385.214(a)(2) (2006).

Copies of all documents and correspondence in this proceeding should be sent to:

Cynthia McCarran
Chief, Office of Electric, Gas & Water
–Gas Policy and Supply
New York State Public Service
Commission
3 Empire State Plaza, 12th Floor
Albany, NY 12223
Cynthia.McCarran@dps.ny.gov

Alan T. Michaels
Assistant Counsel
New York State Public Service
Commission
3 Empire State Plaza, 17th Floor
Albany, NY 12223
Alan.Michaels@dps.ny.gov

IV. DISCUSSION

As proposed, the Project would provide the interconnection for 650,000 dekatherms per day of natural gas production from the proposed Constitution pipeline. However, before accepting the benefits to be gained by the proposed Project, the NYPSC fully supports the Commission's public process of review. The Commission must first determine whether any adverse economic impacts on existing customers, competing pipelines, and landowners and the surrounding community are minimal. Then, FERC will provide a thorough review of the impact on human health and the environment.

It is anticipated that the Commission will ask the Company to take into careful consideration the comments presented during the Constitution pre-filing proceeding (PF12-9-000). Not only did FERC Staff receive many comments from the public, but it also received comments from municipalities, and federal and state agencies, including the Army Corps of Engineers and the New York State Office of Parks, Recreation and Historic Preservation. If it has not done so already, the Company should acknowledge the comments in the accompanying proceeding, and make amendments to the proposal or otherwise respond accordingly.

V. CONCLUSION

Based on the foregoing, NYPSC provides its notice of intervention in this proceeding, and looks forward to participating in this matter. NYPSC anticipates a continued robust review of the filing, and consideration given to any public comments. Provided, after its thorough review, the Commission finds that the benefits outweigh any economic and environmental burdens created by this Project, NYPSC would expect enhanced reliability and competition as a result of adding 650,000 dekatherms per day of capacity.

Respectfully submitted,



Peter McGowan
General Counsel
Public Service Commission
of the State of New York

By: Alan T. Michaels
Assistant Counsel
3 Empire State Plaza, 17th Floor
Albany, NY 12223
518-474-1585 (phone)

July 1, 2013
Albany, New York

CERTIFICATE OF SERVICE

I, Alan T. Michaels, do hereby certify that I will serve on July 1, 2013, the foregoing Notice of Intervention and Comments of the New York Public Service Commission upon each of the parties of record indicated on the official service list compiled by the Secretary in this proceeding.

Dated: July 1, 2013
Albany, New York


Alan T. Michaels