

Submission Description: (doc-less) Motion to Intervene of Riverkeeper, Inc. under CP14-96-000.

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Dockets

CP14-96-000 Algonquin Gas Transmission, LLC's Abbreviated Application for a Certificate of Public Convenience and Necessity and for Related Authorizations re its proposed Algonquin Incremental Market (AIM) Project under CP14-96.

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	-----
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Riverkeeper, Inc.	mduvall@riverkeeper.org

Basis for Intervening:

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's (FERC or Commission) Rules of Practice and Procedure, 18 CFR § 385.214, Riverkeeper, Inc. (Riverkeeper) hereby moves to intervene in the instant proceeding. In addition, pursuant to Rule 213(a)(2) of the Commission's rules, 18 C.F.R. § 385.213(a)(2), Riverkeeper respectfully requests permission to respond to any answer that may be filed in opposition to its Motion to Intervene.

Riverkeeper is a member-supported, non-profit environmental organization with more than 3,600 members, dedicated to defending the Hudson River and its tributaries and to protecting the drinking water supply of nine million New York City and Hudson Valley residents. Riverkeeper is actively involved in litigation, advocacy, and public education surrounding the issue of shale gas extraction and related infrastructure, particularly because of the potential impacts on New York State's drinking water supplies.

As described below, Riverkeeper meets the requirements for a motion to intervene set forth in 18 CFR § 385.214(b)(1) and (2).

In accordance with our mission, Riverkeeper seeks to ensure that the New York City (NYC) drinking water supply watershed and the Hudson River and its watershed are protected, and that the project complies with the National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq., Federal Water Pollution Control Act (Clean Water Act), 33 U.S.C. §§ 1251 et seq., Safe Drinking Water Act, 42 U.S.C. §§ 300f et seq., and other applicable laws and regulations. See 18 CFR 385.214(b)(1). As detailed in Riverkeeper's comments on the application (Docket No. CP 14-96-000, dated April 8, 2014), which are incorporated by reference in full herein, the Algonquin Incremental Market Project (AIM Project) has the potential to significantly impact not only the Hudson River and its watershed, but also a portion of the NYC drinking water supply watershed. We urge the Commission to take a hard look at all of the likely and reasonably foreseeable environmental impacts that would or could result from the project.

Riverkeeper represents interests that may be directly affected by the outcome of this proceeding. See 18 CFR 385.214(b)(2)(ii). A significant number of

Riverkeeper members depend on the NYC watershed for their drinking water supply, and use and enjoy the Hudson River and its tributaries. Any impacts to the NYC watershed or Hudson River and its watershed could directly affect their interests in clean water and use and enjoyment of the Hudson River and its tributaries. In addition, many Riverkeeper members are also located along the pipeline route and may potentially be affected by construction and maintenance activities.

Riverkeeper's participation is also in the public interest. See 18 CFR 385.214(b)(2)(iii). Riverkeeper's mission is to safeguard the drinking water supply of the nine million New Yorkers who depend on the NYC watershed and to protect the environmental, recreational, and commercial integrity of the Hudson River. As both of these resources may be adversely impacted by the AIM Project, Riverkeeper's participation will help ensure protection of the NYC and Hudson River watersheds and is in the public interest.

Finally, Riverkeeper further qualifies for intervenor status as a party actively participating in the environmental review process. See 18 CFR § 380.10(a). Riverkeeper submitted comments during the scoping process (Docket No. PF 13-16-000, dated October 15, 2013) and on environmental aspects of the application, and plans to continue to fully participate in the environmental review process, including submitting comments on the Draft Environmental Impact Statement.

Document Content(s)

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