

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

Re: Docket Nos. CP19-78-000; CP15-558-000; CP20-47-000; PennEast Pipeline Company, LLC

August 28, 2020

Dear Ms. Bose,

The City of Lambertville opposes the PennEast pipeline and makes the following comments on the Environmental Assessment for PennEast "Phase 1".

Need for project is not justified:

There are flaws in the Purpose and Need Statement. Half the pipeline gas volume is unsubscribed. The existing contracts for gas volumes are with PennEast affiliates, no independent third parties have signed onto PennEast.

Phase 1 does not enter NJ, but there are NJ affiliates who have contracted for gas volumes. How will these affiliates receive the contracted gas? The proposed route in NJ is no longer viable given eminent domain proceedings.

FERC fails to address the fact that NJR Energy Services and UGI Energy Services are skipping out on a combined 100,000 dekatherms/day commitment in PA from the original project.

FERC fails to ask about Phase 2 purpose and need. Given that Phase 1 has some of the same shippers as the original route, FERC must demand shipper details for Phase 2.

Addressing stakeholder concerns:

The 30 day comment period is insufficient in the time of covid-19. People need more time to assess this given the difficulties of the pandemic. Please extend the comment period for concerned parties to be able to review the environmental assessment and respond.

FERC fails to acknowledge the jurisdiction of the DRBC. The Delaware River Basin Commission has authority to review projects within the Basin and this is not explicitly stated by FERC as another required approval for PennEast.

The EA states that it has addressed commenters concerns during the scoping period in the EA. It does not address the 100s of comments that were made previously, as demonstrated in the flaws of the Purpose and Need Statement.

In conclusion, FERC must determine that a new EIS is required. Much has changed since the original application and certificate granted. Based on the changes in purpose and need, dropped subscribers and scope change of PennEast, a new EIS must be prepared so that the Commission can properly assess the significant environmental impacts vs. purpose and need.