August 14, 2020

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



Columbia Gulf Transmission, LLC 700 Louisiana Street, Suite 700 Houston, TX 77002-2700

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Via electronic filing

Re: <u>Columbia Gulf Transmission, LLC</u> Louisiana XPress Project Docket No. CP19-488-000 Request for Prompt Action

Dear Ms. Bose:

Please consider this letter as a request by Columbia Gulf Transmission, LLC ("Columbia Gulf") for prompt action from the Federal Energy Regulatory Commission ("FERC" or "Commission") in the above captioned docket. As background, on July 16, 2019, Columbia Gulf filed with the Commission an abbreviated application for a certificate of public convenience and necessity and related authorizations pursuant to Section 7(c) of the Natural Gas Act ("Application") for its Louisiana XPress Project ("Project"). The Project, as proposed, includes the construction of three new 46,940 horsepower greenfield compressor stations and modifications to one existing compressor station in East Carroll, Catahoula, Evangeline, and Rapides Parishes, Louisiana. Upon completion, the Project will create 493,000 dekatherms per day (Dth/d) of incremental mainline capacity on Columbia Gulf's pipeline system. The incremental capacity created by the Project, in conjunction with the utilization of existing capacity, will allow for open access firm transportation service on approximately 850,000 Dth/d of capacity on a north-to-south path from Columbia Gulf's Mainline Pool to a primary point of delivery with Kinder Morgan Louisiana Pipeline LLC in Evangeline Parish, Louisiana.¹

Columbia Gulf's Application requested the issuance of a certificate of public convenience and necessity for the Project ("Certificate" or "Order") on or before July 1, 2020. The Commission issued an Environmental Assessment ("EA") for the Project on February 6, 2020. In the EA, FERC staff determined that approval of the Project, with appropriate mitigating measures, would not constitute a major federal action significantly affecting the quality of the human environment and recommended that

¹ Columbia Gulf Transmission, LLC, *Abbreviated Application for Certificate of Public Convenience and Necessity and Related Authorizations*, filed July 16, 2019, in Docket No. CP19-488-000.

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the Commission Order contain a finding of no significant impact. However, Columbia Gulf has not yet received its Certificate.

As noted in the Environmental Report submitted with the Application, Columbia Gulf anticipates commencing construction in September 2020, with mechanical completion targeted for November 2021, and commissioning and testing of the facilities anticipated to occur from November 2021 through January 2022. Commencing construction in September allows for tree clearing and access road installation as well as grading and site fill to be completed in the fall when less precipitation is expected in the Project area as opposed to the rainy season in Louisiana which begins in December. Site work activities such as these are safer and more efficiently installed in drier times of the year. As such, in order to meet the February 1, 2022 in-service date, it is critical that Columbia Gulf begin construction activities in September 2020.

To the extent construction schedules cannot be compressed while maintaining safe work practices in a constrained resource environment, delays in the Certificate issuance could manifest in delayed inservice, resulting in impacts for Columbia Gulf and its Project customer. Furthermore, delays to the Certificate will further delay Columbia Gulf's submission of the required Implementation Plan, requesting and receiving the required notice to proceed with construction authorization, followed by the commencement of field preparatory work and tree clearing in a timely manner to achieve the Project inservice date.

Columbia Gulf has provided all required and requested materials to support its Application, and states that it has received all other federal authorizations, including all permits necessary from the U.S. Army Corps of Engineers, required for the Project. Along with the positive Environmental Assessment issued on February 6, 2020, Columbia Gulf respectfully requests prompt Commission action on the pending Louisiana XPress Project Application.

As always, if there are any issues or information that would be helpful to the Commission, please contact me and we will answer your questions as soon as possible.

Respectfully submitted,

Sorana Linder Director, Certificates & Modernization

Cc: Via electronic mail Terry Turpin - FERC John Wood - FERC Pamela Boudreau - FERC J. Rich McGuire, - FERC Andrea Bloomfield – FERC Docket Service List