



DARREN SUAREZ
Director of Government Affairs

April 4, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Constitution Pipeline Company, LLC – FERC Docket No. CP13-499

Dear Ms. Bose,

On behalf of The Business Council of New York State, I am writing to express our continued support for the Constitution Pipeline Company, LLC project (“**Constitution**” or “**Project**”) and **request that the Commission act** swiftly to make certain that this critical Project is in service in 2015. The Business Council’s membership strongly supports efforts to provide affordable and stable energy costs. Affordable energy is a critical component to any thriving economy, and a necessity for New York businesses and residents alike, particularly to the energy intensive manufacturing sector.

The harsh winter we just experienced in New York State once again reminds us of how critical it is to have a robust energy supply infrastructure that meets the needs of all New York residents. Besides ensuring adequate supplies, modern energy infrastructure is critical in providing supplies at the most reasonable and fair price. When infrastructure cannot meet current needs, especially in time of extreme cold or hot weather, residential and commercial users feel the economic squeeze.

With this in mind, I want to reaffirm The Business Council’s support for the pending Project, which will bring supplies of natural gas from Pennsylvania to New York. The 124-mile long pipeline would connect Pennsylvania gas fields to two important interstate natural gas lines, Iroquois Gas Transmission and Tennessee Gas Pipeline systems, respectively, in the Town of Wright, Schoharie County. The Iroquois line is critical in meeting gas capacity needs in New York City and Long Island, while the Tennessee line runs east to New England.

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communities across New York State



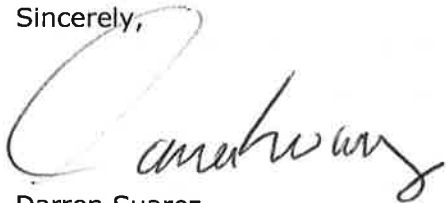
Constrained natural gas transmission, combined with increased demand, has resulted in a New York natural gas spot market price in January that exceeded \$120 per thousand cubic feet. At that time, the same gas was selling for approximately \$5 per thousand cubic feet in Pennsylvania.

The Project will also assist New York in meeting its clean energy goals as enunciated in the New York State Draft Energy Plan. In fact, the recently drafted 2014 New York State Energy Plan proposes to assist with the replacement of heating oil with natural gas. Additionally, initiatives 8 and 9 in the draft State Energy Plan specifically address the need for additional natural gas infrastructure. Natural gas currently provides over 54% of the energy used in residential heating in the state, a figure that is sure to grow in the near future.¹ Moreover, natural gas represents over 34% of total energy use in the state for both residential and commercial purposes.²

It is expected that the new pipeline can go into service in late 2015, so long as necessary regulatory approvals are secured. The Commission staff recently issued a draft Environmental Impact Statement for the project, which concluded that the construction and operation of the pipeline would result in limited adverse environmental impacts. FERC staff has also outlined additional mitigation measures that Constitution could take to minimize or avoid potential impacts on major areas of concern including water bodies, wetlands and wildlife. Conclusively, the record in these proceedings demonstrates that the Project is in the public convenience and necessity and warrants the **Commission's approval**.

For the reasons mentioned above, The Business Council strongly urges the Commission to issue the necessary regulatory approval to ensure construction may proceed in a timely manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Darren Suarez", written over a horizontal line.

Darren Suarez
Director of Government Affairs
Intervenor

¹ NYS Draft Energy Plan, 2014, Table 7, p. 17.

²*Id.*, p.18.