

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

NORTHERN NATURAL GAS COMPANY)
)

Docket No. CP20-503-000

COMMENTS OF NORTHERN NATURAL GAS

Northern Natural Gas Company (“Northern”) respectfully submits comments in the above-referenced docket and requests the Commission to expedite a decision in the above-referenced proceeding. Northern submits herewith the letters from Northern States Power Company, d/b/a Xcel Energy and Midwest Natural Gas Company, as Exhibit A and B, respectively, in support of Northern’s request to expedite. We seek to expedite approval in order to ensure that the project construction is completed, and the facilities are placed in-service for next winter to meet the growth in human needs for customers in Minnesota and Wisconsin.

**I.
RENEWAL OF NORTHERN NATURAL’S REQUEST TO EXPEDITE APPROVAL OF
THE PROJECT AND COMMENTS IN SUPPORT**

Northern Natural Gas requests an expedited issuance of a certificate in this docket. Northern filed its section 7 application for approval of the Northern Lights 2021 project on July 31, 2020, after successful execution of the Commission’s pre-filing process.¹ Northern filed a request for expedited order February 5, 2021.

In light of additional Commission directive provided in the order issued March 22, 2021, in Docket No. CP20-487-000² (the “March 22 Order”), Northern renews its request for approval of its application and the issuance of an order authorizing the project and the start of construction. There is no basis for delay based on any greenhouse gas (“GHG”) emission impact on climate

¹ On December 6, 2019, the Commission approved Northern’s request to use the Commission’s pre-filing process. (Docket No. PF20-1-000).

² 174 FERC ¶ 61,189 (2021).

change as articulated in the March 22 Order. However, there are inherent environmental and safety risks that will result from a continued delay in project approval. In short, the record establishes issuance of a certificate in this docket is in the public interest.

There is no existing active opposition to the Northern Lights 2021 application. There were four vanilla interventions and comments from only two parties – the International Union of Operating Engineers (IUOE) Local 49 regarding the use of union labor, and the U.S. Environmental Protection Agency suggesting Northern develop a COVID-19 response plan (Northern complied by filing its COVID-19 response plan January 19, 2021). This is the very type of project warranting swift Commission approval – Northern has engaged in a collaborative use of the pre-filing process to identify and address stakeholder concerns, adopted re-routes to respond to landowner requests, and opposition to the filed application is entirely lacking. Additionally, pursuant to the March 22 Order, GHG emission impacts are fully addressed below.

In the March 22 Order, the Commission announced it would employ an expanded scope of environmental review, one that includes a review of GHG emission impacts and the effects on climate change. The Commission used the information on expected GHG emissions provided by Northern, the applicant in that docket and here. The inclusion of GHG emission data in its applications underscores Northern’s anticipation of the Commission’s possible evaluation of GHG emissions in its environmental review.³ Northern is committed to facilitating Commission review of its applications through the thorough and transparent presentation of all necessary facts supporting its proposed projects.

³ Northern notes its monitoring of the Commission’s pending Notice of Inquiry in Docket No. PL18-1-000 and the review of dissents in prior certificate dockets prodded its inclusion of GHG emission data; Northern had no indication that a standard was to be adopted by the Commission in a certificate docket.

Northern presented GHG emission data in the instant application in the same manner and similar format as it did in Docket No. CP20-487-000.⁴ Northern divided its analysis between construction and operational GHG emissions and pointed out all known GHG emission sources (construction, fugitive, pipeline facilities, and proposed aboveground facilities). The Commission effectively used the format in Docket No. CP20-487-000 to conduct its review and found it sufficient to approve the application. In that docket, despite the inclusion of GHG emission data, Northern made no conclusions on the impact of GHG emissions because the Commission had yet to decide on a methodology for analyzing GHG impacts. Now, with the explanation provided by the Commission in the March 2022 Order in hand, Northern submits the GHG emission impacts as described in its Northern Lights 2021 application would not be significant.

Finally, while the GHG impacts here are not significant, delay presents real and immediate risk. Without prompt approval of its application (assuming eventual approval), Northern will be required to work well past November 1 and into the timeframe for which winter construction methods will need to be used to complete the project in time for the peak winter conditions in Minnesota. As the Commission is aware, winter construction carries inherent risks. For example, winter construction increases the safety risk for our employees and contractors as they are forced to work in extreme conditions of cold, winter weather and the accompanying conditions of icy and risky highways, roads and construction sites. Second, and of particular concern to the Commission, winter construction carries inherent environmental risks as well including working near frozen waterbodies, increased rutting by construction equipment, and an enhanced risk for erosion. Indeed, Commission regulations require pipelines to file specific winter construction plans when winter construction is anticipated, acknowledging the extra effort that must be taken to avoid

⁴ See, Resource Report 9; specifically, sections 9.1.1 *et seq.*

condition-specific environmental harms.⁵ While the climate change impacts of this project are demonstrably nominal, the enhanced environmental threat resulting from winter construction are real and recognized as significant enough to warrant the Commission's immediate attention.

II. CONCLUSION

The Northern Lights 2021 project application warrants immediate approval based on Northern's successful mitigation of landowner impacts and threats to the environment to date. There is no pending opposition to the application or outstanding technical issues to address. Northern successfully used the Commission's pre-filing process to identify and respond to landowner concerns. Northern's cooperation with federal and state permitting authorities is well-documented within the application, and the critical need to supply needed heating energy for peak winter conditions in the state of Minnesota is even more apparent given recent events. The Commission can approve the project by seamlessly applying the GHG emission impact methodology used in the March 22 Order here without need for further delay.

Wherefore, for the foregoing reasons, Northern respectfully requests the Commission consider its request to expedite the issuance of a certificate of public need and necessity in this proceeding.

Respectfully Submitted,

NORTHERN NATURAL GAS COMPANY

/signed/ JoAnne DeWald_

JoAnna S. DeWald
Senior Attorney

⁵ See, *FERC's Upland Erosion Control, Revegetation and Maintenance Plan, Section III, subsection I. (May 2013)*.

Northern Natural Gas Company
1111 South 103 Street
Omaha, NE 68124-1000
402-398-7077
joanna.dewald@nngco.com

/signed/Michael T. Loeffler

Michael T. Loeffler
Senior Director, Certificates and External Affairs
Northern Natural Gas Company
1111 South 103 Street
Omaha, NE 68124-1000
402 398-7103
mike.loeffler@nngco.com

April 9, 2021.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Omaha, NE, this 9th day of April 2021.

/s/ Michael T. Loeffler

Exhibit A



1800 Larimer Street
Denver, Colorado 80202

1-800-895-4999
xcelenergy.com

April 9, 2021

Laura Demman
Vice President, Business Development and Customer Service
Northern Natural Gas Company
Omaha, Nebraska

Ms. Demman,

On behalf of Northern States Power Company, a Minnesota corporation (NSP), I request that you include the following letter in support of Northern Natural Gas Company's (Northern) comments requesting an order, without further delay, for its Northern Lights 2021 Expansion Project.

NSP receives natural gas transportation and storage service from Northern. NSP participated in the open season held in 2019 soliciting firm throughput service commencing on or after November 1, 2021, to certain delivery points in Northern's Market Area. Following the open season, NSP executed a long-term contract with Northern for natural gas transportation. The open season resulted in the Northern Lights 2021 project. NSP contracted for 9,459 Dth/day of capacity on Northern's system through the Northern Lights 2021 project. In its application, Northern sought an order from the Commission by March 16, 2021, to commence construction activities to ensure a contracted in-service date of November 1, 2021.

Our open season bid was the result of careful analysis and forecasting. We examine alternatives to the construction of new facilities for the acquisition of capacity to minimize construction needs and their inherent impacts. Further, our requested capacity is subject to the review of the Minnesota Department of Commerce and the Minnesota Public Utilities Commission. We take seriously our responsibility to execute energy need plans thoughtfully, efficiently, and in accordance with our customer's needs.

The natural gas to be delivered by the facilities supported by this project are critical. We require the incremental volumes of natural gas to ensure we have access to sufficient capacity to cover the

anticipated design day demand of our natural gas customers to serve customer load growth on our system. While the Northern Lights 2021 project will supplement our needs at a number of locations, we highlight one area in particular. The city of Delano, MN is a fast-growing community near the Minneapolis-St. Paul population center. The area is experiencing rapid growth. Currently, there is a large church complex, a specialty food processing plant, a retail store, a fire station, an auto parts store, and a new large apartment complex waiting for firm distribution service this fall. In addition, there are six housing subdivisions under development with hundreds of homes planned for construction. It is vital that the Northern Lights project be completed by November 1, 2021, so that we may provide firm gas service to these customers this winter.

NSP needs the level of natural gas deliveries that will be supplied by the Northern Lights 2021 project to ensure we continue to meet our obligations to our residential, commercial and business customers to provide reliable and sufficient levels of natural gas to make sure that every home, office, school, hospital and factory is warm and operating during the next Minnesota winter season. Cold weather is the norm, not the exception, in Minnesota.

For these reasons, I request Northern include this letter in its submission to the Federal Energy Regulatory Commission requesting an issuance of an order, without further delay, in Northern's application for the Northern Lights 2021 Expansion Project.

Respectfully submitted,

Curtis Dallinger

Director, Gas Supply and Planning

Xcel Energy Services, Inc

Authorized Signatory for Northern States Power

Company, a Minnesota corporation

Exhibit B

Date: April 8, 2021

Laura Demman, Vice President, Business Development and Customer Service
Northern Natural Gas
Omaha, Nebraska

On behalf of Midwest Natural Gas, I am requesting that you include the following letter in support of Northern's comments requesting an issuance of an order, without further delay, in the application of Northern Natural Gas for its Northern Lights 2021 Expansion Project.

Midwest Natural Gas receives natural gas transportation service from Northern. Midwest Natural Gas participated in the open season held in 2019 soliciting firm throughput service commencing on or after November 1, 2021, to certain delivery points in Northern's Market Area. Following the open season, Midwest Natural Gas executed a long-term contract with Northern for natural gas transportation. The open season resulted in the Northern Lights 2021 project. Midwest Natural Gas has contracted for 1,354 Dth/day of capacity on Northern's system through the Northern Lights 2021 project. The Public Service Commission of Wisconsin approved the purchase of this important incremental capacity by letter order dated January 13, 2020, Docket No. 3670-GP-2019.

In its application, Northern sought an order from the Commission by March 16, 2021, in order to commence construction activities to ensure a contracted in-service date of November 1, 2021. Midwest is in support of NNG's application to proceed with construction of this project.



Gas: The Mark of Efficiency

OFFICE LOCATIONS

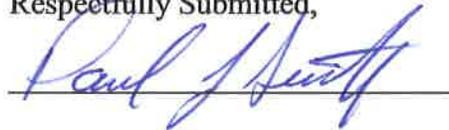
3600 STH 157 P.O. Box 429 LA CROSSE, WI 54602 Phone: (608) 781-1011	106 W. State Street P.O. Box 97 WESTBY, WI 54667 Phone: (608) 634-4617	23389 Whitehall Road INDEPENDENCE, WI 54747 Phone: (715) 985-5500	611 Shay Street SOMERSET, WI 54025 Phone: (715) 247-5279
--	---	---	--

WISCONSIN TOLL-FREE 24-HOUR GAS LEAK LINE 1 (877) 817-3119

It is no overstatement to say that the natural gas capacity that will be delivered by Northern by the facilities supported by this project are a critical component of our gas planning. We require the incremental capacity to ensure the company has access to sufficient capacity to cover the future growth and anticipated peak demand of our natural gas residential, firm commercial and business customers.

For these reasons, I am requesting Northern include this letter in their submission to the Federal Energy Regulatory Commission requesting an issuance of an order, without further delay, in Northern's application for its Northern Lights 2021 Expansion Project. Midwest highly supports this project.

Respectfully Submitted,



Paul J. Senty
President
Midwest Natural Gas, Inc.