



Northern Natural Gas Company
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402 398-7200

April 29, 2022

Via eFiling

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

Re: Northern Natural Gas Company
Northern Lights 2023 Expansion
Docket No. CP22-138-000
Supplemental Document – Customer Support Letter

Dear Ms. Bose:

Northern Natural Gas (Northern) submits for filing with the Federal Energy Regulatory Commission in the above-referenced docket the attached supplemental customer support letter from St. Croix Valley Natural Gas Company, Inc. Northern is filing on behalf of St. Croix.

Any questions regarding this filing should be directed to the undersigned at (402) 398-7103.

Respectfully submitted,

/signed/ Michael T. Loeffler

Michael T. Loeffler, senior director, certificates

Cc: Parties of Record

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

Northern Natural Gas, application for a certificate of public need and necessity, Northern Lights 2023 Project))))	Docket No. CP22-138-000
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**COMMENTS OF ST. CROIX VALLEY NATURAL GAS COMPANY, INC.
IN SUPPORT OF APPLICATION OF NORTHERN NATURAL GAS
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission’s (FERC or the Commission) Rules of Practice and Procedure, St. Croix Valley Natural Gas Company, Inc. respectfully provides the following comments in support of the application of Northern Natural Gas for a certificate of public convenience and necessity from the Commission for the proposed Northern Lights 2023 Project as submitted in the above-captioned docket.

I. BACKGROUND

On March 25, 2022, Northern Natural Gas (Northern) filed an application for public convenience and necessity for its Northern Lights 2023 Project. As explained in Northern's application, Northern proposes to own, construct, and operate certain facilities, as described in its application. The facilities were designed to provide needed incremental capacity by November 1, 2023, to its customers in its Market Area.

St. Croix Valley Natural Gas Company, Inc. supported and participated in the open season held by Northern in 2021 for the project. Accordingly, the Northern Lights 2023 Project is a market-driven project designed to meet incremental growth needs to serve our customers. St. Croix Valley Natural Gas Company, Inc. has executed an agreement with Northern to transport the natural gas necessary to meet these growth needs.

II. COMMENTS IN SUPPORT

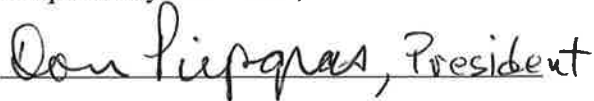
St. Croix Valley Natural Gas Company, Inc. respectfully submits that since the customers supporting Project have executed agreements with Northern for the incremental capacity, the Northern Lights 2023 Project meets the Commission's threshold criteria for the determination of project need. Notably, none of the shippers in the project are an affiliate of Northern. But beyond the execution of an agreement for the increased capacity afforded by the Project, the determination of need is supported by our expert analysis of the long-term needs for reliable energy for our customers. We necessarily and prudently develop long-term plans to serve the peak winter demands of the customers we serve. Although identified natural gas needs may occur for only a few days of a winter season, our customers and, just as importantly, our state regulators, expect reliable delivery of natural gas to all we serve during the coldest days of a northern winter. Further, failure to design our natural gas distribution systems for future needs not only threatens reliable natural gas delivery to our customers, but it also would inhibit planned residential and industrial growth.

St. Croix Valley Natural Gas Company, Inc. files annually with the Public Service Commission of Wisconsin (PSCW) to plan for and to meet the expected population growth and incremental energy demands in our service area. The review and approval of the PSCW provides an appropriate state-specific framework to ensure the proposed facilities are needed. The proposed Project is required to meet these identified needs. We have reviewed the application filed by Northern and find the application accurately describes the determination of need for the Project and the process for state-level review.

St. Croix Valley Natural Gas Company, Inc. respectfully submits these comments in support of Northern's Project and asks the Commission to expeditiously review and approve the Northern Lights 2023 Project. St. Croix Valley Natural Gas Company, Inc. also urges the Commission to grant the certificate of convenience and necessity no later than February 16, 2023, so that Northern may complete construction of the Project facilities by our contracted date of November 1, 2023, and in time to meet the residential and business demands for natural gas for the cold weather season.

Dated: April 29, 2022

Respectfully submitted,

Handwritten signature of Don Pipgras in cursive script, followed by the word "President" in a serif font.

St. Croix Valley Natural Gas Company, Inc.