

Notice of Public Comment Period February 28, 2024

Applicant:

Iroquois Gas Transmission System (Iroquois)
LP One Corporation Dr Suite 600
Shelton, CT 06484

Project:

Iroquois Enhancement by Compression (ExC) Project

DEC Application IDs:

3-1326-00211/00001 (Dover Compressor Station)
4-1922-00049/00004 (Athens Compressor Station)

Permit(s) Applied for:

Article 19, Air State Facility

Project Locations:

Dover Compressor Station, 186 Dover Furnace Road (Co. Route 46), Dover Plains, NY 12522
Athens Compressor Station, 915 Schoharie Turnpike (Co. Route 28), Athens, NY 12015

Project Description:

The Iroquois Enhancement by Compression Project (“ExC Project”) includes the addition of 12,000 horsepower (“hp”) of new compression and associated facilities at the existing Iroquois Dover Compressor Station located at 186 Dover Furnace Road in Dover Plains and the addition of 12,000 hp of new compression and associated facilities at the existing Iroquois Athens Compressor Station located at 915 Schoharie Turnpike in Athens. The ExC Project also includes upgrades at the Milford and Brookfield Stations in Connecticut. The ExC Project is designed to provide a total of 125,000 Dekatherms per day (“Dth/d”) of incremental firm natural gas transportation service to two existing customers of Iroquois, Consolidated Edison Company of New York, Inc. (“Con Ed”) and KeySpan Gas East Corporation d/b/a National Grid (“National Grid”).

On March 25, 2022, the ExC Project received approval from the Federal Energy Regulatory Commission (FERC) in the form of a Certificate issued under the Natural Gas Act (FERC Docket No. CP20-48). To proceed with construction, Iroquois needs two Air State Facility (ASF) permits from New York State Department of Environmental Conservation (NYSDEC), one for each of the two compressor station upgrades in New York. Additionally, the ExC Project needs a minor modification to a Title V permit and a New Source Review permit from the Connecticut Department of Energy and Environmental Protection.

On December 28, 2022, NYSDEC issued a Notice of Complete Application for the ExC Project. A public comment hearing was held on January 31, 2023, and a written public comment period was open until February 22, 2023.

Air State Facility (ASF) Applications:

NYSDEC is responsible for reviewing the ExC Project's applications for compliance with the air pollution regulations and the Climate Leadership and Community Protection Act (Climate Act), Chapter 106 of the Laws of 2019, which considers greenhouse gas emissions and whether such emissions would interfere with the attainment of the statewide greenhouse gas emissions limits established in Article 75 of the Environmental Conservation Law. In cases where the project would be considered inconsistent with those limits, NYSDEC must ascertain whether there is a need for the project, or if the project is otherwise justified under Section 7(2) of the Climate Act.

The ExC Project would result in additional greenhouse gas emissions, particularly due to downstream greenhouse gas emissions from the end-use combustion of the incremental natural gas capacity and would facilitate the expanded or continued use of fossil fuels through new infrastructure development. Thus, as the New York State Department of Public Service (DPS) is generally responsible for overseeing utilities' ability to provide safe and reliable gas service in New York State, on January 24, 2024, NYSDEC requested input from DPS on whether there is a reliability need for the ExC Project or if the project is otherwise justified. On February 26, 2024, DPS provided its assessment that the ExC Project is necessary to ensure Con Edison's and National Grid's continued provision of safe, adequate, and reliable gas service to customers in the downstate region of New York State. Letters are available at: <https://dec.ny.gov/iroquois-enhancement-by-compression-exc-project>.

The NYSDEC is providing notice of DPS' assessment and holding this additional public comment period to allow for an opportunity for the public to provide feedback on DPS' finding that the ExC Project is necessary, and, therefore, justified under Section 7(2) of the Climate Act, should the NYSDEC find that the ExC Project is inconsistent with the attainment of the statewide greenhouse gas emission limits.

Pursuant to the requirements of Section 7(2) of the Climate Act and in compliance with NYSDEC's Program Policy for the Climate Act and Air Permit Applications (DAR-21), NYSDEC has requested and received information from Iroquois to identify greenhouse mitigation measures since no potential alternatives were identified. The ExC Project includes the installation of certain greenhouse gas emissions mitigation measures, including Vent Recovery Systems (VRS) at each of the four Project compressor stations in New York State and Connecticut, and fuel use restrictions limiting the maximum operation of each new turbine. Iroquois also proposed the installation of VRS, if feasible, at each of three other (i.e., non-Project) compressor stations located in New York State (Boonville, Croghan, and Wright) as additional greenhouse gas emissions mitigation measures. These measures have been incorporated into the draft ASF permits and would be included, along with other greenhouse gas mitigation measures to be imposed as appropriate, as part of any ASF permits ultimately issued by NYSDEC.

Pursuant to Section 7(3) of the Climate Act, NYSDEC has requested and received information from the applicant regarding the ExC Project's potential impact on disadvantaged communities, as identified pursuant to the Climate Act. The Athens Compressor Station is in and has the potential to impact a disadvantaged community. Additionally, the Dover Compressor Station is immediately adjacent to and has the

potential to impact a disadvantaged community. Therefore, at NYSDEC's request, Iroquois provided a Disadvantaged Communities Evaluation for the ExC Project. Iroquois asserts that the ExC Project would not disproportionately burden any disadvantaged communities. NYSDEC will require the development of a Public Participation Plan (PPP) to solicit input from members of the disadvantaged community regarding the proposed project design considerations and existing and potential benefits of the project as identified by Iroquois. The PPP planning period would overlap with the public comment period. Prior to issuing any permits for the ExC Project, NYSDEC would need to ensure compliance with the requirements of Section 7(3) of the Climate Act, which may include additional project design measures to ensure the ExC Project will not disproportionately burden any disadvantaged community.

NYSDEC is inviting the public to comment on the reliability and needs determination made by DPS.

Availability of Application Documents:

Filed application documents and NYSDEC draft ASF permits are available at:
<https://www.iroquois.com/operations/projects/exc-project/>.

Written Public Comment Period:

Individuals and parties may file written comments to the Contact Person or may submit comments electronically at DEPEnergy@dec.ny.gov. All written filed comments and electronically submitted comments must be received no later than 5:00 p.m. on March 29, 2024.

Contact Person:

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