

PUBLIC PARTICIPATION PLAN

Applicant:

Iroquois Gas Transmission System, LP

Facility:

Enhancement By Compression (ExC) Project

NYSDEC Application Numbers:

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

Submitted to:

New York State Department of Environmental Conservation
Division of Environmental Permits
625 Broadway
Albany, NY 12233-1750

Prepared by:

Iroquois Gas Transmission System, LP

Date:

April 29, 2024

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1.0 INTRODUCTION

This Public Participation Plan (“PPP”) has been prepared by Iroquois Gas Transmission System, LP (“Iroquois”) to fulfill and comply with the applicable requirements of New York State Department of Environmental Conservation (“NYSDEC”) Commissioner Policy 29, Environmental Justice and Permitting (CP-29) for Iroquois’ proposed Enhancement By Compression Project (the “ExC Project” or the “Project”), which requires modifications to the Air State Facility permits for the Dover Compressor Station located at 186 Dover Furnace Road, Dover Plains, New York 12522 and the Athens Compressor Station located at 915 Schoharie Turnpike, Athens, New York 12015 (collectively, the “Permit Applications”).¹

On February 26, 2024, the New York Department of Public Service (“DPS”) sent a letter to NYSDEC advising that the Project is needed to maintain reliability of the downstate natural gas distribution systems. On February 28, 2024, NYSDEC issued a Notice of Public Comment Period regarding DPS Staff’s determination. With the February 28, 2024 Notice, NYSDEC advised that it was requiring that Iroquois prepare and implement this PPP as a result of NYSDEC’s determination that the Project could potentially impact one or more Disadvantaged Communities (“DAC”).

The Athens Compressor Station is located within Census Tract 36039080900 (Athens Village), and the Dover Compressor Station is located approximately 0.13 miles east of Census Tract 36027040003 (Wingdale). Each of the above-referenced Census Tracts has been designated a DAC and will hereinafter be collectively referred to as the “Proximate DACs”. The locations of the Dover and Athens Compressor Stations in relation to DACs are shown on Figures 1 and 2.

None of the Project facilities or workspaces are proposed to be sited within Potential Environmental Justice Areas (“PEJA”). For the Athens Compressor Station, the closest PEJA is approximately 0.9 miles to the west. For the Dover Compressor Station, the closest PEJA is located to the west, across Dover Furnace Road, approximately 700 feet west of the nearest Project facilities. The locations of the Dover and Athens Compressor Stations in relation to PEJAs are shown on Figures 3 and 4.

This PPP has been developed in accordance with the procedures established in CP-29 Section V.D and it aims to help ensure meaningful and effective public participation for stakeholders within the Proximate DACs. Public participation in the NYSDEC environmental permit review process means a program of activities that provides opportunities for stakeholders to be informed about and involved during the review of a proposed action.

The objective of this PPP is to outline and describe the program of activities that Iroquois has and will implement to actively seek and enhance public participation for stakeholders within the Proximate DACs during the application review process.

¹ The Permit Applications, as supplemented, and this Public Participation Plan have been filed with NYDEC without prejudice to any rights that Iroquois now has, may have, or which it seeks to assert in the future under the Natural Gas Act (15 U.S.C. §§ 717–717z) or any other federal or state law or regulation, all of which are hereby expressly reserved.

2.0 PROJECT DESCRIPTION

2.1 Project Overview

The ExC Project consists of the installation of four new approximately 12,000 horsepower (“hp”) turbines with associated cooling, filter separators, and other ancillary facilities at existing Iroquois compressor stations. The new turbines will be installed at the existing Athens Compressor Station in the Town of Athens, Greene County, New York, the existing Dover Compressor Station in Town of Dover, Dutchess County, New York, and the existing Brookfield Compressor Station in the Town of Brookfield, Fairfield County, Connecticut. Gas cooling and associated piping will be added to Iroquois’ existing Milford Compressor Station in the City of Milford, New Haven County, CT.

To implement the Project, on February 28, 2020, Iroquois submitted the Permit Applications to the NYSDEC for modifications to the Air State Facility Permits for Iroquois’ Athens Compressor Station (DEC ID No. 4-1922-00049) and Dover Compressor Station (DEC ID No. 3-1326-00211).

2.2 Project Purpose

The purpose of the Project is to supply to each of Con Edison Company of New York, Inc. (“Con Edison”) and KeySpan Gas East Corporation d/b/a National Grid (“National Grid”) 62,500 dekatherms per day of incremental firm natural gas transportation service to serve each of their respective local distribution company service territories. The Project is needed to ensure that Con Edison and National Grid have sufficient pipeline capacity available to meet their customers’ demand for natural gas on the coldest winter days.

On March 25, 2022, the Federal Energy Regulatory Commission (“FERC”) issued an Order pursuant to Section 7 of the Natural Gas Act finding that “the public convenience and necessity requires approval of the Enhancement by Compression Project.”² On February 26, 2024, DPS sent a letter to NYSDEC advising that the Project is needed to maintain reliability of the downstate natural gas distribution systems, stating: “DPS has determined 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.”³

2.3 Potential Impacts

As discussed further below, the potential impacts resulting from the Project were assessed as part of FERC’s National Environmental Policy Act (“NEPA”) review and during NYSDEC’s review of the Permit Applications.

² Order Issuing Certificate, 178 FERC ¶ 61,200 at P 95. The Certificate Order can be found at the following website and is hereby incorporated by reference into this response: https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220325-3078&optimized=false.

³ Department of Public Service, Letter to Thomas Berkman, NYSDEC General Counsel, dated February 26, 2024.

2.3.1 Air Emissions

The NEPA review determined that Project emissions, when considered with existing and background concentrations, would not cause or contribute to an exceedance of the National Ambient Air Quality Standards (“NAAQS”), which are designed to be protective of human health and welfare⁴. FERC also concluded that the Project would result in a net reduction of greenhouse gas (“GHG”) emissions and would not have a disproportionately high and adverse impact on environmental justice communities.⁵ Documents related to FERC’s NEPA review are available on the Project website.⁶

Iroquois also commissioned a Human Health Risk Assessment (“HHRA”) for the ExC Project. The HHRA evaluated potential exposures and human health risks associated with current and future operational emissions at each of the Project’s compressor stations. The HHRA utilized conservative assumptions to assess potential exposure to surrounding receptors. The HHRA showed that modeled hazardous air pollutants (“HAP”) emissions from the Project compressor stations are well below a level of health concern. Specifically, potential total excess lifetime cancer risk and noncancer hazard indices were calculated based on a theoretical Reasonable Maximum Exposure (“RME”) for adult and child receptors from long-term exposures to the highest predicted maximum five-year average HAP concentrations emitted during normal operations at the facility fence line. This is a conservative assumption since concentrations will decrease substantially with distance from the compressor station fence lines, further reducing exposure and risk. Cumulative cancer risks were below one in one million and noncancer hazard indices were at or below the target Hazard Index (“HI”) of one (e.g., the level at which sensitive individuals can be exposed without risk of chronic noncancer health effects). The results of the HHRA indicate that there would be no significant impact on human health in the Project areas from inhalation of emissions associated with the proposed modifications to the Athens, Brookfield, and Dover compressor stations resulting from the Project. A copy of the HHRA was included with Iroquois’ April 29, 2022, Response to NYSDEC’s January 13, 2022 Request for Additional Information (“RFI”), a copy of which is included on the Project website.⁷

The mitigation measures proposed by Iroquois (discussed in Section 3.0, below) will reduce GHG and co-pollutant emissions at the Dover and Athens compressor stations, which will help to avoid disproportionate environmental burdens to the Proximate DACs. Iroquois also proposes to provide funding to the Proximate DACs (discussed in Section 3.3 below), which will help deliver more affordable low emission technologies to residents within the Proximate DACs, make electric vehicle charging more accessible, and benefit community sponsored programs that are also intended to reduce environmental burdens within the Proximate DACs.

2.3.2 Traffic

⁴ Order Issuing Certificate, 178 FERC ¶ 61,200 at Paras. 78 and 83.

⁵ *Id.* at Paras. 85-86.

⁶ <https://www.iroquois.com/operations/projects/exc-project/>

⁷ <https://www.iroquois.com/operations/projects/exc-project/>

Iroquois will implement mitigation measures to reduce traffic impacts to nearby communities such as avoiding peak commute times and periods associated with school traffic, as well as coordinating its construction with local transportation authorities.⁸

2.3.3 Noise

Regarding noise, construction noise would be temporary, and Iroquois has committed to implementing mitigation during operations such that noise levels at both the Dover and Athens Compressor Stations would not exceed day-night noise levels of 55 dBA (A-weighted decibels) at the nearest noise sensitive receptors.⁹

2.3.4 Visual

Visual impacts will be mitigated since Project facilities will either not be visible or only partially visible from surrounding areas and would be partially obscured by existing compressor station facilities, landform, or surrounding vegetation.¹⁰

2.3.5 Construction

During construction, Iroquois will mitigate potential dust by implementing the Project's Dust Control Plan which requires the use of dust suppressants (water), reducing vehicle speeds on unpaved roadways, removing debris from paved roads, and complying with federal, State and local standards.¹¹

3.0 Mitigation and DAC Benefits

3.1 Air Impact Mitigation

As part of the Project, Iroquois proposes numerous mitigation measures that would reduce emissions at the Project compressor stations.

Iroquois proposes the installation of vent recovery systems ("VRS") at the Project compressor stations. The VRS will capture and reinject into the pipeline natural gas emissions from planned blowdowns and dry compressor seal gas leakage. At the Athens Compressor Station, the VRS is expected to result in a reduction of calculated actual emissions by 4,327 tons per year of carbon dioxide equivalents ("CO₂e"), reflecting an approximately 90% reduction in natural gas emissions at that station as compared with uncontrolled levels based on historic operating conditions. At the Dover Compressor Station, the VRS is expected to result in a reduction of calculated actual emissions by 3,907 tons per year CO₂e, reflecting an approximately 90% reduction in natural gas emissions at that station as compared with uncontrolled levels based on

⁸ Order Issuing Certificate, 178 FERC ¶ 61,200 at Para. 75 and 80.

⁹ *Id.* at Para. 76 and 81.

¹⁰ *Id.* at Para. 77 and 82.

¹¹ *Id.* at Para. 78 and 83.

historic operating conditions. The implementation of the VRS system is anticipated to reduce total New York Project compressor station actual CO₂e emissions by an estimated 8,234 metric tons per year compared to historic operating levels, which equates to an approximately ninety percent (90%) reduction as compared to uncontrolled levels.

In addition to GHG emission reductions that would result from the installation of VRS, the ExC Project was designed to minimize potential co-pollutant emissions. The Athens and Dover Compressor Stations total HAPs PTE will be well below the Major Source Threshold following the development of the Project. Total HAPs PTE at the Athens Compressor Station and Dover Compressor Station would be 0.88 tons per year ("TPY") and 1.2 TPY, respectively, representing 3.5% and 4.8% of the Major Source Threshold at those stations, respectively. Iroquois has committed to installing oxidation catalysts ("OC") on the proposed combustion turbines and emergency generator engines. The catalysts reduce carbon monoxide ("CO") and volatile organic compounds ("VOCs"), including HAPs that also happen to be VOCs ("VOC-HAPs"). CO, VOC, and VOC-HAPs emissions are expected to be reduced by 90%. Iroquois has also committed to purchasing and installing more expensive "advanced" SoLoNO_x turbines for the Project instead of conventional SoLoNO_x, which reduce potential NO_x emissions. At Athens the reduction would be from 25 parts per million by volume ("PPM") to only 9 PPM (a 64% reduction). At Dover the reduction would be from 42 parts per million by volume ("PPM") to only 9 PPM (a 79% reduction).

3.2 Additional Proposed Mitigation

Iroquois also evaluated alternative technologies and operational measures that could be implemented to further reduce GHG and co-pollutant measures. This evaluation was included in Iroquois' April 29, 2022 Response to NYSDEC's January 13, 2022 RFAI. A copy of the April 29, 2022 RFAI response is available on the Project website.¹² As set forth in that submission, Iroquois also proposed additional mitigation including (i) implementing a 91.5% maximum annual fuel use limit for the Project's turbines at Dover and Athens, and (ii) proposed to install VRS at its three other compressor stations (Boonville, Croghan, and Wright) following a feasibility study (which study would be provided to NYSDEC for review and approval). In addition to the GHG emissions benefits, these additional proposed mitigation measures would reduce overall potential emissions at Iroquois' compressor stations, including co-pollutant emissions.

3.3 Additional DAC Benefits Considered

Based on the Project's design and the proposed mitigation, Iroquois maintains that the Project will not result in a disproportionate impact to the Proximate DACs. However, NYSDEC has suggested that the Project could affect the Proximate DACs. As a result, Iroquois has assessed the following additional Project design measures that would benefit the Proximate DACs.

Alternative Technologies to Reduce Emissions

¹² <https://www.iroquois.com/operations/projects/exc-project/>

Proposed Technologies

As discussed above, Iroquois proposes to install VRS at the Project compressor stations and will evaluate the feasibility of installing VRS at the non-Project New York compressor stations. The results of Iroquois' VRS feasibility studies will be submitted to NYSDEC for review and approval. If determined to be feasible, Iroquois will propose to install VRS at the non-Project compressor stations. Iroquois will further update the Project website with information regarding the status of this proposed mitigation measure.

Iroquois has also committed to installing OC on the proposed combustion turbines and emergency generator engines installing "advanced" SoLoNOx turbines for the Project. As explained above, these proposed design measures are intended to reduce GHG and co-pollutant emissions.

Electric Motor-Driven Compression

Iroquois also assessed the feasibility of utilizing electric-motor-driven compressor units in lieu of the proposed natural gas fired compressor units at the Athens, Dover, and Brookfield Compressor Stations. As explained in Iroquois' April 29, 2022 RFAI Response, this potential alternative was determined not to be feasible after considering environmental, cost, reliability and Project schedule impacts that would result if it was implemented.

Oxidation Catalyst and Selective Catalytic Reduction

Iroquois also assessed the feasibility of incorporating OC and selective catalytic reduction ("SCR") at its Project and non-Project compressor stations to reduce co-pollutant emissions. The addition of OC and/or SCR at the Project compressor stations would alter the footprint of the Project and, thus, would require additional review by FERC, and may necessitate additional permits or further modifications to existing NYSDEC permits. This additional review and/or obtaining new or modified NYSDEC permits would not be consistent with the current proposed Project in-service date. Expansion of the Project footprint may also affect wetlands and other valuable natural resources. Moreover, incorporation of SCR at the Project compressor stations would require trucking ammonia canisters into these communities, which would not only require additional environmental review, but would add truck traffic and could present additional health and safety concerns to the Proximate DACs. Accordingly, Iroquois determined that, at this time, the addition of OC and SCR to the Project or non-Project compressor stations is neither practicable nor feasible.

Natural Gas Fuel Cells

Additionally, Iroquois evaluated the use of natural gas fuel cells as an alternative power generation technology for the Dover and Athens ExC Compressor Stations. For the reason set forth below, the use of natural gas fuel cells would not be practical.

The demand for natural gas fluctuates depending on numerous factors. When natural gas demand increases, a compressor may need to be started and become fully operational within 10 to 15 minutes to ensure supply meets demand requirements. As such, Iroquois' natural gas driven compressors cycle on and off. Unlike Iroquois' compressors, natural gas fuel cells operate best when base loaded – that is to be started with a matched load and operate continuously and uninterrupted. Natural gas fuel cells can take up to an hour to become 100% operational. Accordingly, these operational restrictions would not be compatible with Iroquois' operations.

Additionally, natural gas fuel cells typically have an output voltage of 480 volts. Due to the high horsepower requirements of the ExC compressors – 12,000 HP – which is the equivalent of approximately 9 MW of electrical power, a service voltage of 115,000 volts would need to be maintained. Iroquois is unaware of a fuel cell manufacturer that can offer this voltage requirement and do so at a steady state during a variety of operating load conditions.

Operational Mitigation

Fuel Use Restriction

Iroquois also assessed operational mitigation for the Project. As explained in Iroquois' April 29, 2022, Response to NYSDEC's RFAI (and in Section 3.2, above), Iroquois proposed to implement a 91.5% maximum annual fuel use restriction for the Project turbines at the Dover and Athens compressor stations. Doing so will reduce the GHG potential to emit ("PTE") at both New York Project compressor stations. Further fuel use restrictions were determined to be unfeasible due to Iroquois' existing contractual obligations.

NOx Emission Limits

However, Iroquois will agree to a lower NOx limit for the proposed turbine at the Athens Compressor Stations. Currently, the draft permit for the proposed turbine at the Dover Compressor Station specifies a NOx limit 3.04 lbs/hr, which corresponds to 9 PPMV. Although a similar limit is not specifically included in the Athens draft permit, Iroquois agrees to include the same condition for the proposed turbine at the Athens Compressor Station. The corresponding limit for the proposed Athens turbine would be 3.07 lbs/hr, which would be equivalent to 9 PPMV.

Additional Fugitive Emissions Monitoring

Iroquois also assessed the feasibility of implementing additional fugitive emission monitoring at the New York Project compressor stations. Currently, in accordance with NYSDEC's Part 203 regulations ("Part 203"), Iroquois performs bi-monthly inspections, at least 45 days apart (i.e., six surveys per year), at the New York Project compressor stations. As part of the Project, Iroquois will agree to a permit condition that would add six additional surveys (identified as "ExC

Project fugitive emissions surveys”) at each New York Project compressor station, which would be scheduled to be offset from the Part 203 surveys (i.e., 12 fugitive emissions surveys per year). Following the “ExC Project fugitive emissions surveys,” a leak repair schedule will be implemented for leaks detected during such interim fugitive emissions surveys. This additional monitoring and repair will help reduce methane emissions.

Financial Mitigation / DAC Benefits

Iroquois has also considered providing direct financial benefits to the Proximate DACs. To that end, Iroquois proposes the following additional DAC benefits:

- **Grant Program**

- Establishment of a grant program that would provide funds to the Town of Athens, Village of Athens and Town of Dover, New York for programs and/or projects that would benefit the Proximate DACs.
- Such programs and/or projects would be required to demonstrate that they would help to reduce or eliminate environmental burdens within the Proximate DACs.
- An ExC DAC benefit committee would be established to receive, review and process applications for funding under the grant program. The DAC committee would include members from Iroquois and the applicable municipality. The DAC benefit committee would be responsible for ensuring that funding under the program would help to reduce or eliminate environmental burdens within the Proximate DACs. DEC will require compliance reporting and review of the grant program operations.
- Iroquois’ proposed total DAC Grant Program fund commitment would be \$400,000.00 with each of the Town of Athens, Village of Athens and Town of Dover allocated as follows: \$100,000.00 to the Town of Athens, \$100,000.00 to the Village of Athens. and \$200,000.00 to the Town of Dover.

- **Electric Vehicle Charging Stations**

- Donation of publicly available electric vehicle charging stations to each of the Town of Athens, Village of Athens and Town of Dover, New York.
- Iroquois’ proposed total fund commitment for EV charging stations: \$200,000.00 allocated as follows: \$50,000.00 to the Town of Athens, \$50,000.00 to the Village of Athens, and \$100,000.00 to the Town of Dover.

- **Heat Pump Program**

- In conjunction with the local electric distribution companies,¹³ Iroquois would match the current heat pump rebate programs offered by the local utility companies to property owners within the Proximate DACs.
- Iroquois’ proposed Heat Pump Program fund commitment is \$400,000.00, split equally between the two Proximate DACs.

¹³ Iroquois has had preliminary discussions with the local electric distribution companies regarding this proposed program. Iroquois will perform additional coordination with the local utility companies to assess the requirements for implementation of this program following the issuance of Project permits.

- Iroquois will request that the LDCs' programs utilize heat pumps that are consistent with the then best current technology intended to reduce GHG emissions.

Iroquois would fully fund the above-proposed DAC benefit programs immediately following Project construction and placement of ExC Project facilities into operation. The funding for the programs would be made available until the funds are exhausted. Iroquois will provide additional details regarding the above proposed programs at the planned public meetings (discussed below).

4.0 STAKEHOLDER IDENTIFICATION & CONTACT LIST

A contact list consisting of the names, addresses, phone numbers, and/or email addresses (as available) of Project stakeholders is provided in Appendix A. The contact list includes individuals and organizations located in or near the Proximate DACs and people and organizations that have expressed interest in the Project.

The current contact list has been developed in consultation with NYSDEC by identifying stakeholders from the following categories: local government and elected officials; business owners, residents, and occupants; local civic, community, environmental and religious organizations; and property owners within approximately 0.5-mile of the New York Project compressor stations. Iroquois also included among the stakeholders those community, environmental, and business groups with interests in or nearby the Proximate DACs that commented during NYSDEC's 2023 public comment period for the Permit Applications.

The applicant will utilize this contact list to communicate and disseminate information about the Project and the Permit Applications. At minimum, this includes distribution of the written information and outreach materials described in Section 6 to inform the community about upcoming public meetings and opportunities for public participation.

The contact list will be reviewed periodically and updated as appropriate throughout the Permit Applications review process. Iroquois will update the contact list with any new stakeholders identified during the public meeting or execution of other PPP components. In addition, individuals and organizations will be added to the contact list upon request. Such requests should be submitted to the Project Liaison identified in Section 5. Other additions to the contact list may be made at the discretion of Iroquois or, at the request of the NYSDEC project manager, in consultation with other NYSDEC staff, as appropriate.

5.0 PROJECT LIAISON

The following representative from Iroquois' Project team will serve as the Project Liaison and will be available during business hours:

Robert Perless, ExC Project Director

1 Corporate Drive, Suite 600
Shelton, CT 06484
(203) 944-7016
Robert_perless@iroquois.com

Impacted residents and interested stakeholders can contact the Project Liaison to provide input to the Project team, discuss any issues or concerns and/or to ask questions or request information. The Project Liaison will respond in a timely manner and in the manner appropriate to question or information request received. The Project Liaison will be responsible for tracking and documenting public input, inquiries, questions, and information requests received, along with responses provided.

Stakeholders may also call the Project Hotline (1-800-253-5152, Option 3), email the Project's email address (excproject@iroquois.com) and visit the Project website <https://www.iroquois.com/operations/projects/exc-project/> to provide comments/input to the Project team and/or to obtain further information regarding the Project.

6.0 PUBLIC OUTREACH ACTIVITIES

Iroquois has and will continue to utilize a range of engagement strategies and conduct various public outreach activities to facilitate participation, involvement, and direct communication with the affected community during the Permit Application review process. The applicant will implement the public outreach activities outlined below upon finalization and approval of this PPP by NYSDEC.

In compliance with the requirements of CP-29, Iroquois has and will hold public information meeting(s) to keep the public informed about the Project and the environmental permit review process. Iroquois has and will continue to prepare, distribute and post written information and materials, including a meeting notice and fact sheet, to encourage dialogue and solicit input from interested stakeholders during the permit application review process. All public outreach materials and information will be prepared and presented in an easy-to-read, understandable format, using plain language free of legal terminology, and geared towards a non-technical audience.

The public meeting notice and fact sheet will be made available and disseminated to the public and Project stakeholders in both English and Spanish.¹⁴ In addition, the public can contact the Project Liaison regarding the availability of language assistance.

6.1 Public Outreach

6.1.1 Public Outreach Performed to Date

¹⁴ This PPP will also be translated into Spanish once it is finalized.

Iroquois has provided opportunity for public input and comment throughout the Project planning and permitting process.

Iroquois held informal community open houses on January 8, 2020, specific to the proposed Athens Compressor Station Project facilities. This open house was held at the Athens Volunteer Fire Department located at 39 3rd Street, Athens, New York. Iroquois held an open house on January 9, 2020, specific to the proposed Dover Compressor Station Project facilities. This open house was held at the American Legion Post 1949, located at 797 Route 22, Wingdale, New York. Iroquois provided public notice of its public information meetings in local newspapers. Notice of the open houses was also provided to landowners within 0.5-miles of the Project compressor stations and published in the Poughkeepsie Journal and Catskill Daily Mail on December 26 and 31, 2019, and January 2, 2020.

At each of the above open houses, Iroquois representatives offered an overview of the Project, discussing the Project schedule and explaining how stakeholders can participate in the planning and permitting process. Informational materials detailing the proposed Project facilities, permitting activities, and construction schedule were made available to all attendees. The open house attendees were invited to discuss questions and concerns with the Iroquois representatives in attendance.

During the FERC's Project NEPA review, the public was provided with additional opportunities to provide input and comment on the Project. On February 19, 20 and 25, 2020, Iroquois published notices in the Poughkeepsie Journal and Catskill Daily Mail of its FERC application filing and its availability for review and comment on the FERC eLibrary website and local libraries. Furthermore, FERC accepted public comments on the Environmental Assessment prepared for the Project between September 30 and October 30, 2020. FERC also held a public comment period on the Draft Environmental Impact Statement, which ran from June 11 to August 9, 2021. Numerous individuals participated in the public comment process and Iroquois incorporated their comments into the planning process as appropriate.

On December 28, 2022, NYSDEC issued a Notice of Complete Application for the ExC Project. NYSDEC held a legislative public comment hearing on January 31, 2023, and a written public comment period was open until February 22, 2023. Notification of the January 2023 public comment hearing and public comment period was published in the Poughkeepsie Journal and Catskill Daily Mail on January 3, 2023.

Iroquois has also involved elected officials and staff (county, state, and federal), community leaders, first responders, and other interested stakeholders throughout the course of the Permit Application proceeding.

6.1.2 Additional Proposed Public Outreach

On February 28, 2024, NYSDEC issued a Notice of Public Comment Period regarding DPS Staff's determination that the Project is needed for reliability purposes. With that notice, NYSDEC also advised the public that Iroquois would be preparing this PPP and would be seeking further input from stakeholders of the Proximate DACs. The public comment period

initially extended to March 29, 2024. Notice of this additional public comment period was published in Poughkeepsie Journal and Catskill Daily Mail on March 4 and 5, 2024, respectively. On March 27, 2024, NYSDEC extended the public comment period to April 29, 2024.

Iroquois will also facilitate two in-person public meetings and one virtual public meeting to:

- Inform the public about the proposed Project and Permit Applications review status.
- Provide an additional opportunity for stakeholders to make comments and express concerns about the Project.
- Identify resources for stakeholders to obtain information regarding the Project following the meeting.
- Inform attendees how they may submit written comments regarding the Project to Iroquois and/or NYSDEC.

Iroquois' virtual public meeting will be held on a platform that will enable participation through a web browser and by telephone.

During the meeting, Iroquois will present an overview of the Project, details on the status of the Permit Applications, scope of work, schedule, and community impacts. Iroquois will also distribute information allowing questions and comments to be made to Iroquois. In addition, the following discussion points will be addressed:

- Make it clear that the meeting is being held prior to NYSDEC's permitting decision for the Project.
- Identify the location of the online document repository and provide directions on how attendees may obtain and review materials relevant to the Permit Applications.
- Identify and provide contact information for the Project Liaison and announce procedures for how attendees may obtain answers to questions following the meeting and how interested stakeholders can submit questions, express concerns, or request additional information by telephone, email, and in writing.

Attendance will be recorded during the meeting and Iroquois will track the number of attendees. In addition, Iroquois will document meeting notes or minutes, along with a record of comments and questions raised. Attendees not identified on the contact list will have the option to be added in the event of future meetings or information sharing.

6.2 Public Meeting Notice Preparation and Distribution

Information regarding the details of the in-person and virtual public meetings and how to participate in those meetings will be contained in the meeting notice, the form of which is included in Appendix B. Through this notice, the public and stakeholders will be invited and encouraged to attend the public meetings.

Once the PPP has been approved by NYSDEC, the public meeting notice will be posted and available in the online document repository described in Section 7 of this document. At least two

weeks in advance of the public virtual meeting, the notice will be published in the Poughkeepsie Journal and Catskill Daily Mail which are daily newspapers printed, published, and circulated in Hudson Valley Region. In addition, the public meeting notice will be emailed, mailed and/or hand delivered (door-to-door) to the stakeholders identified in the contact list in Appendix A at least two weeks prior to the public virtual meeting.

6.3 Fact Sheet Preparation and Distribution

Information regarding the Project is outlined in the reader-friendly fact sheet included in Appendix C. In addition, the fact sheet outlines how interested stakeholders can: participate in the Permit Application review process; access the online document repository to review relevant application materials; and contact the Project Liaison to obtain additional information.

Once the PPP has been approved by NYSDEC, the fact sheet will be posted and available in the online document repository described in Section 7.0 of this document. No later than two weeks prior to the public meeting, the applicant will distribute the fact sheet to provide stakeholders with relevant background on the Project and facilitate meaningful participation during the meeting. The fact sheet will be distributed together with the public meeting notice via email, mail and/or hand delivery (door-to-door).

The fact sheet(s) will also be posted within the vicinity of the Project compressor stations and visible to the public.

6.4 Distribution of NYSDEC Notices

The Permit Applications' Notice of Complete Application ("NOCA") was issued on December 28, 2022. NYSDEC issued a Notice of Public Comment Period regarding DPS Staff's Project need/reliability determination on February 28, 2024. Copies of both documents are available on the Project's website: <https://www.iroquois.com/operations/projects/exc-project/>.

7.0 DOCUMENT REPOSITORY

An online document repository has been established for the community and interested stakeholders to access and review information about the Project. The online repository available at <https://www.iroquois.com/operations/projects/exc-project/>, will provide information and documents relating to the Project and the Permit Applications.

The repository will be updated throughout the application process with project-related information and written materials.

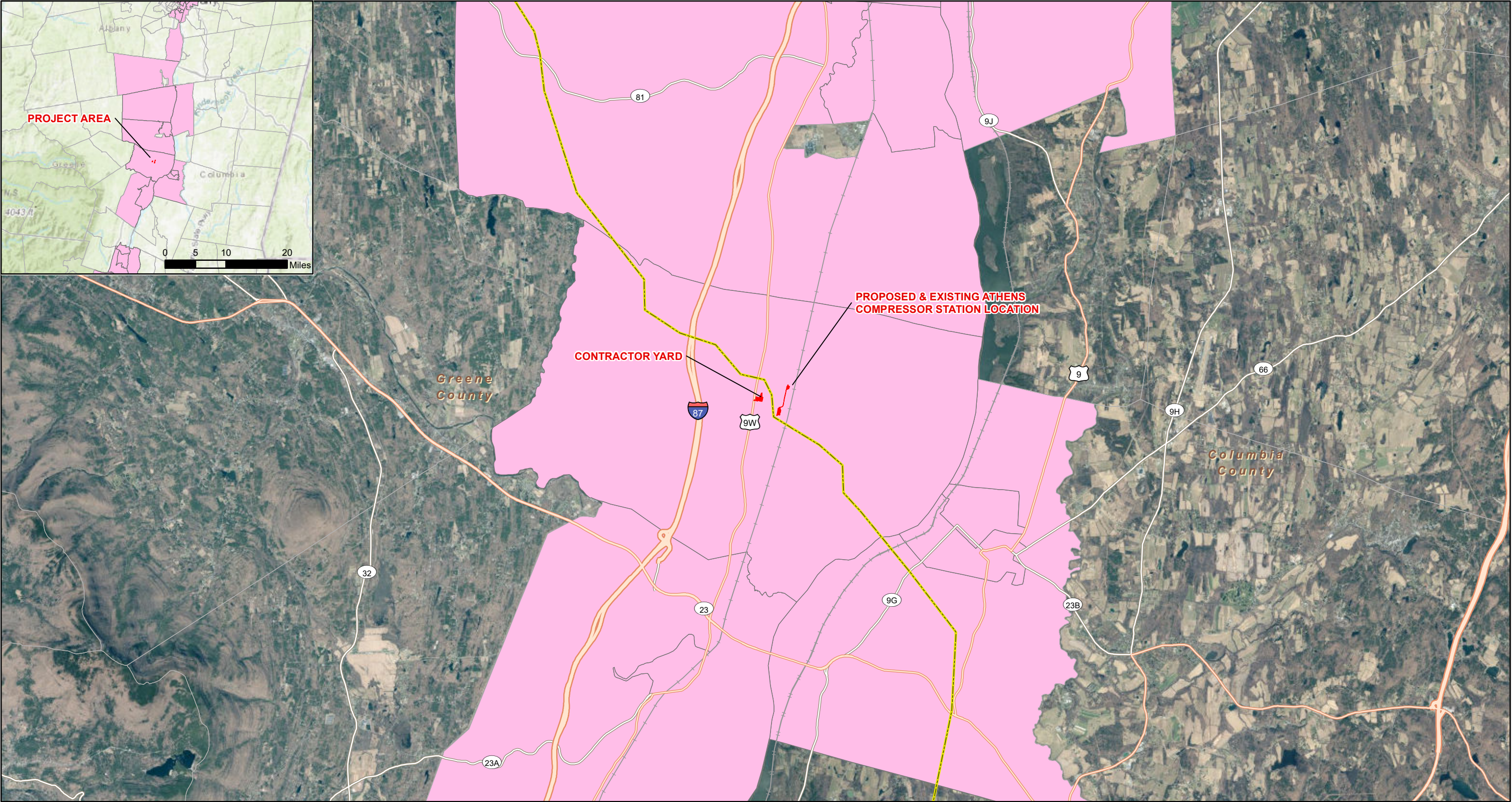
8.0 SUBMISSIONS

Upon completion of the enhanced public participation plan, Iroquois will submit written certification to NYSDEC to certify that it has fully executed and complied with the approved PPP. The certification will be signed by Iroquois and submitted to NYSDEC prior to a final decision on the Permit Applications.

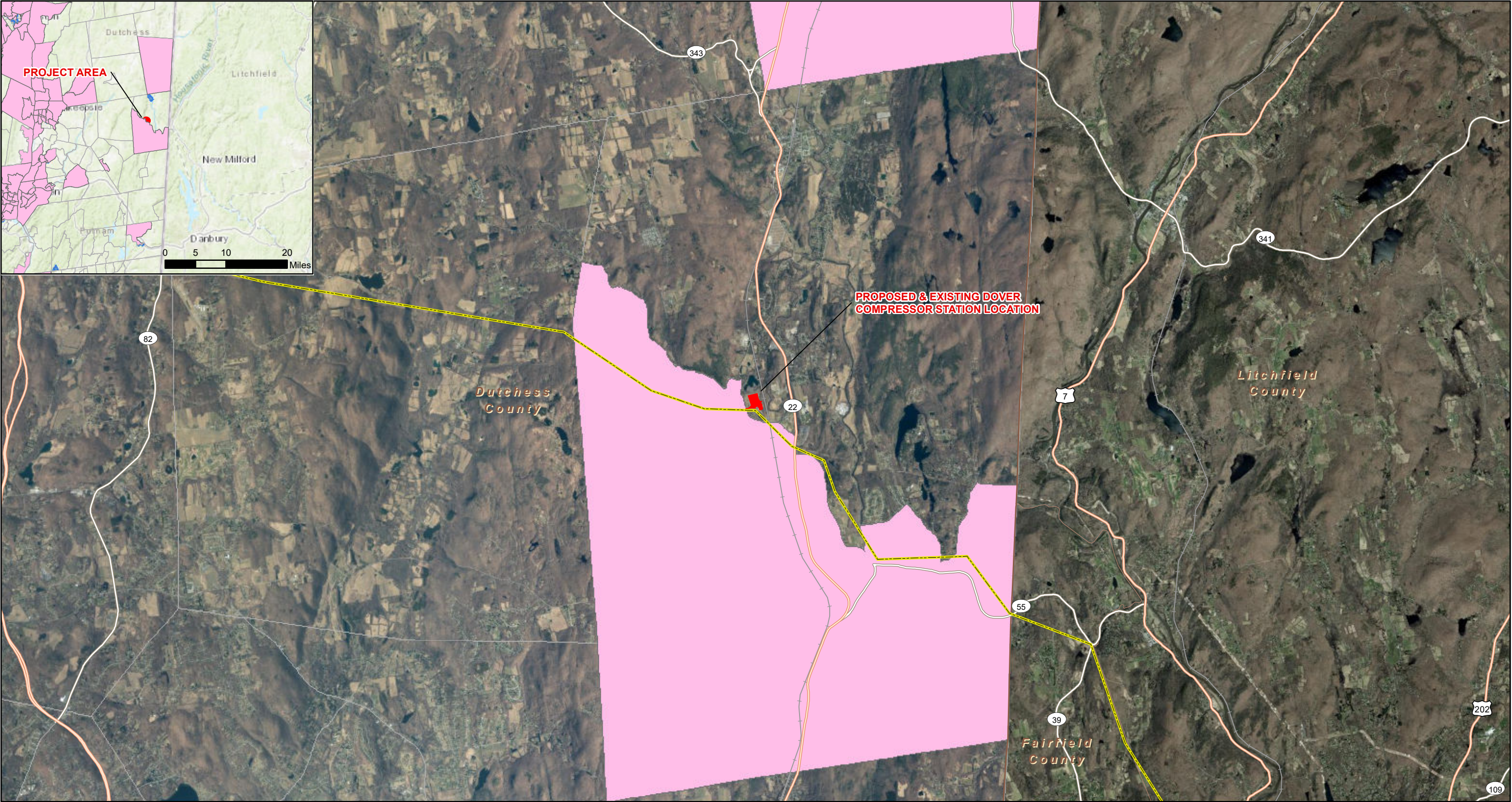
As part of the certification, Iroquois will submit a final summary report documenting the implementation of this PPP. The report will summarize the activities that occurred in accordance with the PPP and will identify any substantive concerns raised by stakeholders during the public meeting, or, at any time throughout the permitting process and provide Iroquois' response(s) to any such concerns or questions. Iroquois will include, or append, any documentation that supports the final summary report, such as: the record of meeting attendees/participants, meeting presentation, notes or minutes, summary of questions/comments provided to Iroquois, and copy of newspaper notice or other proof of publication. In addition, the report will identify any changes or modifications to the Project that were made or considered by Iroquois to address or reduce concerns surrounding the Permit Applications.

The final summary report and written certification will become part of the Permit Applications record and will be posted to the online document repository so that it is readily available to the public. Iroquois will also further update the Project website with information regarding its implementation of the mitigation measures/DAC benefits proposed in this PPP.

FIGURES



<ul style="list-style-type: none">Designated as a Disadvantaged CommunityNot Designated as a Disadvantaged CommunityPROJECT LIMIT OF DISTURBANCEIROQUOIS PIPELINE MAINLINEMAJOR HIGHWAYHIGHWAYMAJOR ROAD	<h2>IROQUOIS GAS TRANSMISSION SYSTEM, LP</h2> <h3>ENHANCEMENT BY COMPRESSION PROJECT</h3> <p>ATHENS COMPRESSOR STATION DISADVANTAGED COMMUNITIES</p> <p>GREENE COUNTY, NEW YORK</p> <p>0 1 2 4 Miles</p>				DRAWN BY: JLM
			ABSOLUTE SCALE: 1:100,000		CHECKED BY: DRG
			REFERENCE SCALE: 1 inch = 8,333.33 feet	5295 S. Commerce Dr., Ste. 500 Salt Lake City, UT 84107	APPROVED BY: DRG
					REV. DATE: 3/8/2024
					REVISION: D
				DESC: IFP	
				FIGURE 1	



	Designated as a Disadvantaged Community
	Not Designated as a Disadvantaged Community
	PROJECT LIMIT OF DISTURBANCE
	IROQUOIS PIPELINE MAINLINE
	MAJOR HIGHWAY
	HIGHWAY
	MAJOR ROAD

IROQUOIS GAS TRANSMISSION SYSTEM, LP

ENHANCEMENT BY COMPRESSION PROJECT

DOVER COMPRESSOR STATION
DISADVANTAGED COMMUNITIES

DUTCHESS COUNTY, NEW YORK

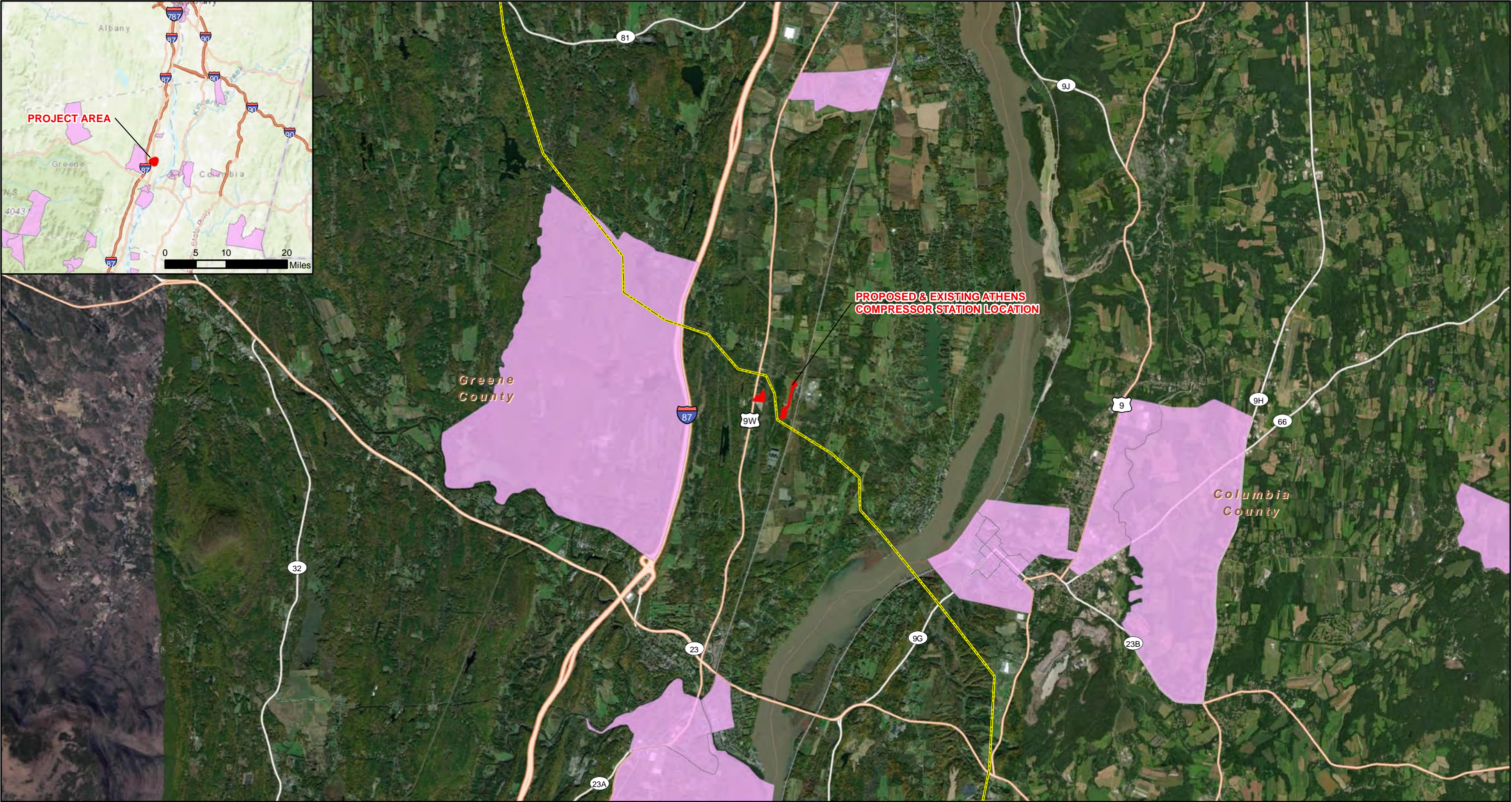
ABSOLUTE SCALE:
1:84,000

REFERENCE SCALE:
1 inch = 7,000 feet

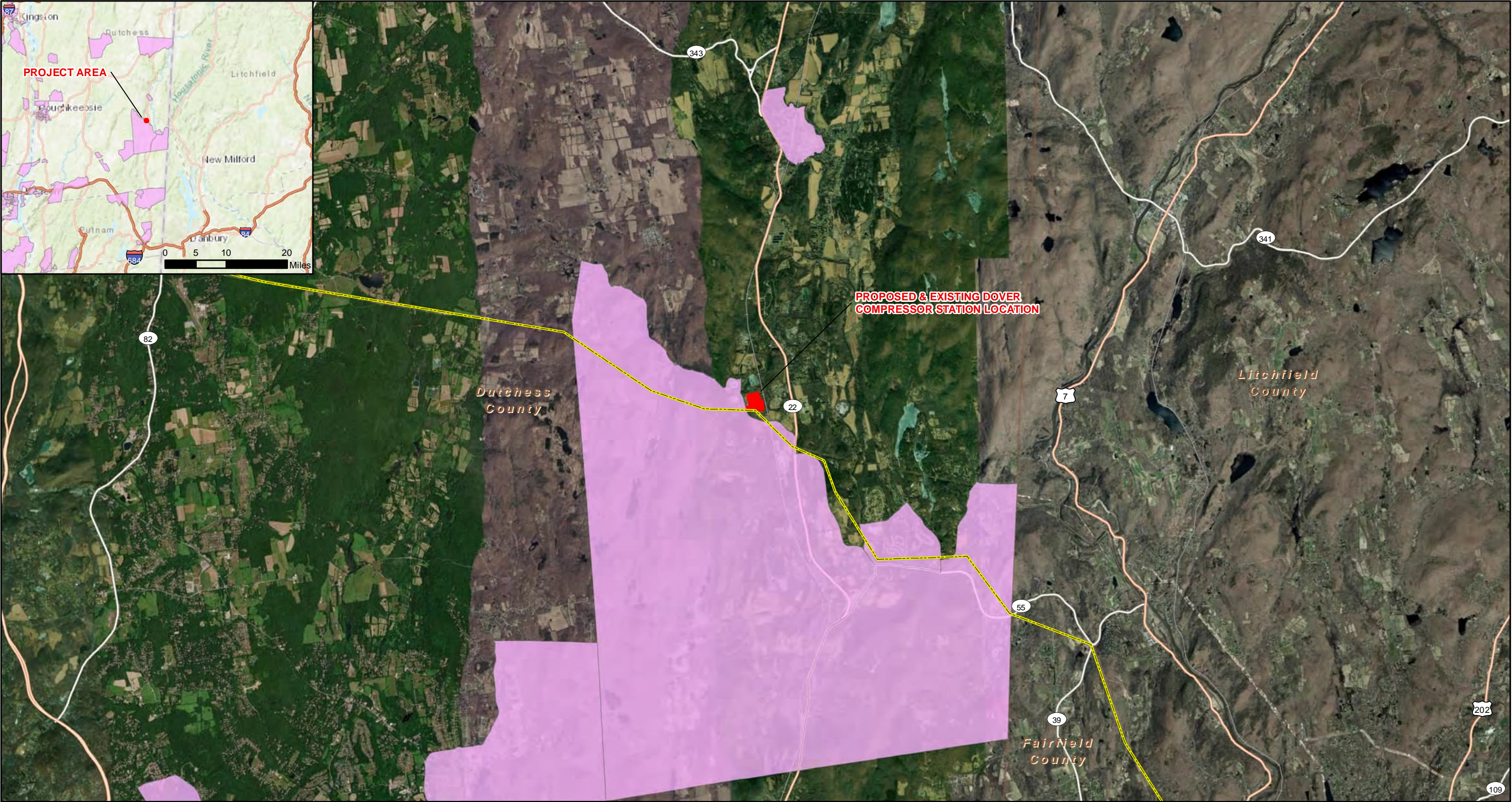
M
MOTT
MACDONALD


5295 S. Commerce Dr.,
Ste. 500
Salt Lake City, UT 84107

DRAWN BY:	JLM
CHECKED BY:	DRG
APPROVED BY:	DRG
REV. DATE:	3/8/2024
REVISION:	D
DESC:	IFP
FIGURE 2	



<ul style="list-style-type: none">POTENTIAL ENVIRONMENTAL JUSTICE AREAPROJECT LIMIT OF DISTURBANCEIROQUOIS PIPELINE MAINLINEMAJOR HIGHWAYHIGHWAYMAJOR ROAD	IROQUOIS GAS TRANSMISSION SYSTEM, INC. ENHANCEMENT BY COMPRESSION PROJECT ATHENS COMPRESSOR STATION POTENTIAL ENVIRONMENTAL JUSTICE AREAS GREENE COUNTY, NEW YORK <div><div></div><div>0</div><div>1</div><div>2</div><div>4</div><div>Miles</div></div>		<div><div>N</div><div>W</div><div>E</div><div>S</div></div>		DRAWN BY: JLM
			ABSOLUTE SCALE: 1:84,000		CHECKED BY: DRG
			REFERENCE SCALE: 1 inch = 7,000 feet	<div><div>M</div><div>M</div><div>MOTT</div><div>MACDONALD</div></div> <div>5295 S. Commerce Dr., Ste. 500 Salt Lake City, UT 84107</div>	APPROVED BY: DRG
					REV. DATE: 11/16/2021
					REVISION: C
				DESC: IFP	
				DWG. NO. Figure 3	



<ul style="list-style-type: none">POTENTIAL ENVIRONMENTAL JUSTICE AREAPROJECT LIMIT OF DISTURBANCEIROQUOIS PIPELINE MAINLINEMAJOR HIGHWAYHIGHWAYMAJOR ROAD	IROQUOIS GAS TRANSMISSION SYSTEM, INC. ENHANCEMENT BY COMPRESSION PROJECT DOVER COMPRESSOR STATION POTENTIAL ENVIRONMENTAL JUSTICE AREAS DUTCHESS COUNTY, NEW YORK <div><div></div><div>0124</div><div>Miles</div></div>		<div><div>N W E S</div></div> <div>ABSOLUTE SCALE: 1:84,000</div> <div>REFERENCE SCALE: 1 inch = 7,000 feet</div>	<div> M M MOTT MACDONALD 5295 S. Commerce Dr., Ste. 500 Salt Lake City, UT 84107</div>	<div>DRAWN BY: JLM</div> <div>CHECKED BY: DRG</div> <div>APPROVED BY: DRG</div> <div>REV. DATE: 11/16/2021</div> <div>REVISION: C</div> <div>DESC: IFP</div> <div>DWG. NO. Figure 4</div>
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APPENDIX A

Contact List

Public Participation Plan Contact List
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Greene County IDA,			2 Union St., Athens, NY 12015	
Peckham Materials Corp,			172 Prospect Hill Rd., Brewster, NY 10509	
JR Deschaine Holding, LLC,			208 Old South Durham Hwy., Acra, NY 12405	
John	Deschaine		208 South Durham Hwy., Acra, NY 12405	
Central Hudson Gas & Elec,			284 South Ave., Poughkeepsie, NY 12602	
Niagara Mohawk Power Corp,			300 Erie Blvd W Bldg D-MEZZ, Syracuse, NY 13202	
Michael	Desimone		327 Flats d. Ext., Catskill, NY 12414	
Karen	Carroll		351 Flats Rd Ext., Catskill, NY 12414	
Guido J.	Lepage		379 Flats Rd Ext., Catskill, NY 12414	
Webster Leasing LLC,			1 Saw Mill Road, Suite 3, New Fairfield, CT 06812	
Barbara	Malachowski		407 Flats Rd. Ext., Catskill, NY 12414	
Richard J.	Bailey		42 Van Loon Pl. Athens, NY 12015	
Mark	Matson		441 Flats Rd Ext., Catskill, NY 12414	
Scott J.	Fischer		447 Howard Hall Rd., Catskill, NY 12414	
Robert	Hoffman		483 Flats Road Ext., Athens, NY 12015	
Michael J.	Ragaini, Jr.		5 Havenbrook Court, Cohoes, NY 12047	
Flats Road Extension, LLC			57-01 134th St., Flushing, NY 11355	
Teresa Rotonsi 9th St South			612 Brooklyn Ave., N. Hyde Park, NY 11040	
Michael	Ferro		64 Fyke Rd., Catskill, NY 12414	
JPSF Properties LLC			1104 Grand Blvd., Unit 6, Deer Park, NY 11729	
Athens Real Estate LLC			PO Box 1148, Culpeper, VA 22701	
Charles	Ford		80 East Maple Ave., Suffern, NY 10901	
Lenard	Lo Frisco		880 Schoharie Tpk. Athens, NY 12015	
Bret M Trust	Breault		925 Schoharie Turnpike, Athens, NY 12015	
Grace	Brannigan		9377 Rte 9W, Athens, NY 12015	
Sandra	Van Allen		9395 Rte 9W, Athens, NY 12015	
Peter M.	Chast		9491 Rte 9W, Athens, NY 12015	
Antonios	Pafalis		9567 Rte 9W, Athens, NY 12015	
Darci	Ouzi		9634 Rte 9W, Athens, NY 12015	
Robert	Litchko		9637 Rte 9W, Athens, NY 12015	
Iroquois Gas Trans System, LP			One Corporate Dr Ste 600, Shelton, CT 06484	
West Athens Limestone Fire,			PO BOX 156, Athens, NY 12015	
New Athens Gen Co LLC,			PO Box 349, Athens, NY 12015	
Travis	Stupplebeen		9451 Tte 9W, Athens, NY 12015	
Mohammad	El-Hajjar		44 Indian Pipe Drive, Wyantskill, NY 12198	
Michael	Hernandez		9580 Rte 9W, Athens, NY 12015	
Claude	Dedrick		721 Schharoe Tpke, Athens, NY 12015	
Salvatore	Multari		697 Schoharie Tpke, Athens, NY 12015	
Michael J.	Ritter		26 Van Loon Pl., Athens, NY 12015	
Zion Evangelical Lutheran Church			102 N Washington St., Athens, NY 12015	
First Reformed Church of Athens			18 N Church St., Athens, NY 12015	
Light House Church			18 N Franklin St., Athens, NY 12015	
St Patrick's Catholic Church			24 N Washington Ave., Athens, NY 12015	
High Hill United Methodist Church			1448 Schoharie Tpke, Catskill, NY 12414	
Riverton Senior Center			39 2nd Street, Athens, NY 12015	
Coxsackie-Athens Rotary Club			10885 State Route 9w, Coxsackie, NY 12051	
Athens Volunteer Fire Dept			39 3rd Street, Athens, NY 12015	

APPENDIX B

Public Meeting Notice

NOTICE OF PUBLIC MEETINGS

Iroquois Enhancement by Compression (ExC) Project

In-Person Public Meetings

May 13, 2024 6:00 p.m. to 8:00 p.m. at:
Wingdale Elementary School
6413 State Route 55
Wingdale, New York 12594

May 14, 2024 6:00 p.m. to 8:00 p.m. at:
E.J. Arthur Elementary School
51 Third Street
Athens, New York 12015

Virtual Public Meeting

May 16, 2024 at 12:00 p.m. to 2:00 p.m.

Iroquois Gas Transmission System, LP, has submitted applications to the New York State Department of Environmental Conservation (NYSDEC) for modifications to its Air State Facility permits for its Dover Compressor Station (ID No. 3-1326-00211/00001) and Athens Compressor Station (ID No. 4-1922-00049/00004) related to its proposed Enhancement by Compression Project.

The NYSDEC has determined that the Project may affect the Disadvantaged Communities ("DACs") located adjacent to and near the Project. A Public Participation Plan has been developed for the Project in accordance with NYSDEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29). The purpose of these meetings is to inform stakeholders within the DACs about the Project and to involve the community during the permit application review process.

In-Person Public Meetings:

Dover

Wingdale Elementary School
6413 State Route 55
Wingdale, New York 12594
Date: May 13, 2024
Time: 6:00 p.m. to 8:00 p.m.

Athens

E.J. Arthur Elementary School
51 Third Street
Athens, New York 12015
Date: May 14, 2024
Time: 6:00 p.m. to 8:00 p.m.

Virtual Public Meeting

May 16, 2024 12:00 p.m. to 2:00 p.m.

May 16, 2024 12:00 p.m. to 2:00 p.m.

Agenda:

- Project Overview
- Background
- Potential Community Impact
- Proposed Mitigation Measures
- Additional Mitigation and DAC Benefits
- How to Submit Questions/Comments

Your Attendance is Important!

For additional information regarding the Project:

- Contact: Robert Perless, ExC Project Director by phone at (203) 944-7016 or by email at Robert_perless@iroquois.com
- Visit the Project's document repository at:
<https://www.iroquois.com/operations/projects/exc-project/>
- Contact the project liaison to request reasonable accommodation for a disability or interpreter services in a language other than English, so that you can participate in the call and/or to request a translation of any of the event documents into a language other than English.

APPENDIX C

Fact Sheet

Fact Sheet

Iroquois Enhancement by Compression (ExC) Project

- Project: Iroquois Enhancement by Compression (ExC) Project
- Applicant: Iroquois Gas Transmission System, LP
- Facility: Dover Compressor Station, 186 Dover Furnace Road, Dover Plains, New York 12522
- Athens Compressor Station, 915 Schoharie Turnpike, Athens, New York 12015
- NYSDEC Application Number: Dover Compressor Station 3-1326-00211/00001; Athens Compressor Station 4-1922-00049/00004

A Public Participation Plan (PPP) has been developed in accordance with NYSDEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29)

What is the Proposed Project?

Iroquois' Enhancement by Compression Project (the "ExC Project" or the "Project") proposes the installation of four new approximately 12,000 horsepower ("hp") turbines with associated cooling, filter separators, and other ancillary facilities at Iroquois' existing compressor stations. The new turbines will be integrated at the existing Athens Compressor Station in the Town of Athens, Greene County, New York, the existing Dover Compressor Station in Town of Dover, Dutchess County, New York, and the existing Brookfield Compressor Station in the Town of Brookfield, Fairfield County, Connecticut. Gas cooling and associated piping will be added to Iroquois' existing Milford Compressor Station in the City of Milford, New Haven County, CT.

To implement the proposed Project, Iroquois has submitted applications to the NYSDEC for modifications to the Air State Facility Permits for Iroquois' Athens Compressor Station located at 915 Schoharie Turnpike, Athens, New York (DEC ID No. 4-1922-00049) and Dover Compressor Station located at 186 Dover Furnace Road, Dover Plains, New York 12522 (DEC ID No. 3-1326-00211).

Why does Iroquois need to construct the ExC Project?

The purpose of the Project is to supply to each Con Edison and National Grid with incremental firm natural gas transportation service to serve each of their respective local distribution company service territories. The Project is needed to ensure that Con Edison and National Grid have sufficient pipeline capacity available to meet their customers' demand for natural gas on the coldest winter days.

On March 25, 2022, FERC issued an Order pursuant to Section 7 of the Natural Gas Act finding that "the public convenience and necessity requires approval of the Enhancement by Compression Project." On February 26, 2024, the New York Department of Public Service "determined 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."

How might the project affect the surrounding community?

The Federal environmental review performed by the Federal Energy Regulatory Commission (“FERC”) determined that Project emissions would not cause or contribute to an exceedance of the National Ambient Air Quality Standards (“NAAQS”), which are designed to be protective of human health and welfare. FERC also concluded that the Project would result in a net reduction of greenhouse gas (“GHG”) emissions and would not have a disproportionately high and adverse impact on environmental justice communities. Iroquois also commissioned a Human Health Risk Assessment (“HHRA”) for the ExC Project. The results of the HHRA indicate that there would be no significant impact on human health in the Project areas from inhalation of emissions associated with the proposed modifications to the Athens and Dover compressor stations.

During Project construction, Iroquois will implement mitigation measures to reduce traffic impacts to nearby communities such as avoiding peak commute times and periods associated with school traffic, as well as coordinating its construction with local transportation authorities. During construction, Iroquois will also mitigate potential dust by implementing the Project’s Dust Control Plan which requires the use of dust suppressants (water), reducing vehicle speeds on unpaved roadways, removing debris from paved roads, and complying with federal, State and local standards. Construction noise will be temporary, and Iroquois has committed to implementing mitigation during operations such that noise levels at both the Dover and Athens Compressor Stations would not exceed day-night noise levels of 55 dBA (A-weighted decibels) at the nearest noise sensitive receptors. Visual impacts will be mitigated since Project facilities will either not be visible or only partially visible from surrounding areas and would be partially obscured by existing compressor station facilities, landform, or surrounding vegetation.

How can I participate in the permit review process?

To ask questions, express concerns, provide input or submit comments, attend the upcoming in-person public meetings scheduled for:

- May 13, 2024 between 6:00 p.m. and 8:00 p.m. at the Wingdale Elementary School located at 6413 State Route 55, Wingdale, New York.
- May 14, 2024 between 6:00 p.m. and 8:00 p.m. at E.J. Arthur Elementary School located at 51 Third Street, Athens, New York.

Or, attend the upcoming virtual public meeting scheduled for:

- May 16, 2024 between 12:00 p.m. and 2:00 p.m. Registration required.
To Register: email name and address or affiliation to: amcmullin@burnsmcd.com
A confirmation with link and instructions on how to participate will be provided.

Where can I get more information about the proposed project?

- Visit the online document repository at:
<https://www.iroquois.com/operations/projects/exc-project/> to obtain application materials, relevant documents, and information about the project.

- Contact Robert Perless, ExC Project Director by phone at (203) 944-7016 or by email at Robert_perless@iroquois.com or in writing at: 1 Corporate Drive, Suite 600, Shelton, CT 06484 for information on the Project, instructions on how to attend the upcoming virtual public meeting, or to find out about the status of the permit application and public comment period.

Who is responsible for reviewing the Permit Application?

Karen Gaidasz, Project Manager Bureau of Energy Project Management
NYSDEC - Division of Environmental Permits
625 Broadway, 4th Floor, Albany, NY 12233-1750
Phone: (518) 402-9167, Fax: (518) 402-9168