

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E
Constitution Pipeline, LLC
Constitution Pipeline Project
Docket No. CP13-499-006
Iroquois Gas Transmission System, L.P.
Wright Interconnect Project
Docket No. CP13-502-003

May 5, 2026

VIA FERC SERVICE

Stephen Hatridge
Vice President & Assistant General Counsel
Constitution Pipeline Company, LLC
Post Office Box 1396
Houston, TX 77251-1396

Kimberly A.E. Pritchard
Vice President and General Counsel
Iroquois Gas Transmission System, L.P.
One Corporate Drive, Suite 600
Shelton, CT 06484

Re: Environmental Information Requests

Dear Mr. Hatridge and Ms. Pritchard:

The information described in the enclosed requests is required for staff review of Constitution Pipeline Company, LLC's (Constitution) and Iroquois Gas Transmission System, L.P.'s (Iroquois) requests for Reissuance of Certificates (Petition), for the Constitution Pipeline Project and Wright Interconnect Projects (Project). The enclosed requests seek clarifications of discrepancies and identify necessary information that will assist in our review of your Petitions. **Please file a complete response within 20 days of the date of this letter.** For any responses not complete within 20 days, provide a schedule for filing the responsive information. File your response in accordance with the provisions of the Federal Energy Regulatory Commission's (FERC or Commission) Rules of Practice and Procedure. In particular, Rule 2005 (18 CFR 385.2005) requires all

responses to be filed under oath by an authorized company representative, and Rule 2010 (18 CFR 385.2010) requires service to each person whose name appears on the official service list for this proceeding.

Electronic filing is encouraged using the Commission's eFiling system (see <https://ferconline.ferc.gov/eFiling.aspx>). Be sure to prepare separate volumes, as outlined on the Commission's website at <https://www.ferc.gov/sites/default/files/2020-04/CEII-Filing-guidelines.pdf>, and label all controlled unclassified information (CUI) as described at <https://www.ferc.gov/cui>. Critical Energy Infrastructure Information (CEII) (e.g., plot plans showing equipment or piping details) and privileged information (PRIV) (e.g., cultural resources material containing location, character, or ownership information; trade secret information; proprietary information) are considered CUI. This information should be filed as non-public and labeled as: "**CUI//CEII**" (18 CFR 388.113), "**CUI//PRIV**" (18 CFR 388.112), and as otherwise appropriate with other statutes for labeling CUI (e.g., "**CUI//CEII/SSI**" and in accordance with 49 CFR 15.13 marking requirements). All CUI should be filed separately from the remaining information, which should be marked "**Public**." For assistance with the Commission's eFiling system, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

If you have any questions, please contact me at (202) 502-6287. Thank you for your cooperation.

Sincerely,

Kevin Bowman
Special Advisor, Division of Gas-
Environment and Engineering
Office of Energy Projects

Enclosures (2)

cc: VIA FERC Service

**Constitution Pipeline Project
Docket No. CP13-499
Environmental Information Request**

General

1. Provide updated agency correspondence and meeting notes since the January 30, 2026 filing and indicate the current status of all applicable permitting.
2. Provide updated information on the status of and/or reaffirmation of compliance for each Condition of the Certificate Order.
3. Indicate whether estimated greenhouse gas emissions resulting from construction and operation of the Project have changed since issuance of the October 2014 final environmental impact statement (FEIS) in CP13-499 and CP13-502.

Accounting

4. Provide an Exhibit K reflecting the updated cost for the Project.

Rates

Instructions for the spreadsheets to be provided in response to this data request: all workpapers must be submitted, with formulas, in spreadsheet format acceptable under the Commission's eFiling rules, such as Microsoft Excel. All spreadsheets must contain all the formulas necessary to calculate the requested rates. If the spreadsheets use macros, functions or other techniques to perform iterative functions, Constitution should provide an explanation of the macros or functions used, where they are located, and how to initiate those functions. All macros and functions should not be set at a default state to run upon opening the spreadsheet. All formulas, variables and results should be visible and not hidden. The spreadsheets should not use security features that prevent copying, modification, or printing – although Constitution may provide separate spreadsheets that do have these features activated. The spreadsheets should not contain any links to sources outside the spreadsheet document.

5. Provide Constitution's revised cost of service and maximum recourse rates for the proposed Project consistent with all changes required by the December 2, 2014 Order Issuing Certificates and Approving Abandonment (Certificate Order).¹

¹ *Constitution Pipeline Co., LLC*, 149 FERC ¶ 61,199 (2014).

Include all relevant exhibits and calculations.

6. Provide Constitution's *pro forma* tariff records to reflect changes that have occurred since the Certificate Order was issued, including all changes required in the Certificate Order and all updates to the North American Energy Standards Board standards.
7. Revise Constitution's exhibits and related calculations in its workpapers to reflect the current federal corporate tax rate of 21%.

2025 Petition (December 19, 2025)

8. Revise the alignment sheets (attachment F) to include proposed aboveground facilities (i.e., mainline valves [MLVs] and pig launcher/receivers).

Attachment I - Environmental Consistency Summary (December 19, 2025)

9. Section 1.10 states "There have been no *substantial* (emphasis added) changes in environmental conditions or Project design since the FEIS, the 2014 [Certificate] Order, and associated [Notice to Proceed with Construction]." In order to confirm what changes (if any) are proposed, provide a detailed and descriptive table(s) listing (including mileposting where applicable) only the additions/changes (changes/revisions could include different dimensions and/or locations) made to the previously authorized Project, including but not limited to:
 - a. right-of-way width changes (widened or narrowed);
 - b. additional temporary workspaces (ATWS);
 - c. contractor yards;
 - d. aboveground facilities including MLVs, meter and regulation (M&R) stations, and tap facilities (note that Table 1.2-3 appears to show different names / road names for MLVs #2 and #9);
 - e. cathodic protection groundbeds;
 - f. temporary and permanent access roads (including improvements that have changed and noting the possible changes to MLVs #2 and #9 listed above which could indicate new or modified access roads);
 - g. route changes that have shifted the alignment (temporary and/or permanent rights-of-way) from the exact location previously approved;
 - h. road, highway, and railroad crossings that have been added/changed (provide new location by milepost (MP) as applicable);
 - i. new/changed activities that would require 24-hour construction;

- j. blasting locations;
 - k. areas (if applicable) that changed from temporary effects to permanent effects and vice-versa; and
 - l. new/changed crossing methods for waterbodies, wetlands, roads, railroads, nearby residences, and sensitive lands (such as trail crossings).
10. Clarify whether the design or type of equipment used for construction or to operate the M&R stations or MLVs has changed since issuance of the Certificate in a way that could affect environmental effects, such as air emissions or fugitive leaks of natural gas.
 11. Section 1.2 states “Constitution proposes to begin pipeline construction in the fourth quarter of 2026 for in service by fourth quarter 2027.” However, page 41 of the 2025 Petition states “Constitution requests the Commission expeditiously issue an order reissuing the certificate for the Project so that Constitution can complete construction of the Project facilities and place the Project in service by May 2028.” Resolve the apparent discrepancy. In addition, clarify, or provide an updated construction schedule including anticipated start date and end dates, duration, and daily schedule (e.g., 7:00 am to 7:00 pm or daylight hours Monday through Saturday).
 12. Table 1.2-4 lists the design capacity for the Turnpike Road M&R Receipt Station as “500^c.” Provide a definition for footnote “c.”
 13. Table 1.3-1 lists cathodic protection ground beds as TBD with a footnote of “Cathodic Protection Ground Bed land requirements will not be calculated until detailed design.” Land requirements for cathodic protection systems were previously included in the FEIS (see table 2.1.2-2). Update table 1.3-1 to include cathodic protection ground bed land requirements and clarify if the currently proposed locations, dimensions, etc. have changed.
 14. Table 1.7-1 states “Constitution will evaluate status of easements and obtain as applicable” regarding easements for the proposed crossings of state forest property (Melondy Hill and Clapper Hollow). Provide an update on the status of these easements. In addition, table 1.7-1 states “NYSHSP provides updated list of state listed species which includes dragonfly and yellow lamp mussel as newly listed.” However, table 1.10-3 does not include dragonfly, yellow lamp mussel is listed as “unlisted,” and the text in section 1.10.3 states “One new unlisted species, spatterdock darner, was identified during the 2025 submission.” Resolve the apparent discrepancies.
 15. The following resources were addressed in the FEIS but were not discussed in the Environmental Consistency Summary. Provide updated information for each resource which addresses any changes to these resources in the Project area. Also include proposed avoidance, minimization, and mitigation measures (as appropriate):

- a. New oil and gas production facilities;
- b. New/changed quarry operations;
- c. New natural gas pipelines constructed in the Project area;
- d. New/changed utility collocation;
- e. New/changed adjacent non-Project related rights-of-way (address if these new rights-of-way would require route modifications and/or different construction techniques);
- f. Seismic activity;
- g. Landslide potential areas;
- h. New/changed areas of contaminated soils and groundwater;
- i. New/changed groundwater and surface water supply areas, both private and public (see comments 20260120-5056 and 20260120-5034);
- j. New/changed septic systems;
- k. New/changed prime farmland areas;
- l. New/changed state designated aquifers and/or wellhead and aquifer protection areas;
- m. New/changed vegetation types, including vegetation communities of special concern or value;
- n. New/changed species affected/effects on migratory birds, bald eagles (including new surveys for eagle nests), and other raptors [per section 1.10.3, “Constitution will consult with the applicable agencies and will update the mitigation measures if required.”];
- o. New/changed wildlife species and/or habitats (including sensitive habitats) [per section 1.10.3, “Constitution is in ongoing consultation with the applicable resource agencies to determine if additional resources have emerged since 2014, as outlined below.”];
- p. New/changed state wetland classifications;
- q. New/changed designated scenic rivers or Nationwide Rivers Inventory streams;
- r. New/changed FEMA flood hazard zones;
- s. New/changed invasive species (include plants and animals, and terrestrial and aquatic species, such as the rusty crayfish mentioned in comment 20260421-5034) which could require changes to Constitution’s State-specific Invasive Species Management Plans. Update the status of coordination with Pennsylvania Department of Conservation and Natural Resources, New York State Department of Environmental Conservation

(NYSDEC), and New York State Department of Agriculture and Markets regarding whether the state-specific invasive species management plans are still up-to-date;

- t. New/changed Pipeline and Hazardous Materials Safety Administration class locations and high consequence areas and describe any associated proposed changes to the Project’s design to comply with new designations;
 - u. New/changed special use areas, specialty crops, recreational use areas;
 - v. New/changed conservation easements or other land use restrictive easements;
 - w. New/changed agricultural drainage tiles and/or irrigations systems;
 - x. New/changed agricultural districts and/or organic farms;
 - y. Socioeconomic factors including population, employment, housing, public services, and transportation/traffic; and
 - z. New/changed ecotourism businesses.
16. Regarding crossing methods for Starrucca Creek and its tributaries, section 1.10.2 states “*When available, Constitution will file any updates in a supplemental filing.*” Provide updated information regarding proposed crossing methods for Starrucca Creek and its tributaries. Similarly, indicate whether proposed crossing methods have changed for Roaring Run (upgraded to Wild Trout Waters – Natural Reproduction) and its associated wetlands (designated as Exceptional Value). Denote if any proposed waterbody crossing methods/mitigation measures have changed as a result of coordination with the Pennsylvania Department of Environmental Protection (PADEP) regarding these waterbody crossings.
17. Indicate whether any proposed waterbody crossing methods/mitigation measures have changed in New York as a result of coordination with the NYSDEC regarding waterbody crossings, particularly for those waterbodies that are subject to upgraded waterbody classifications by NYSDEC.
18. The header for section 1.10.3 includes “Fisheries” but the section does not include a discussion of aquatic resources/fisheries. Provide a discussion of changes to aquatic resources/fisheries in the Project area including (but not limited to) water quality classifications and fisheries of special concern.
19. Section 1.10.3 states Constitution is still evaluating source water for hydrostatic testing. Provide:
- a. proposed source water locations, volumes, and withdrawal rates;
 - b. the results of any associated agency coordination and status of any recommended mitigation; and

- c. indicate the anticipated discharge location, volume, and rate for each hydrostatic test water discharge.
20. Table 1.10-1 (Federal Threatened and Endangered Species) states survey results for 2025 Information for Planning and Consultation (IPaC) species are “TBD.” Provide updated survey data and an effect assessment for the newly-identified species listed in IPaC and indicate whether the IPaC results are still current. Also, clarify if updated surveys will be conducted for the Northern long-eared bat.
21. Table 1.10-2 (Pennsylvania Threatened and Endangered Species) states survey results for timber rattlesnake are TBD (the only 2025 Pennsylvania Natural Diversity Inventory [PNDI] species listed). Provide updated survey results for timber rattlesnake, as recommended by the Pennsylvania Fish and Boat Commission in its July 25, 2025 letter.
22. Table 1.10-3 (New York Rare, Threatened, and Endangered Species) states survey results for 2025 New York Natural Heritage Program (NYNHP) species are “TBD.” Provide updated survey results for the 2025 NYNHP species, including spatterdock darner.
23. Provide an update on the status of reinitiation of tribal consultations with all federally recognized Tribes with interest in the Project Area.
24. Provide updated stone pile treatment plans for the previously identified stone piles based on previous requests for modifications to the treatment plans from the tribes regarding the sites.
25. Provide a summary update on the status of specific requests made by the New York and Pennsylvania State Historic Preservation Officers (SHPOs) in their August 15 and August 27, 2025 letters, respectively, for FERC’s compliance with section 106 of the National Historic Preservation Act. Also, provide an update regarding the status of section 106 consultation with the SHPOs including the sufficiency of prior investigations (including any changes in recommended survey methods). This update should include discussion of any applicable new cultural resources studies within the area of potential effects since the last studies were completed for the original Project.
26. Provide a summary of all cultural resources studies completed to date for the Project. Include what percentage of the Project area of potential effects still requires field surveys for identification efforts, avoidance plans, National Register of Historic Places (NRHP) evaluations, and effect determinations. Also provide the status of consultation with the SHPOs on these studies.
27. Clarify if there are any historic structures since the last cultural resources studies were completed for the original Project that are now 45 years old, or older, and could be eligible for the NRHP. If so, provide an inventory, NRHP evaluation, and recommendation of findings of effect for the structures and provide the status of consultation with the SHPO(s).

28. For each horizontal directional drill (HDD) or direct pipe installation entry or exit location and each new meter station:
 - a. Identify any new NSAs within ½ mile of the HDD or direct pipe entry or exit site or new meter station location and provide an updated acoustical analysis for the Project facilities;
 - b. a description of any noise mitigation that would be implemented during drilling activity to reduce noise impacts attributable to the equipment associated with drilling activities at the new NSAs below 55 dBA Ldn; and
 - c. a topographic map showing the distance and direction of the nearest NSAs.
29. Provide an updated table, identifying by milepost, all US Department of Transportation Class Locations; and Moderate and High Consequence Areas (as defined in 49 CFR 192.903) for the proposed route; and explain the basis for HCA identification.
30. Section 1.12.3 states “In 2025, Constitution reviewed the Approved Route and identified four areas where changes in land use or landowner obstructions may require route realignment or workspace adjustments, or coordination with the landowner if the obstruction may be relocated. One of these potential conflicts is in Pennsylvania and three are in New York as specified in Table 1.22-1. Constitution will continue coordinating with affected landowners, agencies, and other stakeholders to assess these areas and determine whether any variances are necessary, or if other resolution with the landowner is a viable alternative.” Provide updates on proposed resolutions for the four areas depicted in table 1.22-1.
31. Regarding Attachment D, provide a table for projects considered for potential cumulative effects with data columns for:
 - a. project/company relevant action description/location;
 - b. status/estimated construction date;
 - c. action components overlapping with Project’s geographic scope and approximate closest distance (miles) to the Project;
 - d. approximate action component effects within the Project’s geographic scope;
 - e. anticipated temporal overlap; and
 - f. overlapping geographic scope(s).
32. Regarding Attachment G, provide an update regarding landowner/utility operator coordination and/or a plan for each instance where it appears that new, non-project right-of-way may overlap with proposed, right of way, such as at MPs 1.6, 8.05, 12.36, and 25.5.

Environmental Consistency Summary Supplement (January 30, 2026)

33. Section 1.3.1 provides additional information regarding new water wells that were identified within 150 feet of the Approved Route construction workspace based on review of desktop data sources. Indicate whether applicable landowners and water utilities have been contacted regarding the potential for private or public wells established since issuance of the Certificate. Clarify if any new springs have been identified within 150 feet of proposed construction workspace.
34. Table 1.3-5 footnote b states “New York Wetland Classification (6 NYCRR Chapter X Part 664): To be determined (TBD) once verification surveys are completed.” Provide a schedule for when surveys will be completed and this information filed with the FERC.
35. Provide any updated correspondence with the U.S. Army Corps of Engineers regarding the information requested in their October 31, 2025, letter (Attachment B-1 of Constitution’s January 30, 2026, supplemental filing).
36. Section 1.3.3 states “No new occupied residences are present within 25 feet (i.e., all identified homes were part of the Approved Route); therefore, no additional site-specific plans or mitigation measures are required.” Clarify if any of the residences within 25 feet of the proposed Project are new landowners (i.e., ownership changed since issuance of the FEIS, Order, and NTP).
37. Table 1.3-6 (Residences and Other Structures within 50 Feet of the Construction Work Area for the Constitution Pipeline) includes several structures in **bold** type. Clarify what the **bold** type denotes. Provide an update regarding landowner coordination and/or a plan for each of the eight structures (and any others) that would be located within the proposed workspaces (i.e., where the approximate distance and direction from the construction work area equals 0 in Table 1.3-6).
38. Section 1.3.3 states Constitution has identified two new planned developments within the Project area. Provide updated information about these developments including potential effects and proposed avoidance and/or mitigation measures, including coordination with these landowners and/or developers.
39. Project emissions within Schoharie County, New York were previously analyzed for General Conformity applicability under the 1997 8-hour ozone standard. Although this standard has been revoked, the nonattainment area designation still exists, and general conformity requirements still apply to federal actions that would be taken within designated nonattainment areas.² Provide updated

² See *South Coast Air Quality Management Dist. v. EPA*, 882 F.3d 1138 (D.C. Cir. 2018) (*South Coast II*) (finding that the EPA could revoke a NAAQS but could not revoke a designation, so anti-backsliding measures, including general conformity, still apply in nonattainment and maintenance areas).

quantified emissions of criteria pollutants (nitrogen oxides and volatile organic compounds) in tons per year for Schoharie County, New York for each year of estimated construction.

**Wright Interconnect Project
Docket No. CP13-502
Environmental Information Request**

General

1. Provide updated information and/or reaffirmation of compliance for each (applicable) Condition of the Certificate Order.
2. Provide an updated permits, approvals, and consultations table (similar to table 1.5-1 of the FEIS). Include copies of agency correspondence and meeting notes related to Iroquois's Petition and indicate the current status of all applicable permitting.
3. Provide updated IPaC results for federally listed species that may be affected by the Project. For any species that were listed or proposed to be listed after the 2014 FEIS, provide survey information, an assessment of the Project's potential impacts, and an effect determination.
4. Indicate if any new state-listed species that were not considered in the 2014 EIS would be affected by the Project and, if so, provide an assessment of the potential impacts on each species, including survey information as necessary.
5. In the 2014 Final EIS, emissions within Schoharie County, New York were analyzed for General Conformity applicability under the 1997 8-hour ozone standard. Although this standard has been revoked, the nonattainment area designation still exists, and general conformity requirements still apply to federal actions that would be taken within designated nonattainment areas.³ Provide updated quantified emissions of criteria pollutants (nitrogen oxides and volatile organic compounds) in tons per year for the expansion and modifications of the existing Wright Compressor Station within Schoharie County, New York for each year of estimated construction.
6. Provide a narrative of the air dispersion modeling required for the New York State Department of Environmental Conservation's (NYSDEC) air permitting process for the Wright Compressor Station expansion. If air dispersion modeling is not required per the states' permitting process, explain the information, criteria, or

³ See *South Coast Air Quality Management Dist. v. EPA*, 882 F.3d 1138 (D.C. Cir. 2018) (*South Coast II*) (finding that the EPA could revoke a NAAQS but could not revoke a designation, so anti-backsliding measures, including general conformity, still apply in nonattainment and maintenance areas).

methodology that NYSDEC will require of Iroquois to demonstrate compliance with the Clean Air Act. Also, provide:

- a. a status update on submittal of the applicable air permit application; and
- b. an updated air dispersion modeling analysis of the Wright Compressor Station expansion disclosing the air quality impacts from criteria pollutants in comparison to the National Ambient Air Quality Standards (NAAQS); and state ambient air quality standards, if different.

Provide all source input parameters (emission rate, stack height, stack temperature, exit velocity, etc.), and justify the bases for any assumptions. Provide a description on how the modeling was performed (for example, identify the specific model number, meteorological data source, terrain data, source parameters, building information, receptor grids, NO₂/NO_x conversion, post-processing assumptions, etc.). Provide the background monitors used and justify their use. Provide input data, as well as output data showing maximum impacts outside the fenceline (the EPA-defined ambient air boundary), and at sensitive receptors in the area (schools, hospitals, nursing homes, etc). Provide the input and output files as outlined in the attached document titled *Guidance for Filers: How to Transmit Files that cannot be eFiled to FERC* or contact FERC staff for directions on how to submit the modeling files.

7. Identify any new NSAs within one mile of the modified Wright Compressor Station location and provide an updated acoustical analysis for the Project facilities, including:
 - a. a description of any noise mitigation that would be implemented during operational activity to reduce noise impacts attributable to the equipment at the new NSAs below 55 dBA L_{dn}; and
 - b. a topographic map showing the distance and direction of the nearest NSAs.
8. Regarding projects considered for potential cumulative effects, particularly for air quality and noise, provide a table with data columns for:
 - a. project/company relevant action description/location;
 - b. status/estimated construction date;
 - c. action components overlapping with the Project's geographic scope and approximate closest distance (miles) to the Project;
 - d. approximate action component effects within the Project's geographic scope;

- e. anticipated temporal overlap; and
- f. overlapping geographic scope(s).

Accounting

9. In Exhibit K, Iroquois Gas Transmission, L.P. (Iroquois) estimates total capitalized Allowance for Funds Used During Construction (AFUDC) to be approximately \$11,279,000. Provide the following in Microsoft Excel:
 - a. The worksheet computations on a monthly basis to support the \$11,279,000 of AFUDC. Separately identify the debt/equity components.
 - b. The computation and methodology to support the debt/equity cost rates used to derive the AFUDC rate.

The worksheets and/or files should retain all notes and any formulas supporting the calculation.

10. Iroquois proposes to lease the incremental capacity associated with its project to Constitution Pipeline Company, LLC. Provide the proposed accounting for the capacity lease.
11. Iroquois proposes to include estimated engineering and inspection costs of \$8,139,000 as a component of construction. Explain the nature of these costs and clarify whether they are associated with construction or post-construction activities.
12. Iroquois proposes to include estimated contingency costs of \$29,963,000 as a component of construction. Describe the nature of these costs and provide details on how the estimate for capitalized contingency costs was developed.

Rates

Instructions for the spreadsheets to be provided in response to this data request: all workpapers must be submitted, with formulas, in spreadsheet format acceptable under the Commission's eFiling rules, such as Microsoft Excel. All spreadsheets must contain all the formulas necessary to calculate the requested rates. If the spreadsheets use macros, functions or other techniques to perform iterative functions, Iroquois should provide an explanation of the macros or functions used, where they are located, and how to initiate those functions. All macros and functions should not be set at a default state to run upon opening the spreadsheet. All formulas, variables and results should be visible and not hidden. The spreadsheets should not use security features that prevent copying, modification, or printing – although Iroquois may provide separate spreadsheets that do

have these features activated. The spreadsheets should not contain any links to sources outside the spreadsheet document.

13. Provide Iroquois's *pro forma* tariff records to reflect updates to its measurement variance/fuel use factor as required in the December 2, 2014 Order Issuing Certificates and Approving Abandonment (Certificate Order).

Engineering

14. Verify the facilities proposed to be constructed under the project. Include the number, size, and type of compressor unit(s).
15. File electronically the pipeline simulation models supporting the flow diagrams filed in Attachment B to Iroquois' petition. Ensure the flows and compression in the hydraulic models match the application and flow diagrams filed. Provide an explanation of any discrepancies.
16. Provide a Flow and Pressure Table listing the point name, pressure, and volume of gas at each boundary point identified in the flow diagrams for both the existing and proposed operating scenarios.
17. Pursuant to section 157.14(a) of the Commission's regulations,⁴ ensure that each receipt and delivery point mentioned in the petition and all attachments is labeled with the location point name and code in conformity with section 284.13(f).⁵

⁴ 18 C.F.R. § 157.14(a).

⁵ 18 C.F.R. § 284.13(f).