

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E
Constitution Pipeline, LLC
Docket No. CP13-499-006
Iroquois Gas Transmission System, L.P.
Docket No. CP13-502-003
§ 375.308(x)

June 25, 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 & General Counsel
Iroquois Pipeline Operating Company
Iroquois Gas Transmission System, L.P.
One Corporate Drive, Suite 600
Shelton, CT 06484

Re: Environmental Information Request No. 2

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 Project (Projects). 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 15 days of the date of this letter.** For any delayed responses, 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

Digitally signed by
KEVIN BOWMAN
Date: 2026.06.25
14:14:41 -04'00'

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

Enclosures (2)

**Constitution Pipeline Project
Docket No. CP13-499-006
Information Request**

Environmental

1. Revise table 1.7-1 to include specific permit submittal and anticipated approval dates for each permit and include the U.S. Environmental Protection Agency (EPA), the Delaware River Commission, the New York State Department of Transportation, New York State Department of Agriculture and Markets, and the local and county entities previously included in table 1.5-1 of the final Environmental Impact Statement [EIS] (or indicate why they are no longer applicable).
2. Constitution's response to the May 5, 2026 Environmental Information Request (EIR) No. 15s states "Constitution will coordinate with the [Pennsylvania Department of Conservation and Natural Resources] PADCNr and [New York State Department of Environmental Conservation] NYSDEC to confirm whether the state-specific Invasive Species Management Plans remain current." Clarify when such coordination will occur.
3. Constitution's response to EIR No. 15v states "Within 2 months of the May 22, 2026, response Following reinstatement of the Certificate Order, these surveys will be conducted as needed and applicable measures will be assessed." Clarify if the timing is within 2 months of the May 22, 2026 response or following any reinstatement, if so, of the Certificate Order.
4. Constitution's response to EIR No. 18 regarding fisheries and aquatic resources states "The Project's environmental review and permitting process has involved close coordination with state and federal agencies to identify these sensitive resources and to develop avoidance, minimization, and mitigation measures." Given that prior coordination is approximately 12 years old, provide updated coordination with relevant agencies and discuss updates, if any, regarding identification of sensitive resources, potential impacts, and mitigation measures. Indicate specifically when updated coordination with the applicable agencies will occur.
5. Constitution's response to EIR No. 20 states that "recent consultation with the New York [NY] Natural Heritage Program indicated that ten hibernacula are present within four miles of the proposed route, one as close as 0.15 mile." File details regarding the location of these hibernacula, including distance and direction from the proposed route, as privileged information as applicable. Discuss potential impacts, avoidance, and minimization measures and provide any

recent consultation with the U.S. Fish and Wildlife Service regarding these hibernacula.

6. Constitution's response to EIR No. 22 states that "yellow lampmussel is unlikely to be present in the Project workspace." Further clarify and justify that statement given that the EIR No. 22 response also indicates that live yellow lampmussel specimens were found during 2015 surveys in Schoharie Creek. In addition, the EIR No. 22 response states that "... suggests that no impacts to Hooker's orchid or northern wild comfrey are anticipated from the pipeline project." However, the same response states that "some parcels could not be accessed due to landowner restrictions." Clarify how habitat suitability, presence/absence, and potential impacts can be assessed if some areas have not yet been surveyed.
7. Provide any recent correspondence with the U.S. Fish and Wildlife Service regarding consultation under Section 7 of the Endangered Species Act.
8. The EIS stated that Constitution would cross 289 waterbodies. However, Constitution's January 30, 2026 supplement states that 330 waterbodies would be crossed. Please explain or correct this discrepancy.
9. Constitution's response to EIR No. 26 states that 12 sites in Pennsylvania and several more in New York require National Register of Historic Places eligibility evaluations and the development of avoidance or Phase II work plans. Provide the exact number of sites in New York that have been identified to date that are currently unevaluated for listing in the NRHP. Further, provide the exact percentage of the area of potential effects that has not been surveyed to date.
10. Constitution's response to EIR No. 27 states that up to 50 additional properties over 45 years of age require further survey and that assessment of these properties will continue following reissuance of the Certificate Order. Provide (as privileged if necessary) a list of the additional properties over 45 years of age that have been identified to date, including details such as a description, nearest milepost, direction and distance from nearest milepost, property name, and survey/evaluation status. Provide the exact percentage of the area of potential effects that has not been surveyed to date for these additional properties over 45 years of age.
11. Confirm whether the individuals associated with the following comments are not (or are no longer) directly affected landowners. If they are directly affected landowners indicate whether Constitution is communicating with the landowners regarding potential effects on environmental resources and/or landowner concerns (**bold** font in the accession nos. listed below denotes an apparent "new" landowner who may have obtained the property after issuance of the 2014 Final EIS):
 - a. 20260129-5082;
 - b. 20260128-5056;

- c. 20260127-5001;
 - d. 20260129-5089;
 - e. 20260325-5110;
 - f. 20260202-0011;
 - g. 20260129-5040;
 - h. 20260501-5130;
 - i. **20260420-5224**;
 - j. **20260420-5019**; and
 - k. 20260526-0001.
12. Provide a response to the following comments and address whether the specific environmental resources and/or stakeholder/landowner concerns identified would be impacted, and if so whether (and how) the stated impacts could be avoided, minimized, and/or mitigated (**bold** font in the accession nos. listed below denotes an apparent “new” landowner who may have obtained the property after issuance of the 2014 Final EIS):
- a. 20260120-5000;
 - b. **20260126-5078**;
 - c. **20260127-5125**;
 - d. **20260128-5059**;
 - e. 20260129-5330;
 - f. **20260126-5139**;
 - g. **20260127-5127**;
 - h. 20260127-5153;
 - i. 20260129-5013;
 - j. **20260129-5124**;
 - k. 20260128-5040;
 - l. **20260421-5002**;
 - m. 20260429-5128;
 - n. **20260430-5180**;
 - o. 20260501-5392;
 - p. 20260504-5049;
 - q. **20260504-5356**;

- r. **20260202-0004**; and
 - s. 20260605-5017.
13. Due to changes at the Capital Career and Technical School (comment letter 20260504-5271) since the Final EIS, provide a response to the comment letter and address whether the specific landowner concerns identified would be impacted, and if so whether (and how) the stated impacts could be avoided, minimized, and/or mitigated.

Accounting

14. In Exhibit K, Constitution estimates total capitalized Allowance for Funds Used During Construction (AFUDC) to be approximately \$124,846,000. Provide the following in Microsoft Excel:
- a. The worksheet computations on a monthly basis to support the \$124,846,000 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.
15. Constitution proposes to include estimated engineering and inspection costs of \$62,197,609 as a component of construction. Explain the nature of these costs and clarify whether they are associated with construction or post-construction activities.
16. In the related filing in Docket No. CP13-502-003, Iroquois represents that it will lease capacity on the Wright Interconnect Project to Constitution. However, Constitution did not note this in its application. Confirm that Constitution proposes to use Account 858 (Transmission and Compression of Gas by Others) to record lease payments to Iroquois.

**Wright Interconnect Project
Docket No. CP13-502-003
Information Request**

Environmental

1. Revise the table provided in Data Request 2 - Attachment to include specific permit submittal and anticipated approval dates for each permit.
2. Provide a discussion of the feasibility of using electric-motor-driven compressors for the proposed Wright Interconnect Project. Provide the rate of electricity required and the number of electric motors required. Compare the size of the electric transmission line necessary under the current proposal with what would be required for the electric motors. In addition, provide analyses of the emissions produced to generate the electricity for the Wright Interconnect Project using the EPA's AVOIDed Emissions and geneRATION Tool (AVERT). (See scoping comment accession #20260129-5243.)

Accounting

3. In its May 22, 2026 response, Iroquois provided its general accounting for leases. However, it did not provide its accounting for its capacity lease receipt associated with the revenue received from Constitution. Confirm that Iroquois proposes to use Account 489.2 (Revenues from Transportation of Gas of Others Through Transmission Facilities) to record capacity lease receipts.