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SHELTON, CT 06484-6211

July 10, 2026

BY ELECTRONIC TRANSMISSION

The Honorable Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: OEP/DG2E
Iroquois Gas Transmission System, L.P.
Constitution Pipeline Project
Docket Nos. CP13-499-006 and CP13-502-003
Responses to June 25, 2026 Environmental Information Request

Dear Secretary Reese:

On February 13, 2026, Iroquois Gas Transmission System, L.P. ("Iroquois") submitted a request in the referenced docket for a reissuance of a certificate of public convenience and necessity for its proposed Wright Interconnect Project ("WIP"). On June 25, 2026, the Commission's Staff issued to Iroquois an Environmental Information Request seeking additional information from Iroquois in connection with the WIP ("June 25 Data Requests"). Iroquois is hereby submitting its responses to the June 25 Data Requests.

Please contact the undersigned if there is any additional information you require or if you have any questions about this submission.

Respectfully submitted,

/s/ Kimberly A.E. Pritchard
Kimberly A.E. Pritchard
Vice President and General Counsel

Enclosures

cc: Kevin J. Bowman, FERC Office of Energy Projects (w/enc)
All Parties on Service List

CERTIFICATE OF SERVICE

On this, the 10th day of July, 2026, I hereby certify that I have caused the delivery, by electronic transmission, of a true and correct copy of the foregoing Responses to June 25, 2026 Data Request, to all parties listed on the official service list compiled by the Office of the Secretary for this matter.

Daniel P. Archuleta

Daniel P. Archuleta

OEP/DG2E
Constitution Pipeline Company, LLC
Constitution Pipeline Project
Iroquois Gas Transmission System, L.P.
Wright Interconnect Project
Docket Nos. CP13-499-006 and CP13-502-003

**Response of Iroquois Gas Transmission System, L.P. to
June 25, 2026 Data Request
Dated: July 7, 2026**

Data Request:

1. Revise the table provided in Data Request 2 - Attachment to include specific permit submittal and anticipated approval dates for each permit.

Iroquois Response:

The attached spreadsheet has been revised. The updated table reflects Iroquois' information related to the Wright Interconnect Project. Constitution's updated information can be found in a separate response related to the Constitution Pipeline, Docket CP13-499-006.

Respondent:
Iroquois Pipeline Operating Company
Daron Kleppe
Manager, Engineering Services
(203) 925-7272

OEP/DPC/CB-2
Constitution Pipeline Company, LLC
Constitution Pipeline Project
Iroquois Gas Transmission System, L.P.
Wright Interconnect Project
Docket Nos. CP13-499-006 and CP13-502-003

**Iroquois Gas Transmission System, L.P.
Wright Interconnect Project – Docket No. CP13-502**

**Data Request 1
Attachment**

Agency Type	Agency	Permit/Approval/Consultation	Agency Action	Iroquois Status
Federal	FERC	Certificate of Public Convenience and Necessity	Determine whether the proposed project is in the public interest, and consider issuance of a Certificate.	Iroquois filed a petition for expedited reissuance of certificate (originally filed June 13, 2013) and authority and approval of capacity agreements February 17, 2026.
Federal	COE	Section 404, CWA Permit	Issuance of a Section 404 permit for discharges of dredged or fill material into waters of the United States, including jurisdictional wetlands.	Not applicable
Federal	EPA	Section 404, CWA Permit	Review CWA, Section 404 wetland dredge-and-fill applications to the COE with 404(c) veto power for wetland permits issued by the COE.	Not applicable
Federal	EPA	CAA	Determination of General Conformity Applicability. Review and publicly comment on the environmental impacts of major federal actions.	Delegated to NYSDEC
Federal	FWS	Section 7 ESA Consultation Biological Opinion	Finding of impacts on federally listed or proposed species. Provide Biological Opinion if the project is likely to adversely affect federally listed or proposed species or their habitats.	In 2014, according to results of the 2014 EIS, no federally listed species were identified within the vicinity of the project. In 2026, an official species list was generated on 5/14/26. Results and additional information on the evaluation and determination for the other listed species are included in Resource Report #3. Coordination with USFWS is ongoing.
Federal	FWS	Migratory Bird Treaty Act	Provide comments to prevent taking or loss of habitat for migratory birds.	In May of 2026, consultation reinitiated with the USFWS. See above
Federal	FWS	Bald & Golden Eagle Protection Act	Provide comments to prevent taking or loss of habitat for bald and golden eagles.	In May of 2026, consultation reinitiated with the USFWS. See above
Federal	Federal Aviation Administration (FAA)	49 CFR Part 77.9	Review of communication tower specifications	Not applicable
Federal	Susquehanna River Basin Commission	Water Allocation Permit	Issuance of a Water Allocation Permit for withdrawal of surface water and groundwater.	Not applicable
Federal	Delaware River Basin Commission	Water Withdrawal Permit	Issuance of a Water Withdrawal Permit for withdrawal of surface water and groundwater.	Not applicable
State of Pennsylvania	PADEP Regional Bureaus of Watershed Management	Section 401 Water Quality Certification	Issuance of a Section 401 permit for discharge to waters of the United States.	Not applicable
State of Pennsylvania	PADEP Regional Bureaus of Watershed Management	Chapter 105	Issuance of a Chapter 105 permit for wetlands and water obstructions.	Not applicable
State of Pennsylvania	PADEP Bureau of Land and Water Conservation Division of Stormwater Management and Sediment Control	Chapter 102	Issuance of a Chapter 102 permit	Not applicable
State of Pennsylvania	PADEP Bureau of Water Quality Protection	CWA Section 402 National Pollutant Discharge Elimination System & General Permit for Hydrostatic Test Water Discharges	Issuance of a Section 402 & hydrostatic test water discharge permit.	Not applicable
State of Pennsylvania	Pennsylvania Department of Transportation	Highway Occupancy Permit	Issuance of a Highway Occupancy Permit for installation of utilities which serve the public.	Not applicable
State of Pennsylvania	Pennsylvania Department of Conservation and Natural Resources	Rare Species Consultation	Provide comments to prevent impacts on rare species.	Not applicable
State of Pennsylvania	Pennsylvania Fish and Boat Commission (PFBC)	Rare Species Consultation	Provide comments to prevent impacts on rare species.	Not applicable
State of Pennsylvania	Pennsylvania Fish and Boat Commission (PFBC)	Permit for Use of Explosives in Commonwealth Waters	Permit for blasting in waterbodies.	Not applicable
State of Pennsylvania	Pennsylvania Fish and Boat Commission (PFBC)	Chapter 93 Water Quality Determinations	Review and comment on water quality designations.	Not applicable
State of Pennsylvania	PA Game Commission (PAGC) PA Department of Conservation and Natural Resources (PADCNR)	Rare Species Consultation	Provide comments to prevent impacts on rare species.	Not applicable
State of Pennsylvania	Pennsylvania Historical and Museum Commission Bureau of Historic Preservation	Section 106, NHPA Consultation	Review and comment on the project and its effects on historic properties.	Not applicable
State of Pennsylvania	Susquehanna County/Municipalities	County/Municipal Road Opening Permits	Permits for impacts on roads.	Not applicable

State of Pennsylvania	Susquehanna County Planning Commission	Plan Certification Under Article VII (Commercial and Industrial Land Development) Section 707.4 (Noise)	Permit for noise impacts	Not applicable
State of New York	NYSDEC	Joint Permit including: Article 15, Article 24, and CWA Section 401	Issuance of Water Quality Certificate	Not applicable
State of New York	NYSDEC	Article 15 Title 33	Permit hydrostatic test water withdrawal	Not applicable
State of New York	NYSDEC	Article 15 (Protection of Waters Program) and Article 24 (Freshwater Wetlands Act)	Issuance of Article 15 and 24 permits	Not applicable
State of New York	NYSDEC	SPDES General Permit - GP-0-25-001	Issuance of SPDES General Permit	Iroquois has not yet initiated the permit application process. As such, Iroquois does not expect to receive corresponding permit approvals before Q1 of 2027.
State of New York	NYSDEC	State Pollution Discharge Elimination System Program General Permit for Stormwater Discharges from Construction Activities (GP-02-01)	Issuance of permit for hydrostatic test Water discharge and trench dewatering.	Iroquois has not yet initiated the permit application process. As such, Iroquois does not expect to receive corresponding permit approvals before Q1 of 2027.
State of New York	NYSDEC	Air State Facility Permit	Permit for construction and operation of source air pollutant emissions	Iroquois has not yet initiated the permit application process. As such, Iroquois does not expect to receive corresponding permit approvals before Q1 of 2027.
State of New York	NYSDEC	Major Title V Greenhouse Gas Operating Permit	Permit for major potential source of greenhouse gases.	Iroquois has not yet initiated the permit application process. As such, Iroquois does not expect to receive corresponding permit approvals before Q1 of 2027.
State of New York	NYSDEC Bureau of Forest Lands Management	Temporary Revocable Permit	Issuance of Temporary Revocable Permit for use of state lands.	Not applicable
State of New York	New York State Office of Parks, Recreation and Historic Preservation, State Historic Preservation Office Office of Parks and Recreation Historic Preservation (OPRHP)	Section 106, NHPA	Review and comment on the project and its effects on historic properties.	Clearance received July 31, 2013. The project area has not changed. Iroquois is evaluating if further consultation is required.
State of New York	NYSDAM	Agricultural lands consultation	Consultation on crossing of agricultural lands.	Not applicable
State of New York	New York State Department of Transportation	Highway Occupancy Permit	Issuance of a Highway Occupancy Permit for installation of utilities which serve the public. Coordination on crossing design of Route 17, which will become Interstate 86.	Not applicable
State of New York	State Forest Properties (Melondy Hill and Clapper Hollow)	Easements	Granting of Easements	Not applicable
State of New York	NY State Natural Heritage Program (NYSHP)	State Threatened and Endangered Species Consultation	Provide comments to prevent impacts on rare species.	Consultation has been initiated as of May of 2026.
Local	County/Municipalities	County/Municipal Road Opening Permits	Permits for impacts on roads.	Not applicable
Local	Town of Wright, NY	Local Approvals for Compressor Buildings	Site Plan review, building permit, and State Environmental Quality Review Act review	Iroquois has not yet initiated the permit application process. As such, Iroquois does not expect to receive corresponding permit approvals before Q1 of 2027.

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June 25, 2026 Data Request
Dated: July 9, 2026**

Data Request:

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.)

Iroquois Response:

Electric-motor driven compressors ("EMDs") for the WIP are unfeasible due to the extended time and associated incremental costs to upgrade electric capabilities to serve the project site. The WIP would require two EMDs at an approximate total electric load of 20 MVA. Electric lines in the area would have to be upgraded at a cost of approximately \$32M and add almost six years to the project. The infrastructure would require extending dedicated 69/115 kV transmission service approximately 3 miles to the project station. The rate of electricity required would be National Grid Electric Service Classification 3. Furthermore, the additional costs for incremental electricity required by the EMD's are estimated at \$4.5M / year.

Assuming 20 MVA x 8760 hrs/year x 25% runtime = 43.8 GWh per year.

As reflected above, the calculated electricity requirement to operate two EMDs is approximately 43.8 Gigawatt-hour per year (GWh/yr). Factoring in estimated losses due to electrical transmission, the annual generation requirements becomes approximately 47.4 GWh/yr.

Emissions generated to produce and transmit the required electricity were determined using EPA's AVERT program and are summarized in the following table. The AVERT program estimates emissions using historical regional emission factors from EPA's air markets program data and national emission inventories.

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Pollutant	Emissions (pounds/year)
Sulfur Dioxide (SO ₂)	3,480
Nitrogen Oxides (NO _x)	14,500
Carbon Dioxide (CO ₂)	23,070
Particulate Matter (PM _{2.5})	4,520
Volatile Organic Compounds (VOC)	2,500
Ammonia (NH ₃)	2,640

Respondent:
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Daron Kleppe
Manager, Engineering Services
(203) 925-7272

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Dated: July 7, 2026**

Data Request:

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.

Iroquois Response:

Iroquois affirms that it will use the FERC account 489.2 for lease accounting associated with WIP lease revenue received from Constitution Pipeline.

Respondent:
Iroquois Pipeline Operating Company
Chris Lown
Director, Financial Services & Corporate Controller
(203) 944-7015 (office)

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