

Columbia Gas (TC Energy) Virginia Reliability Project & Transco-Williams Commonwealth Energy Connector Project - FERC Scoping Period Talking Points

Docket Numbers: PF22-3-000 / PF22-4-000

*Updated March 2022

Want additional information? Review: [FERC notice](#) or the overall pipeline [fact sheet](#) from the Sierra Club

Submit your comments by 5pm on April 6th, 2022 via eFile or eComment on <http://www.ferc.gov/> or by mail to:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
988 First Street NE, Room 1A
Washington, DC 20426

In your comments, please incorporate:

- 1) The docket number for either or both projects**
- 2) Involvement from the Office of Public Participation as an environmental justice area and/or consideration of new FERC [guidelines on climate change](#)**

Virginia Reliability Project:

TC Energy has two concurrent projects, the Virginia Electrification Project and the Virginia Reliability Project, which are aimed at upgrading the same set of compressor stations and pipeline. The VRP intends to replace 48 miles of pipe, increasing the size from 12in diameter to 24in diameter capacity, and upgrade a compressor station in Emporia to use electric turbines. The line runs south of Petersburg and into the Hampton Roads Region. The anticipated in-service date is November 2025, with construction beginning the year prior.

Commonwealth Energy Connector Project:

Transco-Williams has proposed almost 7 miles of new pipeline, a new compressor station in Mecklenburg County, and upgrades to an existing compressor station in Greenville County in order to ramp up capacity by 105,000 dt per day. The anticipated in-service date is the end of 2025, with construction beginning the year prior.

Potential Concerns

Climate Change: Any upgrades to fossil fuel infrastructure further entrenches an industry that is on its way out. Investments should be made in future sustainable infrastructure that meets energy needs.

FERC must consider its own changed guidelines to permitting fracked gas projects when evaluating these upgrades. The Commonwealth Energy Connector Project would bring the CO2 equivalent to over 2 million tons annually, putting it well above the threshold of 100,000 tons for “significant climate impacts,” without even including emissions from construction.

Environmental Justice: These communities are areas of legacy pollution and will require studies of baseline impacts before any future modeling. Additionally, there should be a consideration of cumulative impacts when assessing new projects. The terminus of these projects in the Hampton Roads region is

laden with superfund sites and has a clear determination of status as an environmental justice community by EJ Screen data.

There has not been significant or proper outreach into affected communities, with most living in the area unaware of the projects. Therefore, this case should be flagged by the newly founded Office of Public Participation. This would include outreach from: reaching out to major institutions (churches, community centers, schools and civic leagues), notices in media (print/digital/radio), door to door outreach in closest areas to project site, letters to all affected community members.

All historic and cultural resources need to be adequately accounted for using the best available technology, especially during periods of construction.

Segmentation: Both of these projects include identical upgrades to the Emporia Compressor Station in Greenville County. This is a case of segmentation and should not be allowed.

Challenging the narrative of public necessity: Mothers Out Front conducted a [study](#) of need in the Hampton Roads area for the proposed extension of the Atlantic Coast Pipeline that proved that there has been no increase in demand in recent years.