

THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER SCOTT M. STRINGER

April 6, 2021

Chairperson Richard Glick 888 First STreet, NE Washington, DC 20426

Dear Chairperson Glick and Commissioners of FERC:

We, the undersigned, urge you to deny Transco's request for a two-year extension to construct and place into service the Williams Northeast Supply Enhancement (NESE) Pipeline.

We stand behind the New York State Department of Environmental Conservation's (DEC) 2020 denial of the pipeline, which was explicitly based on the facts that construction would irreparably threaten the health and safety of New York Harbor, that the project is inconsistent with state climate law, and that the project is entirely is unnecessary when renewable alternatives are taken into account.

The DEC's denial also noted the massive public opposition to the Williams NESE Pipeline with over 16,000 public comments submitted concerning the state water quality permit. Thousands of additional comments were submitted against the project in the Public Service Commission (PSC) Case No. 19-G-0678 and hundreds of community members spoke at PSC, DEC and FERC public hearings vehemently opposing the Williams Pipeline.

We urge FERC to listen to those New York City residents who spoke about surviving Superstorm Sandy and fearing the devastating climate impacts this project would have on our frontline communities.

New York City has made its vehement opposition to this project known at every level. The New York City Council passed a resolution against the Williams Pipeline in 2019. 74 elected officials have opposed it, including 11 New York congressional members.

And we're not just opposing this project; we are enthusiastically supporting the renewable alternatives that could take its place. In PSC Case No. 19-G-0678 New Yorkers overwhelmingly supported meeting future energy needs with energy efficiency, demand response, and electrification.

BIPOC communities across New York City were some of the hardest hit by COVID-19 in part because of health impacts from decades of fossil fuel pollution. We will not allow the racist legacy of environmental and climate injustice to continue by building infrastructure that will increase the amount of polluting fracked gas in our city.

In the nearly two years since the Commission issued a Certificate of Public Convenience and Necessity for the project, much has changed. For example, the Commission recently ruled that it was appropriate to consider downstream greenhouse gas emissions when making assessments of proposed projects. In addition, new findings regarding leaked methane and other climate impacts have only added urgency to the need to closely scrutinize proposed infrastructure.

Given the substantial emissions impact that the Williams NESE project would have, these developments alone should render the project's current certificate obsolete. It now represents an outdated assessment of the project that no longer serves the public interest.

A report from Energy Futures Group¹ found that, in order for the Williams Pipeline to adhere to state climate law, 95% of its fracked gas would have to remain unburned.

Commissioner Glick, we agree with you that refusing to consider greenhouse gas emissions, especially upstream emissions, while declaring a pipeline to be environmentally safe "fails to give climate change the serious consideration it deserves and that the law demands."

We take climate change seriously, as we have already lost loved ones here in New York City to climate-fueled superstorms and heat waves that caused death, illness, debt, and scarcity.

For our constituents and for the future generations who will live with the consequences of allowing the Williams Pipeline to be built, we urge you to deny Williams' request and stop this fracked gas pipeline for good.

Sincerely,

Comptroller Scott Stringer

Senator James Sanders

Senator Jessica Ramos

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¹https://energyfuturesgroup.com/wp-content/uploads/2020/03/Critical-Elements-in-Short-Supply_EFG_March-9-2020-FINAL-posted.pdf

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Senator Joseph P. Addabbo, Jr.



Senator Julia Salazar



Senator Andrew Gounardes

MERC

New York State Senator Brian Kavanagh



Senator Brad Hoylman Senator Alessandra Biaggi





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Assemblymember Stacey Pheffer-Amato

Assemblymember Khaleel Anderson

Assemblymember Brian Barnwell



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Assemblymember Zohran Mamdani

Assemblyman Robert Carroll

Assemblymember William Colton

Assemblymember Emily

Gallagher

Assemblywoman Jo Anne Simon

Assemblymember Phara Souffrant Forrest

Assemblymember Harvey Epstein

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Rockaways District Leader Lew Simon

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Rockaways District Leader Jeanette Garramone

Council Member Carlina Rivera