



EAST TENNESSEE NATURAL GAS, LLC
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Houston, Texas 77079
(713) 627-5400

December 19, 2023

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *East Tennessee Natural Gas, LLC*, Docket No. CP23-516-____
Ridgeline Expansion Project
Amendment to Abbreviated Application for a Certificate of Public Convenience and
Necessity and Related Authorizations

Dear Ms. Bose:

Pursuant to Section 7(c) of the Natural Gas Act, as amended,¹ and Part 157, Subpart A of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,² East Tennessee Natural Gas, LLC (“East Tennessee”) hereby submits for filing an amendment (“Amendment”) to its Abbreviated Application for a Certificate of Public Convenience and Necessity and Related Authorizations (“Application”) for its proposed Ridgeline Expansion Project (“Project”), submitted on July 18, 2023 in the captioned docket.³ As described more fully in the Amendment, East Tennessee is amending its Application to reflect that its proposed Project now has approximately 8 miles of 30-inch diameter mainline at the end of the proposed pipeline in Morgan and Roane counties, Tennessee, in lieu of the same segment of originally proposed approximately 8 miles of 24-inch diameter lateral. This pipe diameter change will not change the environmental impacts associated with the Project, will not result in a change in the proposed workspace requirements or right-of-way necessary for the Project, nor will it affect any new landowners.

Included herewith are two volumes. Volume I contains public information and is comprised of the Amendment and its public exhibits, including Exhibit F-I (Environmental Report). Volume II contains Critical Energy Infrastructure Information (“CEII”) and is comprised of Exhibits G through G-I (flow diagrams).

Volume II is marked **“CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION—DO NOT RELEASE”**⁴ and **“CUI//CEII.”**⁵ CEII should be treated as confidential pursuant to Order Nos. 630, *et seq.* and is for use by Commission Staff only and is not

¹ 15 U.S.C. § 717f(c) (2018).

² 18 C.F.R. Pt. 157, Subpart A (2022).

³ Abbreviated Application for Certificate of Public Convenience and Necessity and Related Authorizations of East Tennessee Natural Gas, LLC, Docket No. CP23-516-000 (Jul. 18, 2023).

⁴ See 18 C.F.R. § 388.113(d)(ii) (2022).

⁵ See Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff, Accession No. 20170414-3009 (Apr. 14, 2017).

to be released to the public.⁶ East Tennessee is submitting this information as CEII because it contains specific engineering, vulnerability, and detailed design information that could be useful to a person in planning an attack on critical infrastructure. East Tennessee requests that this information be treated as CEII for the longest period of time permitted under the Commission's regulations (currently, five years), unless re-designated by the CEII Coordinator.

Questions pertaining to confidential information may be submitted to:

Anish George
Manager, Rates and Certificates
East Tennessee Natural Gas, LLC
P.O. Box 1642
Houston, Texas 77251-1642
Phone: (713) 627-5120
Email: anish.george@enbridge.com

Pursuant to the Commission's electronic filing guide,⁷ East Tennessee is eFiling this Amendment. In accordance with Rule 2011(c)(5) of the Commission's Rules of Practice and Procedure,⁸ I hereby state that I have read the electronic version of the filing and am familiar with the contents thereof; and that all of the statements contained herein are true and correct, to the best of my knowledge, information and belief.

⁶ *Critical Energy Infrastructure Information*, Order No. 630, 102 FERC ¶ 61,190, FERC Stats & Regs Regulations Preambles ¶ 31,140 (2003), 68 Fed. Reg. 9857 (Mar. 3, 2003), *order on reh'g*, Order No. 630-A, 104 FERC ¶ 61,106 (2003), 68 Fed. Reg. 46456 (Aug. 6, 2003).

⁷ Federal Energy Regulatory Commission Filing Guide/Qualified Documents List at p. 4 (Dec. 17, 2022), available at <https://www.ferc.gov/media/filing-guide-and-qualified-documents-list>.

⁸ 18. C.F.R. §385.2011(c)(5) (2022).

Ms. Kimberly D. Bose

December 19, 2023

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Should you have any questions regarding this filing, please contact Anish George, Manager, Rates and Certificates at (713) 627-5120 or the undersigned at (713) 627-4522.

Sincerely,

/s/ Estela D. Lozano

Estela D. Lozano

Director, Regulatory

Attachments

cc: Pamela Boudreau (FERC – Volume I only)
Rich McGuire (FERC – Volume I only)
Daniel Green (FERC – Volume I only)
Nancy Fox-Fernandez (FERC – Volume I only)

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

East Tennessee Natural Gas, LLC

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Docket No. CP23-516-___

**AMENDMENT OF EAST TENNESSEE NATURAL GAS, LLC
TO ABBREVIATED APPLICATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AND FOR RELATED AUTHORIZATIONS**

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

East Tennessee Natural Gas, LLC

)

Docket No. CP23-516-___

**AMENDMENT OF EAST TENNESSEE NATURAL GAS, LLC TO
ABBREVIATED APPLICATION FOR A CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY AND FOR RELATED AUTHORIZATIONS**

Pursuant to Section 7(c) of the Natural Gas Act (“NGA”), as amended,¹ and Part 157, Subpart A of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,² East Tennessee Natural Gas, LLC (“East Tennessee”) hereby files an amendment (“Amendment”) to its abbreviated application for a certificate of public convenience and necessity and for related authorizations (“Application”) for its Ridgeline Expansion Project (“Ridgeline Project” or “Project”).³ The Application includes an approximately 8-mile segment of pipeline in Morgan and Roane counties, Tennessee that was designed as 24-inch pipeline near the terminus of the pipeline. By this Amendment, East Tennessee modifies its proposed Project by replacing that same segment of approximately 8 miles of 24-inch diameter lateral with approximately 8 miles of 30-inch diameter mainline. The Amendment will not change any other aspect of the Ridgeline Project. As shown in the Environmental Report included with this Amendment, this pipe diameter change will not alter the environmental impacts associated with the Ridgeline

¹ 15 U.S.C. § 717f(c) (2018).

² 18 C.F.R. Pt. 157, Subpart A (2022).

³ Abbreviated Application for Certificate of Public Convenience and Necessity and Related Authorizations of East Tennessee Natural Gas, LLC, Docket No. CP23-516-000 (Jul. 18, 2023) (“Application”). East Tennessee resubmitted the public files, Volumes I and II, of the Application on August 23, 2023, because the originally submitted public files included non-public information.

Project (with the exception of the need for additional hydrostatic test water),⁴ will not result in a change in the proposed construction workspace requirements or right-of-way necessary for the Project, nor will it affect any new landowners.

As described herein, the entire length of Project pipeline will now be 30-inch diameter pipeline and will be referred to as “Mainline,” and the reference to a “Lateral” is no longer applicable. As shown in the Exhibit G flow diagrams provided herewith, the change in pipeline diameter results in a minor change to the horsepower (“HP”) requirements at the Hartsville Compressor Station but does not change the need for two electric motor driven compressor units rated to 7,300 HP each, nor does the Amendment change the transportation or Customized Delivery Service capacity proposed in the Application. Finally, East Tennessee is not proposing any changes to the incremental recourse rates and the initial incremental electric power cost (“EPC”) rate filed in the Application because the Amendment will not result in a material change to the Project costs reflected in Exhibit K to the Application.

The Ridgeline Project, as amended hereby, is in the public interest and required by the public convenience and necessity. East Tennessee requests that the Commission grant the requested certificate authorizations for the Project, as amended, on or before November 1, 2024, as requested in the Application, to ensure that the Project is in service by November 1, 2026, in time to meet the service needs of the Project’s shipper. As described in the Application, the Project is designed to provide incremental firm transportation

⁴ To account for the increase in pipeline diameter from 24- to 30-inches for the 8-mile segment, an additional volume of water is required for hydrostatically testing before placing the line into service. This additional volume of water was incorporated into Table 18-1, included as Attachment 6-1, to East Tennessee’s December 11, 2023 Response to the November 21, 2023 Environmental Information Request. Aside from this increase in hydrostatic test water needs, there will not be any changes in water use associated with this Amendment.

service to the Tennessee Valley Authority (“TVA”) for its Coal Replacement Project to replace existing coal-fired generation with natural gas-fired generation at the Kingston Fossil Plant (“Kingston Plant”) site as part of its Kingston Fossil Plant Retirement. The Commission’s issuance of a certificate for the Project by November 1, 2024, is requested so that Project facilities are available to provide natural gas transportation service to the Kingston Plant for TVA to commission and commercially operate the proposed replacement generation in advance of TVA’s retirement of the coal-fired units.

In support hereof, East Tennessee submits the following:

I.
IDENTITY OF APPLICANT AND COMMUNICATION

The exact legal name of East Tennessee is East Tennessee Natural Gas, LLC. East Tennessee is a limited liability company organized and existing under the laws of the State of Tennessee and has its principal place of business at 915 North Eldridge Parkway, Suite 1100, Houston, Texas 77079. East Tennessee is authorized to do business in the states of Georgia, North Carolina, Tennessee, and Virginia and is an indirect, wholly-owned subsidiary of Enbridge Inc.

East Tennessee is a natural gas company as defined in the NGA, engaged in the transportation of natural gas in interstate commerce, subject to the jurisdiction of the Commission. East Tennessee owns and operates a natural gas pipeline system extending from central Tennessee through Virginia to North Carolina and south to Georgia.

The names, title, and mailing addresses of the persons to whom correspondence and communications concerning this Amendment should be addressed are:

* Estela D. Lozano
Director, Regulatory
* Anish George
Manager, Rates and Certificates
East Tennessee Natural Gas, LLC
P.O. Box 1642
Houston, Texas 77251-1642
Phone: (713) 627-4522
Fax: (713) 627-5947
Email: estela.lozano@enbridge.com
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Vice President & Strategic Advisor,
US Gas Law
East Tennessee Natural Gas, LLC
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and

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Suite 4700
Houston, Texas 77002
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Fax: (713) 615-5206
Email: jseegers@velaw.com

* East Tennessee respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow each of these persons be included on the Commission's official service list.

II. BACKGROUND

In its Application, East Tennessee proposes to construct, install, own, operate, and maintain the Ridgeline Project under Section 7(c) of the NGA. The Project would

provide up to 300,000 Dth per day of natural gas transportation service and 95,000 Dth of Customized Delivery Service capacity for deliveries to TVA's Kingston Plant. Since East Tennessee's existing system along the Project path is essentially fully subscribed, new natural gas transportation capacity is needed for TVA to access supply from Texas Eastern, Midwestern Gas, and Columbia Gulf for the Kingston Plant, and the Customized Delivery Service capacity is needed to allow TVA to quickly

ramp up generation at the Kingston Plant to meet changing electric demand.⁵

On December 18, 2023, East Tennessee filed supplemental information in the above-captioned docket reflecting certain centerline adjustments, workspace modifications, and other minor changes in Project design (“Supplemental Filing”).⁶ Among the changes reflected in the Supplemental Filing is the relocation of the Kingston Delivery Meter onto TVA property adjacent to the Kingston Plant site. TVA requested that East Tennessee relocate this meter. In evaluating the relocation of the meter, East Tennessee reconsidered the design of the 24-inch diameter lateral and determined that with the change of the meter station location it could improve the design by using 30-inch diameter pipeline instead of the 24-inch diameter pipeline without any material change in the estimated Project cost. The 8 miles of 30-inch diameter pipeline will follow the same route as the 24-inch diameter pipeline would have followed absent the Amendment, as such route has been modified by the Supplemental Filing. Accordingly, East Tennessee is filing this Amendment solely to reflect this change in pipe diameter size from 24-inches to 30-inches. East Tennessee is not changing any other aspect of the Project facilities or the transportation service or Customized Delivery Service capacities proposed in the Application.

The location and design of the Project facilities are more fully described in Exhibits F, F-1, and G through G-II to the Application and this Amendment, as well as the revised Project alignment sheets provided in the Supplemental Filing.

⁵ Application at 2-3.

⁶ Supplemental Information of East Tennessee Natural Gas, LLC, Docket No. CP23-516-000 (Dec 18, 2023) (“Supplemental Filing”).

III.
**CERTIFICATE POLICY STATEMENT AND PUBLIC CONVENIENCE AND
NECESSITY**

Because the Certificate Policy Statement⁷ analysis contained in the Application continues to apply to the Project as amended by this Amendment, East Tennessee incorporates that discussion by reference⁸ and will only summarize the key points below.

A. The Project Continues to Satisfy the Threshold No-Subsidy Test.

The Project continues to satisfy the economic threshold requirement for existing pipelines because it avoids subsidization by East Tennessee's existing customers and any adverse impact to their rates. The Project, as amended, will continue to have separate initial incremental recourse rates under Rate Schedule FT-A for service on the Project, as well as an initial incremental fuel and loss retention percentage and an initial incremental EPC rate that will apply to service provided on the Project facilities under Rate Schedule FT-A. As such, East Tennessee's conclusion that the Project is financially viable without any adverse rate effect on, or subsidies from, East Tennessee's existing customers continues to be true.⁹ Accordingly, the Project, as amended, meets the threshold requirement established in the Commission's Certificate Policy Statement.¹⁰

B. The Project, As Amended, Will Have No Adverse Effects on East Tennessee's Existing Customers or on Existing Pipelines and Their Captive Customers.

The Project, including this Amendment, will result in no degradation of service to existing customers, and, as described above, will not result in subsidization of existing

⁷ *Certification of New Interstate Natural Gas Pipeline Facilities*, 88 FERC ¶ 61,227 at pp. 61,745-46 (1999) ("Certificate Policy Statement")

⁸ Application at Section III.

⁹ Application at 16-17.

¹⁰ Certificate Policy Statement at p. 61,745.

customers because East Tennessee is proposing incremental rates for the Project. The Project will result in no degradation of the contractual service requirements to existing customers because the Ridgeline facilities as modified herein continue to be designed to meet the entirety of TVA's new gas service needs. The Project, as modified herein, also will not have any adverse effect on existing pipelines in the region or their customers for the same reasons stated in the Application.¹¹ Accordingly, the Project, as amended, will have no adverse effect on existing customers or existing pipelines and their customers.

C. East Tennessee Has and Continues to Minimize the Potential for Adverse Impacts on Landowners and Communities Affected by the Project, as Amended.

As demonstrated in the Resource Reports attached to the Application, as supplemented by Exhibit F-I hereto, East Tennessee has minimized and will continue to minimize the potential for adverse impacts on landowners, communities affected by the Project, and the environment, consistent with the proven construction techniques and mitigation procedures described in detail in the Application, this Amendment, and the environmental reports in both filings. Indeed, as explained herein, this Amendment will not result in any changes to the environmental impacts associated with the Project with the limited exception that additional water will be needed for the hydrostatic test due to the increase in pipe diameter size for the approximately 8-mile segment.¹² The modifications described in this Amendment will occur entirely within the boundaries of the same rights-of-way and construction workspace requirements described in the Application and Supplemental Filing. East Tennessee will continue to work with affected landowners and

¹¹ Application at 18.

¹² See *supra* note 4.

communities to minimize any residual impacts of the Project, as amended, and will keep them and all stakeholders informed of project status. In this regard, East Tennessee will notify all affected landowners of this Amendment.¹³

D. The Benefits of the Project, as Amended, Continue to Outweigh Potential Residual Adverse Effects.

Given that the changes described in this Amendment will be constructed entirely within the same right-of-way and workspace described in the Application, as modified in the Supplement Filing, the Project will continue to have limited residual impacts. In addition, the Project will continue to provide the same benefits described in the Application.¹⁴ Accordingly, the benefits of the Project will continue to far outweigh the potential impacts, which have been or will be mitigated as described in the Application and this Amendment.

E. The Project, as Amended, Is Required by the Public Convenience and Necessity.

As described herein and in the Application, the Project will provide significant benefits and, with the Amendment, will continue to be constructed and operated with minimal landowner and environmental impacts. As such, the Project continues to meet the standards of the Certificate Policy Statement, is in the public interest, and is required by the public convenience and necessity.

F. Summary

In summary, the Project as modified herein continues to satisfy the Commission's Certificate Policy Statement and is consistent with the Commission's economic and

¹³ 18 C.F.R. § 157.6(d). In addition, East Tennessee will publish notice of the Amendment in relevant daily and/or weekly newspapers of general circulation.

¹⁴ Application at 20-21.

environmental goals. Accordingly, East Tennessee respectfully submits the Project meets the standards of the Certificate Policy Statement, will serve the public interest, and is required by the public convenience and necessity.

IV. ENVIRONMENTAL IMPACT

A supplemental Environmental Report included herewith more fully describes the potential environmental impacts of the Amendment. As shown in the supplemental Environmental Report, the Amendment causes no change to environmental impacts associated with the Project, with the exception that the change in pipe diameter will result in an increase in the volume of water needed for the hydrostatic test of the proposed pipeline facilities.¹⁵

The supplemental Environmental Report shows that the Amendment will not change the analysis in the Environmental Report submitted with the Application, which demonstrates that (i) any impacts of the proposed Project will be minimal, (ii) any adverse impacts can be avoided or mitigated, (iii) the proposed action is East Tennessee's best alternative, (iv) the short-term use of the environment will not conflict with the long-term benefits to the environment, and (v) significant resources will not be irreversibly or irretrievably lost due to the construction activities. Based on the foregoing, East Tennessee respectfully submits that approval of the proposed Project activities and facilities described in the Application as modified herein will not be a major federal action significantly affecting the quality of the human environment.¹⁶

¹⁵ Application at Section IV. As noted above, this additional volume of water was incorporated into Table 18-1, included as Attachment 6-1, to East Tennessee's December 11, 2023 Response to the November 21, 2023 Environmental Information Request.

¹⁶ See 40 C.F.R. § 1501.4 (2022).

**V.
RATES AND TARIFF**

The incremental recourse rates for the Project are based on the costs included in Exhibit K of the Application. As described above, the Amendment will not materially change the Project cost reflected on Exhibit K of the Application. Accordingly, East Tennessee is not proposing any change to the recourse rates for the Project.

The change in the anticipated horsepower requirements for the Hartsville Compressor Station is expected to result in a minor decrease to the electric power requirements of the station. Given that other inputs and estimates in the derivation of the EPC rate may change prior to East Tennessee placing the Project into service and because the EPC charges will be tracked and trued-up, East Tennessee is not proposing any change to the initial incremental EPC rate proposed in its Application.

**VI.
OTHER APPLICATIONS**

With the exception of the Application and this Amendment, East Tennessee knows of no other applications pending or required before the Commission under the NGA for the Ridgeline Project. As described in the Application, East Tennessee will require other federal, state, and local authorizations for the facilities proposed herein, in addition to the authorizations requested in this Amendment. East Tennessee is continuing to work with a number of federal, state, and local agencies to obtain permits, as necessary, to complete the Project.

**VII.
NOTICE**

East Tennessee has attached a form of Notice of this Amendment suitable for publication in the *Federal Register* hereto.

VIII. EXHIBITS

East Tennessee is filing this Amendment pursuant to Section 157.7 of the Commission's regulations.¹⁷ Under the Commission's regulations, East Tennessee is submitting the following exhibits, which update or supplement the exhibits included in the Application.

- | | |
|-------------|--|
| Exhibit A | <u>Articles of Incorporation</u>
Omitted. Exhibit A has been filed in Docket No. CP23-131-000 and is incorporated herein by reference. |
| Exhibit B | <u>State Authorization</u>
Omitted. Exhibit B has been filed in Docket No. CP23-131-000 and is incorporated herein by reference. |
| Exhibit C | <u>Company Officials</u>
Attached. |
| Exhibit D | <u>Subsidiaries and Affiliates</u>
Omitted. This information is contained in Exhibit D of the Application and is incorporated herein by reference. |
| Exhibit E | <u>Other Pending Applications and Filings</u>
Omitted. This information is contained in Section VI of this Amendment. |
| Exhibit F | <u>Location of Facilities</u>
Omitted. This Amendment reflects only a change in pipe diameter for the last approximately 8 miles of the pipeline. This information is contained in Exhibit F to the Application and is incorporated herein by reference, subject to any changes reflected in other filings by East Tennessee in the instant docket including the Supplemental Filing. |
| Exhibit F-I | <u>Environmental Report</u>
Attached hereto is an Environmental Report for this Amendment. |

¹⁷ 18 C.F.R. § 157.7 (2022).

Exhibits G through G-II	<u>Flow Diagrams and Flow Diagram Data</u>	Attached hereto in Volume II is an amended Exhibit G and related exhibits. Volume II contains CEII and is labeled “ Contains Critical Energy Infrastructure Information—Do Not Release ” and “ CUI//CEII. ” Exhibit G-II has been filed in the Application and is incorporated herein by reference.
Exhibit H	<u>Total Gas Supply</u>	Omitted. This information is contained in Section V of the Application and is incorporated herein by reference.
Exhibit I	<u>Market Data</u>	Omitted. Exhibit I has been filed in the Application and is incorporated herein by reference.
Exhibit J	<u>Other Federal Authorizations</u>	Omitted. The Amendment does not result in any changes to the Exhibit J of the Application and the monthly status updates filed in Docket No. CP23-516, which are incorporated herein by reference.
Exhibit K	<u>Cost of Facilities</u>	Omitted. The Amendment does not result in any material change to Exhibit K of the Application, which is incorporated herein by reference.
Exhibit L	<u>Financing</u>	Omitted. East Tennessee will finance the cost of the Project through funds on hand and borrowings under short-term financing arrangements.
Exhibit M	<u>Construction, Operation, and Maintenance</u>	Omitted. East Tennessee will construct or cause the Project facilities to be constructed and will manage and operate the proposed facilities.
Exhibit N	<u>Revenues, Expenses, and Income</u>	Omitted. Information related to the Project is included in Exhibit P included in the Application and is incorporated herein by reference.

- Exhibit O Depreciation and Depletion
Omitted. This information is included in Section VI of the Application and is incorporated herein by reference.
- Exhibit P Tariff and Rates
Omitted. Exhibit P has been filed in the Application and is incorporated herein by reference.

IX. OTHER

East Tennessee is marking Volume II as “CUI//CEII” because it contains specific engineering, vulnerability, and detailed design information that could be useful to a person in planning an attack on critical infrastructure. East Tennessee requests that this information be treated as CEII for the longest period of time permitted under the Commission’s regulations (currently, five years), unless re-designated by the CEII Coordinator.


X. CONCLUSION

WHEREFORE, for the foregoing reasons, East Tennessee respectfully requests that the Commission issue an order granting the authorizations requested in the Application, as amended by this Amendment, on or before November 1, 2024. East Tennessee also

requests that the Commission grant any other authorizations and waivers necessary to implement the proposal contained herein.

Respectfully submitted,

EAST TENNESSEE NATURAL GAS, LLC

By:  _____
Estela D. Lozano
Director, Regulatory

Dated: December 19, 2023

EAST TENNESSEE NATURAL GAS, LLC

RIDGELINE EXPANSION PROJECT

DOCKET NO. CP23-516-___

Verification

VERIFICATION

THE STATE OF TEXAS)
)
COUNTY OF HARRIS)

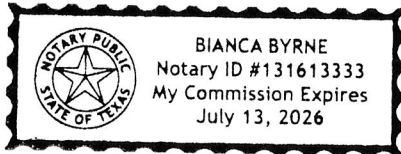
Estela D. Lozano, being first duly sworn, states that she is Director, Regulatory, for East Tennessee Natural Gas, LLC; that she is authorized to execute this Verification; that she has read the foregoing Amendment and is familiar with the contents thereof; and that all allegations of fact therein contained are true and correct to the best of her knowledge and belief.

EAST TENNESSEE NATURAL GAS, LLC



Estela D. Lozano
Director, Regulatory

Subscribed and sworn to before me this 19th day of December 2023.



Notary Public, State of Texas

My Commission Expires: July 13, 2026

EAST TENNESSEE NATURAL GAS, LLC

RIDGELINE EXPANSION PROJECT

DOCKET NO. CP23-516-__

Exhibit C

Company Officials

**East Tennessee Natural Gas, LLC
Ridgeline Expansion Project
COMPANY OFFICIALS**

Name	Title	Title Role	Status
Berry, David L.	Controller	Officer	Active
Capps, Allen C.	Senior Vice President & Chief Commercial Officer, GTM	Officer	Active
Dennis-Brown, Sonya M.	Vice President	Officer	Active
Gould, Jonathan E.	Treasurer	Officer	Active
Gray, Kelly L.	Corporate Secretary	Officer	Active
Hassanien, Sherif S.	Vice President, GTM Asset Integrity	Officer	Active
Haynes, James D.	Vice President, People Operations	Officer	Active
Huffman, Robert L.	President	Officer	Active
Koby, Michael P.	Senior Vice President & Chief Operations Officer, GTM	Officer	Active
Love, LaWonda C.	Tax Officer	Officer	Active
McHenry, Allison	Assistant Corporate Secretary	Officer	Active
Neyland, Stephen J.	Vice President - Finance	Officer	Active
Paglia, Richard M.	Vice President, US Marketing	Officer	Active
Rakowski, Kyle A.	Vice President, Core Projects	Officer	Active
Watson, Robert J.	Vice President, Project Execution	Officer	Active
Wilson, Teresa L.	Vice President, U.S. Operations	Officer	Active
Wooden, Jr. Thomas V.	Vice President, GTM Engineering & Asset Management	Officer	Active

EAST TENNESSEE NATURAL GAS, LLC

RIDGELINE EXPANSION PROJECT

DOCKET NO. CP23-516-__

Exhibit F-I

Environmental Report



East Tennessee Natural Gas, LLC

RIDGELINE EXPANSION PROJECT

AMENDMENT APPLICATION

Environmental Report

FERC Docket No. CP23-516-____

December 2023

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ACRONYMS AND ABBREVIATIONS

Application	Application for a Certificate of Public Convenience and Necessity and Related Authorizations
Certificate	Certificate of Public Convenience and Necessity
Columbia Gulf	Columbia Gulf Transmission, LLC
Dth	dekatherm
Dth/day	dekatherms per day
DOT	Department of Transportation
East Tennessee	East Tennessee Natural Gas, LLC
E&SCP	Erosion and Sediment Control Plan
FERC or Commission	Federal Energy Regulatory Commission
FERC Plan	Upland Erosion Control, Revegetation, and Maintenance Plan
FERC Procedures	Wetland and Waterbody Construction and Mitigation Procedures
HDD Plan	Horizontal Directional Drill Monitoring, Inadvertent Return Response, and Contingency Plan
Kingston Plant	Kingston Fossil Plant
Midwestern Gas	Midwestern Gas Transmission Company
PCB	Polychlorinated Biphenyl
Project	Ridgeline Expansion Project
Texas Eastern	Texas Eastern Transmission, LP
TVA	Tennessee Valley Authority

1.0 GENERAL PROJECT DESCRIPTION

1.1 Introduction

On July 18, 2023, East Tennessee Natural Gas, LLC (East Tennessee) submitted its Abbreviated Application for a Certificate of Public Convenience and Necessity and Related Authorizations (Application) with the Federal Energy Regulatory Commission (FERC or Commission), for its Ridgeline Expansion Project in Docket No. CP23-516-000 (Project). In the Application, East Tennessee requested authorizations to construct, own, and operate approximately 110 miles of 30-inch diameter pipeline and an approximately 4-mile 30-inch diameter header pipeline (collectively referred to as the Mainline), an approximately 8-mile 24-inch diameter pipeline lateral to connect to the Kingston Plant (Lateral), a 14,600-horsepower electric-powered compressor station with natural gas backup (Hartsville Compressor Station), and other facilities as described in further detail therein. East Tennessee will separately construct a new, non-FERC jurisdictional 8-megawatt alternating current solar array to partially power the Hartsville Compressor Station.

The Project is designed to provide up to 300,000 dekatherms per day (Dth/day) of new firm natural gas transportation capacity for the proposed gas-fired generation at the Kingston Plant and 95,000 dekatherms (Dth) of additional line pack capacity to allow the parking of gas in the pipeline to the site of Tennessee Valley Authority's (TVA) Kingston Fossil Plant (Kingston Plant) if TVA ultimately chooses to replace coal-fired generation at its Kingston Plant with the proposed gas-fired generation at the same site. The scheduled in-service date for the Project is November 1, 2026.

Since filing its Application, East Tennessee has incorporated several proposed adjustments to the pipeline centerline, workspace modifications and other minor changes in the Project design, including the relocation of the Kingston Delivery Meter to the terminus of the Project pipeline at TVA's request. In evaluating the relocation of the Kingston Delivery Meter, East Tennessee reconsidered the design of the 24-inch diameter lateral and determined that it could improve the Project design by utilizing 30-inch diameter pipeline for the entirety of the pipeline route. Accordingly, East Tennessee is filing an amendment (Amendment) to its Application for the Project, requesting authorization under NGA Section 7(c) to construct approximately 8 miles of 30-inch diameter mainline pipeline in Morgan and Roane counties, Tennessee, instead of the same length of 24-inch diameter lateral pipeline included in the Application. Therefore, the entire length of the Project pipeline will now be 30-inch diameter pipeline and will be referred to as Mainline, and the reference to Lateral is no longer applicable.

This Environmental Report describes the changes to the Project facilities requested in the Amendment. Because each of the proposed modifications in this Amendment will occur within the same workspaces, and with the same construction procedures, workforce, and schedule, as analyzed in the Application and its Resource Reports, this Environmental Report does not repeat discussions of the existing resources or the analysis of potential environmental impacts where the proposed modifications do not result in any change. Thus, for each resource, this Environmental Report either provides an updated analysis to describe any changes to potential impacts to environmental resources resulting from the change to larger diameter pipe on the 8-mile segment, or confirms the prior analysis, alongside a brief summary of relevant measures to minimize or mitigate potential impacts.

1.2 Purpose of the Adjusted Project

The purpose and need for the Project remains the same as described in the Application, which is to provide up to 300,000 Dth/day of natural gas transportation capacity and 95,000 Dth of parking capability to TVA's proposed gas-fired generation at its Kingston Plant. Since East Tennessee's existing system along the Project path is essentially fully subscribed, new natural gas transportation capacity is needed for TVA to access supply from Texas Eastern Transmission, LP (Texas Eastern), Midwestern Gas Transmission

Company (Midwestern Gas), and Columbia Gulf Transmission, LLC (Columbia Gulf), and the new parking capability is needed to allow TVA to quickly ramp up generation to meet changing electric demand and respond to growing intermittent and variable renewable energy sources should TVA ultimately chose to replace its Kingston Plant with a single gas-fired combined cycle gas plant and 16 dual-fuel Aero-derivative combustion turbine units.

The purpose of the Amendment is to improve the Project design by utilizing 30-inch diameter pipeline for the entirety of the Project route. Under the original Project design, the Kingston Delivery Meter was located approximately 8 miles away from the Kingston Plant site and the Project was designed to transition from 30-inch diameter pipeline upstream of the Kingston Delivery Meter to 24-inch diameter pipeline downstream of the Kingston Delivery Meter. The location of Kingston Delivery Meter in the Application required separate pig launcher/receiver apparatus upstream and downstream of the meter. With the relocation of the Kingston Delivery Meter, the transition to smaller diameter pipeline was no longer an optimal design. Utilizing a uniform pipe diameter allows for continuous pigging of the entire length of pipeline, which would not be possible if East Tennessee retained the transition to 24-inch diameter pipeline lateral.

1.3 Adjustment Description

East Tennessee is proposing to modify the Project design to construct approximately 8 miles of 30-inch diameter pipeline in Morgan and Roane counties, Tennessee instead of the same length of 24-inch diameter lateral pipeline included in its Application. Consequently, the entire length of Project pipeline will now be 30-inch diameter pipeline. The change contemplated herein does not require any additional right-of-way and does not result in any increases in construction workspace. No additional landowners are affected by this change.

1.4 Land Requirements

East Tennessee will construct the 30-inch-diameter pipeline in the same workspace as designed for the 24-inch-diameter pipeline. Therefore, no changes to land requirements are required. East Tennessee's land requirements are presented in its Application, Resource Report No. 1, Table 1.4-1 and in subsequent responses to Environmental Information Requests and/or supplement filings to Docket No. CP23-516-000.

1.5 Construction Procedures and Schedule

East Tennessee will construct the 30-inch-diameter pipeline using the same construction procedures, with the same construction workforce, and with the same schedule as designed for the 24-inch-diameter pipeline. Therefore, no changes to construction procedures, workforce, and schedule are required.

1.6 Operation and Maintenance

East Tennessee will operate and maintain the 30-inch-diameter pipeline as designed for the 24-inch-diameter pipeline. Therefore, no changes to operation and maintenance procedures are required.

1.7 Future Plans and Abandonment

East Tennessee is not aware of any reasonably foreseeable future expansion or abandonment of the adjusted 30-inch-diameter pipeline, or in any of the proposed Project facilities. If additional demand for natural gas requires future expansion, East Tennessee will seek the appropriate authorizations from FERC and other relevant governmental agencies, as required. If, and when, any subsequent application is filed, the environmental impact of the new proposed facilities will be examined at that time. Similarly, for any future abandonment of facilities, East Tennessee will seek appropriate authorizations from FERC and other relevant governmental agencies.

1.8 Landowners and Stakeholders

The proposed modification to pipeline diameter does not affect new landowners or stakeholders for the Project.

1.9 Non-Jurisdictional Facilities

The proposed modification to pipeline diameter does not require additional non-jurisdictional facilities for the Project.

1.10 Permits, Approvals, and Regulatory Consultations

The proposed modification to pipeline diameter does not require any additional or different permits, approvals, and regulatory consultations than previously described for the Project.

1.11 Cumulative Impacts

The proposed modification to pipeline diameter does affect the cumulative impact analysis for the Project. As discussed in Section 9.0 below, the proposed modification to pipeline diameter will result in a minor decrease in the horsepower requirements at the Hartsville Compressor Station but is not expected to result in any material difference in operating emissions or noise generated by the compressor station, either standing alone or in the context of the cumulative impacts analysis. Nor is there any material difference in overall greenhouse gas emissions or the analysis or conclusions regarding climate change as discussed in the cumulative impacts analysis.

2.0 WATER USE AND QUALITY

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline, will not result in any additional water crossings, and will only result in de minimis changes to the trench size. However, the proposed modification will result in additional water needs for hydrostatic testing of the larger diameter pipeline. To account for the increase in pipeline diameter from 24- to 30-inches, approximately 557,880 gallons of additional water volume is required. These additional water requirements were incorporated into Table 18-1, included as Attachment 6-1, to East Tennessee's December 11, 2023 Response to the November 21, 2023 Environmental Information Request. Aside from this increase in hydrostatic test water needs, there will not be any changes in water use nor will there be any new or different impacts to groundwater aquifers, surface waters, or wetlands. East Tennessee will implement its Horizontal Directional Drill Monitoring, Inadvertent Return Response, and Contingency (HDD Plan) and FERC's Upland Erosion Control, Revegetation, and Maintenance Plan (FERC Plan) and Wetland and Waterbody Construction and Mitigation Procedures (FERC Procedures) to minimize impacts to groundwater aquifers, surface waters, and wetlands. Thus, impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on water use and quality, with the exception of additional water needs for the purpose of hydrostatic testing of the pipeline.

3.0 FISH, WILDLIFE AND VEGETATION

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and will only result in de minimis changes to the trench size. The proposed modification does not include changes to the pipeline route or waterbody crossings, and East Tennessee will implement its HDD Plan and FERC's Plan and Procedures to minimize impacts to fisheries and surface waters. Similarly, no change to the acreage of impacted wildlife habitat or vegetation as identified in Tables 3.3-1 and 3.4-1 of Resource Report 3 is anticipated due to the proposed modification. East Tennessee will implement FERC's Plan and Procedures and Project Erosion and Sediment Control Plan (E&SCP) to

minimize impacts to wildlife and vegetation. Thus, impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on fish, wildlife, and vegetation.

4.0 CULTURAL RESOURCES

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and will not require additional aboveground components that may result in visual impacts to cultural resources. Thus, the proposed modification to pipeline diameter will not impact any additional archeological resources, historic properties, tribal interests, or other cultural resources beyond those already discussed in Resource Report 4. East Tennessee is consulting with state archeological agencies regarding impacts to cultural resources and has developed and will implement its *Unanticipated Discoveries and Emergency Procedures* plan to address any unanticipated discoveries of cultural resources or human remains during construction. Thus, impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on cultural resources.

5.0 SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and will not cross additional counties, require additional workers or construction equipment, or include any aboveground components that may result in visual effects or increased air quality impacts to surrounding communities. The proposed modification will not result in additional socioeconomic impacts and will not affect additional environmental justice communities. East Tennessee will implement mitigation measures as described in Resource Report 5. Thus, impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on socioeconomics and environmental justice.

6.0 GEOLOGICAL RESOURCES

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and will only result in de minimis changes to the trench size. Thus, the proposed modification to pipeline diameter will occur within the same geologic setting and affect the same resources described in Resource Report 6, without resulting in any new or different impacts to any geologic resources. East Tennessee will implement karst, landslide, flash flooding, and other construction mitigation measures and its Blasting Plan, if necessary, to reduce geologic-hazard related risks described in Resource Report 6. Thus, impacts from the Project and proposed modification remain the same as described in East Tennessee's prior assessment on geological resources.

7.0 SOILS

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and will only result in de minimis increase in trench size and volume of soil excavated. While there may be de minimis impacts to soils due to the increased trench size, no additional acreage or soil units will be impacted. East Tennessee will minimize all impacts through application of the FERC Plan, its Project E&SCP, and erosion and sedimentation controls required by the State of Tennessee and as described in Resource Report 7. Thus, analysis of impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on soil resources.

8.0 LAND USE, RECREATION AND AESTHETICS

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and does not require additional aboveground components that would impact

visual resources. The proposed modification will only result in de minimis increase in trench size and does not affect any additional acreage or land uses from those identified in Tables 8.2-7 and 8.2-8 of Resource Report 8. Texas Eastern will mitigate impacts on land use, recreation and aesthetics by implementing the FERC Plan and Procedures and measures contained in any landowner agreements or required by the Tennessee Wildlife Resources Agency, Tennessee Department of Environment and Conservation, National Park Service or U.S. Army Corps of Engineers for federal or state-managed lands. Thus, analysis of impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on land use, recreation, and aesthetics.

9.0 AIR AND NOISE QUALITY

The proposed modification to pipeline diameter will use the same equipment as designated for the 24-inch diameter pipeline and does not require any additional aboveground facilities that would result in air emissions or noise impacts. The proposed modification to pipeline diameter results in a minor decrease in horsepower requirements at the Hartsville Compressor Station, but is not expected to result in any material difference in operating emissions or noise generated by the compressor station. East Tennessee will implement emissions and noise control measures as described in Resource Report 9 and will conduct a post-construction sound survey at aboveground facilities to confirm that modelled sound levels meet the applicable FERC criteria and field measurements. Thus, analysis of impacts from the Project and the proposed modification remain the same as described in East Tennessee's prior assessment on air and noise quality.

10.0 ALTERNATIVES

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and will only result in de minimis changes to the trench size and hydrostatic test water needs. The proposed modification does not include changes to the pipeline route and does not require any additional construction equipment or aboveground facilities. Because the changes associated with the proposed modification are de minimis, East Tennessee has not identified any additional alternatives that should be considered, and the proposed modification does not affect East Tennessee's prior assessment on alternatives.

11.0 RELIABILITY AND SAFETY

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline and does not include any changes to the pipeline route. Thus, the proposed modification will not result in a change to any Department of Transportation (DOT) area classifications or High Consequence Areas crossed by the pipeline identified in Tables 11.2-1 or 11.2-2 of Resource Report 11. East Tennessee will design, construct, operate, and maintain the Project in accordance with the DOT Minimum Federal Safety Standards, as set forth in 49 CFR Part 192. Thus, analysis of impacts from the Project and the proposed modification remain the same as in East Tennessee's prior assessment on reliability and safety.

12.0 POLYCHLORINATED BIPHENYL(PCB) CONTAMINATION

The proposed modification to pipeline diameter will occur within the same workspace as designated for the 24-inch diameter pipeline, does not include any changes to the pipeline route, and does not involve the replacement, abandonment by removal, or abandonment in place of pipeline facilities determined to have PCBs in excess of 50 parts per million in pipeline liquids, nor does it involve compressor station modifications. Thus, analysis of impacts from the Project and the proposed modification remain the same as in East Tennessee's prior assessment on PCB contamination.

EAST TENNESSEE NATURAL GAS, LLC

RIDGELINE EXPANSION PROJECT

DOCKET NO. CP23-516-__

Exhibit G and related exhibits

Flow Diagrams

Enclosed under separate cover as Volume II and marked

“Contains Critical Energy Infrastructure Information – Do No Release” and

“CUI//CEII”

EAST TENNESSEE NATURAL GAS, LLC

RIDGELINE EXPANSION PROJECT

DOCKET NO. CP23-516-___

Notice

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

East Tennessee Natural Gas, LLC

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Docket No. CP23-516-___

**NOTICE OF AMENDMENT TO ABBREVIATED APPLICATION OF
EAST TENNESSEE NATURAL GAS, LLC
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AND FOR RELATED AUTHORIZATIONS**

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Take notice that on December 19, 2023, East Tennessee Natural Gas, LLC (“East Tennessee” or “Applicant”), 915 North Eldridge Parkway, Suite 1100, Houston, Texas 77079, filed with the Federal Energy Regulatory Commission (“FERC” or “Commission”) an amendment (“Amendment”) to the certificate application filed on July 18, 2013 in Docket No. CP23-516-000 (“Application”) for its proposed Ridgeline Expansion Project (“Project”). Specifically, East Tennessee is amending the Application to modify the diameter of approximately 8 miles of proposed pipeline from 24 inches to 30 inches. East Tennessee respectfully requests the Commission issue an order granting the authorizations requested in the Application, as amended by this Amendment, by November 1, 2024, in order to have the time and certainty necessary to place the Project facilities, as amended, into service by November 1, 2026.

The name, address, and telephone number of the person to whom correspondence and communications concerning this Amendment should be addressed is:

Estela D. Lozano
Director, Regulatory
East Tennessee Natural Gas, LLC
P.O. Box 1642
Houston, Texas 77251-1642
Phone: (713) 627-4522
estela.lozano@enbridge.com

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission’s Rules of Practice and Procedure (18 C.F.R. §§ 385.211 and 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. Anyone filing a motion to intervene or protest must serve a copy of that document on the Applicant. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the “eFiling” link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 5 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at <http://www.ferc.gov> using the “eLibrary” link. Enter the docket number excluding the last three digits in the docket number field to access the document. There is an “eSubscription” link on the Commission’s web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: 5:00 pm Eastern Time on **[INSERT DATE]**.

Kimberly D. Bose
Secretary