

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

In the Matter of

COLUMBIA GAS TRANSMISSION, LLC

Docket No. CP16-38-000

MOTION TO INTERVENE AND PROTEST OF  
APPALACHIAN MOUNTAIN ADVOCATES, APPALACHIAN VOICES,  
CHESAPEAKE CLIMATE ACTION NETWORK, and SIERRA CLUB (VIRGINIA and  
WEST VIRGINIA CHAPTERS)

**I. MOTION TO INTERVENE**

Pursuant to 18 C.F.R. §§ 157.10, 385.211, and 385.214, the following parties move to intervene and protest in the above-captioned proceedings:

Appalachian Mountain Advocates is a non-profit law and policy center focused on protection of the environment and human communities in the Appalachian region, with offices in Virginia and West Virginia. Appalachian Mountain Advocates works to promote sensible energy policies that protect the environmental and economic well-being of the citizens of the region in the short and long term. Appalachian Mountain Advocates opposes any energy development that unreasonably impacts the region's communities, landscapes, and water resources and contributes to long-term reliance on climate-altering fossil fuels.

Appalachian Voices is an award-winning, nonprofit organization working in partnership with local people and communities to defend the natural heritage and economic future of the Appalachian region. Our primary focus is to strengthen the citizens movement across Virginia, West Virginia, North Carolina, Tennessee and Kentucky to shift the region away from harmful, polluting energy practices — like

mountaintop removal coal mining and natural gas fracking — to cleaner, more just and sustainable energy sources.

Appalachian Voices has offices in Charlottesville and Norton, Va., Knoxville, Tenn., and Asheville and Chapel Hill, N.C. and employs 24 passionate, professional individuals including environmental policy experts, community organizers and water quality specialists. Appalachian Voices has almost 1,000 dues-paying members, plus another 25,000 supporters throughout the country who take action to help us achieve our goals. The WB Xpress Project would pose unacceptable environmental damage and health risks to our members and supporters along the proposed route through West Virginia and Virginia and would compound the harmful impacts that people in the Appalachian region living near natural gas fracking sites already experience. Further, public and private investment in this project would lock the country into decades more of dependence on fossil fuels, diverting those investments away from cleaner, more sustainable energy options for the region including efficiency and wind and solar generation.

The Chesapeake Climate Action Network (“CCAN”) is the first grassroots, nonprofit organization dedicated exclusively to fighting climate change and all of the harms fossil-fuel infrastructure causes in Maryland, Virginia, and Washington, D.C. and to securing policies that will put us on a path to climate stability. CCAN has offices in Takoma Park, Md., Richmond, Va., and Norfolk, Va. One of the primary tools CCAN uses to fight climate change and move toward a clean-energy future is building, educating, and mobilizing a powerful grassroots movement to push for a societal switch away from dirty fossil-fuel energy and toward clean energy. In support of its mission,

CCAN opposes projects that could contribute to climate change, harm the public, and degrade the Chesapeake Bay.

CCAN has over 90,000 supporters in Maryland, Virginia, and Washington, D.C. who have signed up to receive updates from CCAN, donated to CCAN, signed an online petition, or attended a CCAN-sponsored event. Of our supporters, more than 20,000 live in Virginia. CCAN supporters live, exercise, work, raise children, garden, fish, boat, and recreate on a regular basis on or near the route of the WB Xpress. CCAN seeks to intervene in this proceeding because the WB Xpress will exacerbate climate change in a region that is particularly susceptible to the impacts, will lock the region in to future reliance on fossil fuels while taking resources away from renewable energy and energy efficiency, and will cause additional environmental and economic harm to our supporters.

The Sierra Club is the nation's largest grassroots environmental organization with more than two million members and supporters. Its environmental campaigns range from protecting millions of acres of wilderness to helping pass the Clean Air Act, Clean Water Act, and Endangered Species Act. More recently, Sierra Club made history by leading the charge to move away from fossil fuels that cause climate disruption and toward a clean energy economy.

The Virginia Chapter of the Sierra Club is 15,000 members strong. It has offices in Northern Virginia, Richmond, Norfolk, and Charlottesville, VA. The West Virginia Chapter of the Sierra Club has nearly 2,000 members with an office in Morgantown, WV. The energy choices we make today will impact Virginians and West Virginians for generations to come. Sierra Club firmly believes that Virginians and West Virginians want and deserve clean air to breathe, safe water to drink and good local jobs. But our

utilities and many of our leaders are relying on dirty fuels that put our health at risk, destroy our land and contribute to climate disruption. Building clean, renewable energy like wind and solar power, and conserving energy through efficiency programs, will jump start new industries, create jobs and help keep our families safe from harmful pollution.

The Sierra Club seeks to intervene in this proceeding because the WB Xpress severely impacts our water resources and headwaters in the mountains of VA and WV, fragments our national forests, threatens endangered species, disrupts cultural attachments and communities adjacent to the corridor, impacts our historic resources, violates property rights, inflicts economic damage on communities and continues to block the development of renewable energy sources. Further, the cumulative impacts of the WB Xpress combined with the impacts from the Atlantic Coast Pipeline, the Mountain Valley Pipeline, the Mountaineer Xpress, and the proposed Atlantic Connector in Virginia and West Virginia are unknown and require further analysis of cumulative impacts as part of a regional or Programmatic Environmental Impact Study. Additional requests for a Programmatic Environmental Impact Study will be filed to the FERC as part of our record of submittals.

Together, these groups represent thousands of citizens, consumers, and landowners that would be directly affected by construction and operation of the proposed pipeline and associated facilities. Although these groups share common goals, each group has its own independent mission and supporter base and each group joins this motion as individual movants, requesting independent intervenor status on behalf of their organizations in the above-captioned proceedings.

The movant's interests are not adequately represented by any existing party to the proceeding and their participation would further the public interest. This motion is timely filed in accordance with FERC's January 14, 2016 Notice.

## **II. COMMUNICATIONS AND SERVICE**

All communications, pleadings, and orders with respect to this proceeding should be sent to the following group representatives:

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### **III. PROTEST IN OPPOSITION**

Pursuant to 18 C.F.R. § 385.211, the above-listed groups register their protest and opposition to the issuance of a Certificate of Convenience and Necessity under Section 7 of the Natural Gas Act, 15 U.S.C. § 717f, for the WB Xpress Project. These groups (“Proposed-Intervenors”) oppose the WB Xpress because the project is not needed, will have significant adverse impacts on a wide variety of environmental resources, will disrupt the traditional character of numerous communities and substantially lower property values in the vicinity of the project and the supply production areas, and will further commit the nation to long-term dependence on climate-altering fossil fuels.

This Motion and Protest states the interests and positions of the Proposed-Intervenors to the extent known at this time. Proposed-Intervenors intend to obtain and develop additional factual evidence and arguments in this proceeding and reserve the right to submit those materials to FERC as they are developed.

Respectfully submitted on behalf of all parties in this intervention and protest,

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