

The background of the slide is a photograph of several large, parallel industrial pipes, likely for natural gas, stretching into the distance. The pipes are supported by blue metal brackets. The scene is set during sunset or sunrise, with a warm, orange and yellow glow in the sky and blurred industrial structures in the background.

# Rob Mosher

Vice President, Government  
Affairs

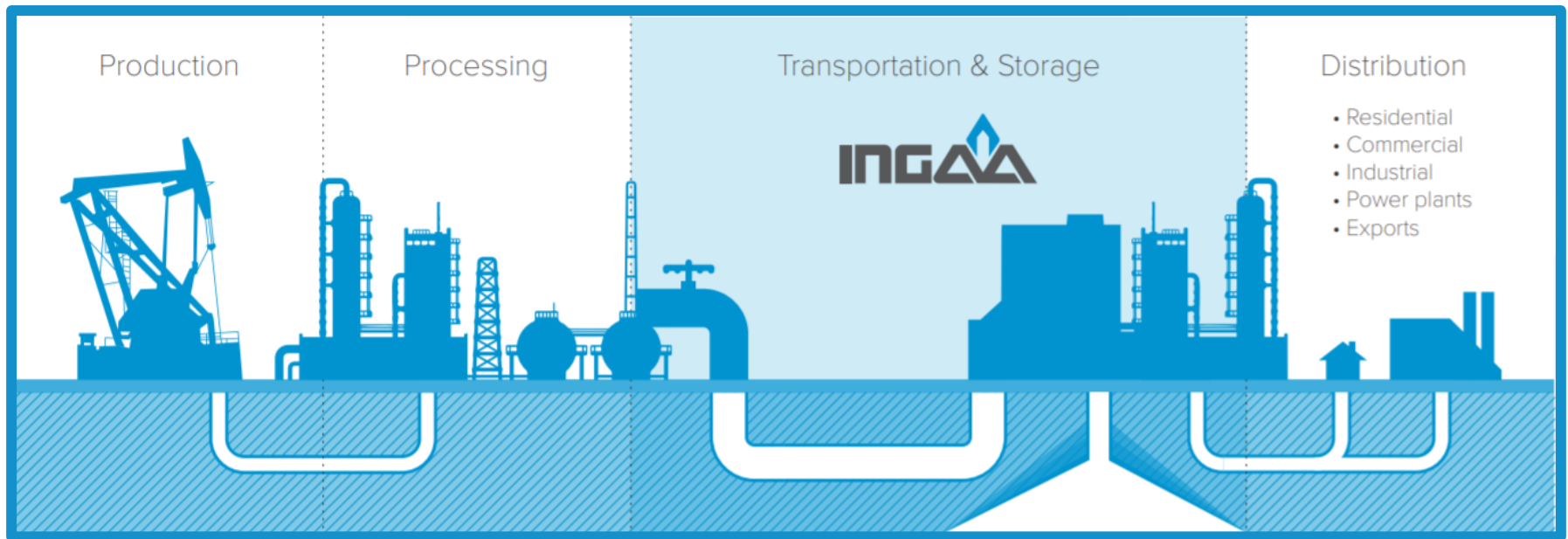
Interstate Natural Gas  
Association of America

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Natural Gas Pipeline Buildout and Needed  
Permitting Reforms

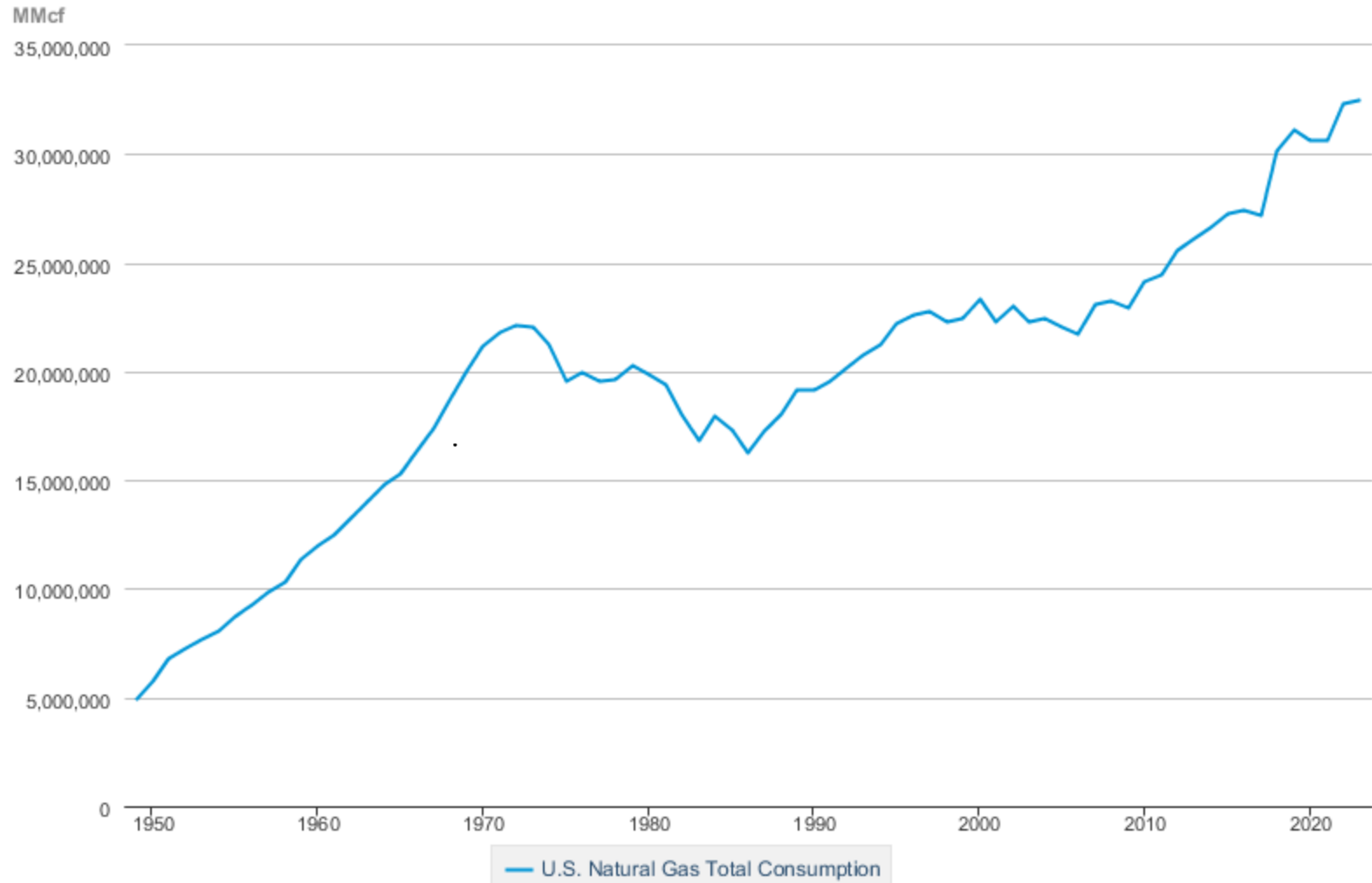
# Who is INGAA?

**INGAA** is the federally focused trade association for the interstate natural gas transmission pipeline industry. INGAA is made up of 27 members representing the vast majority of the interstate natural gas transmission system in the U.S. and Canada, operating almost 200,000 miles of pipeline.



# Natural Gas Consumption

## Natural Gas Consumption by End Use

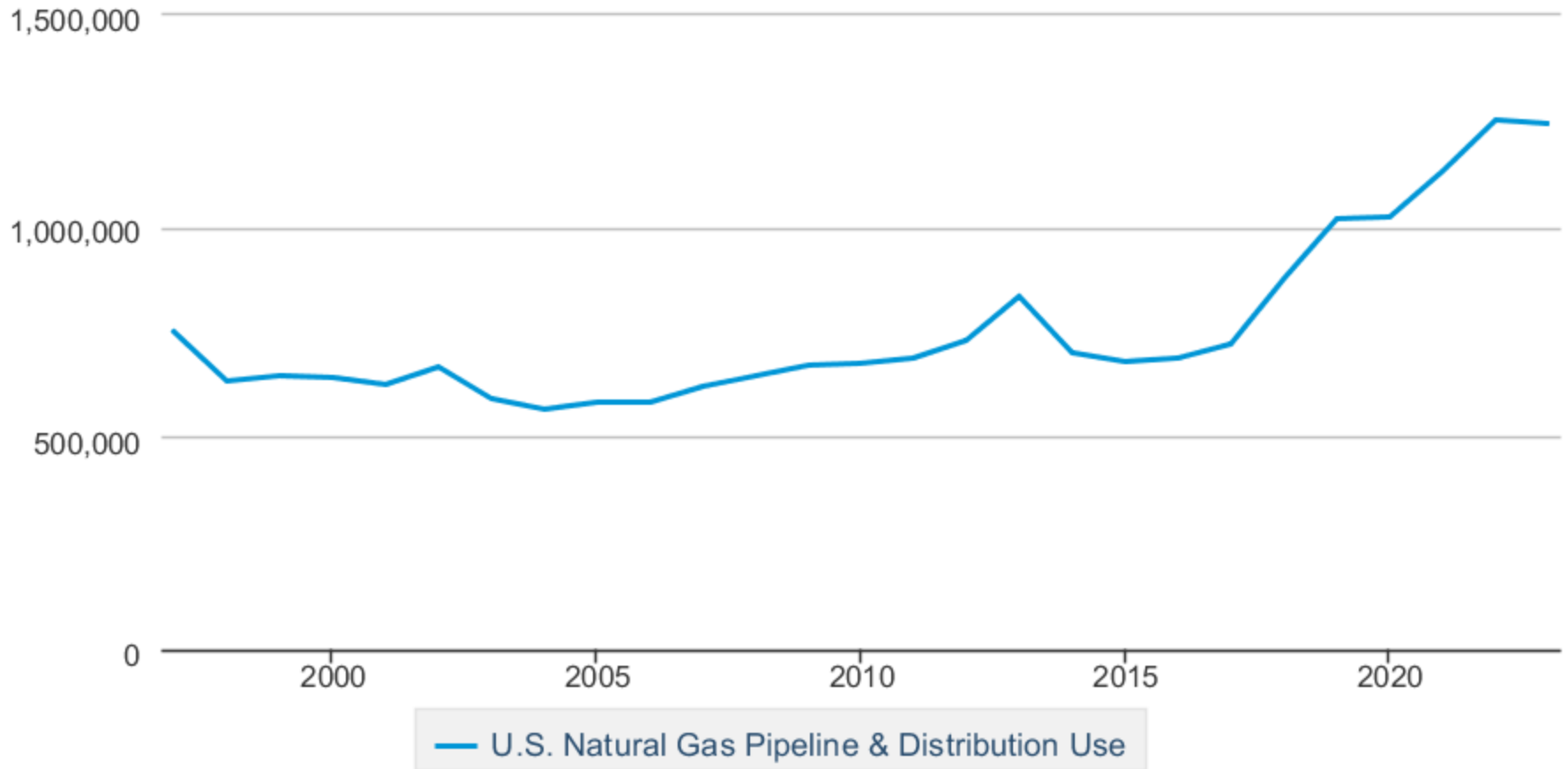


Data source: U.S. Energy Information Administration

# Natural Gas Pipeline Usage

## U.S. Natural Gas Pipeline & Distribution Use

Million Cubic Feet



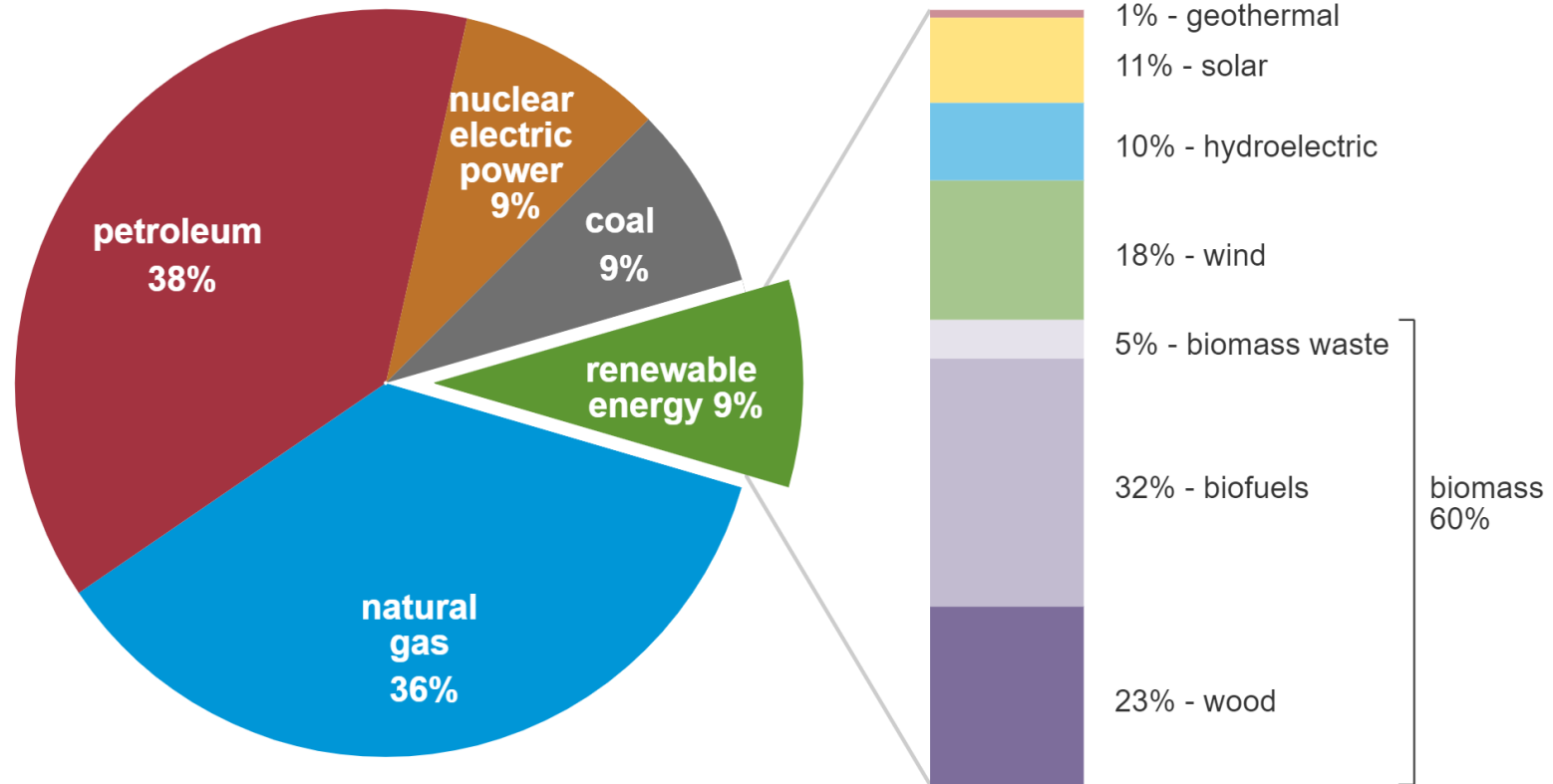
Data source: U.S. Energy Information Administration

# Energy Consumption by Source

## U.S. primary energy consumption by energy source, 2023

total = 93.59 quadrillion  
British thermal units

total = 8.24 quadrillion British thermal units



Data source: U.S. Energy Information Administration, *Monthly Energy Review*, Table 1.3 and 10.1, April 2024, preliminary data

Note: Sum of components may not equal 100% because of independent rounding.



# Shuttered Planned Capacity (new/expanded pipes)

Project Name	State(s)	Cost (millions)	Additional Capacity (MMcf/d)
Atlantic Coast Pipeline	WV,VA,NC	\$5,100	1,500
Constitution Pipeline	PA,NY	\$683	650
Northeast Energy Direct	PA,NY,MA	\$3,300	1,300
Northeast Supply Enhancement Project	PA,NJ,NY	\$927	400
PennEast Pipeline	PA,NJ	\$1,300	1,107
		<b>\$11,310</b>	<b>4,957</b>

# Planned Capacity that Disappeared (expansion)

Project Name	State(s)	Cost (millions)	Additional Capacity (MMcf/d)
Access Northeast	NY,CT,MA	\$3,000	925
Cimarron Expansion Project	OK, KS		631
Sooner Trails Project	OK	\$300	1,400
Sweden Valley Project	PA,OH	\$50	120
Appalachia to Market Project (A2M Project)	OH,WV,PA,NJ		1,000
Waynoka Gas Supply Lateral Project	OK	\$50	225
Wright Interconnect Project	NY	\$75	650
Mid-Atlantic Chiller Project	PA,VA		25
Morgantown Connector Project	WV	\$191	240
Trail West/N-MAX	OR	\$800	450
		\$4,466	5,666

## Needed permitting improvements:

- ✓ Section 401 Clean Water Act (CWA)
  - Limit State's scope of review to only potential water quality impacts
  - Clarify water quality certification conditions
- ✓ Judicial Review
  - Time limiting injunctions
  - Shorten statute of limitations
  - Expediting court assignment
- ✓ National Environmental Policy Act (NEPA)
  - Specifying effects as reasonably foreseeable, not speculative, or remote
  - Impacts defined as having reasonably close causal relationship
- ✓ USACE nationwide permits (Section 404 CWA)
  - Create a statutory definition of a "Single and Complete Project"
  - Require Corps to maintain a nationwide permit for gas pipelines



- **POTUS enacted FRA with NEPA changes & MVP last June**
  - ✓ Project sponsors may now prepare EIS
  - ✓ New default deadlines & page limits for EIS/EA
  - ✓ Project sponsors may challenge agency delays in court
- **What's missing?**
  - ✓ No substantive definition amendment of “major federal action” & only codifies regulation
  - ✓ Align statutory text w/existing case law on “reasonableness”
  - ✓ Does not codify nor specify if a project must proximately cause an environmental effect to consider review



[www.INGAA.org](http://www.INGAA.org)