

**UNITED STATES OF AMERICA**

**FEDERAL ENERGY REGULATORY COMMISSION**

IN THE MATTER OF

Algonquin Gas Transmission, LLC            )            Docket No. CP14-96-000

**MOTION TO INTERVENE ON BEHALF OF  
THE COMMUNITY WATERSHEDS CLEAN WATER COALITION**

James Bacon, Esq.  
*Attorney for Intervenors*  
PO Box 575,  
New Paltz, NY 12561  
(845) 419-2338

To:   Kimberly D. Bose, Secretary  
      Nathaniel J. Davis, Sr., Deputy Secretary  
      Federal Energy Regulatory Commission  
      888 First Street, NE  
      Washington, DC 20426

Berk Donaldson  
Director, Rates and Certificates  
Spectra Energy Transmission, LLC  
5400 Westheimer Ct.  
Houston, Texas 77056  
bdonaldson@spectraenergy.com

*By Electronic Filing*

Algonquin Pipeline Company, LLC, a subsidiary of Spectra Energy Corp., (“Applicant”) has submitted an application<sup>1</sup> to the Federal Energy Regulatory Commission (FERC) for a project known as the Algonquin Incremental Market (AIM) Project. The project proposes constructing 20.1 miles of 42-inch diameter mainline take-up/relay and new pipeline in Connecticut and New York and 5.1 miles of new 16-inch and 24-inch diameter lateral pipeline in Massachusetts and adding six new compressor units at five existing compressor stations in New York, Connecticut and Rhode Island and modifications to existing compressor stations.

Proposed intervenors submit this motion pursuant to 18 CFR 385.214 and 18 CFR 157.10 because this Application is not in the public interest.

Proposed intervenor is the Community Watersheds Clean Water Coalition (“CWCWC”), a not-for-profit organization comprising over 50 member groups – housing, community, environmental and religious – throughout NYC, Westchester and Putnam Counties dedicated to improving the waters of the state. Since 1997, CWCWC has advocated to protect the Croton Watershed (“Croton”), which serves as the drinking water source for approximately one million New Yorkers, primarily located in the Bronx, Manhattan and Ossining.<sup>2</sup>

As grounds for its Petition to Intervene, CWCWC respectfully asserts:

1. The project will damage water resources contrary to CWCWC’s purposes and negatively impact the lives of CWCWC members in Westchester and Putnam Counties.
2. No disruption to this proceeding will result as a consequence of granting intervenor status to CWCWC.
3. CWCWC’s interest is not adequately represented by any other party hereto.
4. Existing parties will not be prejudiced by, nor will they sustain any additional burden from CWCWC becoming a party to this proceeding. CWCWC’s participation in this Certificate Proceeding is in the public interest as required by 18 C.F.R. § 385.214(b)(iii).

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<sup>1</sup> Application of Algonquin Pipeline Company, LLC for a Certificate of Public Convenience and Necessity under CP14-96-000

<sup>2</sup> CWCWC’s mission statement states: “[t]he Coalition strives to protect and improve the waters of NYC’s Croton Watershed as well as all New York State watersheds. We are an alliance of individuals and groups who believe that safe, clean and affordable drinking water is a basic human right.”

Therefore, based on the foregoing, CWCWC City respectfully requests that the Federal Energy Regulatory Commission allow it to intervene in this Certificate Proceeding with full rights attendant to that status.

Respectfully,

A handwritten signature in black ink, appearing to read "James Bacon". The signature is stylized with a long horizontal stroke and a curved flourish above it.

James Bacon

Attorney for CWCWC