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Organization: Southern Company

Title:

Comments: Dear Under Secretary Wilkes, Southern Company Services, Inc., acting as agent for the electric operating companies of The Southern Company, including Alabama Power Company, Georgia Power Company, Mississippi Power Company, and Southern Power Company, and Southern Company Gas, representing the Atlanta Gas Light Company, Chattanooga Gas Company, Nicor Gas, and Virginia Natural Gas local distribution companies (collectively "Southern Company"), submits these comments in support of the Mountain Valley Pipeline Project. This proposed underground, interstate natural gas pipeline system will span about 303 miles from northwestern West Virginia to southern Virginia. The project will be constructed and owned by Mountain Valley Pipeline, LLC - a joint venture of Equitrans Midstream Corporation; NextEra Capital Holdings, Inc.; Con Edison Transmission, Inc.; WGL Sustainable Energy LLC; and RGC Midstream, LLC. Targeting a full in-service in the second half of 2023, Equitrans Midstream Corporation, significant interest owner, will operate the pipeline. Southern Company operates as a vertically integrated public utility system, serving the electricity needs of more than 4.4 million retail customers across the Southeastern states of Alabama, Georgia and Mississippi, as well as wholesale customers throughout the Southeast and elsewhere, while the Southern Company local distribution companies serve the natural gas demand for approximately 4.3 million residential, commercial, and industrial customers in Georgia, Illinois, Tennessee, and Virginia. In furtherance of this service, Southern Company relies on a diverse generating portfolio, with gas-fueled resources providing the largest single source of energy production. The ultimate goal of Southern Company's customer-centric business model is high service reliability at the lowest practicable cost. To this end, Southern Company is committed to reducing GHG emissions to provide our customers and communities a clean energy future. The increased use of natural gas has enabled the Southern Company to affordably and reliably serve its customers while reducing its emissions. Southern Company views natural gas as a foundational fuel to continue to make progress towards its goals to further decarbonize its operations. Because of the locations of its service territories in the Southeast and Mid-Atlantic regions of the United States, Southern Company holds substantial natural gas transportation capacity on Transcontinental Gas Pipe Line's interstate pipeline system and competes with other customers for capacity and natural gas volumes. Over the past eighteen months, the rising demand for natural gas has resulted in substantial price increases and higher volatility in the marketplace, and on a more sustained basis than perhaps experienced sporadically in years past. When completed, the Mountain Valley Pipeline Project will allow for the delivery of additional volumes of natural gas into Transcontinental Gas Pipe Line, which will enhance access to a critical source of reliable natural gas supply for the eastern and southeastern United States. Such an expansion will benefit the areas Southern Company serves and help dampen the price increases and volatility being witnessed today. To this end, the public need for the Mountain Valley Pipeline Project has been repeatedly affirmed by state and federal regulators, and in 2022, the Federal Energy Regulatory Commission extended Mountain Valley's certificate of public convenience and necessity to 2026.

Southern Company understands that project work for the 303-mile Mountain Valley Pipeline is nearly 94 percent complete. This includes all above-ground facilities (certificated interconnects and three compressor stations), more than 270 miles of pipe installed and backfilled, and more than half of the right-of-way fully restored. In addition, the interconnection with Transcontinental Gas Pipe Line (as well as two other interconnections) is fully constructed and ready to deliver natural gas into interstate pipeline systems that serve numerous markets in the eastern and southern U.S. As discussed, access to additional gas volumes afforded by this interconnection is a very welcomed improvement to the market. Today, hundreds of thousands of miles of interstate natural gas transmission lines operate underground across the U.S., including through national forests. Natural gas pipelines run throughout Virginia, including the East Tennessee Natural Gas pipeline that runs under the Spring Hollow Reservoir and passes near Camp Roanoke. The drinking-water reservoir was built on top of the natural gas pipeline decades ago. These pipelines are recognized as a safe and reliable way to transport natural gas. Southern Company appreciates the efforts of the Forest Service and understands that its approach and analysis to be appropriate under the circumstances. Also, Southern Company understands that Mountain Valley

has prepared an incredibly detailed Plan of Development for the 3.5 miles of the project that will occur in the Jefferson National Forest, with over two dozen appendices that include minimization and conservation measures for every potential resource affected in the National Forest. Such detailed and comprehensive information should provide a substantial basis upon which the Forest Service can rely as it develops project-specific Forest Plan amendments. Southern Company thanks the Forest Service for its continued work and appreciates the opportunity to provide these comments in support of the Mountain Valley Pipeline Project.