



DONALD F. SANTA
PRESIDENT & CEO

May 18, 2015

The Honorable Lisa Murkowski
Chairman
Committee on Energy and Natural Resources
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member
Committee on Energy and Natural Resources
Washington, DC 20510

Dear Chairman Murkowski and Ranking Member Cantwell,

Thank you for conducting the May 14 hearing on energy infrastructure legislation. As part of the record for that hearing, I am submitting the comments of the Interstate Natural Gas Association of America, or INGAA. INGAA represents interstate natural gas transmission pipeline operators in the U.S. and Canada. Our 24 members operate the vast majority of the interstate natural gas transmission network, which is the natural gas industry analog to the interstate highway system.

The approval and permitting process for interstate natural gas pipelines has become increasingly challenging. While this remains a good, albeit complex, process, there have been some trends in the wrong direction. What was once orderly and predictable is now increasingly protracted and contentious.

Several bills have been introduced in the Senate to address the natural gas permitting process. For example, S. 1210, introduced by Senator Capito, would make some modest improvements in this process. While the pipeline certificate process at the Federal Energy Regulatory Commission generally functions in an orderly and timely fashion, interstate pipelines still must seek a multitude of permits from federal and state agencies before construction can begin. It is with these federal and state permits that many of the approval delays occur. S. 1210 introduces reforms aimed at bringing additional transparency and accountability to the permitting process for pipelines, and therefore has our support. INGAA continues to believe, however, that permitting agencies should face consequences for inaction or delay. We urge Congress to consider such consequences in future oversight and legislative efforts.

INGAA also supports two bills – S. 411 introduced by Senator Barrasso and S. 1196 introduced by Senator Cassidy – that would allow the Department of the Interior to review and approve natural gas pipeline rights of way on lands administered by the National Park Service without seeking a project-specific authorization from Congress. The Department of the Interior has had the authority to approve rights of way for electric, water and communications facilities on these lands, without prior authorization from Congress, since Theodore Roosevelt was president. The current process, which puts Congress in the role of a *de facto* permitting agency for an individual natural gas pipeline project, is peculiar and unnecessary. The Department of the Interior is perfectly capable of reviewing these proposals and making balanced decisions on its own. This is entirely consistent with the statutes authorizing other federal agencies, such as the Bureau of Land Management and the U.S. Forest Service, to issue permits for natural gas pipelines. Seeking a project-specific bill in Congress, which only allows the Department of the Interior to *negotiate* with a pipeline developer for a right of way and does not authorize the permit itself, adds years to the process. We hope Congress will act to delegate this permitting authority to the Department of the Interior.

Thank you for allowing INGAA to submit these comments for the record. Please let us know if you have any questions.

Respectfully,

A handwritten signature in blue ink, appearing to read 'D. F. Santa', with a stylized flourish at the end.

Donald F. Santa

cc: The Honorable John A. Barrasso
The Honorable William Cassidy
The Honorable Shelley Moore Capito