

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Northern Natural Gas Company

Docket No. CP19-479-000

(Issued February 20, 2020)

GLICK, Commissioner, *dissenting in part*:

1. I dissent in part from today's order because it violates both the Natural Gas Act¹ (NGA) and the National Environmental Policy Act² (NEPA). The Commission once again refuses to consider the consequences its actions have for climate change. Although neither the NGA nor NEPA permit the Commission to ignore the climate change implications of constructing and operating this project, that is precisely what the Commission is doing here.

2. In today's order authorizing Northern Natural Gas Company to abandon a portion of its A-line pipeline and replace the abandoned capacity with a new compressor station (Project), the Commission continues to treat greenhouse gas (GHG) emissions and climate change differently than all other environmental impacts.³ The Commission again refuses to consider whether the Project's contribution to climate change from GHG emissions would be significant, even though it quantifies the direct GHG emissions from the Project's construction and operation.⁴ That failure forms an integral part of the Commission's decisionmaking: The refusal to assess the significance of the Project's contribution to the harm caused by climate change is what allows the Commission to state that approval of the Project "would not constitute a major federal action significantly affecting the quality of the human environment"⁵ and, as a result, conclude that the Project is in the public interest and required by the public convenience and necessity.⁶ Claiming that a project has no significant environmental impacts while at the

¹ 15 U.S.C. § 717f (2018).

² National Environmental Policy Act of 1969, 42 U.S.C. §§ 4321 *et seq.*

³ *Northern Natural Gas Company*, 170 FERC ¶ 61,146 (2020) (Certificate Order).

⁴ Certificate Order, 170 FERC ¶ 61,146 at P 29; Bushton to Clifton A-Line Abandonment Project Environmental Assessment at Table 7 and 8 (EA).

⁵ Certificate Order, 170 FERC ¶ 61,146 at P 31; EA at 56.

⁶ Certificate Order, 170 FERC ¶ 61,146 at P 14.

same time refusing to assess the significance of the project's impact on the most important environmental issue of our time is not reasoned decisionmaking.

3. For all the reasons I have articulated previously,⁷ I respectfully dissent in part.

Richard Glick
Commissioner

⁷ *Columbia Gas Transmission, LLC*, 170 FERC ¶ 61,045 (2020) (Certificate Order) (Glick, Comm'r, dissenting in part).