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**BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

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**Florida Gas Transmission Company, LLC  
Docket No. CP23-11-000  
Tampa West Project**

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January 13, 2023

**COMMENT IN OPPOSITION TO PROPOSED BLANKET CERTIFICATE ACTIVITY**

To Whom It May Concern -

On behalf of its 87,858 members and supporters in the state of Florida, Food & Water Watch submits this comment in opposition to Florida Gas Transmission's proposed "Tampa West" project, FERC Docket No. CP23-11-000, which is designed to increase flow rates of methane gas by more than 300 million British thermal units per hour into Hillsborough County, Florida for downstream electricity generation by Tampa Electric. At a time when the nation should be rolling back the use of fossil fuels, Tampa Electric continues to expand their capacity and use of methane gas. The Tampa West project solidifies their expansion of dirty energy and costly fossil fuel infrastructure, which leaves local ratepayers vulnerable to fluctuating costs of service and exacerbates the extreme climatological problems facing coastal Florida, such as sea level rise, saltwater intrusion, and increasing storm intensity. Given the major increase in flow capacity, the indirect environmental implications of this project are far too large to be permitted under existing blanket permit authority, which must be reserved for more routine maintenance projects - not the doubling of flow capacity. As such the Federal Energy Regulatory Commission (FERC) should commence an environmental review pursuant to the National Environmental Policy Act (NEPA) that analyzes the full scope of indirect upstream, downstream, and cumulative environmental impacts of this project.

Both of the cities where this project intends to expand pipeline capacity — St. Petersburg and Tampa — have passed resolutions to end the use of fossil fuels, yet this project aims to expand the use of methane gas for Tampa Electric ratepayers for decades to come. It is imperative that the Commission not support the expansion of fossil fuel infrastructure at a time when the region has committed to moving off fossil fuels. As the Commission is required to consider "all factors bearing on the public interest" when making its determination under Section 7 of the Natural Gas Act, it is vitally important that FERC consider the local legislation of St. Petersburg and Tampa when determining whether this project is truly in the public convenience and necessity. See, 15 U.S.C. § 717f(e), *Atl. Ref. Co. v. Pub. Serv. Comm'n of N.Y.*, 360 U.S. 378, 391 (1959).

This pipeline expansion is meant to increase the delivery of methane gas to Tampa Electric's Big Bend Modernization Project which is converting the state's largest coal plant to methane gas. Not only will this project impact ratepayers now with the construction of the pipeline, it will

mean extra ratepayer costs in the future too. Cumulative impacts of these projects must be taken into account, rather than approving these projects one-by-one as downstream combustion is a reasonably foreseeable downstream effect of this project's approval.

Each new fossil fuel project locks Florida ratepayers into decades of reliance upon expensive and dangerous methane gas. Not only are Florida ratepayers paying for the increasing cost of the fracked gas supplied by these pipelines, they are paying for these projects through rate increases (plus a guaranteed profit for the developer) — at the expense of our health and community. Florida's utilities should be decreasing their use of dirty energy, not building new fossil fuel infrastructure, especially when ratepayers will be footing the bill. These expansions are destructive to our neighborhoods, and they are in direct opposition to the public interest.

In conclusion, approval of this project under existing blanket authority should be denied, and the Commission should require a robust environmental review of cumulative and indirect effects of this project under a full Section 7 review process per the requirement of NEPA and the Natural Gas Act.

Respectfully Submitted,

Food & Water Watch

A handwritten signature in black ink, appearing to read "Brooke A. Ward". The signature is fluid and cursive, with the first name being the most prominent.

Brooke A. Ward  
Senior Florida Organizer