

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>Broadwater Energy LLC</b>	)	<b>Docket No. CP06-54-000</b>
	)	
<b>Broadwater Pipeline LLC</b>	)	<b>Docket No. CP06-55-000</b>
	)	<b>Docket No. CP06-56-000</b>

**MOTION TO INTERVENE  
OF THE AMERICAN GAS ASSOCIATION**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. §385.214, the American Gas Association ("AGA") respectfully moves to intervene in this proceeding and offers its comments on the filing made herein. In support thereof, AGA states as follows:

**I. COMMUNICATIONS**

All pleadings, correspondence, and other communications filed in this proceeding should be served on the following:

Jane R. Lewis-Raymond  
Vice President, Regulatory Affairs  
American Gas Association  
400 North Capitol Street, N.W.  
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## II. STATEMENT OF ISSUES

Whether, pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2005), AGA should be permitted to intervene in this proceeding.

## III. STATEMENT OF INTEREST AND MOTION TO INTERVENE

1. The American Gas Association, founded in 1918, represents 197 local energy utility companies that deliver natural gas to more than 56 million homes, businesses and industries throughout the United States. AGA's members account for roughly 83 percent of all natural gas delivered by the nation's local natural gas distribution companies. AGA is an advocate for local natural gas utility companies and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international gas companies and industry associates. Natural gas meets nearly one-fourth of the United States' energy needs. For more information, go to [www.aga.org](http://www.aga.org).

2. On January 30, 2006, Broadwater Energy LLC ("Broadwater Energy") filed an application under section 3 of the Natural Gas Act (NGA) and Part 153 of the Commission's Rules and Regulations seeking authorization to site, construct and operate an offshore liquefied natural gas (LNG) receiving terminal and associated facilities (Floating Storage and Regasification Unit) in Long Island Sound, as a place of entry for the importation of LNG. The proposed terminal is intended to facilitate the importation of foreign LNG into the United States.

3. Broadwater Pipeline LLC (“Broadwater Pipeline”) also filed on January 30, 2006, (i) an application in Docket No. CP06-55-000 requesting a certificate of public convenience and necessity, pursuant to Subpart A of Part 257 of the Commission’s regulations, authorizing Broadwater Pipeline to construct, own, operate and maintain a 30-inch, 22 mile subsea lateral (and related facilities) as a single-use pipeline; and (ii) a blanket certificate in Docket No. CP06-56-000 under section 7(c) of the NGA and Part 157, Subpart F of the Commission’s regulations to perform routine activities in connection with the future construction, operation and maintenance of the proposed 22-mile pipeline.

Broadwater is seeking authorization to permit its pipeline to be operated as a single-use pipeline – to transport natural gas 22 miles from the Floating Storage and Regasification Unit (FSRU) to a subsea interconnection with an existing interstate pipeline.
4. Commission action on the Broadwater petitions will have significant, industry-wide implications for AGA member companies who will be directly affected by the outcome of this proceeding and the resulting import of additional LNG supplies. AGA members have a substantial interest that cannot be adequately represented by another party in this proceeding. AGA respectfully requests the Commission grant its motion to intervene in this matter with full rights as a party to these proceedings.

**V. CONCLUSION**

WHEREFORE, the American Gas Association respectfully requests that the Commission grant its intervention in this proceeding.

Respectfully submitted,

AMERICAN GAS ASSOCIATION

By: /s/ Jane R. Lewis-Raymond  
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Its Counsel

Dated: March 9, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have on this 9<sup>th</sup> day of March, 2006, sent a copy of this document, either by electronic or first-class U.S. mail, to each person designated on the official service lists compiled by the Secretary in these proceedings in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Washington, D.C., this 9th day of March 2006.

\_\_\_\_\_/s/\_\_\_\_\_  
Jane R. Lewis-Raymond

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