



September 3, 2018

The Honorable John Barrasso  
Chairman, Senate Committee on Environment and Public Works  
410 Senate Dirksen Office Building  
Washington, D.C. 20510

Dear Chairman Barrasso,

The Power and Communication Contractors Association (PCCA) represents contractors, manufacturers, and distributors who build and repair America's power and communications infrastructure, including electric transmission, distribution, and substation facilities and broadband, telephone, and cable television systems. PCCA members also engage in directional drilling, local area and premises wiring, and improvements to water and sewer infrastructure and gas and oil pipelines. Because of the increasing reliance on natural gas in the generation of electric power, PCCA supports the Water Quality Certification Improvement Act of 2018 (S 3303), and we look forward to doing our part to see this bill become law.

A primary use for natural gas is to generate electric power. In fact, natural gas is the source of more than 25% of the nation's electricity, and according to the Energy Information Administration, 46 percent of new generating capacity added to the grid will come from natural gas by 2035. Therefore, PCCA members have a vested interest in legislation that would facilitate the delivery of natural gas to markets across the country.

Pipelines continue to serve as the safest mode of transportation of energy resources. However, there are some states that do what they can to obstruct pipeline projects from commencing in their regions. Section 401 of the Clean Water Act (CWA) provides states the authority to issue water quality certifications prior to final approval by the Federal Energy Regulatory Commission (FERC). While the intent of CWA Sec. 401 is to ensure for a state's water quality, some states misuse this authority to simply delay pipeline transportation projects from even getting started.

S 3303 would clarify that the scope of CWA 401 reviews is limited to water quality impacts only and that states can only consider discharges that would result from the permitted project itself when considering water quality. The bill also calls for clear requirements and for states to base their final decisions only on reasons related to water quality. Finally, states would be required to inform project applicants whether they have all needed materials needed to process a certification request within 90 days.

Electric power depends on natural gas and its timely delivery. The provisions in S 3303 would take needed steps to reform the outdated permitting process for natural gas pipeline projects. PCCA appreciates your leadership in introducing this bill, and we stand ready to assist advancing it through the legislative process.

Regards,

Larry Pribyl  
President