

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Algonquin Gas Transmission, LLC

Docket No. CP14-96-000

**PETITION OF THE TOWN OF CORTLANDT FOR REHEARING OR
RECONSIDERATION OF THE MARCH 3, 2015 ORDER ISSUING A CERTIFICATE
FOR THE ALGONQUIN INCREMENTAL MARKET PROJECT**

The Town of Cortlandt (the “Town”), by its attorneys, petitions pursuant to Section 19(a) of the Natural Gas Act and Rule 713 of the Federal Energy Regulatory Commission (“FERC”)’s Rules of Practice and Procedure for rehearing or, in the alternative, reconsideration of FERC’s March 3, 2015 Order Issuing Certificate and Approving Abandonment for the Algonquin Incremental Market (“AIM”) project. The AIM project is the proposed abandonment, replacement, and installation of about 37.4 miles of natural gas pipeline and related gas compressor facilities, including over 7 miles within the Town.

The Town has a unique interest in the significant public safety risks and environmental impacts of the AIM project. The Town is the location of the Indian Point Energy Center’s nuclear facility, which lies in close proximity to the proposed route of the AIM project, as well as the home of treasured scenic, environmental, and historic resources of the Hudson Highlands region, including the Hudson River, Blue Mountain Reservation, and historic landmarks. To protect the safety of its residents and the integrity of its natural environment and cultural heritage, the Town participated in the environmental review of the AIM project and submitted technical reports and comments relating to the safety concerns arising from the location of this massive gas pipeline near a nuclear power plant. Those comments and reports included the Town’s comments on the Draft Environmental Impact Statement, filed September 29, 2014, and its comments regarding public safety and the Indian Point facility and related reports of the

Town's consultant, Accufacts, Inc., filed on November 21, 2014, and on January 6, 2015.

Because the March 3, 2015 Order failed to address adequately the Town's concerns, either in its approval of the project or in its provision of certificate conditions, the Town is compelled to request rehearing or reconsideration.

The Town's objections to the March 3, 2014 Order are sufficiently similar to those errors and issues set forth in the rehearing petition of the Coalition of Environmental and Community Organizations, which was also filed today. Accordingly, the Town will not reiterate the arguments contained therein, but rather incorporates by reference each of those arguments and requests as if fully set forth again here. For those reasons, FERC should stay commencement of the AIM project under the previously granted certificate, grant rehearing and reconsideration of its March 3, 2015 order, correct the errors in its environmental review of the AIM project, deny the certificate unless FERC reasonably determines that the project is in the public interest, and, if it reissues the certificate, revise Environmental Condition 16 to ensure that the environmental review of the project will be appropriately supplemented in the event of an unsuccessful attempt at the project's use of horizontal directional drilling to cross the Hudson River.

Yours very truly,

THOMAS F. WOOD
Town Attorney, Town of Cortlandt

- and -

SIVE, PAGET & RIESEL, P.C.
Special Counsel, Town of Cortlandt

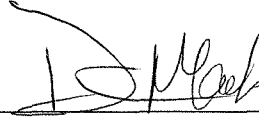
By: 

Daniel Riesel, Esq.
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New York, New York 10022
(212) 421-2150

Dated: New York, New York
April 2, 2015

CERTIFICATE OF SERVICE

I certify that on April 2, 2015, I served the foregoing petition for rehearing on all parties listed on the official service list through the Federal Energy Regulatory Commission's e-filing system.

A handwritten signature in black ink, appearing to read 'DMach', written over a horizontal line.

Daniel Mach
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