Margaret A. Morris, Esquire

From: eFiling@ferc.gov

Sent: Wednesday, February 14, 2018 4:52 PM

To: Margaret A. Morris, Esquire; eFilingAcceptance@ferc.gov

Subject: FERC Acceptance for Filing in CP18-46-000

Acceptance for Filing

The FERC Office of the Secretary has accepted the following electronic submission for filing (Acceptance for filing does not constitute approval of any application or self-certifying notice):

-Accession No.: 201802145164 -Docket(s) No.: CP18-46-000 -Filed By: East Goshen Township -Signed By: Margaret Morris

-Filing Type: Motion/Notice of Intervention -Filing Desc: Motion to Intervene Out-of-Time of East Goshen Township

under CP18-46.

-Submission Date/Time: 2/14/2018 4:43:05 PM -Filed Date: 2/14/2018 4:43:05 PM

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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

ADELPHIA GATEWAY, LLC

Docket No. CP18-46-000

MOTION OF EAST GOSHEN TOWNSHIP TO INTERVENE OUT OF TIME

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's

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(Commission) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 214 (2007), East

Goshen Township (EGT) files this Motion to Intervene Out of Time, in the above referenced

proceeding.

On January 11, 2018, Adelphia Gateway LLC (Adelphia) filed its Application under

Section 7 of the Natural Gas Act, 15 U.S. C. § 717(f), and Section 157 of the Commission's

Regulations, 18 C.F.R. § 157.1 et seq., for its proposed pipeline project, at FERC Docket No.

CP18-46-000. Adelphia seeks, inter alia, to 1) acquire, own and operate the existing pipeline

system and related facilities in the Commonwealth of Pennsylvania that are currently operated by

Interstate Energy Company LLC (IEC), 2) construct, own and operate certain compression

facilities and pipeline facilities in Commonwealth of Pennsylvania and 3) construct, install, own

and operate certain other appurtenant facilities (Project).

I. COMMUNICATIONS AND SERVICE

All communications, pleadings and orders with respect to this proceeding should be

forwarded to the following:

Margaret A. Morris, Esquire Reger Rizzo & Darnall LLP Cira Centre, 13th Floor 2929 Arch Street Philadelphia, PA 19104 (215) 495-6524 tel. (215) 495-6600 fax mmorris@regerlaw.com

II. INTEREST OF THE PETITIONER

In support of its Motion, EGT states that it is a township located in Chester County, Pennsylvania and comprised of 10 square miles, with a population of 18,026 at the time of the 2010 census. IEC's pipeline system currently runs though East Goshen Township and a mainline valve site currently exists at Paoli Pike. EGT seeks to intervene because it has a responsibility to plan for and participate in the protection of its assets and resources as well as the obligation to protect the public health, safety and welfare of its residents. EGT will be directly affected by the outcome of this proceeding. EGT's intervention in this proceeding is in the public interest.

EGT avers that due to the illness of the undersigned counsel, the Motion could not be timely filed. A grant of the intervention will not disrupt the proceedings. Other parties to this proceeding cannot adequately represent EGT's interest, and the participation of EGT will not prejudice the rights of any party. There is no prejudice to, or additional burden on, existing parties might result from permitting the intervention one day late.

III. CONCLUSION

IV.

WHEREFORE, East Goshen Township, respectfully requests that this Commission grant its Motion Intervene Out of Time as a party with full rights to participate in all further proceedings.

Dated: February 14, 2018

Respectfully submitted,

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