



February 27, 2017

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Spire STL Pipeline LLC, Docket No. CP17-40-000

The Independent Petroleum Association of America (“IPAA”) submits the following comments in support of the Application by Spire STL Pipeline LLC (“Spire”) for Certificates of Public Convenience and Necessity to construct, own, and operate a new interstate natural gas pipeline and to provide interstate natural gas transportation and transportation-related services subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC” or “Commission”).

IPAA represents the thousands of companies that drill 95 percent of America's onshore and offshore oil and natural gas wells. America’s independents produce 54 percent of American oil and produce 85 percent of American natural gas. IPAA members rely on a strong, safe network of pipelines to transport natural gas and its associated products to consumers.

Spire’s application is an excellent example of the flexibility of the U.S. interstate natural gas system. The project will improve upon some existing pipeline yet construct a relatively short 59 miles of greenfield pipeline to access supplies that will bring new sources of natural gas to residential, commercial, and industrial consumers in the St. Louis market, served by Laclede Gas Company. These customers cannot rely exclusively on renewable energy. The natural gas from Spire will allow for integration of renewables, yet still providing a clean, abundant, and affordable energy source. While American natural gas production recently has risen to its highest levels, carbon emissions have dropped dramatically to historic 20-year lows.

With the growth in American energy production—and its attendant benefits in creating new jobs, providing consumers with affordable energy, lowering manufacturing costs, and improving air quality—comes the need for infrastructure to move the commodity to markets. The Spire Project creates an opportunity to better utilize existing infrastructure, along with construction of new pipeline to better meet the needs of St. Louis consumers and American producers serving this market. As such, IPAA supports Spire’s application and urges prompt FERC consideration to allow Spire to commence construction by January 2018, with service commencement on November 1, 2018.

Respectfully submitted,

Susan Ginsberg
Vice President
Crude Oil & Natural Gas Regulatory Affairs