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May 9, 2025

Commander
U.S. Army Corps of Engineers
Norfolk District
Attention: Steven VanderPloeg
CENAO-WRR
803 Front Street
Norfolk, VA 23510-1011

Re: Mountain Valley Pipeline – South Gate Project, Corps Project Number NAO-2018-1574 (VMRC 25-0752), SAW-2018-00887

On behalf of the Industrial Energy Consumers of America (IECA), we are strongly in support of the Mountain Valley Pipeline – South Gate Project. IECA membership represents a diverse set of industries including chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.

The manufacturing sector's economic growth is facing a growing crisis due to inadequate natural gas pipeline capacity. Not having available natural gas pipeline capacity has major economic and job implications for Virginia and North Carolina. In 2024, for Virginia and North Carolina, the manufacturing sector accounted for 703 thousand jobs, over 20 thousand facilities, and \$1.3 billion in GDP.

Without increased natural gas pipeline capacity, Virginia and North Carolina has neither natural gas nor electric reliability, which disrupts supply chains for consumer, industrial and national defense goods, investments, and job creation. Manufacturers cannot increase production without a reliable supply of natural gas.

Because of inadequate pipeline capacity, during winter and summer peak natural gas demand, manufacturers are the first to be curtailed. When this happens, manufacturers must reduce or stop operating their facilities with a significant economic impact, which can cost millions of dollars per day.

Manufacturing equipment that uses natural gas cannot be converted to use electricity. Even if that were possible, a Btu of electricity is about 300 percent more expensive than a Btu of natural gas. Most companies do not have a backup source of energy such as fuel oil, propane, or coal.

Again, we are supportive of the Mountain Valley Pipeline – South Gate Project and would like to see the project move forward.

Sincerely,

Paul N. Cicio

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President & CEO

cc: Chairman Mark C. Christie, FERC
Commissioner David Rosner, FERC
Commissioner Lindsay S. See, FERC
Commissioner Judy W. Chang, FERC

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.3 trillion in annual sales, over 12,000 facilities nationwide, and with more than 1.9 million employees. One hundred percent of IECA members are manufacturing companies whose competitiveness is largely determined by the cost and reliability of natural gas and electricity. IECA's sole mission is to reduce and avoid energy costs and increase energy reliability through advocacy in Congress and regulatory agencies, such as the Federal Energy Regulatory Commission (FERC). IECA membership represents a diverse set of industries including chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.