



1050 Connecticut Avenue, NW, Suite 500 • Washington, D.C. 20036
Telephone (202) 223-1420 • www.ieca-us.org

July 23, 2025

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

Re: Transcontinental Gas Pipe Line Company, LLC Southeast Supply Enhancement Project: Docket No. CP25-10

On behalf of the Industrial Energy Consumers of America (IECA) and its member companies located in states served by the pipeline, we reaffirm our support for the Southeast Supply Enhancement Project. Besides reaffirming that pipeline capacity is desperately needed by manufacturing companies, this letter responds to claims made by the Southern Environmental Law Center that commissioned the study “Uncertainty and Upward Bias are Inherent in Data Center Electricity Demand Projections.”

IECA 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. 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.

There is no firm pipeline capacity that is available to allow manufacturing companies in states served by the pipeline to invest capital, increase production, and create jobs. Our companies are under constant threat of OFOs and curtailments that used to be only during winter months and now happen almost all year long. When we get curtailed, it is at great costs of tens of millions of dollars per day. When there is an inadequate supply, manufacturers are always the first to be curtailed.

Manufacturing is an important job creator and economic contributor to the economy of states supplied by this pipeline. Increased pipeline capacity is necessary to reshore jobs, strengthen supply chains, and for national security. We are major suppliers to the defense industries.

State	Manufacturing GDP (2024, \$Millions)	Manufacturing Employment (2024, Thousands)	Manufacturing Facilities (2024)
Alabama	\$50,115.2	285.8	7,078
Georgia	\$86,618.5	423.4	13,520
North Carolina	\$108,069.6	460.5	11,484
South Carolina	\$47,222.4	263.0	9,337
Virginia	\$54,708.9	242.2	9,005
Totals	\$346,734.60	1,674.9	50,424

Source: U.S. Bureau of Economic Analysis, U.S. Bureau of Labor Statistics

We urge you to reject claims made by the Southern Environmental Law Center that asserts the pipeline capacity is not needed. We can present hundreds of companies whose future is threatened by costly outages and higher costs.

The Southern Environmental Law Center claim, “The expansion would support uncertain data center related load, creating substantial risk that ratepayers will shoulder the economic burden of unneeded infrastructure.” Because there is inadequate pipeline capacity, we are already shouldering an enormous economic burden and will continue to do so unless the pipeline is completed. We are not worried about an overbuilding of capacity. With increased capacity, manufacturers will expand and/or build new facilities to fully use the capacity. It truly is the case of “if you build it, they will come.”

We are happy to meet with FERC authorities to ensure that this pipeline is completed.

Sincerely,

Paul N. Cicio

Paul N. Cicio

President & CEO