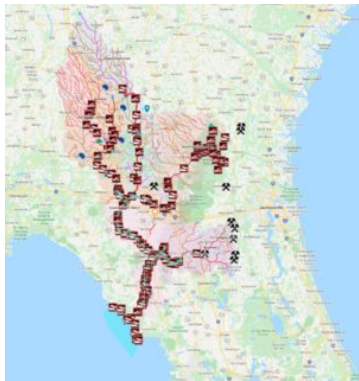


June 20, 2020

To: Nathaniel J. Davis, Sr., Deputy Secretary.
Federal Energy Regulatory Commission (FERC)
Via e-filing

Re: Brief of WWALS Watershed Coalition, Inc. in the Rehearing of Sabal Trail Transmission, LLC Phase II under CP15-17-005

Dear Secretary Davis and FERC Commissioners,



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WWALS is an IRS 501(c)(3)
nonprofit charity est. June 2012

Suwannee Riverkeeper on behalf of WWALS Watershed Coalition, Inc. (“WWALS”) files this brief under 18 C.F.R. § 385.713(d)(2)¹ in the “Rehearing for Further Consideration re Sabal Trail Transmission, LLC under CP15-17” granted by FERC on June 19, 2020.² In this brief, WWALS supports WWALS’ own request of April 13, 2020 for independent third-party inspection of Sabal Trail’s work before accepting it,³ as well as Sierra Club’s May 22, 2020 request⁴ for rescission of FERC’s letter order of April 22, 2020 granting⁵ Sabal Trail’s request to place into service the Sabal Trail Project II Facilities, as well as Sierra Club’s motion in its same letter for a stay on Sabal Trail Phase II operations while the Commission conducts supplemental environmental review of the public health and environmental justice impacts of placing the facilities into service, in a manner that complies with the Commission’s obligations under the National Environmental Policy Act (“NEPA”) and the Natural Gas Act.

WWALS is an Intervenor both in the underlying process of Docket No. CP15-17,⁶ as well as in⁷ the comment period⁸ on the March 26, 2020, request⁹ by Sabal Trail Transmission, LLC (“Sabal Trail”) for an extension of time to construct and place into service its Phase II project facilities for its Sabal Trail Project authorized on February 2, 2016.

On May 1, 2020, FERC declared moot¹⁰ that comment period on Sabal Trail’s request for an extension of time because of FERC’s April 22, 2020, letter order granting Sabal Trail permission to place Phase II into service, and because of Sabal Trail’s letter to FERC of

¹ 18 C.F.R. § 385.713(d)(2) “The [Commission](#) may afford parties an opportunity to file briefs or present oral argument on one or more issues presented by a request for rehearing.” <https://www.law.cornell.edu/cfr/text/18/385.713>

² “Order Granting Rehearing for Further Consideration re Sabal Trail Transmission, LLC under CP15-17,” FERC, June 19, 2020, FERC [Accession Number 20200619-3050](#)

³ “Motion to Halt Sabal Trail Phase II and to Invoke Penalties, by WWALS Watershed Coalition, Inc. under CP15-17.” WWALS, April 13, 2020, [FERC Accession Number 20200413-5269](#)

⁴ “Sierra Club request for rehearing and stay of FERC’s April 22, 2020 letter order under CP15-17.” Sierra Club, May 22, 2020, [FERC Accession Number 20200522-5342](#).

⁵ “Letter order granting Sabal Trail Transmission, LLC’s 04/08/2020 request to place into service the Sabal Trail Project Phase II Facilities, etc. under CP15-17,” FERC, April 22, 2020, [FERC Accession Number 20200422-3020](#).

⁶ “Motion to Intervene of WWALS Watershed Coalition, Inc. under CP15-17, et. al.” WWALS, December 22, 2014, [FERC Accession Number 20141222-5054](#)

⁷ “Motion to Intervene by WWALS Watershed Coalition, Inc., in proceeding on Request for Extension by Sabal Trail Transmission, LLC under CP15-17.” WWALS, April 6, 2020, [FERC Accession Number 20200406-5070](#)

⁸ “Notice of Extension of Time Request re Sabal Trail Transmission, LLC under CP15-17,” FERC, March 27, 2020, [FERC Accession Number 20200327-3095](#)

⁹ “Sabal Trail Transmission, LLC submits its request for extension of time to complete construction of certificated facilities under CP15-17.” Sabal Trail, March 26, 2020, FERC Accession Number [20200326-5147](#)

¹⁰ “Notice Dismissing Request for Extension of Time As Moot re Sabal Trail Transmission, LLC under CP15-17.” FERC, May 1, 2020, [FERC Accession Number 20200501-3043](#).