UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Mountain Valley Pipeline, LLC	)	Docket No. CP26-___-000

ABBREVIATED APPLICATION OF MOUNTAIN VALLEY PIPELINE, LLC FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

Pursuant to Section 7(c) of the Natural Gas Act ("NGA"), as amended,[1] and Part 157 of the regulations of the Federal Energy Regulatory Commission ("Commission" or "FERC"),[2] Mountain Valley Pipeline, LLC ("Mountain Valley") hereby submits this Application requesting that the Commission issue a certificate of public convenience and necessity ("Certificate") for the MVP Boost Project ("MVP Boost" or "Project"). The Project consists of the addition of compression at three existing compressor stations on the MVP Mainline System and the construction of a new compressor station in Montgomery County, Virginia. MVP Boost is designed to meet the proven demand for natural gas by providing up to 600,000 dekatherms per day ("Dth/d") of additional firm transportation capacity on the Mainline System. Based on current permitting and construction timelines, the Project is expected to be in service by mid-2028.

To meet the confirmed need of Mountain Valley's shippers for additional firm natural gas transportation capacity, Mountain Valley respectfully requests that the Commission issue an order authorizing the Project by **November 19, 2026**.

[1] 15 U.S.C. § 717f(c) (2018).

[2] 18 C.F.R. Part 157 (2025).

I. BACKGROUND

Mountain Valley Mainline System (Docket No. CP16-10-000)

In October 2017, the Commission issued an order authorizing Mountain Valley to construct the 303-mile Mainline System to transport up to 2 Bcf/day of Marcellus and Utica shale production from Wetzel County, West Virginia, to Transcontinental Gas Pipe Line Company, LLC's ("Transco") Zone 5 compressor station 165 in Pittsylvania County, Virginia.[3] As certificated and constructed, the Mainline System includes three compressor stations:

- Bradshaw Compressor Station, located at Mainline System Milepost 2.8 in Wetzel County, West Virginia consisting of four gas-driven turbine units;
- Harris Compressor Station, located at Mainline System Milepost 77.5 in Braxton County, West Virginia consisting of two gas-driven turbine units; and
- Stallworth Compressor Station, located at Mainline System Milepost 154.2 in Fayette County, West Virginia consisting of two gas-driven turbine units.

Mountain Valley's pre-filing request in Docket No. PF15-3-000 for the Mainline System included a proposed fourth compressor station, the Swann Compressor Station, in Roanoke County, Virginia. Due to refinements in project design, the Swann Compressor Station was not included in the Mainline System certificate application filing in Docket No. CP16-10-000.

After protracted litigation-related delays, construction of the Mainline System was completed in June 2024, and the Mainline System was placed into service on June 14, 2024.[4] Capacity on the Mainline System is 100% fully subscribed under long-term firm transportation service agreements.

[3] *Mountain Valley Pipeline, LLC*, 161 FERC ¶ 61,043 (2017), *order on reh'g*, 163 FERC ¶ 61,197 (2018), *aff'd sub. nom*., *Appalachian Voices v. FERC*, No. 17-1271, 2019 WL 847199 (D.C. Cir. Feb. 19, 2019).

[4] Mountain Valley Pipeline, LLC, Notification of In-Service Date, Docket Nos. CP16-10-000, et al. (filed June 14, 2024).

Mainline System Plays Critical Role In Winter Reliability

In the summer of 2025, Mountain Valley marked its first full year of operations for the Mainline System, proving to be an integral component in our nation's energy infrastructure system. The Mainline System has been instrumental in providing a reliable supply of affordable natural gas needed to meet state and national environmental goals, promote economic development and job creation and ensure economic and energy stability. In a joint report from FERC and the North American Electric Reliability Corporation, the Mainline System was acknowledged for its critical role in helping to avoid supply curtailments during winter weather events and periods of record demand.[5]

MVP Southgate Amendment Project (Docket No. CP25-60-000)

On June 18, 2020, the Commission issued an order authorizing Mountain Valley to construct, own, and operate the MVP Southgate Project ("MVP Southgate").[6] MVP Southgate was proposed to extend approximately 75 miles from the terminus of the Mountain Valley Mainline System in Pittsylvania County, Virginia to new delivery points in Rockingham and Alamance Counties, North Carolina and provide up to 375,000 Dth/d of firm transportation service.[7]

On February 3, 2025, Mountain Valley filed an application in Docket No. CP25-60-000 to amend its existing certificate of public convenience and necessity for MVP Southgate

[5] *See January 2025 Arctic Events: A System Performance Review*, Docket No. AD25-9-000 (Apr. 17, 2025) ("VACAR South noted it benefited from the Mountain Valley Pipeline, which reached full capacity in January 2025 for the first time since it became operational in June 2024. VACAR South indicated that the pipeline played a crucial role in maintaining reliable electric supply during this high demand period by sustaining stable pipeline pressure.").

[6] *Mountain Valley Pipeline, LLC*, 171 FERC ¶ 61,232 at P 2 (2020), *order on reh'g*, 172 FERC ¶ 61,261 (2020), *aff'd sub. nom., Sierra Club, et al. v. FERC*, 38 F.4th 220 (D.C. Cir. 2022).

[7] *Id*. at P 1. As originally certificated, MVP Southgate consisted of approximately 31 miles of 24-inch pipeline and 42 miles of 16-inch pipeline.

("Amendment Project"). The Amendment Project will extend approximately 31 miles from the terminus of the Mainline System in Pittsylvania County, Virginia to planned new delivery points in Rockingham County, North Carolina using 30-inch diameter pipe. The Amendment Project is less than half the length of the original MVP Southgate Project and will include substantially fewer water crossings and will not require a new compressor station.[8] The new precedent agreements collectively provide for 550,000 Dth/d of firm capacity commitments and are each for 20-year terms. On October 3, 2025, the Environmental Assessment was issued, and Mountain Valley has requested an order approving the Amendment Project by December 31, 2025.

MVP Boost Open Season

From June 23, 2025 through July 23, 2025, Mountain Valley held an open season and reverse open season for the Project. Through the open season, Mountain Valley solicited interest in an expansion of the Mainline System via the addition of compression at the three existing compressor stations and the construction of a new compressor station. While Mountain Valley originally contemplated total Project capacity of 500,000 Dth/d, Mountain Valley optimized the Project in response to overwhelming shipper demand in order to offer 600,000 Dth/d of additional firm transportation capacity. Mountain Valley received no requests from existing shippers to turn back Mainline System capacity.

[8] Note that the Lambert Compressor Station that is no longer proposed as part of the MVP Southgate Amendment Project has no linkage to the MVP Boost Project. The Lambert Compressor Station was originally proposed to relay gas along the 75-mile original route of MVP Southgate. With the shorter route, compression is no longer required for the MVP Southgate Amendment Project. The Swann Compressor Station proposed as part of MVP Boost is necessary to relay the additional volumes of Project capacity to the existing terminus of the Mainline System at Transco Station 165.

II. DESCRIPTION OF MOUNTAIN VALLEY

The exact legal name of the applicant is Mountain Valley Pipeline, LLC. Mountain Valley is a limited liability company duly organized and existing under the laws of the State of Delaware. Mountain Valley's principal office is located at 2200 Energy Drive Canonsburg, Pennsylvania 15317.

Mountain Valley owns and operates an interstate natural gas pipeline system and is a "natural gas company" within the definition of Section 2(6) of the NGA, 15 U.S.C. § 717a(6), subject to the Commission's jurisdiction.

III. CORRESPONDENCE AND COMMUNICATIONS

The persons to whom correspondence and communications concerning this Application should be directed and upon whom service is to be made are as follows:

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IV. REGULATORY AUTHORIZATIONS REQUESTED

Mountain Valley is seeking a Certificate pursuant to Section 7(c) of the NGA and Part 157 of the Commission's regulations to construct, own, operate, and maintain the Project. Specifically, Mountain Valley requests that the Commission issue a Certificate to enable Mountain Valley to construct the following facilities:

[9] Persons designated to receive service pursuant to Rule 203 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203 (2025).

[10] Person designated as the responsible Mountain Valley official under Section 154.7(a)(2) of the Commission's regulations, 18 C.F.R. § 154.7(a)(2) (2025).

- **Bradshaw Compressor Station Expansion:** the addition of one Titan 130E gas-driven turbine, which will add approximately 23,470 horsepower ("hp") of compression for a total station combined 117,350 hp. The Bradshaw Compressor Station expansion will be contained within the existing permanent footprint of the station and no new temporary workspace beyond that previously approved in Docket No. CP16-10-000 is required.
- **Harris Compressor Station Expansion:** the addition of one Titan 350 gas-driven turbine, which will add approximately 52,500 hp of compression for a total station combined 93,500 hp. The expansion and temporary workspace will be contained within the workspace previously approved in Docket No. CP16-10-000.
- **Stallworth Compressor Station Expansion:** 1) upgrades to the two existing compressors, which will increase the combined horsepower by 5,940 to a combined total of 46,940 hp; and 2) installation of two additional Titan 130E gas-driven turbines, which will add approximately 46,940 hp of additional compression. The expansion and temporary workspace will be contained within the workspace previously approved in Docket No. CP16-10-000.
- **Swann Compressor Station:** construction of a new compressor station on land owned by Mountain Valley in Montgomery County, Virginia at Milepost 236 of the Mainline System. The new Swann Compressor Station will contain two Titan 350 gas-driven turbines and one Titan 250 gas-driven turbine, which combined will provide a total of approximately 136,900 hp of compression. Construction of approximately 0.2 mile of new 42-inch-diameter dual lay natural gas suction and discharge facilities will be required at the Swann

Compressor Station to connect the proposed compressor station to the existing Mainline System.

- **Ancillary Facilities:** construction of one mainline block valve to be installed within the fence line of the proposed Swann Compressor Station. The mainline block valve will be a bypass valve that will be used to allow gas to continue to flow along the Mainline System in the event that the compressor station is shut down for maintenance. The mainline block valve will be buried with aboveground appurtenances and equipped with valve actuators to allow for local or remote operation. Mountain Valley also proposes to install a pig launcher and receiver within the fence line of the proposed Swann Compressor Station.

V. BINDING NON-AFFILIATE AGREEMENTS FOR 100% OF THE MVP BOOST CAPACITY

As part of the open season, Mountain Valley offered all potential customers the opportunity to become an Anchor Shipper or a standard shipper for the Project. To qualify as an Anchor Shipper, a party was required to sign a binding Precedent Agreement and credit agreement and commit to at least 125,000 Dth/day of firm capacity for a minimum initial contract term of 20 years and primary delivery point of MVP Southgate or other delivery points as evaluated by Mountain Valley, in its sole discretion, based on continued project development.[11]

Following the open season, Mountain Valley executed precedent agreements for 600,000 Dth/d of long-term firm service for 20-year terms at negotiated rates with three non-affiliated shippers that qualified as Anchor Shippers: Duke Energy Carolinas, LLC ("Duke") for 275,000 Dth/d; Public Service Company of North Carolina, Inc. ("PSNC") for 125,000 Dth/d; and Virginia

[11] *See* Notice of Open Season, *available at* https://mvpboost.info/news/open-season.

Power Services Energy Corp., Inc. ("VPSE") for 200,000 Dth/d (together, the "Project Shippers"). Copies of the precedent agreements with the Project Shippers are included herewith as Exhibit I.[12]

Consistent with FERC policy,[13] Mountain Valley solicited offers from existing shippers to turn back all or a portion of their current Mainline System firm transportation entitlements. Mountain Valley received no requests to turn back capacity.

VI. CERTIFICATE POLICY STATEMENT AND PUBLIC CONVENIENCE AND NECESSITY

The Commission's Certificate Policy Statement establishes criteria for determining whether there is a need for a proposed project and whether the proposed project will serve the public interest.[14] The "threshold requirement for pipelines proposing new projects is that the applicant must be prepared to financially support the project without relying on subsidization from its existing customers."[15] The Commission then analyzes "whether the applicant has made efforts to eliminate or minimize any adverse effects the project might have on the applicant's existing customers, existing pipelines in the market and their captive customers, and landowners and communities affected by the proposed project."[16] Finally, if residual adverse effects on these

[12] The precedent agreements contain commercially-sensitive information. As such, Mountain Valley has filed redacted copies of the precedent agreements as public and unredacted copies as non-public and has labeled them "CUI//PRIV - Contains Privileged Information – Do Not Release." Mountain Valley has included a Form of Confidentiality and Protective Agreement as Exhibit Z-2.

[13] *Texas Eastern Transmission, LP*, 146 FERC ¶ 61,086 at P 38 (2014).

[14] *Certification of New Interstate Natural Gas Pipeline Facilities*, 88 FERC ¶ 61,227; *corrected,* 89 FERC ¶ 61,040 (1999), *clarified*, 90 FERC ¶ 61,128; *further clarified*, 92 FERC ¶ 61,094 (2000) ("Certificate Policy Statement"). On September 12, 2025, the Commission issued an order terminating the Docket No. PL18-1-000 proceeding that reviewed a proposed updated Certificate Policy Statement. *See Certification of New Interstate Natural Gas Facilities, Order Terminating Proceeding*, 192 FERC ¶ 61,216 (2025). The Commission affirmed that the Certificate Policy Statement, as subsequently applied by the Commission, "continues to provide the appropriate framework for reviewing proposed natural gas projects in a legally durable manner, pursuant to the Natural Gas Act and consistent with judicial precedent, as it has for over 25 years." *Id*. at P 6.

[15] *Rover Pipeline, LLC*, 192 FERC ¶ 61,236 at P 12 (2025).

[16] *Id*.

interest groups are identified after efforts have been made to minimize them, the Commission will evaluate the project by balancing the evidence of public benefits to be achieved against the residual adverse effects.[17] This balancing test is "essentially an economic test."[18] For the reasons explained herein, Mountain Valley's proposed MVP Boost Project meets the Commission's Certificate Policy Statement criteria and should be approved as consistent with the public convenience and necessity.

Subsidization And Impacts On Existing Customers

Under the Certificate Policy Statement, the "the threshold requirement for pipelines proposing new projects is that the applicant must be prepared to financially support the project without relying on subsidization from its existing customers."[19] As discussed below, Mountain Valley meets that requirement.

As noted above, Mountain Valley has entered into long-term precedent agreements with three non-affiliate Project Shippers for 600,000 Dth/d of firm transportation capacity at negotiated rates. Upon approval of the Project and prior to the in-service date, Mountain Valley and the Project Shippers will enter into firm transportation agreements at negotiated rates for the subscribed capacity. The amount of capacity subscribed represents 100 percent of the proposed incremental capacity for the Project.

As discussed below in Section IX, Mountain Valley conducted a rolled-in rate analysis and concluded that rolling the Project's costs into existing Mainline System rates does not result in an

[17] *Id*.

[18] *Id*.

[19] *Id*.

increase in existing rates. As such, the Project is not subsidized by existing customers and is financially viable.

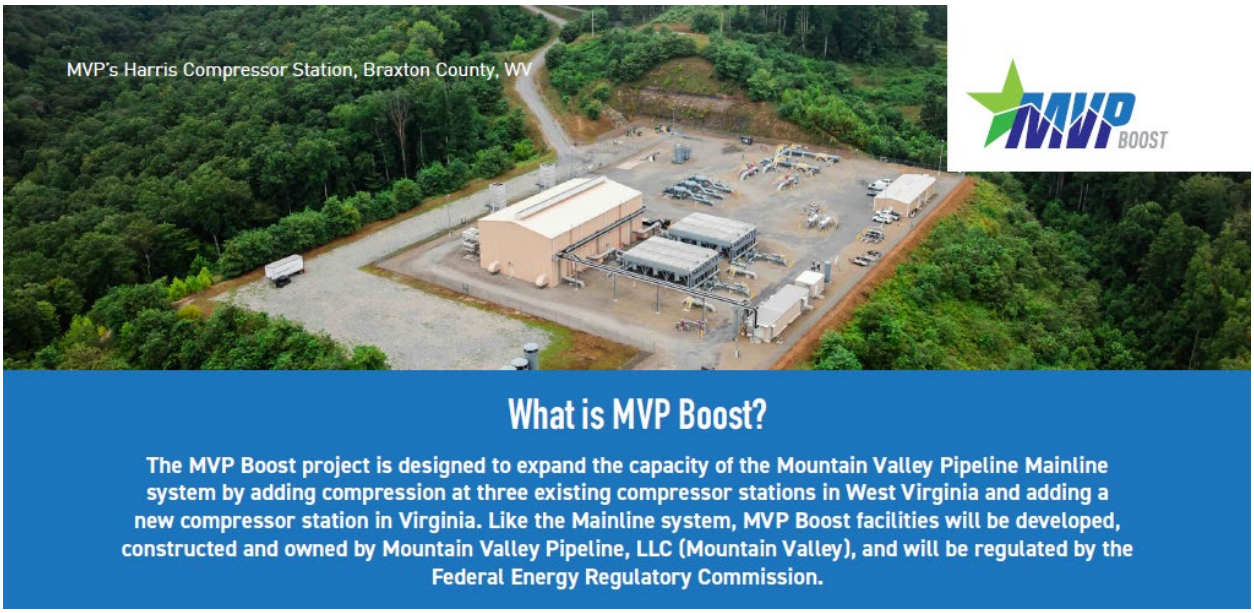
Impacts On Landowners And Communities

Mountain Valley has designed the Project to minimize impacts to landowners and communities. With respect to the three existing compressor station sites, construction of the Project will be contained within the temporary workspace already reviewed and approved by the Commission in Docket No. CP16-10-000 for the Mainline System. The Swann Compressor Station will be located on a 64.5 acre parcel owned by Mountain Valley, and Mountain Valley proposes to use existing permanent access roads to further minimize impacts to landowners and communities. Construction and operation of the Project will require acquiring one permanent easement in Montgomery County, Virginia near the Swann Compressor Station site. Accordingly, Mountain Valley does not anticipate the use of eminent domain for the Project.

Mountain Valley has continued the outreach to impacted communities that it first initiated in 2014 for the Mainline System and has implemented a comprehensive Public Participation Plan[20] for the Project. Utilizing available online resources, census data, and Mountain Valley's first-hand knowledge of the community from years of outreach and collaboration, updated demographic and socioeconomic data was collected in order to gain a greater understanding of the communities that may be impacted by the Project. In October 2025, Mountain Valley held listening sessions in Shawsville, Virginia near the Swann Compressor Station site to provide an in-person opportunity for stakeholders to meet the Project team members, ask questions, and provide feedback in an

[20] *See* Exhibit F-1 Environmental Report, Resource Report 1, Appendix 1-E.

informal, conversational setting. Postcards advertising the listening sessions were mailed to stakeholders in the vicinity of the proposed Swann Compressor Station.



Project Information Materials – Mailed September 2025

Mountain Valley will continue to post Project updates on its website (www.mvpboost.info) and disseminate Project information via local advertising, digital advertising, email, flyers, in-person meetings, and sponsorship of and participation in community events. Mountain Valley operates a toll-free phone number (844-MVP-TALK), e-mail address (mail@mountainvalleypipeline.info), and postal mailing address (2200 Energy Drive, Canonsburg, Pennsylvania 15317) that enables stakeholders to obtain additional Project information and provide input directly to Mountain Valley. This information is printed on all materials and included on the Project website and includes a single point of contact for stakeholder inquiries.

FTI Consulting, Inc. prepared an analysis of the economic and fiscal benefits of the Project.[21] The analysis found that engineering, procurement, and construction ("EPC") phase of the Project will contribute $80 million and $42 million in cumulative gross regional product to West Virginia and Virginia, respectively, and add $582 million to cumulative U.S. gross regional product.[22] The EPC phase of the Project will also generate $84 million in cumulative federal taxes across the U.S. In addition, approximately $6 million and $3 million in cumulative state and local tax revenues will be generated in West Virginia and Virginia, respectively. MVP Boost will not only generate benefits through its direct operations, but it will also provide a significant boost to the natural gas industry by facilitating the transportation of new gas production to end markets.

Market Need For MVP Boost

The Project is 100% fully subscribed under three non-affiliate precedent agreements with Anchor Shippers for a total of 600,000 Dth/d of firm transportation capacity. As the Commission and courts have recently affirmed, binding precedent agreements are significant evidence of the need for a project.[23] Each of the three Project Shippers has proven, near-term need for additional Mainline System capacity.

The Project will provide additional firm natural gas transportation services for Duke, a current Mainline System shipper, to meet growing supply needs. The North Carolina Utilities

[21] *See* Exhibit F-1 Environmental Report, Resource Report 5, Appendix 5-A (*Economic Benefits of the Mountain Valley Pipeline Boost Project in West Virginia and Virginia*).

[22] *Id*.

[23] *See East Tennessee Natural Gas, LLC*, 191 FERC ¶ 61,004 (2025) (rejecting arguments from Appalachian Voices and Sierra Club regarding the probative value of non-affiliate precedent agreements and finding that "the precedent agreement is significant evidence of need for the proposed project."); *City of Oberlin, Ohio v. FERC*, 937 F.3d 599, 605–06 (D.C. Cir. 2019) (finding the Commission's conclusion reasonable that precedent agreements were the best evidence of project need and upholding the Commission's policy of not looking behind precedent agreements); *Healthy Gulf v. FERC*, No. 23-1226 (D.C. Cir. 2025) (upholding FERC's use of precedent agreements to establish market need).

Commission ("NCUC") is supportive of Duke's need to acquire incremental transportation to meet growing demand and a diversified gas supply.

In 2021, the North Carolina General Assembly enacted Session Law 2021-165: Energy Solutions for North Carolina ("House Bill 951"), which directs NCUC to determine the least-cost path for Duke to reduce carbon emissions from its electric generating facilities. The law also requires the NCUC to ensure that all planned generation and resource changes maintain or improve upon the adequacy and reliability of the existing grid. In compliance with House Bill 951, Duke filed its 2023-2024 Carbon Plan Integrated Resource Plan ("CPIRP") with the NCUC in August 2023, and subsequently supplemented the CPIRP in January 2024 to address emerging, unprecedented growth in electric demand now occurring in the Carolinas. In the CPIRP, Duke projects significant load growth while also planning for the orderly retirement of Duke's remaining 8,400 MW of coal-fired generating capacity in North Carolina by 2035. To transition away from coal, however, Duke has identified in the CPIRP that it needs to increase the fuel security of natural gas supply. Failing to do so only increases the likelihood of, and risks related to, delayed coal retirements. Duke has contracted with Mountain Valley for capacity on the Project as part of that fuel security solution that enables Duke's significant planned coal unit retirements over the next decade.

Duke has also stated that if its ability to deploy and utilize new natural gas generation is limited, such as due to lack of additional natural gas supply, additional and significant costs will be imposed on customers, and Duke may be delayed in its ability to meet the carbon emission reduction target under North Carolina law.[24]

[24] *See* NCUC Docket No. E-100, Sub 190, Rebuttal Testimony of J. Verderame and H.L. Mitchell, IV on Behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (Jul. 1, 2024).

PSNC, also a current Mainline System shipper, is a single-state regulated gas utility in North Carolina serving over 600,000 customers in service territories supported by strong economic growth in cities such as Raleigh, Durham, Gastonia, and Asheville. PSNC operates over 13,000 miles (over 20,500 km) of natural gas distribution and transmission pipelines and is constructing and will operate a liquefied natural gas storage facility that will enhance system reliability. PSNC has added about 100,000 new natural gas customers over the past decade and remains committed to ensuring the highest levels of service to the homes and businesses that rely on natural gas for heating, cooking and other uses. The additional capacity on the Mainline System provided by MVP Boost is vital to PSNC's ability to meet increasing demand for natural gas.

VPSE, is an indirect subsidiary of Virginia Electric and Power Company (d/b/a Dominion Energy Virginia). VPSE is a special purpose entity formed for the purpose of managing Dominion Energy Virginia's fuel-related activities, including the purchase, sale, storage and/or transportation of fuel, and providing associated risk management services. VPSE intends to use the additional Mainline System capacity to meet the existing power generation needs of its affiliate, Dominion Energy Virginia in the Commonwealth of Virginia. Dominion Energy Virginia is responsible for reliably delivering electricity to over 2 million customers, including during unpredictable weather events.

In addition to meeting the confirmed needs of the Project Shippers for additional Mainline System capacity, construction of the Project is also consistent with recent Executive Orders designed to "unleash America's affordable and reliable energy and natural resources."[25] In Executive Order No. 14156, President Trump declared a national energy emergency to facilitate

[25] Exec. Order No. 14154, *Unleashing American Energy*, 90 Fed. Reg. 8353 (Jan. 29, 2025).

the expedited development of energy infrastructure as a matter of national and economic security.[26] MVP Boost will bring critically-needed supplies of domestically-produced natural gas to end-use customers in furtherance of these Executive Order mandates.

MVP Boost Is Needed Independent Of The MVP Southgate Amendment Project

There is proven market need for the Project independent of the MVP Southgate Amendment Project.[27] Moreover, MVP Boost and the MVP Southgate Amendment Project are not connected actions for purposes of the Commission's review. Under Commission and court precedent, a project will be found to have substantial independent utility when "one project will serve a significant purpose even if a second related project is not built."[28]

In *Transcontinental Gas Pipe Line Company, LLC*,[29] the Commission held that a pipeline's expansion project was not a connected action with respect to separate compressor upgrade projects on the same pipeline system. The Commission noted that "[e]ach project comprises discrete facilities in separate locations" and the design of the projects were not dependent on each other. In *City of Boston Delegation v. FERC*,[30] the United States Court of Appeals for the District of Columbia Circuit held that three upgrade projects on the same pipeline system had substantial independent utility where the projects held separate open seasons, executed individual precedent agreements, and had different negotiated and recourse rates.

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[26] Exec. Order. No. 14156, *Declaring a National Energy Emergency*, 90 Fed. Reg. 8433 (Jan. 29, 2025).

[27] *See Tennessee Gas Pipeline Company, L.L.C.*, 187 FERC ¶ 61,136 at PP 59-60 (2024) (citing *O'Reilly v. U.S. Army Corps of Eng'rs*, 477 F.3d 225, 237 (5th Cir. 2007) (explaining that there is independent utility when a project "can stand alone without requiring construction of the other [projects] either in terms of the facilities required or of profitability")).

[28] *See Millennium Pipeline Co., L.L.C.*, 161 FERC ¶ 61,229 at P 61 (2018).

[29] 164 FERC ¶ 61,101 at P 55 (2018).

[30] 897 F.3d 241, 252 (D.C. Cir. 2018).

MVP Boost meets the substantial independent utility test. The Project comprises discrete facilities in separate locations (the closest MVP Boost facility is more than 65 pipeline miles from the planned MVP Southgate interconnection with the Mainline System) and the design of MVP Boost is not affected by the MVP Southgate Amendment Project. Further, Mountain Valley held separate open seasons for the projects more than a year apart, the projects are supported by separate precedent agreements, and have different negotiated and recourse rates.

The precedent agreements underpinning MVP Boost provide for transportation of additional firm volumes of natural gas to existing delivery points on the Mainline System. As explained herein, the Mainline System is operating at full utilization, and MVP Boost is designed to optimize existing system design and hydraulics to provide additional capacity while minimizing impacts to landowners and communities consistent with the Certificate Policy Statement.

VII. LANDOWNER NOTIFICATION

In accordance with Section 157.6(d) of the Commission's regulations, Mountain Valley has included a complete list of affected landowners. The landowner list is being filed in Volume IV as privileged information pursuant to 18 C.F.R. § 388.112 as it contains landowner names and addresses, which should not be released. Mountain Valley requests privileged treatment for Volume IV and has marked the applicable documents "CUI//PRIV – Do Not Release."

In furtherance of its commitment to keeping landowners informed and building on its longstanding community relationships in the Project area, Mountain Valley mailed Project information letters in September 2025 to affected landowners and those living within three miles of the Swann Compressor Station site. The information letters contained overview maps of the Project sites, a compressor station fact sheet, and contact information for providing feedback or asking questions about the Project.

VIII. ENVIRONMENTAL IMPACT

The Resource Reports attached hereto as Exhibit F-1 more fully describe the potential environmental impacts of the Project. The information in Exhibit F-1 has been prepared in accordance with Part 380 of the Commission's regulations and FERC's Guidance Manual for Environmental Report Preparation and meets the requirements for the Commission to perform its environmental analysis of the Project.[31]

Construction of the Project will be conducted in accordance with all applicable environmental regulations, and approval of the proposal will not result in a significant impact on the environment. As fully described in the Environmental Report, the Project will leverage the existing 303-mile Mainline System by adding compression at each of the three existing compressor stations in West Virginia, and a new compressor station in Montgomery County, Virginia, thereby minimizing the need for new construction and associated environmental impacts, while supporting the region's growing natural gas demand.

The three existing compressor stations, the Bradshaw, Harris, and Stallworth Compressor Stations, are located in remote, heavily-wooded areas of West Virginia. The addition of compression equipment these stations will not require any additional temporary workspace beyond that previously reviewed and approved for the Mainline System. The new compression equipment will be installed within the existing fence line of the Bradshaw and Harris Compressor Stations.

[31] As discussed in Section VI above, MVP Boost meets the substantial independent utility test and should be analyzed separately from the MVP Southgate Amendment Project for purposes of the Commission's review under the National Environmental Policy Act. *See Algonquin Gas Transmission, LLC*, 187 FERC ¶ 61,198 at PP 29-34 (2024) (finding that multiple projects by the same applicant had substantial independent utility and rejecting protestor requests that the Commission analyze the projects together for NEPA purposes); *City of Bos. Delegation v. FERC*, 897 F.3d 241, 252 (D.C. Cir. 2018) (holding that the Commission did not impermissibly segment its environmental review of three upgrade projects on the same pipeline system where the projects had substantial independent utility).

To accommodate the relocation of the blowdown silencers at the Stallworth Compressor Station, the fence line will be expanded by approximately 0.1 acre. Mountain Valley has also leveraged the use of existing, previously-disturbed access roads and laydown yards to the greatest extent possible in order to reduce the overall Project impacts and minimize inconvenience to landowners. No tree clearing is anticipated to be required for use of any of the Project's laydown yards.

The Swann Compressor Station is proposed to be constructed adjacent to the existing Mainline System right-of-way at Milepost 236 in Montgomery County, Virginia. The parcel is owned by Mountain Valley and is predominantly wooded, but a more open area in the central and northern portion of the site was formerly used as a surface/strip mine in support of brick manufacturing by the Old Virginia Brick Company in Salem, Virginia. At the Swann Compressor Station site, approximately 18.8 acres of the 64.5-acre parcel will be converted for the operation of the compressor station.

In order to minimize air quality impacts, Mountain Valley has selected the most efficient turbines that meet the Project operational requirements. Each of the turbines is equipped with Solar's SoLoNOx technology, which is a combustion technology that reduces nitrogen oxides and carbon monoxide emissions. Mountain Valley also performed a complete air dispersion modeling analysis to ensure that the concentration levels from the emission sources at the compressor stations will not exceed the National Ambient Air Quality Standards.[32] Mountain Valley conducted extensive noise modeling for each of the compressor stations and, with proposed mitigation, all sites are predicted to be compliant with FERC requirements with all equipment operating at full load.

[32] *See* Exhibit F-1 Environmental Report, Resource Report 9, Appendices 9E – 9H.

Mountain Valley has designed the MVP Boost Project to minimize impacts to the environment, leveraging the existing compressor station locations and the use of workspace within the limits of disturbance of the Mainline System as extensively reviewed and approved by the Commission in Docket No. CP16-10-000.

IX. RATES AND TARIFF

The Project Shippers have elected to pay negotiated rates for firm transportation service on the Project. In compliance with Commission policy, Mountain Valley will file tariff records reflecting its negotiated rate agreements with the Project Shippers within 30 to 60 days prior to when the underlying negotiated rates are proposed to become effective.[33] As described in the open season notice, Mountain Valley offered the following benefits for Anchor Shipper status: (1) no pro-rationing of contract quantity in the open season until other shippers' quantities have been reduced; (2) five year contract extension rights; (3) and a Right of First Refusal upon the expiration of the primary term of their service agreement pursuant to the process detailed in Mountain Valley's FERC Gas Tariff. Mountain Valley offered these incentives to obtain the capacity commitments it required to advance the Project and to recognize the Anchor Shippers' financial commitments to the Project.

The Commission's policy is to accept non-conforming provisions for initial shippers as permissible if they will not present any risk of undue discrimination, affect the operational conditions of providing service, or result in a shipper receiving a different quality of service from

[33] *Mountain Valley Pipeline, LLC*, 161 FERC ¶ 61,043 at P 92 (2017) ("Consistent with Commission policy, Mountain Valley and Equitrans must either file the negotiated rate agreements or a tariff record setting forth the essential terms of these agreements at least 30 days, but not more than 60 days, before the proposed effective date for such rates.").

that available to other shippers.[34] Mountain Valley submits that all of the agreement provisions applicable to its Anchor Shippers should be accepted as permissible pursuant to these standards.

Mountain Valley proposes to use the applicable Mainline System rates as the maximum recourse rates for service on the Project and to roll-in the costs of the Project into its general system rates in its next NGA Section 4 general rate proceeding. Rolled-in rate treatment for costs is appropriate when the overall result would be a reduction in rates for non-expansion customers.[35] To obtain rolled-in rate treatment, a pipeline must show that the incremental rate for service on the expansion and replacement is less than the existing recourse rate and that the incremental rate will fully recover the cost of service associated with the expansion.[36]

As shown on Exhibit P (page 1), the Monthly Incremental Firm Transportation Reservation Rate associated with the Project would be $15.0220/Dth, which is lower than the existing Mainline System[37] maximum recourse rates under Rate Schedule FTS of $53.4208 and the 100% load factor rate associated with the Project would be $0.4994/Dth, which is lower than the existing Mainline System maximum recourse rates of $1.7794. Additionally, as shown on Exhibit N (page 1), the total revenues generated from the Project utilizing the Mainline System recourse rates are higher than the estimated cost of service of the Project. As such, use of the existing Mainline System maximum recourse rates will generate revenues in excess of the estimated cost of service. In addition, all customers will receive operational benefits from the Project. Specifically, the addition

[34] *See, e.g., Equitrans, L.P.*, 183 FERC ¶ 61,200 at P 31 (2023); *Gulf South Pipeline Co., LP*, 149 FERC ¶ 61,174 at P 104 (2014).

[35] *See, e.g., Northern Natural Gas Co.*, 184 FERC ¶ 61,186 at P 24 (2023); *Dominion Transmission, Inc*., 144 FERC ¶ 61,182 at P 19 (2013).

[36] *See ANR Pipeline Co.*, 179 FERC ¶ 61,122 at P 24 (2022).

[37] *See* Mountain Valley Pipeline, LLC FERC Gas Tariff, Section 4.1, Statement of Rates, Transportation Rates FTS & EFT.

of compression will increase system reliability, efficiency, and operational flexibility for the benefit of all of Mountain Valley's customers. Therefore, rolling-in the cost of the Project into Mountain Valley's Mainline System rates in its next NGA Section 4 general rate proceeding will benefit existing customers and is fully consistent with the Commission's Certificate Policy Statement, which recognized the need for certain exceptions to the rigid application of incremental pricing for all projects.[38]

Exhibit Z-1 contains an analysis of the impact that the Project will have on the Mainline System Retainage Factor.[39] The results of this study demonstrate that the expected fuel usage and lost and unaccounted for volumes (LAUF) attributable to the Project facilities is approximately 6.017% per Dth, which is more than the current Mainline System Retainage Factor.[40] Accordingly, since rolling the Project's fuel costs and LAUF into Mountain Valley's Mainline System fuel rates may result in the project being subsidized by existing customers, Mountain Valley proposes to separately identify the incremental fuel and LAUF associated with the Project and develop an incremental Retainage Factor for the Project. Per the Tariff, when total Mainline System throughput, including volumes contracted in response to the Project, is below the current system capacity, all shippers will be assessed the same Retainage Factor. When throughput exceeds the current system capacity, the Project Shippers will be assessed a blended rate comprised of the

[38] Certificate Policy Statement at p. 61,737.

[39] Per Mountain Valley's Commission-approved FERC Gas Tariff, the Retainage Factor is calculated by tracking the "actual experienced fuel and lost and unaccounted for gas experienced to provide transportation service on the system." *See* Mountain Valley Pipeline, LLC FERC Gas Tariff, Section 6.28.

[40] The Retainage Factor per Section 4.4 of Mountain Valley's FERC Gas Tariff, Statement of Rates - Statement of Retainage Factors, is listed as 0.60%; the Percentage will be updated in accordance with Section 6.28 of the General Terms and Conditions of the Tariff. At least ten (10) days prior to the beginning of the month, Mountain Valley will publish the Retainage Factor for the applicable month on its Informational Postings Website. The Actual Retainage Factor experienced since Mountain Valley's in-service in June 2024 ranged from 0.25% to 1.95%.

factor attributable to their volumes using the current system capacity, if any, plus the additional fuel and LAUF incurred as a result of operating the Project facilities.

X. LIST OF EXHIBITS

Pursuant to Section 157.6(b)(6) of the Commission's regulations, the following exhibits are attached hereto, incorporated by reference, or omitted for the stated reasons:

Exhibit A	Articles of Incorporation Omitted. Mountain Valley submitted the Mountain Valley Pipeline, LLC Agreement in Docket No. CP19-14-000 for the MVP Southgate Project.
Exhibit B	State Authorization Omitted. Mountain Valley submitted the Mountain Valley Pipeline, LLC state authorizations in Docket No. CP19-14-000 for the MVP Southgate Project.
Exhibit C	Company Officials Attached hereto.
Exhibit D	Subsidiaries and Affiliation Omitted. As of the date of this Application, neither Mountain Valley nor any of its officers directly or indirectly owns, controls, or holds with power to vote 10 percent or more of the outstanding voting securities of any other person or group engaged in the production, transportation, storage, distribution, or sale of natural gas or of any person or group engaged in the financing of such enterprises.
Exhibit E	Other Pending Applications and Filings Construction of the Mainline System (Docket Nos. CP16-10-000, CP21-57-000, and CP19-477-000) and the Equitrans Expansion Project

	(Docket No. CP16-13-000) is complete and there are no pending applications. The MVP Southgate Amendment Project application is pending in Docket No. CP25-60-000.
Exhibit F	Location of Facilities Attached hereto.
Exhibit F-1	Environmental Report Included in Volume II.
Exhibits G, G-I, G-II	Flow diagrams Exhibits G, G-I, and G-II are being submitted in Volume III as Critical Energy Infrastructure Information pursuant to 18 C.F.R. § 388.112 and marked as "Contains CEII – Do Not Release."
Exhibit H	Total Gas Supply Data Omitted. Mountain Valley proposes only to provide open-access transportation service on the Project facilities and, accordingly, the Project shippers will be responsible for providing and arranging their own sources of gas supply.
Exhibit I	Market Data Attached hereto. Mountain Valley has redacted certain confidential provisions from the public version of the Precedent Agreements. Unredacted versions are submitted in Volume IV and designated as Privileged and Confidential pursuant to 18 C.F.R. § 388.112 and marked as "Contains Privileged Information – Do Not Release."

Exhibit J	Federal Authorizations See Resource Report 1, Table 1.7-1 of the Exhibit F-1 Environmental Report in Volume II.
Exhibit K	Cost of Facilities Submitted herewith in Excel format.
Exhibit L	Financing Omitted. Mountain Valley will finance the cost of the Project through funds on hand and borrowings under short-term financing arrangements with its members.
Exhibit M	Construction, Operation, and Management Omitted. Mountain Valley incorporates by reference the Construction, Operation and Management between Mountain Valley and EQM Gathering Opco, LLC filed in Docket No. CP16-10-000.
Exhibit N	Revenues-Expenses-Income Submitted herewith in Excel format.
Exhibit O	Depreciation and Depletion Omitted. Mountain Valley will continue to use the 2.5% depreciation rate and 40-year depreciable life approved for the Mainline System.[41]
Exhibit P	Tariff Attached hereto. Rate calculations submitted herewith in Excel format.

[41] *Mountain Valley Pipeline, LLC*, 161 FERC ¶ 61,043 at P 78 (2017).

Exhibit Z-1	Notice of Application A form of notice of this Application suitable for publication in the Federal Register, in accordance with the specifications in 18 C.F.R. § 385.203(d), is attached hereto.
Exhibit Z-2	Form of Confidentiality and Protective Agreement Attached hereto.
Exhibit Z-3	Third Party Contractor Materials Attached hereto. Mountain Valley has included the proposals from third party contractors to assist the Commission in its preparation of the environmental document for the Project. The materials are submitted in Volume IV and designated as Privileged and Confidential pursuant to 18 C.F.R. § 388.112 and marked as "Contains Privileged Information – Do Not Release."
Exhibit Z-4	Fuel Study and Calculations Attached hereto. Fuel calculations submitted herewith in Excel format.

XI. CONCLUSION

WHEREFORE, for the foregoing reasons, Mountain Valley respectfully requests that the Commission issue the Certificate as well as any authorizations the Commission deems necessary, including applicable waivers, so that Mountain Valley can construct and operate the Project, as discussed herein. Mountain Valley requests that this application be processed in accordance with the shortened procedures set forth in Rules 801 and 802 of the Commission's Rules of Practice and Procedure.[42] To meet the confirmed needs of the Project shippers for additional firm natural

[42] 18 C.F.R. §§ 385.801 and 385.802. Mountain Valley requests that the intermediate decision procedure be omitted and waives oral hearing and opportunity for filing exceptions to the decision of the Commission. Mountain Valley

gas transportation capacity on the Mainline System, Mountain Valley requests that the Commission issue an order granting the Certificate by **November 19, 2026**.

Respectfully submitted,

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Dated: October 23, 2025

reserves its rights under the Commission's regulations to seek rehearing or appeal of the Commission's orders issued in this proceeding.