UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Constitution Pipeline Company LLC — Docket Nos. CP13-499-006
CP18-5-004

Additional Comments of Public Citizen, Inc.

We ask the Commission grant our motion, per 18 CFR § 385.212.

On June 22, we filed a *Motion to Hold The Proceeding in Abeyance and Request For Evidentiary Hearing To Investigate the Quid Pro Quo Deal Involving Constitution Pipeline by the President of the United States*.[1] We have submitted evidence—based upon President Donald J. Trump's unambiguous statements—that indicate he is forcing an end to New York offshore wind energy projects to coerce the state's Governor to support the Constitution pipeline. As part of this malicious scheme, the Trump Administration negotiated the cancellation of three New York offshore wind projects: the June 17 Invenergy $765 million payment to not develop three offshore wind projects, of which the company's 83,976 acre New York Bight lease was the largest;[2] the April 27 settlement agreement that paid BlackRock, EDP Renewables and ENGIE to vacate their Bluepoint Wind project off the coast of New York;[3] and the March 23 settlement agreement forcing taxpayers to pay TotalEnergies $928 million to abandon two wind leases, including its offshore New York tract.[4]

Our June 22 warned that RWE's offshore wind lease would be the fourth to be cancelled under President Trump's promised retribution against New York.[5]

On August 6, our forecast materialized, as the Trump Administration enforced the annulment of the fourth New York offshore wind project, with RWE taking $1.2 billion of taxpayer money to terminate its Community Offshore Wind project off the coast of New York. RWE agreed to end the project because the company stated that it

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[1] https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260622-5133
[2] www.doi.gov/pressreleases/interior-announces-new-energy-agreement-strengthen-american-energy-security-and-lower
[3] www.doi.gov/pressreleases/interior-announces-two-historic-agreements-promote-affordable-reliable-energy
[4] www.doi.gov/pressreleases/interior-and-totalenergies-agree-end-offshore-wind-projects-lowering-costs-american
[5] At page 2, https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260622-5133

"determined there is no path forward to permit these projects in the U.S. for the foreseeable future"[6]—suggesting the Trump Administration made clear there was no permitting pathway available.

The Trump Administration's arbitrary, capricious and exploitative campaign to threaten resource adequacy in FERC-jurisdictional power markets to coerce support for the Constitution pipeline is contrary to the public interest.

Furthermore, Williams Cos. Constitution pipeline lacks binding contracts with downstream shippers—a so-called precedent agreement—demonstrating there is no commercial need for the gas pipeline. The combination of the Trump Administration's coercive quid pro quo campaign and the lack of a precedent agreement must result in the Commission rejecting Constitution's petition.

Respectfully submitted,

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Filed August 17, 2026

[6] www.rwe.com/en/press/rwe-americas/2026-08-06-rwe-us-offshore-reaches-settlement-with-doi-on-offshore-wind-leases/