

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Revisions to the Blanket Certificate Program	))))	Docket No. RM25-12-001
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**COMMENTS OF
THE GPA MIDSTREAM ASSOCIATION**

GPA Midstream Association (“GPA Midstream”) respectfully submits these comments in response to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Notice of Proposed Rulemaking (“NOPR”) issued May 21, 2026, concerning revisions to the blanket certificate program under Section 7 of the Natural Gas Act (“NGA”).

GPA Midstream has served the U.S. energy industry since 1921 and represents approximately 45 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids (“NGLs”), crude oil and refined products, commonly referred to as “midstream activities.” The work of the members indirectly creates or impacts an additional 470,000 jobs across the U.S. economy. In 2024, GPA Midstream members had an economic impact of \$191 billion through operating 502,900 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 342 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems. GPA Midstream members operate critical infrastructure that is directly interconnected with interstate natural gas pipeline systems regulated by the Commission.

Accordingly, the efficiency and effectiveness of the Commission's blanket certificate program has significant implications for GPA Midstream members and the broader energy value chain.

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COMMENTS

I. GPA Midstream Supports Modernization of the Blanket Certificate Program

GPA Midstream commends the Commission for undertaking a comprehensive review of the blanket certificate program. The NOPR appropriately recognizes the need to expand the scope and scale of projects to streamline infrastructure development while maintaining appropriate customer and environmental protections.

The blanket certificate program, originally established in 1982 and last significantly updated in 2006, has proven to be an essential tool for enabling the timely construction and modification of interstate natural gas facilities. However, the existing framework has not kept pace with evolving infrastructure needs and modern construction practices.

GPA Midstream strongly agrees that modernization is necessary to ensure that the program continues to fulfill its intended purpose of facilitating the efficient and predictable development of critical energy infrastructure.

II. The Commission Should Further Increase Cost Limits and Provide Automatic Indexing

GPA Midstream supports the Commission's proposal to increase the cost thresholds applicable to blanket certificate projects. Rising labor, material, and compliance costs have significantly eroded the practical applicability of existing limits, resulting in routine, low-impact projects being subjected to full certificate proceedings.

While the proposed increases are an important step forward, GPA Midstream respectfully submits that the Commission should adopt higher cost thresholds to more accurately reflect current economic conditions and project realities.

In addition, GPA Midstream strongly recommends that the Commission implement an automatic indexation mechanism to adjust cost limits annually based on an appropriate inflation index. Without such a mechanism, thresholds will quickly become outdated, necessitating repeated rulemakings and undermining regulatory certainty.

These changes are essential to ensuring that projects appropriately characterized as routine can continue to be processed efficiently under the blanket certificate framework.

III. Eligibility Should be Expanded to Reflect Modern Midstream Operations

GPA Midstream supports the Commission's proposal to expand the categories of projects eligible for blanket certificate authorization. GPA Midstream encourages the Commission to ensure that the final rule clearly encompasses infrastructure and modifications necessary to support modern midstream operations, including:

- Interconnections with gas processing and NGL facilities;
- Compression additions, replacements, and electrification projects;
- Infrastructure supporting emissions reduction and operational efficiency;
- and
- Modifications necessary to integrate upstream supply with interstate pipeline systems.

GPA Midstream members' infrastructure plays a critical role in ensuring the reliable delivery of natural gas to end-use markets. Because these assets are closely

integrated with interstate pipeline systems, limitations in the blanket certificate program can have ripple effects throughout the broader energy supply chain.

IV. The Commission Should Preserve the Efficiency of the Blanket Certificate Process

The central purpose of the blanket certificate program is to allow pipelines to undertake routine and low-impact activities without the need for case-specific authorization under NGA Section 7. GPA Midstream is concerned that certain potential changes—particularly those related to protest procedures and notice requirements—could inadvertently introduce delay and regulatory uncertainty.

GPA Midstream respectfully urges the Commission to ensure that any revisions to the prior notice process do not transform blanket certificate projects into de facto full certificate proceedings. The program's value lies in its predictability, administrative efficiency, and ability to avoid unnecessary regulatory burdens for well-understood project types.

Preserving these characteristics is essential to maintaining the effectiveness of the program.

V. Automatic Authorization Should be Maintained and Expanded

GPA Midstream strongly supports maintaining the distinction between automatic authorization projects and prior notice projects, which has been a foundational element of the blanket certificate framework since its inception.

Automatic authorization is particularly appropriate for projects that are well understood, involve minimal environmental impact, and present limited potential for landowner or stakeholder concerns.

GPA Midstream encourages the Commission to consider expanding the scope of activities eligible for automatic authorization to reflect industry experience and technological advancements.

CONCLUSION

GPA Midstream appreciates the Commission's efforts to modernize the blanket certificate program and strongly supports the overall direction of the NOPR. To maximize the effectiveness of the final rule, GPA Midstream respectfully recommends that the Commission consider these comments. GPA Midstream encourages the Commission to move expeditiously to finalize these important reforms and stands ready to assist the Commission with any additional technical input.

Respectfully submitted,

/s/ Stuart Saulters

Stuart Saulters

Vice President, Federal Affairs

ssaulters@gpamidstream.org

DATED: July 27, 2026