

ORIGINAL

October 2, 2025

FILED
SECRETARY OF THE
COMMISSION

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FEDERAL ENERGY
REGULATORY COMMISSION

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
12225 Wilkins Avenue
Rockville, Maryland 20852

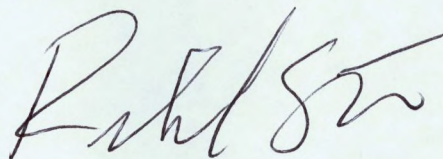
Dear Secretary Reese:

Please find written comments submitted on behalf of the "Teamsters National Pipeline Labor Management Cooperation Trust" in support of the construction of the Proposed Appalachian Reliability Project.

Docket Number: CP25-528-000

If you have any questions I can be reached at (703) 508-8690.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Stern", is written over a faint, circular official stamp.

Richard Stern, Administrator
Teamsters National Pipeline Labor
Management Cooperation Trust

Enclosures

This submission is for the Federal Energy Regulatory Commission, Notice of Scoping Period Requesting Comment On Environmental Issues For The Proposed Appalachian Reliability Project (herein referred as Project).

Docket Number: CP25-528-000

On behalf of the Teamsters National Pipeline Labor Management Cooperation Trust comprised of the Pipe Line Contractors Association and the International Brotherhood of Teamsters and the Teamsters Local Unions whose pipeline construction members will work on the Project, **we support Eastern Gas Transmission and Storage Inc.'s efforts in obtaining approval for construction of the "Project".**

We have contractors who specialize in pipeline work that involve waterways and their trained union workforce operates the specialized equipment in a skilled and environmentally friendly manner.

Also, the Teamster Pipeliners who reside where the Project would be constructed also camp, fish and hunt in Ohio and Pennsylvania.

Therefore, they value protecting the environment while doing the construction and restoring the land associated with the project so they can continue to participate in these recreational activities.

Our collective bargaining agreement has a formal "Drug and Alcohol" Policy. A drug and alcohol free work force is less likely to have accidents or damage the environment since they will not work under the influence of drugs or alcohol that can

negatively impact their judgment and quality of the work.
(Exhibit A)

According to our collective bargaining agreement our workers must be qualified. The contractors demand strict adherence to this language. (Exhibit B)

This ensures a more skilled and trained workforce so it is less likely there will be any environmental issue.

We have certified Training Instructors and a training program specific to the pipeline construction industry stressing quality of work and environmental awareness.

Training not only includes Defensive Driving techniques but often-formal classroom instruction in addition to specific equipment training. (Exhibit C)

Some of our Trainers have been cited by outside Safety Organizations for their expertise and training skills.

Many Teamster workers on the "Project" will be Veterans coming out of Veteran Programs we participate in to recruit our former military men and women. (Exhibit D)

These Teamster Veterans are disciplined and taught about being aware of their natural surroundings both while serving in the military and participating in our training programs.

Our high wages and employer paid health insurance and pensions results in benefiting the workers and the local economies as the workers spend their money locally and the various government agencies continue to receive tax revenue once the project is completed. (Exhibit E)

Also, technological developments in pipeline design and increased safety regulations have made pipelines built today safer than older lines. Modern pipelines, in particular, offer valuable safety features including improved pipe coating that protects against corrosion, more secure welding techniques, and mechanical devices that travel through the pipelines to identify safety risks.

Finally, our collective bargaining agreement as noted earlier provides trained workers, which ensures pipeline infrastructure is built and maintained according to the most up-to-date, safe, and efficient standards----at a significant benefit to the public at large.

Therefore, we support approval to construct the Project.

EXHIBIT A

(C) Holidays designated under this Agreement are: Christmas, Thanksgiving, Memorial Day, Labor Day, New Years' Day, and July 4th. Holidays shall be observed on the day on which they occur. If the holiday occurs on a non-scheduled workday, no pay or waiting time will be owed.

ARTICLE 26: REPORTING TIME

(A) After a person has been hired and ordered to report for work at the regular starting time, and no work is provided for him on the day that he has so reported, he shall receive pay equivalent to four hours at the rate applicable for that day. This pay shall be provided notwithstanding that he has not been ordered to report for work on that particular day, if the person has been working regularly, and the Employer has failed to notify him not to report for work at or before 8:00 P.M. on the preceding day.

(B) Any person who reports to work and for whom any work is provided, regardless of the time that he works, shall receive the equivalent of not less than four hours pay at the rate applicable for that day.

(C) Any person who reports to work and who works more than four hours in any one day, shall receive the equivalent of not less than eight hours pay for said day.

(D) It is expressly provided, however, that when a person refuses to work or continue to work, or work stoppage conditions brought about by a third party or third parties prevent or make ill-advised, in the opinion of the Employer, the performance of any work or the continuance of work once started, no pay for time not worked shall be required under any of the above enumerated conditions.

(E) Where notification to the employees is required under this Agreement to the effect that work shall not be performed on a particular day, notification of such fact to the Steward shall be sufficient notification to the employees, provided such notification is made during working hours and he is afforded a reasonable opportunity to notify the employees during working hours.

ARTICLE 27: DRUG AND ALCOHOL TESTING

(A) A Substance Abuse Policy has been negotiated by the PLCA and the International Brotherhood of Teamsters and is attached hereto and made a part of this Agreement as Schedule C.

(B) If an employee fails a pre-employment drug or alcohol test and is so notified by 9:00 a.m. on the fifth business day following the day of taking the test, then the employee's wage rate shall not be the hourly wage rate set forth in this Agreement. Instead, the employee shall be paid wages at a flat rate of \$90 per day worked (but in no event less than the applicable minimum wage) for all days worked prior to receiving such notification (not to exceed five (5) days) and for which no wages have yet been paid as required by this Agreement. If subsequent testing reveals a false positive, the employee will be entitled to full compensation for the period he worked and reinstatement. The results of all tests will be kept confidential between the employee, the Employer, and the Union.

(C) As a condition of employment, all employees must be registered in the FMCSA Drug & Alcohol Clearinghouse and satisfy all other similar state or federal requirements related to licensing and/or clearance to work. It is the responsibility of the employee to complete all such requirements prior to reporting to the job.

EXHIBIT B

c. Workers referred under this Article to the contractor's job who are not able to perform the job to which they are referred because of their own lack of qualifications, or for some other reason which is the worker's own responsibility, shall not be paid show-up time.

d. Qualified applicants required by Employer at the start of the job must be referred by a Local Union referral office within 48 hours of the receipt of Employer's request; those required by Employer after a job has started must be referred by a Local Union referral office within 24 hours of the receipt of Employer's request. If the Local Union referral office fails to comply with this condition, Employer may secure qualified applicants from any other source (in such instances the Local Union that was unable to dispatch workers will authorize such hires to work under this Agreement.) **Qualified applicants under this Article must:**

(i) Have proper federal and state licenses.

(ii) Have proper Operator Qualification (OQ) credentials where necessary.

(iii) Have pipeline or general construction work experience relevant to pipeline work or completion of a certified pipeline training course operated or approved by the Teamsters Pipe Line Training Fund. The Teamsters and PLCA also agree they will jointly review the training program on a 6-month basis.

(iv) Comply with company employee and safety policy standards. These policy standards will be provided by each Employer at the pre-job conference.

2. In the event there is no valid exclusive referral procedure established in the area where the particular job is to be done or the proper conditions set out hereinabove have not been met by the referral procedure which has been established, Employer will at the pre-job conference notify Union, as one of the sources from which workers are to be recruited, as to the number of workers who will be needed in addition to its regular employees. Employers shall give preference in employment to workers in the area who have had previous pipeline construction experience. It is understood that an Employer may also recruit workers from other sources, will hire all employees at the job site in a non-discriminatory manner, and shall have the absolute right to determine the competence and qualifications of applicants and employees and to reject and discharge accordingly.
3. Once the original crew has been employed, Employer shall have the right to keep such crew on all the work throughout the territory covered by the particular job for which the pre-job conference was held, regardless of Local Union jurisdiction.
4. Employers may submit "Do Not Dispatch" requests to the appropriate Local Union regarding any employee previously terminated by the Employer for just cause. Such

EXHIBIT C

PLACE
STAMP
HERE

About Pipeline Training

The Teamsters National Pipeline Agreement (TNPA) is a labor agreement covering all pipeline construction work in the United States. Pay rates under this agreement are based on "local rates" or composite rates if the work encompasses several Teamster jurisdictions. The typical work day is 10 hours a day six days a week.

When a project is in a local area, the local union with jurisdiction who can staff the project will refer local members to the contractor. In this case local hires are paid local wages and fringe benefits go to the appropriate local fringe benefit fund.

Teamsters National Pipeline

A Common Effort between the
International Brotherhood of
Teamsters and The Pipeline
Contractors Association



CCC/IBT
55004

Teamsters National Pipeline



About Us

Since 1903, the Teamsters labor union has helped millions of workers achieve the American dream. Their success is a testament to those who came before, who united to form a labor movement. These workers fought for the rights and privileges that many Americans take for granted today. For instance, without the solidarity of unions, there would be no week-ends, no pensions, and no health insurance.

The pipeline construction industry must confront many competitive and technical challenges including the need to increase the work opportunities for union construction, the need to increase the efficiency of the pipeline construction industry, the need to foster more harmonious relationships between IBT and its affiliates and the PLCA and its members, the increasingly hazardous nature of the work, the need for specially-trained IBT members, the extent of government regulation, and the necessity to protect public health and safety.

Training Courses

Stringer Truck Driver

The Stringer Truck Driver course is designed to train Class A Commercial Drivers to safely transport pipe using steering trailers in both on road and off road situations. Training will include General Safety, Pre-trip Inspections, Stretching and Shorting the Trailer and Adjusting Steering Cables. The course is taught in both classroom and field formats. Course length is 24 hours.

Crew Bus

The Crew Bus Driver course will teach drivers to safely operate a crew bus, and to prepare them to take the Passenger Endorsement in their home state. The course is taught in both classroom and field formats. Course length 8 hours.



Fork Lift

The Fork Lift course addresses lift truck operation safety in pipeline operations and in accordance with OSHA requirements. The course is taught in both classroom and field formats. Training can include both warehouse, lay down yard and rough terrain situations. Course length 8 hours.

Fueler

The Fueler course focuses on HAZMAT training and various fuels and compressed gases used in pipeline construction. Course length 8 hours.



Additional Equipment

There is a host of "trucks" used on a pipeline construction job. This can include Lowboy, Flatbed or Float, Drop-deck, Dump Truck, Morooka and a host of other different combination vehicles. The driver must have a Class "A" or Class "B" CDL depending on the type of truck used.

Contact Us

To Contact Teamsters National Pipeline
Please use the Contact Form on our
website.

Visit us on the web at:
www.teamsterspipeline.com

EXHIBIT D



International Brotherhood of Teamsters Veteran Registration

Name: _____ Phone: _____

Address: _____ Cell: _____

City State Zip E-mail: _____

Are you a veteran? Yes / No What dates did you serve? _____

In which branch of the military did you serve? (Circle one)

Army Marines Navy Coast Guard Air Force

How long have you been a Teamster? _____

What Joint Council are you affiliated with? _____ What is your local? _____

Who is your current employer? _____

Are you currently receiving benefits for service-related disabilities? Yes / No

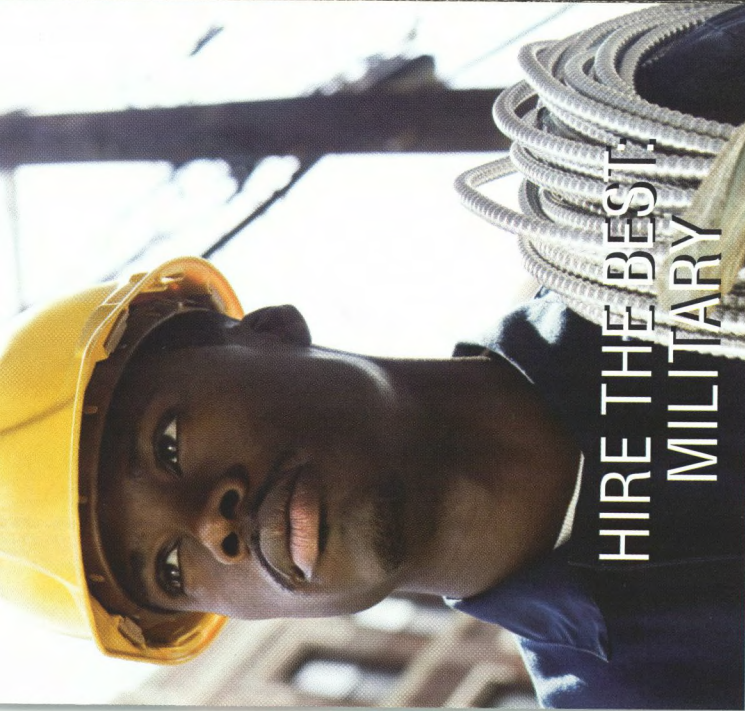
Do you require assistance to pursue or file a disability claim? Yes / No

Do you want to receive updates on disability benefits or presumptive disease issues? Yes / No

Claims and disability filings will be done through certified claims representatives. All information regarding your filing(s) is confidential between you and a certified claims representative.

Thank you for your service to our country. We hope the resources available are beneficial to you and your family.

Please return your completed form via mail or fax to: Teamsters Building and Construction Trades Division, 25 Louisiana Avenue, NW, Washington, D.C. 20001, or fax (202) 624-8107.



HIRE THE BEST. MILITARY

If you're looking for top candidates for your organization, you're in the right place.

Helmets to Hardhats helps to place quality men and women from the Armed Forces into promising building and construction careers.

America's service members have proven themselves to be dedicated, hard working and capable in some of the most difficult and challenging places and situations imaginable. Now, as they transition out of the service, they are looking to put their many skills and experiences to work helping to build America.



These Helmets to Hardhats partners are ready to serve you.

International Association of Heat and Frost Insulators and Allied Workers
International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and Helpers
International Union of Bricklayers and Allied Craftworkers
United Brotherhood of Carpenters and Joiners of America
International Brotherhood of Electrical Workers
International Union of Elevator Constructors
Laborers' International Union of North America
International Union of Operating Engineers
Operative Plasterers' and Cement Masons' International Association of the United States and Canada
International Union of Painters and Allied Trades
United Union of Roofers, Waterproofers and Allied Workers
Sheet Metal Workers' International Association
International Brotherhood of Teamsters
United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada

Contractor Associations

Finishing Contractors Association
International Council of Employers of Bricklayers and Allied Craftworkers
Mechanical Contractors Association of America
National Association of Construction Boilermakers Employers
National Electrical Contractors Association
North American Contractors Association
Sheet Metal and Air Conditioning Contractors National Association
The Association of Union Constructors



www.helmetstohardhats.org



CMRAVE conforms to the applicable provisions of the Civil Rights Act and the Rehabilitation Act.



THEY DEFENDED AMERICA, NOW LET THEM HELP YOU BUILD IT

HIRE MILITARY TALENT FOR
CAREERS IN CONSTRUCTION



www.helmetstohardhats.org

866-741-6210

Helmets to Hardhats is the fastest way for building and construction trades organizations to find and hire the best transitioning military service members



EVERYTHING YOU NEED

- ◊ Well trained
- ◊ Disciplined
- ◊ Dependable
- ◊ Resourceful
- ◊ Hard working
- ◊ Proven performers
- ◊ Tough
- ◊ Creative
- ◊ Mission-focused
- ◊ Team players

“The Helmets to Hardhats program is an important investment in our country's future. The men and women of our armed services deserve the best opportunities for construction careers after completing their service to our country. Veterans comprise the best of the best. They are motivated, responsible, and ready and willing to rebuild our country after they have served and fought for our country.”

— Iz Cakrane
Vice President, Corporate Labor Relations
URS Washington Division

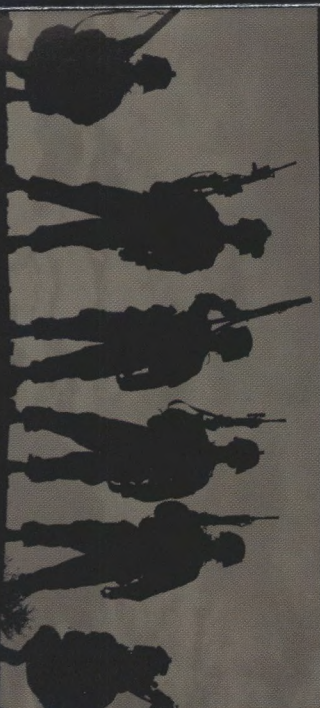


GET STARTED

The first step in finding and hiring transitioning service members for the building and construction trades industry is establishing a free account on www.helmetstohardhats.org. Your account will enable you to post jobs and apprenticeship opportunities to the Helmets to Hardhats website and gives you access to resumes posted by transitioning service members.

TRANSITION INTO THE RIGHT POSITION

Some service members will come to you already expertly trained in construction trade skills, ready for more senior positions. Others may require training. All will possess the dedication and discipline required to allow them to achieve success in your training programs and on the job.



YOUR FREE SOURCE FOR TOP-QUALITY CANDIDATES

“Another generation of young and dedicated American men and women has been placed in harm's way to protect our way of life. Because we ask a great sacrifice of these young men and women, our unions and our industry is prepared to assist them when they need us the most. Providing them with stable and secure career opportunities is the least we can do long after the guns fall silent and the memories of this war have faded.”

— Mark Ayers, President,
Building and Construction Trades Department,
AFL-CIO



EDUCATION

Helmets to Hardhats recommends only the highest quality apprenticeship programs with well-resourced training centers. Many service members leave the military eligible for the G.I. Bill to help them pay for their training and education. For more information on veterans benefits, go to:

<http://info.helmetstohardhats.org/content/veteran-benefits/>

APPRENTICESHIP

Many candidates are interested in entering apprenticeship programs where they can earn a paycheck while training to become a master craftsman. They are as serious about learning their trade as they were about defending their country. This dedication will show in their performance in the classroom and on the job.

EXHIBIT E

INTERNATIONAL BROTHERHOOD OF TEAMSTERS

MAINLINE RATES

2023-26 NATIONAL PIPELINE AGREEMENT

OHIO - ZONE 4 (LOCAL 697)

	<u>7/6/20-5/31/21</u>	<u>5/31/21-5/30/22</u>	<u>5/30/22-6/4/23</u>	<u>6/4/23-6/2/24</u>	<u>6/3/24-6/1/25</u>	<u>6/2/25-5/31/26</u>
GROUP 1	\$32.50	\$33.00	\$33.50	\$34.38	\$35.06	\$35.66
GROUP 2	\$31.66	\$32.16	\$32.66	\$33.51	\$34.17	\$34.75
GROUP 3	\$31.38	\$31.88	\$32.38	\$33.22	\$33.87	\$34.44
H&W	\$8.00	\$8.32	\$8.76	\$9.22	\$9.77	\$10.31
PENSION	\$7.15	\$7.83	\$8.39	\$8.59	\$8.74	\$8.74
PL TRN	\$.25	\$.25	\$.25	\$.25	\$.25	\$.25
LU TRN	\$.20	\$.20	\$.20	\$.20	\$.40	\$.40
LMCT	\$.20	\$.20	\$.20	\$.20	\$.20	\$.20

PREMIUMS (National)

Steward	+\$3.00
Stringing Truck	+\$2.25
Hazmat	+\$1.00
Lowboy	+\$2.25
Fuel Truck	+\$2.25
Log/Grapple Rate:	\$45.55 (current up to 6/1/25)
Mechanic	\$45.55 (current up to 6/1/25)

Per Diem:	\$30 (increases to \$35 effective 6/2/25)
Boot Pay:	\$10/week

ZONE 4 - COUNTRIES Belmont and Monroe

INTERNATIONAL BROTHERHOOD OF TEAMSTERS

MAINLINE RATES

2023+26 NATIONAL PIPELINE AGREEMENT

PENNSYLVANIA - ZONE 3

(LOCALS 30, 110, 261, 341, 397, 491, 538, 570* & 585)

5/30/22-1/1/23 1/1/23-6/4/23 6/5/23-12/31/23 1/1/24-6/2/24 6/3/24-12/31/24 1/1/25-6/1/25 6/2/25-1/4/26

GROUP 1	\$31.20	\$31.61	\$32.59	\$32.97	\$34.00	\$34.27	\$35.49
GROUP 2	\$31.16	\$31.56	\$32.55	\$32.93	\$33.96	\$34.23	\$35.45
GROUP 3	\$30.33	\$30.73	\$31.68	\$32.05	\$33.05	\$33.31	\$34.50
**H&W	38.38%	37.1%	37.1%	35.96%	35.96%	35.17%	35.17%
**PENSION	30.73%	29.84%	29.84%	29.07%	29.07%	28.56%	28.56%
PL TRN	\$.25	\$.25	\$.25	\$.25	\$.25	\$.25	\$.25
LMCT	\$.20	\$.20	\$.20	\$.20	\$.20	\$.20	\$.20

**Effective 10/31/23 Local 453 has ceased operation; all pipeline jurisdiction has been transferred to Local 570*

PREMIUMS (National)

Steward	+\$3.00
Stringing Truck	+\$2.25
Lowboy	+\$2.25
Fuel Truck	+\$2.25
Hazmat	+\$1.00
Log/Grapple Rate:	Same as OE Group 1 rate
Mechanic	Same as OE Group 1 rate

Per Diem:	\$30
Boot Pay:	\$10/week

ZONE 3 Counties (Locals) Allegheny (341), Armstrong (538), Beaver (341), Blair (110), Butler (538), Cambria (110), Centre (110), Clearfield (110), Crawford (397), Erie (397), Fayette (491), Greene (491/585), Indiana (110), Jefferson (110), Lawrence (261), McKean (110), Mercer (261), Somerset (110/570), Venango (538), Warren (110), Washington (585) and *Westmoreland (30/538/585)

*Local 538 (Kensington Only) work done by Local 110; Local 585 (Belle Vernon, Monessen, Webster and West Newton Only)

****Both H&W and Pension Percentages based on gross Mainline wages**

Updated 5/9/25