

October 18, 2021

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

The Honorable Richard Glick, Chairman
The Honorable James Danly, Commissioner
The Honorable Allison Clements, Commissioner
The Honorable Mark C. Christie, Commissioner

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Re: Spire STL Pipeline LLC Temporary Emergency Certificate Application Docket No. CP17-40-000

Dear Mr. Chairman and Commissioners,

On behalf of Ardagh Glass Inc., I write in support of Spire STL Pipeline's application for a Temporary Emergency Certificate. The U.S. pipeline infrastructure is critical to the functioning of America's economy. The Spire STL pipeline is critical infrastructure for the St. Louis region that provides reliable natural gas supply to hundreds of thousands of families and thousands of businesses, like ours. The STL Pipeline has been critical in meeting our energy needs since it went into operation in 2019.

Our business is glass container manufacturing, and workers in glass container manufacturing have been deemed Essential Critical Infrastructure Workforce¹. They worked through the pandemic to provide important products to our customers and consumers. Our operations depend on a consistent supply of natural gas to support 240 good-paying union jobs at our glass packaging plant in Pevely, Missouri. This facility produces glass containers 24 hours a day, 7 days a week for the food and beverage industry, ensuring availability of consumer products on store shelves consistently. This facility produces over 3 million glass containers per day. An interruption to our gas supply could cause a suspension of production for several weeks, and even longer if several extreme weather events occur. As a result, interruptions to the gas supply would affect operations for food and beverage producers in Missouri and the surrounding states to which we provide glass, and the thousands of people they employ. Such interruptions would exacerbate already-existing supply chain pressures in the United States.

The interruption of production for several weeks due to only one curtailment is due to the science of glass packaging production: continuously melting natural raw materials at over 2,900 degrees Fahrenheit to maintain product consistency, safety, and integrity. Our two furnaces cannot be simply switched "off" and "on" without significant planning time and careful controls. These controls are necessary to protect not only the operational health of the furnaces themselves, but the safety of Ardagh's employees. Worker safety is of paramount importance to Ardagh and we continuously strive to protect each and every one of our plant employees. A major component of furnace safety is a sufficient and reliable gas supply, which the STL Pipeline has provided to Ardagh since its inception, even through the February 2021 historic winter weather. An unexpected curtailment of Ardagh's gas supply presents the risk of a catastrophic furnace failure, putting the health and safety of Ardagh's employees in jeopardy. Ardagh cannot allow this to occur. Accordingly, at even the earliest hint of a potential

¹ [Version 3.0 - CISA Guidance on Essential Critical Infrastructure Workers](#)

weather event, Ardagh would be forced to begin the seven-day furnace shutdown process, whether or not the event occurs. Combined with the ten-day start-up time, this would put Ardagh's operation out of service for almost three weeks. Insufficient planning duration of curtailments or interruptions of service that could occur if the Spire STL Pipeline Temporary Emergency certificate is not issued could present employee health and safety risks, an increased likelihood of equipment damage, and even present the risk of future operational viability.

If the Spire STL Pipeline is not granted a Temporary Emergency Certificate per their application, the effects for us will be felt not only in Missouri, but nationwide in our network of 14 glass plants that employ over 4,000 people. Attempting to shift supply of production, with production of 3 million containers per day lost, would affect us, our customers, and food and beverage consumers. The impact would not be contained to only Missouri or the St. Louis region.

Our understanding is that some older, less-efficient gas transmission capacity was taken "offline" or decommissioned when the new Spire STL went into service. That former capacity is not available to "turn on" and provide the critical gas supply capacity that the St. Louis area may need this winter. With the fast-approaching winter heating season, I am concerned what the curtailment of service to Spire's could mean with potential loss of the STL Pipeline. In February 2021, we saw how winter storms brought significant energy supply issues to millions of homes and businesses across Texas, Oklahoma, and the rest of the Central and Southern Plains.

Operating a business is challenging at any time, but we have faced unprecedented obstacles as a result of the global pandemic. Minimizing uncertainty and risk is critical to optimizing our operations and minimizing impact to our business. Having confirmed availability and access to the reliability of the STL Pipeline is critical for both our short- and long-term business planning, as well as our continued safe and efficient operation for the food and beverage producers we supply.

Our Pevely, Missouri facility has provided good-paying jobs for over 40 years in support of the St. Louis and regional food and beverage marketplace. I urge you to quickly take action and to grant a certificate for the STL Pipeline to keep our businesses operational and families warm. Hundreds of thousands of residents across the St. Louis region rely on this critical infrastructure, and there will be potentially significant consequences if it is forced to shut down.

I look forward to assisting the Commission with any other information we can provide to you on this matter.

Sincerely,



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