



BERKSHIRE ENVIRONMENTAL ACTION TEAM
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Protecting the environment for wildlife in support of the natural world that sustains us all.

Environmental Deregulation for Natural Gas Sector — FERC Proposed Changes to Blanket Permitting Process for Gas Industry: Comment Guide

- If you already know about FERC’s proposal, instructions for filing public comments start on page 5.
- If you would rather sign onto an action letter instead of writing a comment, click here <https://actionnetwork.org/letters/tell-ferc-we-call-bullshit-on-your-blanket-certificates>

Overview:

What is FERC?

FERC is The Federal Energy Regulatory Commission. This is an organization inside of the U.S Department of Energy. They regulate the companies that produce natural gas, electricity, oil and hydropower.

What is Blanket Authorization?

When a natural gas company wants to build or operate interstate pipelines, storage facilities, or liquified natural gas terminals, FERC needs to approve this activity through a case-specific permit or certificate for each individual project. However, a project that has blanket authorization can proceed without full review by FERC.

There are two types of blanket authorization, automatic and prior notice projects, which exist under certain project cost thresholds. Despite automatic projects requiring landowner notice and a 45-day wait, and prior notice projects adding a Commission filing, public notification, and a 60-day window for objections, getting something done under a blanket certificate makes things much easier for a natural gas company by eliminating other public and permitting processes in a standard Certificate Process for larger or entirely new projects.

What is FERC Trying to Change with Blanket Authorization?

Recently, the Federal Energy Regulatory Commission issued a [Notice of Proposed Rulemaking \(NOPR\)](#) in [Docket No. RM25-12-001](#) proposing updates to its blanket certificate regulations for interstate natural gas pipelines.

FERC’s proposed changes to the Blanket Certificate Program include increasing project cost limits and expanding the types of activities that may qualify for blanket authorization.

Table 1: Blanket certificate current and proposed dollar cost limits

| | Automatic project | Prior notice project | Storage project |
|--|-------------------|----------------------|-----------------|
|--|-------------------|----------------------|-----------------|



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| | | | |
|----------------|------------|------------|------------|
| Current limit | 14,500,000 | 61,650,000 | 7,900,000 |
| Proposed limit | 30,000,000 | 86,000,000 | 17,000,000 |

Why You Might be Against FERC’s Proposed Changes

1. Increasing Blanket Authorization cost limits lets natural gas companies build more without anyone checking for environmental harm

By raising the maximum cost limits, FERC’s proposed changes would enable companies to construct pipelines and operate certain mainline facilities without serious environmental review. This is because FERC [excludes blanket certificate activities](#) from the preparation of an environmental assessment or environmental impact statement under the National Environmental Policy Act.

Regardless of how environmentally impactful the project is within the newly raised dollar thresholds, FERC’s proposal enables natural gas companies to ignore environmental review. Projects that previously required NEPA scrutiny can simply start without an important check to see if the project will harm the land and its residents.

Expansion of the types of projects that get a blanket certificate defies FERC’s rhetoric that these proposed changes to the blanket certification program are merely updates on the increased cost of routine modifications, replacements, and normal construction. Rather, these changes would deregulate construction of infrastructure that was previously subject to full environmental review. Instead of a bureaucratic efficiency improvement, or what FERC is calling ‘cutting red tape,’ **a structural removal of the public’s most important tool for scrutinizing the effects of fossil fuel infrastructure construction**, maintenance, and operation would result from FERC’s proposal.

2. FERC’s proposal adds types of polluting infrastructure under Blanket Authorization which more heavily impact the poor

Additionally, FERC proposes to include certain [mainline facilities and expansions of existing compressor stations](#) within the blanket authorization program. Problematically, compressor stations which are a major source of air pollution (methane, NO_x, and particulate matter) are disproportionately placed in low income and minority communities. By moving their expansion in the scope of the blanket authorization program, **placing infrastructure that most severely harms the poor and marginalized becomes easier and faster.**



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Expanding compression and looping to be under blanket authorization is a big shift from the present rule that even small mainline projects must be reviewed under the prior notice procedure *even* if its cost falls under the automatic authorization threshold. FERC has not clearly identified the valid reason for why a condition put in place with environmental and human health concerns in mind should now be changed.

3. FERC’s proposal deregulates Liquified Natural Gas facilities which previously had environmental oversight

FERC also proposes to put [Liquified Natural Gas \(LNG\) facilities under streamlined blanket authorization](#) for the first time. The rationale is that targeted activities should be less regulated to “increase efficiency” and “ensure America’s energy infrastructure remains safe, reliable, and ready to meet growing demands.” However, blanket authorization for even ‘targeted activities’ is not without significant air, water, and broader climate footprints and sets a precedent for further deregulation. Moreover, LNG terminals pollute carbon dioxide, methane, sulfur dioxide, and nitrogen oxides, and have discharged heavy metals into the water. These facilities previously had oversight. Extending the blanket certification to LNG facilities should concern the public.

4. FERC’s changes may be political instead of doing what makes sense for communities, homeowners, and the public

Perhaps the largest concern in the way FERC frames this Notice of Proposed Rulemaking is that these changes will accelerate the construction of fossil fuel infrastructure at exactly the wrong moment in time, when climate science has shown that we need to rapidly reduce methane and carbon dioxide emissions. While “energy reliability,” “affordability,” and “national security,” are attractive statements to make on a political level, natural gas infrastructure expansion locks the nation into decades of operation of facilities that consumers who use electrical and heating infrastructure pay for in spite of cheaper, (or financially equivalent) more modern sustainable alternatives.

The recently appointed FERC Chairman Mark Christie does not have climate change as one of his top priorities. The 5-0 vote to propose the most sweeping overhaul of its natural gas blanket certificate program, which is a comprehensive and significant deregulatory move reflects current political composition of the Commission rather than any real consensus about whether these reforms are appropriate in scope, despite Mark Christie [claiming](#) that the unanimous vote signifies “broad institutional consensus that the current framework has become an obstacle to the infrastructure buildout the country needs.”



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RELATED COMMISSION ACTION (more deregulation of the fossil fuel industry)

On May 27, 2026, the Commission extended temporary waivers of certain blanket certificate cost limits through May 31, 2028, one year beyond the previous May 31, 2027 cutoff. The extension is intended to provide regulatory certainty while the Commission considers permanent changes to the blanket certificate program.

On June 18, 2025, FERC temporarily waived Order No. 871 which stopped companies from building approved projects while rehearing requests were going through. The order previously made it easier for natural gas projects to be challenged before projects were in the ground. The proposal to expand the blank check is further compounding on the deregulation that is happening in the natural gas sector, making it easier for construction to begin despite serious environmental concerns

How to file a comment

FERC seeks public comments on their proposed rulemaking. Members of the public, landowners, Tribal Nations, community organizations, state and local agencies, industry stakeholders, and other interested individuals should submit comments to FERC. **Submit a comment by July 27, 2026.**

See our [Step by Step guide](#) on how to file comments with FERC

Why file a comment?

- Filing a comment is the most direct way you can influence policy besides voting
- Comments help FERC better understand the impact of their proposal
- Comments demonstrate that landowners, community members, and other stakeholders care and are concerned about a proposal
- Comments highlight the environmental impacts or issues related to infrastructure development

1. **You can file comments online.** Click [HERE](#) to file an eComment.



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For most people, creating an account with FERC is *not* necessary to file an eComment. Just make sure the comment is under 10,000 characters and does not include any photos or file attachments.

2. **For longer comments**, click [HERE](#). This way requires a FERC Online account made [HERE](#).

This is FERC's eFiling system. Most people should file a shorter eComment above unless the comment is over 10,000 characters or has files

What to include

If the information in the overview of the facts section moves you, it could be helpful to include when writing out your issues with FERC's proposal. In your comment, please put in the Docket No. RM25-12-001. This is the specific FERC proposal that you have just learned about.

Additionally, the [FERC eLibrary](#) is available to anyone with an account who wants access to additional documentation about the proposal.

RM25-9 to 6/2025 allow construction during/despite rehearing
RM25-12 Blanket Certificate Cost Limitations