



**THE COMMONWEALTH OF MASSACHUSETTS  
ENERGY FACILITIES SITING BOARD**

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DEVAL L. PATRICK  
GOVERNOR

October 17, 2014

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 2042

Re: Tennessee Gas Pipeline Company, L.L.C, PF14-22-000

Dear Secretary Bose:

The Massachusetts Energy Facilities Siting Board (“Siting Board”), an administrative agency of the Commonwealth of Massachusetts, appreciates the opportunity to submit these preliminary comments in conjunction with the pre-filing phase of Tennessee Gas Pipeline Company’s (“Tennessee” or “Company”) proposed Northeast Energy Direct pipeline (“NED” or “Project”). The Siting Board hereby notifies both FERC and the Company of its intention to actively participate in the pre-filing phase of FERC natural gas pipeline proceedings in order to preserve the rights of interested citizens of the Commonwealth, pursuant to 980 C.M.R. § 7.07(9).

The Project as proposed would be the largest natural gas pipeline ever to be built in Massachusetts – including the original interstate pipelines extended into New England in the 1950s and 1960s. In particular, Tennessee proposes to construct and operate in Massachusetts over 127 miles of new pipeline, up to 36 inches in diameter, capable of transporting up to 2.2 billion cubic feet per day of natural gas. The Project would extend from the Massachusetts border with New York State at Richmond, Massachusetts to Dracut. In addition to the 127 miles of new mainline pipe in Massachusetts (a significant portion of which would be located in greenfield areas), Tennessee also proposes to construct the following new pipeline laterals and loops in Massachusetts:

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| 1. Haverhill Lateral | Approximately 6.99 miles of 16-inch pipeline in Massachusetts and New Hampshire; |
| 2. Lynnfield Lateral | Approximately 16.62 miles of 20-inch pipeline in Massachusetts;                  |

3. West Nashua Lateral      Approximately 11.95 miles of 12-inch pipeline in Massachusetts and New Hampshire;
4. Fitchburg Lateral Ext.      Approximately 4.97 miles of 12-inch pipeline in Massachusetts;
5. North Worcester Lateral      Approximately 14.13 miles of 12-inch pipeline in Massachusetts; and
6. Pittsfield Lateral      Approximately 1.78 miles of 12-inch pipeline in Massachusetts.

In Massachusetts, the Project would involve the installation of three new compressor stations, as well as metering and regulation facilities, including tap, metering, heating, flow control, overpressure protection, and communications facilities, as necessary, at an additional twelve locations. Modifications to the two existing Massachusetts metering and regulation facilities are also proposed by Tennessee as part of the Project.

Given the unprecedented scale of the Project, as well as the many residential properties and sensitive natural resource/open space areas potentially impacted by the Project, a number of issues implicating interests of the Commonwealth need to be fully addressed. As you are aware, the Massachusetts Secretary of Energy and Environmental Affairs has already filed initial comments with FERC on substantive issues as well as the need for a robust public process moving forward. In light of those interests, the Siting Board intends to be an active participant in the pre-filing process. The Siting Board also urges both Tennessee and FERC to develop a comprehensive public outreach effort in the pre-filing process, and to fully scope the environmental issues that will need to be addressed in any future certificate application at FERC for this Project.

Sincerely,



Andrew G. Greene  
Director

cc: Michael Letson, Tennessee Gas Pipeline Company