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FEDERAL ENERGY
REGULATORY COMMISSION

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Re: Northeast Energy Direct Docket #PF14-22

ORIGINAL

Dear Ms. Bose,

I am writing today to reiterate my strong opposition to the North East Direct natural gas pipeline project, and urge FERC to deny permits for the project to proceed.

On June 11, the Massachusetts Department of Public Utilities (DPU) held a hearing in Greenfield on the pipeline. Virtually all of the overflow crowd of over 700 expressed strong opposition to the pipeline. Among the reasons:

- The pipeline will degrade and destroy protected and conserved land that represents a prime and irreplaceable asset of the State.
- The lands at risk include many areas acquired with public and private funds under the express understanding that such lands would enjoy permanent protection under Article 97 of the State Constitution.
- The pipeline promoters are pursuing a "public benefit" finding under the false assertion that it is necessary to meet regional energy requirements, when the bulk of capacity will be devoted to export, providing no benefit to Massachusetts or U.S. citizens other than profit to the promoters.
- The pipeline represents a major new investment in fossil fuel infrastructure at a time when an increasingly diverse range of global leaders, including President Obama, Pope Francis and the Norwegian sovereign wealth fund, are recognizing the necessity and moral imperative of transforming the global energy system to eliminate fossil fuel consumption.
- The pipeline is being deliberately routed through rural parts of the State where lower safety standards, such as pipe wall thickness, are permitted, implicitly laying a lower value on the lives of rural residents.

In the face of these arguments, the Massachusetts DPU appears to have already made up its mind to support the NED project.



- DPU seems determined to limit participation in the comment and review process, excluding full participation by elected representatives and citizens' organizations.
- DPU seems eager to accept at face value the highly suspect claims of local utilities that they will purchase gas delivered by the pipeline, rather than undertake the conservation, repair and renewables development work that would ensure lower rates and more reliable and safer supply.
- DPU seems determined to move the approval process as rapidly and sloppily as possible, preventing a full consideration of alternatives including moderate upgrade and expansion of existing pipelines and a more genuine commitment to a more efficient and less damaging energy system.
- DPU is all too ready to condone the utilities' outrageous behavior in halting new gas hookups and in some cases, like Berkshire Gas, explicitly conditioning new hook ups on the approval of the NED, without questioning how the utilities could have planned so poorly and irresponsibly as to be unable to meet the current energy demands of their service areas.

DPU's approach is less appropriate to that of a regulator acting in the public interest than of a partner and collaborator in this private project for private gain. Fortunately, it appears that Massachusetts Attorney General Coakley also takes a dim view of the NED project and process and hopefully can be depended on to reveal and prosecute the collusion and corruption that lies beneath the surface.

I hope FERC can be depended on to undertake a more rigorous and transparent review of the North East Direct Pipeline, and speak out against the manipulation of the review process, the blatant favoring of private profit over public benefit and safety, and the short-sighted and destructive energy policy it represents.

Sincerely,

Paul DiLeo
President
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