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PIPE LINE AWARENESS NETWORK
FOR THE **NORTH EAST, INC.**

October 15, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20216

Re: Docket No. PF14-22, TGP Northeast Energy Direct – Scoping; Alternatives

Dear Secretary Bose:

We write to request more detailed analysis of viable, targeted modifications to the Tennessee Gas Pipeline (“TGP”) system, as a preferable alternative means to serve the stated purpose of the proposed Northeast Energy Direct pipeline (“NED”).¹ Specifically, “lift-and-lay” expansions of existing laterals (and perhaps of the TGP 200 line) should be prioritized for any expansion of the TGP system. Minimizing the disturbance of additional land for gas infrastructure (by increasing the diameter of existing pipelines) would greatly reduce the NED proposal's conflicts with local, state, and regional policy priorities.

To date, capacity contracts for a total of 417,262 Dth/day have been approved at the state level. Please note that only 271,462 Dth/day of this amount is for new capacity; the other 145,800 Dth/day would replace capacity contracts on existing pipelines. Please also note that each of the state orders approving NED precedent agreements with local distribution companies (“LDCs”) have been or are anticipated to be appealed (the recent New Hampshire Public Utilities Commission order approving the precedent agreement with Liberty Utilities (EnergyNorth Natural Gas) Corp. (“Liberty Utilities”) has not yet been appealed as of this filing; orders of the Massachusetts Department of Public Utilities have been appealed by multiple parties regarding the precedent agreements with The Berkshire Gas Company, Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“Columbia Gas”), and Boston Gas Company d/b/a National Grid (“National Grid”).

Whatever capacity increases are ultimately determined to be prudent and in the public interest, if any, we ask the Commission for an analysis focused on targeted expansion of existing laterals that could (and we strongly believe *should*) be pursued by TGP as alternative means to meet the contractual capacity requirements of subscribers to NED.

Concord Lateral Alternative in New Hampshire

Please conduct an independent evaluation of modifications to the Concord Lateral that would be necessary to provide additional capacity of 65,000 Dth/d to the Liberty Utilities distribution system. (While the Liberty Utilities NED contract is for up to 115,000 Dth/d, 50,000 of that would be to replace an existing contract which could be renewed using existing capacity.)

¹ The stated purpose of the NED proposal is “to meet the growing demand for natural gas transportation capacity in the Northeast and, more specifically, New England.” *NED Resource Report 1*, July 24, 2015, at 1-10.

Please also evaluate non-pipeline alternatives for fulfilling this contract, such as upgrading and/or expanding propane and liquefied natural gas (“LNG”) storage facilities, or increased use of compressed natural gas (“CNG”). Liberty Utilities has just initiated a proceeding² that includes testimony that suggests that LNG or CNG, coupled with expansion of the Liberty Utilities distribution system, could be a viable alternative for at least some of the company's expansion plans.

Alternatives Expanding Massachusetts Laterals

Please similarly evaluate lateral-based alternatives for fulfilling the capacity requirements of the Massachusetts LDCs. National Grid and Columbia Gas are served off of several laterals in eastern Massachusetts which should be studied for expansion options. The Northampton and North Adams Laterals in western Massachusetts are reported to be at or near capacity. The moratoria imposed by Berkshire Gas and Columbia Gas, prohibiting any new or expanded service along the Northampton Lateral, raise serious economic development concerns for communities in the Pioneer Valley.³ These communities seek an immediate resolution to the moratoria – which NED cannot possibly provide. Instead, the NED proposal is impeding more expeditious, smaller-scale solutions. It should be noted that Berkshire Gas received authority several years ago to install five LNG storage tanks in Whately, Massachusetts, near the Northampton Lateral, and the company has chosen to install only two. Columbia Gas, for its part, has reportedly said that NED would not resolve its capacity problems,⁴ implying that even without NED as proposed, modifications to the Northampton Lateral or the LDC distribution systems are required.

These targeted expansions should be solutions of first resort if any additional pipeline capacity is needed.

Respectfully submitted,



Kathryn R. Eiseman, President
Pipe Line Awareness Network for the Northeast, Inc.

17 Packard Road
Cummington, MA 01026
eiseman@plan-ne.org
413-320-0747

2 NH PUC Docket No. DG 15-442, *In re Liberty Utilities Petition for Approval of a Gas Franchise in Jaffrey, Rindge, Swanzey and Winchester*.

3 Berkshire Gas has intimated that it may subject communities along the North Adams Lateral to a moratorium as well.

4 “State Senate President Stanley Rosenberg calls on Berkshire Gas to lift moratorium,” *Daily Hampshire Gazette*, August 12, 2015 (<http://www.gazettenet.com/readerservices/businessxml/18157902-95/state-senate-president-stanley-rosenberg-calls-on-berkshire-gas-to-lift-moratorium>) (“[Columbia Gas Spokeswoman Sheila] Doiron said the Kinder Morgan pipeline is not a solution for Columbia Gas[.]. Even if the controversial pipeline were ready tomorrow, Doiron said it would not affect the moratoriums.”).