

April 6, 2017

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Tennessee Gas Pipeline Company, L.L.C., Docket No. CP14-529-000  
Connecticut Expansion Project  
Request for Partial Notice to Proceed with Tree Clearing

Dear Ms. Bose:

Tennessee respectfully renews its request that the Commission issue a limited Notice to Proceed (“Limited NTP”) with tree clearing for all portions of the Project in Connecticut, Massachusetts, and New York.

On March 11, 2016, the Federal Energy Regulatory Commission (the “Commission”) issued its Order Issuing Certificate (“Order”) in the above-referenced docket for Tennessee Gas Pipeline Company, L.L.C.’s (“Tennessee”) Connecticut Expansion Project (the “Project”).<sup>1</sup> In the Order, the Commission found that its approval of the Project, which is designed to serve the natural gas transportation capacity needs of three New England local distribution companies (“LDCs”), is required by the public convenience and necessity. Tennessee filed to accept the Order on March 14, 2016 and filed its Implementation Plan for the Project on March 22, 2016.

Tennessee has received all federal permits required to clear trees for the Project. The Massachusetts Department of Environmental Protection (“Mass DEP”) issued a Clean Water Act (“CWA”) Section 401 water quality certification (“WQC”) for the Project in Massachusetts on June 29, 2016 (which was affirmed by the Deputy Commissioner of the Mass DEP in a final decision on the water quality certificate issued on March 27, 2017, as amended on April 5, 2017). The tribal consultation process conducted pursuant to Section 106 of the National Historic Preservation Act is also complete for the Project. Tennessee has also executed firm contracts equal to the level of service for the Project and in accordance with Ordering Paragraph (E) of the Order. Attachment A to this filing contains a table listing all of the federal permits and clearances required for construction activities in Connecticut, Massachusetts, and New York. Concurrent with this request, Tennessee is also requesting separately a request for Notice to Proceed with full construction. Attached to that request are the relevant applicable permits, clearances, and correspondence.

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<sup>1</sup> *Tennessee Gas Pipeline Co., L.L.C.* 154 FERC ¶ 61,191 (2016).

Tennessee respectfully requests that the Commission issue a Limited NTP for the tree felling activity discussed above as soon as possible, but no later than April 13, 2017, so that Tennessee can mobilize its contractor and conduct environmental and safety training for the Project. Granting Tennessee's Limited NTP will help Tennessee place the Project in service by November 1, 2017, in a manner that maximizes the protection of migratory bird habitat, and provides Tennessee's LDC customers much needed fuel for the winter heating season. Attachment B to this filing contains an updated construction schedule for the Project.

In accordance with the Commission's filing requirements, Tennessee is submitting this filing with the Commission's Secretary through the eFiling system. Tennessee is also providing complete copies of this filing to the Office of Energy Projects and to all parties on the official service list for the above-referenced docket. Any questions concerning this filing should be addressed to the undersigned at (713) 420-6547.

Respectfully submitted,

TENNESSEE GAS PIPELINE COMPANY, L.L.C.

By: /s/ Mosby Perrow  
Mosby Perrow  
Assistant General Counsel

Attachments

cc: Elaine Baum (Commission Staff)  
Eric Howard (Commission Staff)  
All parties

ATTACHMENT A

FEDERAL PERMITS AND CLEARANCES

TENNESSEE GAS PIPELINE COMPANY, L.L.C.

CONNECTICUT EXPANSION PROJECT

CP14-529-000

**TENNESSEE GAS PIPELINE COMPANY, L.L.C., DOCKET NO. CP14-529-000  
CONNECTICUT EXPANSION PROJECT**

**FEDERAL PERMITS AND CONSULTATIONS REQUIRED FOR CONSTRUCTION**

Agency	Authorization	Date Submitted	Permit/Clearance Issuance Date	Permit/Clearance Expiration Date	Comments/Status
<b>FEDERAL</b>					
U.S. Fish and Wildlife Service (FWS) – New England Field Office	Rare, Threatened and Endangered Species	September 9, 2013	March 24, 2016	N/A	Biological Opinion for Dwarf Wedgemussel issued August 12, 2016
	Bald and Golden Eagle Protection Act	November 5, 2015	August 16, 2016	N/A	USFWS delegated review of this issue to the state of Massachusetts and Connecticut. No bald eagles identified by CT DEEP (3/28/2016) and NHESP (3/29/2016).
	Northern Long Eared Bat	September 14, 2015	April 12, 2016	December 31, 2022	USFWS stated in letter to Tennessee dated April 12, 2016 that any resulting incidental take of the northern long-eared bat is not prohibited by the final 4(d) rule, and also that no time of year restriction for tree felling is applicable to the Project.
	Migratory Bird Treaty Act	Submitted request for tree felling to May 1, 2016 on March 7, 2016	April 12, 2016	N/A	USFWS stated in letter to Tennessee dated April 12, 2016 that no time of year restriction for tree felling is applicable to the Project.
U.S. Fish and Wildlife Service (FWS) - New York Field Office	Rare, Threatened and Endangered Species Clearance	September 9, 2013	June 24, 2016 April 12, 2016	N/A	No Effect (for Northern Long-Eared Bat, Indiana Bat and Migratory Bird Treaty Act)
	Bald and Golden Eagle Protection Act	November 5, 2015	February 23, 2016	N/A	None identified

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<b>Agency</b>	<b>Authorization</b>	<b>Date Submitted</b>	<b>Permit/Clearance Issuance Date</b>	<b>Permit/Clearance Expiration Date</b>	<b>Comments/Status</b>
	Northern Long Eared and Indiana Bat	September 14, 2015	April 12, 2016	December 31, 2022	USFWS stated in letter to Tennessee dated April 12, 2016 that any resulting incidental take of the northern long-eared bat is not prohibited by the final 4(d) rule, and also that no time of year restriction for tree felling is applicable to the Project.
	Migratory Bird Treaty Act	Submitted request for tree felling to May 1, 2016 on March 2, 2016	April 12, 2016	N/A	USFWS stated in letter to Tennessee dated April 12, 2016 that no time of year restriction for tree felling is applicable to the Project.
U.S. Army Corps of Engineers, New York District	Clean Water Act, Section 404	August 1, 2014	September 2, 2016	March 18, 2020	N/A
U.S. Army Corps of Engineers, New England District	Clean Water Act, Section 404	July 23, 2014	January 13, 2017	January 31, 2023	N/A
U.S. Environmental Protection Agency	National Pollutant Discharge Elimination System	February 17, 2017	March 9, 2017	February 16, 2022	General Permit NOI was submitted on February 23, and 14 day hold period expired on March 9, 2017, therefore permit is now active.

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Agency	Authorization	Date Submitted	Permit/Clearance Issuance Date	Permit/Clearance Expiration Date	Comments/Status
<b>STATE-DELEGATED FEDERAL AUTHORIZATION</b>					
Massachusetts State Historic Preservation Office - State Historic Preservation Officer (MA SHPO)	Section 106, National Historic Preservation Act Consultation	Application submitted July 2014	August 2014  February 2015  September 2015	N/A	Letter identifying Historic Structures and Recommending Avoidance and Protection Plan  Clearance for Site Avoidance and Protection Plan for Historic Structures  Clearance for Pipeyards
New York State Historic Preservation Office and New York State Office of Parks, Recreation, and Historic Preservation	Section 106, National Historic Preservation Act Consultation	Application submitted July 2014	August 2014  March 2015	N/A	Finding of No Adverse Effect  Clearance for Avoidance Measures for Britt-Luke Cemetery
Connecticut State Historic Preservation Office	Section 106, National Historic Preservation Act Consultation	Application submitted July 2014	September 2014  April 2015	N/A	Finding of No Adverse Effect  Concurrence finding no affect after identification of concrete footings during archeological reconnaissance survey
New York Department of Environmental Conservation	Section 401 Water Quality Certification	July 25, 2014	February 3, 2016	February 14, 2021	N/A

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<b>Agency</b>	<b>Authorization</b>	<b>Date Submitted</b>	<b>Permit/Clearance Issuance Date</b>	<b>Permit/Clearance Expiration Date</b>	<b>Comments/Status</b>
Massachusetts Department of Environmental Protection	Section 401 Water Quality Certification	June 29, 2015	June 29, 2016	January 31, 2023	N/A
Connecticut Department of Energy and Environmental Protection	Section 401 Water Quality Certification	April 23, 2015	October 5, 2016	January 31, 2023	N/A
Connecticut Department of Energy and Environmental Protection	State Pollutant Discharge Elimination System	January 5, 2017	March 23, 2017	September 30, 2018	N/A
New York Department of Environmental Conservation	State Pollutant Discharge Elimination System	April 20, 2016	May 5, 2016	January 28, 2020	Permit not required for tree felling activities. However, coverage under the General Permit in place since May 2016.

ATTACHMENT B

CONSTRUCTION SCHEDULE

TENNESSEE GAS PIPELINE COMPANY, L.L.C.

CONNECTICUT EXPANSION PROJECT

CP14-529-000



ID	Task Mode	Task Name	Duration	Start	Finish	2017												
						1st Quarter			2nd Quarter			3rd Quarter			4th Quarter			
						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov		
1		FERC Certificate	1 day	Fri 3/11/16	Fri 3/11/16													
2		Acceptance	0 days	Wed 3/16/16	Wed 3/16/16													
3		Env. Training & Preconstruction Meetings	2 days	Tue 3/7/17	Wed 3/8/17													
4		Preconstruction Inspections/Surveys	35 days	Mon 2/27/17	Fri 4/14/17													
5		Tree Clearing	31 days	Mon 4/17/17	Sat 5/27/17													
6		Pipe Yard/ Access Rd Construction	30 days	Thu 4/20/17	Wed 5/31/17													
7		Pipe Delivery	30 days	Mon 5/15/17	Fri 6/23/17													
8		Mainline Construction	122 days	Mon 5/15/17	Tue 10/31/17													
9		In service	1 day	Wed 11/1/17	Wed 11/1/17													
10		Demobilization	4 days	Thu 11/2/17	Tue 11/7/17													



Project: CT exp Gannt chartjmfrev  
Date: Thu 4/6/17

Task		External Milestone		Manual Summary Rollup	
Split		Inactive Task		Manual Summary	
Milestone		Inactive Milestone		Start-only	
Summary		Inactive Summary		Finish-only	
Project Summary		Manual Task		Deadline	
External Tasks		Duration-only		Progress	