

BEFORE THE UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

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)
Tennessee Gas Pipeline Company, LLC) Docket No. CP19-7-000
)
)
_____)

**MOTION TO INTERVENE OF THE
PIPE LINE AWARENESS NETWORK FOR THE NORTHEAST, INC.**

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) hereby moves pursuant to 18 C.F.R. § 385.214(b) to intervene in the above-captioned proceeding. On October 19, 2018, Tennessee Gas Pipeline Company, LLC (“TGP”) filed with the Commission an Abbreviated Application (the “Application”) for the 261 Upgrade Projects (the “Projects”) pursuant to sections 7(b) and 7(c) of the Natural Gas Act (“NGA”), and Part 157 of the Commission’s regulations, for authorization to construct, install, modify, operate, and maintain certain pipeline and compression facilities located in Massachusetts and Connecticut that would increase natural gas capacity on its pipeline system by approximately 72,400 dekatherms per day.

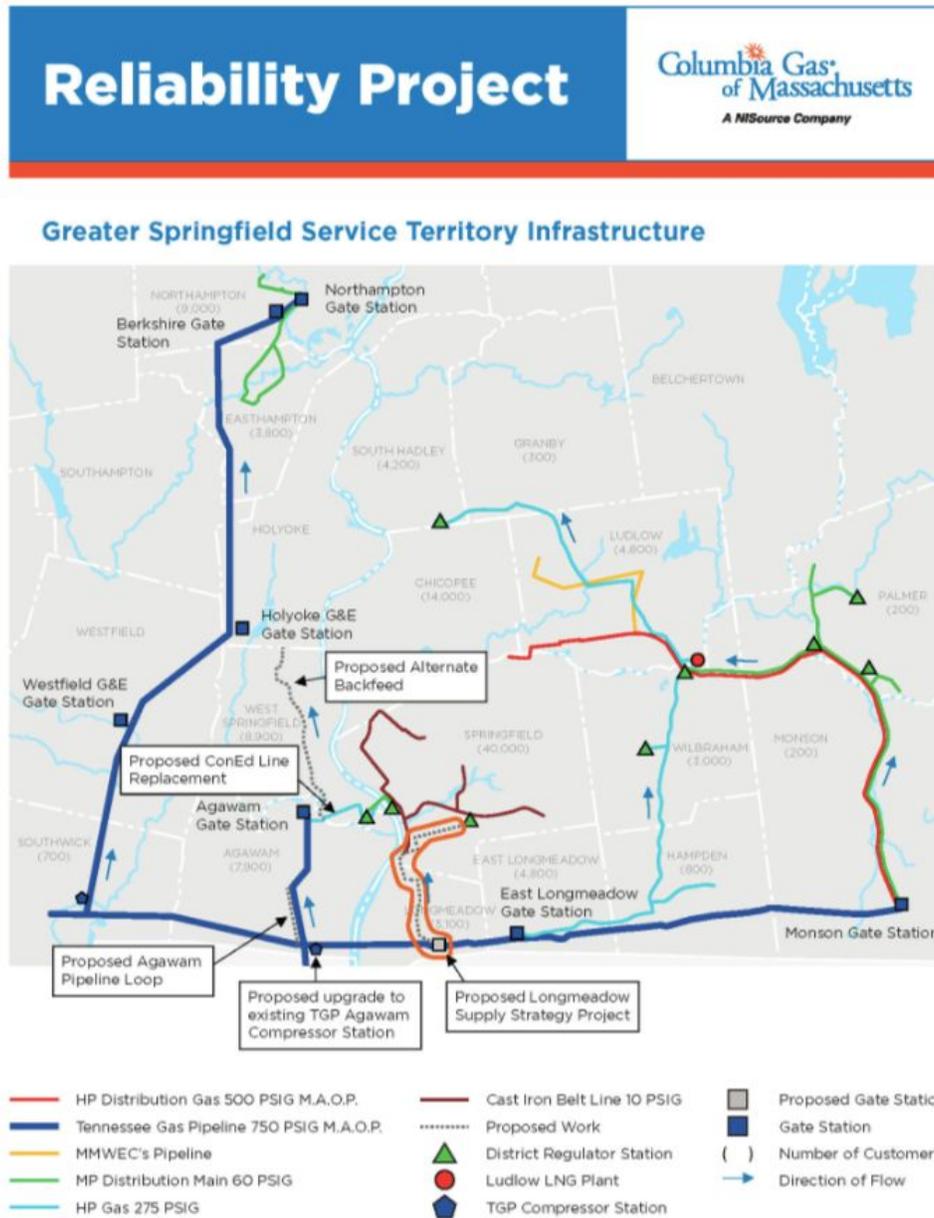
COMMUNICATIONS AND SERVICE

The name and address of the person upon whom all communications concerning this proceeding should be served are as follows:

Kathryn R. Eiseman, President & CEO
Pipe Line Awareness Network for the Northeast, Inc.
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THE PROJECTS ARE PART OF A BROADER EXPANSION PLAN

The Projects are part of what Columbia Gas of Massachusetts (“CMA”) has referred to as “five integrated supporting infrastructure projects” (together, the “Springfield Area Reliability Plan”), depicted on the CMA website¹ and reproduced below:



¹ See www.columbiagasma.com/images/default-source/promotion/reliability-handout-draft---nov-1-draft-6_page_1.jpg; www.columbiagasma.com/images/default-source/promotion/reliability-handout-draft---nov-1-draft-6_page_2.jpg (last visited August 9, 2018).

The Projects are designed, in part, to enable CMA to build a new pipeline running northerly from TGP's Agawam lateral, bisecting the Town of West Springfield, to bring gas to the Holyoke Gas & Electric system. In connection therewith, HG&E's capacity on the TGP Northampton Lateral would be made available to CMA under a long-term capacity exchange agreement.²

INTEREST OF MOVANT

PLAN is a broad-based coalition of organizations, municipalities, businesses, citizen groups, legislators, ratepayers and concerned citizens working to prevent the overbuild of natural gas infrastructure in the Northeast. PLAN seeks to prevent the negative economic and environmental impacts associated with overbuild, and to promote lower-impact energy solutions. PLAN is incorporated as a non-profit under Massachusetts law. PLAN's members include residents of communities that would be directly impacted by the Springfield Area Reliability Plan.

PLAN assists local citizen groups whose members are concerned about the proposed buildout of gas infrastructure. PLAN's work specifically includes support for residents of communities that would be directly impacted by new infrastructure associated with these Projects and the broader Springfield Area Reliability Plan, including Agawam, Longmeadow, Springfield, and West Springfield, as well as residents concerned that these Projects are designed to bring more gas into their communities, including Holyoke, Northampton and Easthampton. Climate concerns, combined with safety concerns brought to a head because of the September 2018 Merrimack Valley disaster resulting from CMA's expansion (or "upgrade") work, have caused many people to question any expansion of gas infrastructure, and even to push for conversion away from gas to cleaner, sustainable energy sources.³ (In Northampton,

² CMA Response to AG 3-2 in Mass. DPU Docket No. 17-172 at 109 (available at eeasonline.eea.state.ma.us/EEA/FileService/FileService.Api/file/FileRoom/9167224).

³ "Disaster could be a turning point in energy debate," *Eagle Tribune*, Sept. 30, 2018 (<https://www.eagletribune.com>).

Massachusetts, these concerns have resulted in a resolution of the City Council⁴ in opposition to gas expansion, including specifically opposition to the Springfield Area Reliability Plan that comprises the Projects as well as CMA expansion components.)

For the reasons set forth above, PLAN has “an interest which may be directly affected by the outcome of the proceeding” pursuant to 18 C.F.R. § 214(b)(2)(ii) and its “participation is in the public interest” pursuant to 18 C.F.R. § 214(b)(2)(iii). PLAN is in a unique position to represent its interests and the interrelated interests of its members.

CONCLUSION

WHEREFORE, for the foregoing reasons, PLAN respectfully requests that its motion to intervene be granted.

Respectfully submitted this 5th day of November, 2018.



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[com/news/merrimack_valley/disaster-could-be-a-turning-point-in-energy-debate/article_c580d0a9-a338-5073-ad05-b8c747f62958.html](https://www.northamptonma.gov/DocumentCenter/View/11657/18170-A-Resolution-Opposing-the-Expansion-of-Gas-Infrastructure---certified)); “After dozens of gas explosions, a community looks for alternatives to natural gas,” Oct. 3, 2018, (<https://insideclimatenews.org/news/02102018/natural-gas-pipeline-explosion-massachusetts-home-heat-pump-district-heating-electricity-solar>).

⁴ Available at <https://www.northamptonma.gov/DocumentCenter/View/11657/18170-A-Resolution-Opposing-the-Expansion-of-Gas-Infrastructure---certified>.