



Tennessee Gas Pipeline  
Company, L.L.C.  
a Kinder Morgan company

**INFORMATION HAS BEEN REMOVED  
FROM THIS DOCUMENT FOR  
PRIVILEGED TREATMENT (18 C.F.R. § 388.112)**

**CRITICAL ENERGY INFRASTRUCTURE  
INFORMATION (CEII) HAS BEEN REMOVED  
FROM THIS DOCUMENT (18 C.F.R. § 388.113(c))**

November 20, 2015

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

Re: Tennessee Gas Pipeline Company, L.L.C.  
Northeast Energy Direct Project  
Abbreviated Application For a Certificate of Public Convenience and Necessity to  
Construct, Install, Modify, Operate, and Maintain Certain Pipeline and Compression  
Facilities and to Abandon Other Facilities  
Docket No. CP16-\_\_\_\_\_-000

Dear Ms. Bose:

Pursuant to Sections 7(b) and 7(c) of the Natural Gas Act and the Federal Energy Regulatory Commission's ("Commission") regulations thereunder, Tennessee Gas Pipeline Company, L.L.C. ("Tennessee") hereby submits an original and two copies of an application ("Application") for a certificate of public convenience and necessity to construct, install, modify, operate, and maintain certain pipeline and compression facilities to be located in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut (referred to as the Northeast Energy Direct Project ("NED Project" or "Project")). The Application also requests authority to abandon other limited facilities,

The NED Project is comprised of two components:

- (1) Supply Path Component, which is comprised of the Project facilities from Troy, Pennsylvania to Wright, New York. The Supply Path Component facilities include approximately 174 miles of pipeline facilities in Pennsylvania and New York, construction of three new compressor stations and modifications to one existing compressor station, construction of two new meter stations, and various

appurtenant facilities. The capacity of the Supply Path Component facilities will be 1.2 Bcf per day.

- (2) Market Path Component, which is comprised of the Project facilities from Wright, New York to Dracut, Massachusetts. The Market Path Component facilities include approximately 188 miles of mainline pipeline facilities in New York, Massachusetts, and New Hampshire, approximately 58 miles of lateral and pipeline looping (five laterals located in Massachusetts and New Hampshire, and one pipeline loop in Connecticut), construction of six new compressor stations, construction of 13 new meter stations and modification of 14 existing meter stations, and various appurtenant facilities. The capacity of the Market Path Component facilities will be 1.3 Bcf per day.

Tennessee is also requesting certificate authorization to enable it to construct and place the Project in service by installing the midpoint compression in phases in order to meet the specific contracted needs of the NED Project shippers. The precedent agreements with Project shippers call for the Project to be placed in service on November 1, 2018. In order to allow Tennessee to complete acquisition of property for the pipeline and compressor station locations, environmental and cultural resource surveys, federal and state permitting activities, materials procurement, and construction of the Project in a time frame compatible with the proposed in-service date of November 1, 2018, Tennessee has requested in the Application that the Commission grant the requested authorizations during the fourth quarter 2016.

### **Scope Modifications**

Tennessee's Application includes several changes that have been incorporated into the Project scope since the filing of the second draft Environmental Report on July 24, 2015 in the pre-filing process for the Project.<sup>1</sup> These scope changes, which are detailed in Resource Report 1 to the final Environmental Report included in Exhibit F-1 to Tennessee's Application, include:

- Increased mileage for Loop 317-3 by approximately 2.12 miles in order to accommodate additional Supply Path Component volumes.
- Total increase in horsepower ("hp") for Supply Path Head Station, Supply Path Mid Station, and Supply Path Tail Station from 92,000 hp to 153,500 hp to accommodate additional Supply Path Component volumes.

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<sup>1</sup> As background, on September 15, 2014, Tennessee filed a request to use the Commission's pre-filing procedures for the proposed Project, and the Commission approved Tennessee's request to use the pre-filing procedures for the Project in Docket No. PF14-22-000 on October 2, 2014. As part of the pre-filing process, Tennessee submitted drafts of Resource Reports 1 and 10 for the Project on November 5, 2014. On December 8, 2014, Tennessee filed a revised draft of Resource Report 1, which reflected the adoption of two major route alternatives for the Market Path Component. On March 13, 2015 and July 24, 2015, Tennessee submitted the first and second drafts, respectively, of the Environmental Report (Resource Reports 1 through 13) to the Commission.

- A change in the location for the new Market Tail Station in Dracut, Massachusetts, which has fewer environmental impacts than the previously proposed site and also accommodates stakeholder requests.
- Re-routing of the Wright to Dracut Pipeline Segment, Maritimes Delivery Line, Lynnfield Lateral, and Haverhill Lateral, and removal of the Concord Delivery Line from the Project scope as a result of the new site for the Market Tail Station in Dracut, Massachusetts.<sup>2</sup>
- A change in location of the new Market Path Mid Station 2, located in Berkshire County, which has fewer environmental impacts than the previously proposed site.
- Two approximately 7-mile re-routes in Amherst-Merrimack and Richmond, New Hampshire to accommodate town and regulatory agency requests. An additional re-route in Amherst-Merrimack, New Hampshire has been made to respond to a recent stakeholder request. As noted in Resource Report 1 of the final Environmental Report, this additional re-route is presented on the USGS 7.5-minute topographic map excerpts, aerial alignment sheets, and National Wetland Inventory mapping included as attachments to the Environmental Report, but has not yet been incorporated in the text, alternatives, resource report figures, or impact evaluations of the Environmental Report due to the timing of concluding an agreement with the stakeholders. Tennessee will include this information in a supplemental filing to the Application.
- Several revisions to meter stations, including: (1) removal the Leominster Meter Station, (2) a change in the name of the West Nashua Meter Station to the Merrimack Meter Station, and (3) a change in the location of the 200-2 Check Meter Station which is now in New Hampshire. As a result of these and other minor changes, the Project scope now includes a total of 15 new meter stations and 14 existing meter station modifications.

Tennessee notes that the landowner list included in Appendix AA to the Environmental Report has been updated since the July 24, 2015 filing of the second draft ER, and includes highlighted rows showing additional landowners who are now affected as a result of the scope modifications, and also indicates those landowners that are no longer affected by the Project as a result of these Project scope modifications. In addition, the landowner list has been revised to reflect the affected landowners only based on the proposed Project scope included in the Application. Landowners that were within or abutted the 400 foot survey corridor that are no longer affected landowners based on the proposed Project scope are identified in the updated landowner list as well.

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<sup>2</sup> With the revised location of the Market Tail Station and the re-routing of the Wright to Dracut Pipeline Segment, the Maritimes Delivery Line, the Lynnfield Lateral, and the Haverhill Lateral, the Concord Delivery Line was no longer needed due to the change in the location of the 200-2 Check Meter Station north of Pelham, New Hampshire. Gas deliveries that were to be made via the Concord Delivery Line will now be made to either the relocated 200-2 Check Meter Station or to the Haverhill Lateral.

## **Tennessee's Response to Scoping Comments and to the Commission's Comments on Draft Environmental Report**

In the Notice of Intent to Prepare an Environmental Impact Statement for the Planned Northeast Energy Direct Project, Request for Comments on Environmental Issues, and Notice of Public Scoping Meetings, issued on June 30, 2015 in Docket No. PF14-22-000, the Commission established a scoping period through August 31, 2015 for the Project. The scoping period for the Project was extended until October 16, 2015 by the Commission in the Notice of Public Scoping Meeting for the Northeast Energy Direct Project, and Extension of Scoping Period, issued September 3, 2015 in Docket No. PF14-22-000.

Tennessee includes, as Attachment A to this transmittal letter, a matrix which includes Tennessee's responses to the scoping comments (either the response itself or a reference to the location in the Application or Environmental Report where the response to the scoping comment may be found). Tennessee notes that the attached matrix includes responses to scoping comments filed with the Commission between June 30, 2015 and October 1, 2015. Tennessee will respond to the scoping comments filed with the Commission between October 2, 2015 and October 16, 2015 (the conclusion of the Commission's scoping period) in a supplemental filing with the Commission to be filed no later than December 21, 2015. Since many of the scoping comments reflect similar issues or themes, Tennessee has provided a combined response to such comments, rather than providing a specific unique response to every scoping comment. For scoping comments that present unique issues, a specific response is provided.

Included as Attachment B to this transmittal letter is a matrix addressing comments from Commission Staff, dated (1) February 27, 2015 (draft Resource Reports 1 and 10, filed November 5, 2014 and updated on December 8, 2014); (2) May 15, 2015 (first draft Environmental Report, filed on March 13, 2015) and (3) October 8, 2015 (second draft Environmental Report, filed on July 24, 2015). Attachment B also addresses comments that were not addressed previously from the Environmental Protection Agency (Attachment A to the Commission's May 15, 2015 Letter) and the U.S. Fish and Wildlife Service, New York Field Office (Attachment B to the Commission's May 15, 2015 letter). The matrix includes either the response to the Commission Staff comment or a reference to the location in the Application or Environmental Report where the response to the Commission Staff comment may be found. As noted in the matrix, certain responses to the Commission Staff comments will be submitted in a supplemental filing to be filed no later than December 21, 2015.

### **Certificate Application Filing**

Tennessee has organized the items being filed herein into the following volumes described below, pursuant to the Commission's Critical Energy Infrastructure Information ("CEII") guidelines:

**The Application Volume is comprised of the following:**

**Public**

- This letter of transmittal
- Application text
- Form of Federal Register Notice
- Exhibits required pursuant to Sections 157.14 and 157.18 of the Commission's regulations, 18 C.F.R. §§ 157.14 and 157.18 (2015) (excluding Exhibits F, F-1, G, G-II, and I)
- Matrix of Tennessee's Responses to Scoping Comments (Attachment A to this letter of transmittal)
- Matrix of Tennessee's Responses to Commission Staff Comments (Attachment B to this letter of transmittal)

**Volume I is comprised of the following:**

**Public**

- Environmental Report (Resource Reports 1 through 13)

**Volume II is comprised of the following:**

**Public**

- Appendices A through T to the Environmental Report

**Volume III is comprised of the following:**

**Privileged and Confidential (Other Non-Public)**

- Appendices AA, BB, CC, DD, EE, and FF to the Environmental Report, including confidential landowner information, threatened and endangered species information, and cultural resource information that is part of Resource Reports 1, 3, and 4.

**Volume IV is comprised of the following:**

**CEII (Non-Public)**

- Appendix AAA (Compressor Station Drawings)

**Volume V is comprised of the following:**

**Privileged and Confidential (Other Non-Public)**

- Exhibit I to the Application (Market Data)

**Volume VI is comprised of the following:**

**CEII (Non-Public)**

- Exhibits G and G-II to the Application (Flow Diagrams and Flow Diagram Data)

Tennessee respectfully requests that Volumes III and V be accorded privileged and confidential treatment, pursuant to Section 388.112 of the Commission's regulations, 18 C.F.R. § 388.112 (2015), and has marked both volumes with the legend "**Privileged and Confidential – Do Not Release**". Tennessee also requests that Volumes IV and VI be accorded a designation of Critical Energy Infrastructure Information pursuant to Section 388.113(c) of the Commission's regulations, 18 C.F.R. § 388.113(c) (2015), and has marked both Volumes IV and VI with the legend "**Contains Critical Energy Infrastructure Information - Do Not Release**".

In accordance with the Commission's filing requirements, Tennessee is submitting this Application with the Commission's Secretary through the eFiling system. Tennessee is also providing complete copies of this Application to the Office of Energy Projects. Any questions concerning the enclosed Application should be addressed to Ms. Jacquelyne Rocan at (713) 420-4544 or to Ms. Shannon Miller at (713) 420-4038.

Respectfully submitted,

TENNESSEE GAS PIPELINE COMPANY, L.L.C.

By: /s/ J. Curtis Moffatt  
J. Curtis Moffatt  
Deputy General Counsel and Vice President  
Gas Group Legal

Enclosures

cc: Mr. Michael McGehee  
Mr. Rich McGuire  
Mr. Eric Tomasi