



April 18, 2019

Secretary Kimberly Bose
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: TGP 261 Upgrade Projects, Docket No. CP19-7-000
April 15, 2019 Data Request - Supplemental Information**

Dear Secretary Bose:

The Pipe Line Awareness Network for the Northeast (“PLAN”) respectfully submits new and additional information pertaining to the “Longmeadow Alternative”, which is the subject of a data request issued to Tennessee Gas Pipeline Company, LLC (“TGP”) on April 15th.

On April 10, 2019, PLAN participated in a meeting with Stephen Bryant, the outgoing president of Columbia Gas of Massachusetts (“CMA”). To assist in the Commission’s evaluation of the 261 Upgrade Projects, we provide below key takeaways from this meeting, with context provided by references to related documentation.

Known Longmeadow Plans:

- The planned Longmeadow Meter Station is a joint TGP/CMA project.¹ In addition to the 40,500 Dekatherms per day (“Dth/d”) that CMA has contracted for with TGP in connection with the 261 Upgrade Projects, CMA has contracted for 6,000 Dth/d in connection with the Longmeadow Meter Station.
- CMA intends to use the Longmeadow Meter Station as a new point of delivery to build a new “backbone” of its system on the east side of the Connecticut River, and plans a 200 psi distribution main north through the Town of Longmeadow into Springfield.

¹ Columbia Gas of Massachusetts 2017/2018 – 2021/2022 Forecast & Supply Plan, Page 108 of 119 (available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9172434>).

- This new 200 psi pipeline would provide a more direct supply of gas to Springfield and is also intended to support the replacement of older distribution pipes in Longmeadow and Springfield.
- The 200 psi distribution main would connect to existing CMA facilities near the Memorial Bridge and, in conjunction with the Longmeadow Meter Station, would allow gas to flow east to west over the river. According to CMA filings:

Together with the reinforcement of the Con Ed Line [which is already underway], construction of the Longmeadow Gate Station will facilitate bi-directional flow east and west across the Connecticut River to improve reliability and operational flexibility to protect the communities of West Springfield and Agawam from major service disruption in the event of supply loss from the Agawam Gate Station.²

Thus, CMA intends for the “Longmeadow Supply Strategy” to provide sufficient capacity and pressures to provide *redundancy* to the Agawam lateral - *in other words, an alternative*.

- While the capacity commitment for the Longmeadow Meter Station project is only 6,000 Dth/d under the approved CMA precedent agreement, the HP Replacement Project, as proposed, would provide 27,000 Dth/d in unsubscribed capacity “to markets in western Massachusetts”.³ If the Commission approves this 27,000 Dth/d in excess of any contractually demonstrated need, some portion of this capacity could subsequently be used to add firm supply at the Longmeadow Meter Station to bolster this (already planned) alternate supply path for CMA’s Greater Springfield service area.

The Planned CMA “Alternate Backfeed” and Capacity Commitment are in Doubt

- The primary component of the conceptual plan driving the 261 Upgrade Projects is a potential CMA pipeline through West Springfield to Holyoke, referred to as the “Alternate Backfeed.” The Alternate Backfeed would allow CMA and Holyoke Gas & Electric (“HG&E”) to effectuate a capacity swap to free up space on TGP’s Northampton Lateral to serve Northampton and Easthampton. CMA stated in a 2017 filing, “The new

² *Id.*, 110 of 119.

³ FERC Application at 43. Inexplicably, the Application states elsewhere that the Agawam 261 Upgrade Projects would “create 27,000 Dth/day of incremental firm transportation capacity from Tennessee’s interconnection with Iroquois Gas Transmission System at *Wright, New York* to the discharge of CS 261. *Id.* at 6.

pipeline will displace HG&E's existing 11,800 Dth/day firm supply from the Northampton Lateral and provide an additional 5,500 Dth/day of supply, totaling 17,300 Dth/day."⁴

- Critically, according to Mr. Bryant, **CMA will not proceed with construction** of the 17,300 Dth/d pipeline to Holyoke **without the support of the City of Northampton, which CMA does not have** (as indicated on the record in this docket). To "cancel" the Alternate Backfeed, Mr. Bryant acknowledges that the next logical step would be to amend the precedent agreement between CMA and TGP to decrease the amount of contracted capacity.⁵
- Mr. Bryant additionally questions whether the Agawam Looping Project would be needed if the Alternate Backfeed plan is abandoned. Notably, the Looping Project is slated to provide **17,000 Dth/d**, approximately equal to the capacity of the Alternate Backfeed.

The redundancy of the multiple projects on the table, coupled with the lack of the "public-private partnership" that CMA's president states is a prerequisite to proceeding with the downstream Alternate Backfeed project, when weighed against extensive environmental impacts associated with the Looping Project, points to a **lack of justification for the Looping Project**.

HP Replacement Project

- TGP states that the HP Replacement Project **will provide "approximately 30,800 Dth/d** of capacity to serve Holyoke's customers' needs at the nearest delivery point on Holyoke's distribution system (Agawam)." Yet, as stated above, the CMA pipeline (the Alternate Backfeed) that had been planned to serve Holyoke **from the Agawam citygate would only have a total capacity of approximately 17,300 Dth/day**.
- If CMA does not intend to go forward with the Alternate Backfeed, the Agawam city gate **cannot** function as a "delivery point" to Holyoke's distribution system, and **no capacity** coming from *either* 261 Upgrade Project would serve Holyoke/HG&E.
- Finally, the Massachusetts Secretary of Energy & the Environment's Certificate on the Draft Environmental Impact Report ("DEIR") became publicly available last week. We

⁴ *Id.*, 111 of 119.

⁵ Per Mr. Bryant, CMA first wants to go before the Northampton City Council to determine whether that body will reconsider its unanimous opposition to the construction of the proposed new gas infrastructure in Hampden County for Northampton.

highlight his commentary concerning the Electric Turbine Alternative to the HP Replacement Project:

The analysis indicated that the use of an electric turbine would minimize GHG emissions by over 13,000 tpy based on the current electrical grid emissions rate. ... I note that pursuant to MassDEP's Clean Energy Standard regulations (310 CMR 7.75), electricity provided to the grid will be increasingly generated by renewable energy sources; by 2050, the grid emission rate for GHG will be less than 30 percent of its current rate. Therefore, **GHG emissions reductions associated with an electric turbine would increase over time.**⁶

Conclusion

In conclusion, based on PLAN's analysis of the record, including filings made with the Massachusetts Environmental Policy Act Office and the Massachusetts Department of Public Utilities, as well as discussions with CMA — the lead shipper driving these Projects — we recommend that (1) the Looping Project be **denied** certification, and (2) if there remains justification for the HP Replacement Project at **any** horsepower level, (a) the horsepower level should be adjusted to reflect demonstrated need in light of changed circumstances, and (b) the HP Replacement Project should be **modified** to require an electric motor drive compressor unit and ancillary equipment rather than a gas turbine.

Respectfully submitted,



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⁶ Certificate of the Secretary of Energy and Environmental Affairs of the Draft Environmental Impact Report, April 4, 2019 Page 8 (available at <https://eeaonline.eea.state.ma.us/EEA/emepa/mepadocs/2019/041019em/sc/eir/15879%20DEIR%20Tennessee%20Gas%20Upgrades%20to%20261%20Agawam-Longmeadow.pdf>) (emphasis added).

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