



April 29, 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
Supplemental Information Regarding Holyoke Mayor's Opposition to Projects**

Dear Secretary Bose:

The Pipe Line Awareness Network for the Northeast ("PLAN") respectfully submits new supplemental information relevant to the alleged need for the Tennessee Gas Pipeline Company, LLC ("TGP") 261 Upgrade Projects (the "Projects"). As indicated in PLAN's April 18, 2019 submission, in the nearly two years that have passed since TGP entered into precedent agreements with Bay State Gas Company d/b/a Columbia Gas of Massachusetts ("Columbia Gas") and Holyoke Gas and Electric ("HG&E"), previous local support for more gas pipeline capacity has decreased, with the Northampton City Council now unanimously opposing the projects that the contracts are designed to support.

On April 22, 2019, Holyoke Mayor Alex Morse released a strong and uncompromising statement "calling for a halt on new natural gas supply and pipeline infrastructure," stating:

I cannot in good conscience support the building of this pipeline.¹ It constitutes a short-term fix to a long-term problem, and falls short of the moral imperatives of this moment in history. The HG&E may be contractually obligated to support this project going forward, but I will not, and will use my position to advocate against it.

To that end, I invite federal and state siting and permitting entities, which will be considering this gas expansion project, to take into consideration the long-term interest of

¹ "This pipeline" refers to the "Alternate Backfeed" pipeline through West Springfield discussed in our previous filings, the construction of which (by Columbia Gas) would be required for HG&E to use any of the capacity it has under contract (5,000 Dth/d plus 11,800 Dth/d from the Columbia Gas/TGP agreement that HG&E would acquire through a capacity swap with Columbia Gas). Mayor Morse confirmed in conversation with PLAN that he opposes the instant Projects as well.

our cities and towns across the country, and see this Columbia Gas proposal as an expensive short-term fix to a long-term, structural problem. And even the short-term benefit would be minimal: at best, this pipeline wouldn't provide any new supply until more than two years from now. It should be rejected in favor of more comprehensive approaches that focus first on efficient consumption, wean us off fossil fuels, and set us up for success in a world remade and powered by renewable energy.²

Thus, the foundation for these Projects continues to crumble. TGP's protestation that it "has no control over what happens to the natural gas downstream of its system" deflects from the proper line of inquiry in the Commission's certification decision. The Commission is required to evaluate "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what ... person undertakes such other actions."³ TGP need not "control" its customers' actions for the future actions of Columbia Gas and HG&E to be "reasonably foreseeable."

Instead, the Projects are key components of what was originally conceived of as "five integrated supporting infrastructure projects,"⁴ designed by TGP together with the Project customers. Conversely, given that the Project customers (and local government leaders) are reevaluating another key component of these "integrated" projects, the instant Projects should not proceed as proposed.

Conclusion

Without the approximately 17,000 Dth/d that would be supplied to HG&E via the "Alternate Backfeed", these Projects are approximately 45% subscribed. As previously explained, the Agawam Horsepower Upgrade should provide more than enough capacity for any claimed reliability needs and realistic levels of expansion, without any need for the Agawam Looping Project. Furthermore, if an electric turbine is substituted — the indicated preference of both the Massachusetts Secretary of Energy and Environmental Affairs⁵ and the Massachusetts Energy

² Full April 22, 2019 statement of Holyoke Mayor Alex Morse available at <https://www.holyoke.org/news/earth-day-statement-from-mayor-alex-morse/>.

³ 40 CFR § 1508.7. See also discussion of cumulative impacts analysis in *Delaware Riverkeeper Network, et al. v. FERC*, No. 13-1015 (D.C. Cir. 2014), 28-29 (holding that FERC failed to adequately address cumulative impacts of TGP Upgrade projects).

⁴ See www.columbiagas.com/images/default-source/promotion/reliability-handout-draft---nov-1-draft-6_page_1.jpg.

⁵ MEPA Certificate of the DEIR at 8, available at elibrary.ferc.gov/IDMWS/common/OpenNat.asp?fileID=15227426.

Facilities Siting Board⁶ — a compressor station upgrade could even result in a reduction of greenhouse gas emissions from the status quo.

Respectfully submitted,



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Cc: Holyoke Mayor Alex B. Morse
Service List

⁶ Comments of the Massachusetts Energy Facilities Siting Board at 7, available at elibrary.ferc.gov/IDMWS/common/OpenNat.asp?fileID=15227423.

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