



July 25, 2019

VIA EMAIL

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, EEA No. 15879
Alex Strysky, MEPA Analyst
100 Cambridge Street, Suite 900
Boston MA 02114

Re: EEA #15879, Tennessee Gas Pipeline 261 Upgrade Projects, Agawam and Longmeadow, Comments on FEIR

Dear Secretary Theoharides:

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) submits the following comments in response to the Final Environmental Impact Report (“FEIR”) submitted by Tennessee Gas Pipeline Company L.L.C. (“TGP” or the “Applicant”) for its proposed 261 Upgrade Projects (the “Projects”).

FEIR’s responses to PLAN’s Previous Comments

TGP’s responses in the FEIR to many of PLAN’s previous comments are inadequate. For example, in response to several of PLAN comments, the Applicant states that the Connecticut Expansion Project is a separate project.¹ We are not raising the issue of possible improper segmentation regarding the Connecticut Expansion at this time; rather, we believe that the newly proposed Projects by the same Applicant, on the same interstate pipeline, at the same site, are relevant to how the agencies should view forward-looking assertions from the Applicant. Shortcomings and failings of the Applicant are demonstrative of their work ethic and relevant to the new proposal.

¹ See G-12 in the FEIR.

PLAN reiterates that the majority of the environmental issues and impacts raised by the instant Project proposal can and should be avoided by denying permitting for the proposed pipeline loop. Several matters relating to the remaining components of the Projects are discussed below.

Meter Station

The Applicant states, misleadingly, in its response to comment HH-1: “Tennessee is required to construct and deliver the Meter Station Project pursuant to a DPU-approved Precedent Agreement with Bay State Gas Company dba Columbia Gas of Massachusetts (“CMA”). Tennessee is not in a position to assess CMA’s alternatives but must perform as required by Tennessee’s customers to comply with the Precedent Agreement.”

In fact, the referenced precedent agreement (the “Precedent Agreement”) specifies that it is “contingent upon the receipt and continuation of all necessary regulatory approvals or authorizations” and that the Precedent Agreement “shall be void and of no force and effect if any necessary regulatory approval is not so obtained or continued”.² Moreover, the publicly available Precedent Agreement does not specify a particular location for the meter station, beyond being “located on Transporter’s [i.e., TGP’s] 200 Line in Zone 6 in Hampden County, Massachusetts.

Multiple portions of the Meter Station would be constructed by CMA and therefore presumed to be subject to the jurisdiction of the Massachusetts Energy Facilities Siting Board (“EFSB”), in conjunction with a 200 psi pipeline that CMA intends to seek EFSB approval to construct. (This new CMA pipeline would connect in Springfield to CMA’s existing system). An EFSB proceeding concerning these facilities will require “a description of the alternatives to the facility, such as other methods of transmitting or storing energy, other site locations, other sources of electrical power or gas, or a reduction of requirements through load management.” MGL ch. 164, section 69J. While that EFSB proceeding will concern CMA’s facilities, not TGP’s, both companies are seeking to preclude the consideration of alternatives which would be reasonable and appropriate for that state agency to consider.

Electric Motor-Driven Compression Alternative

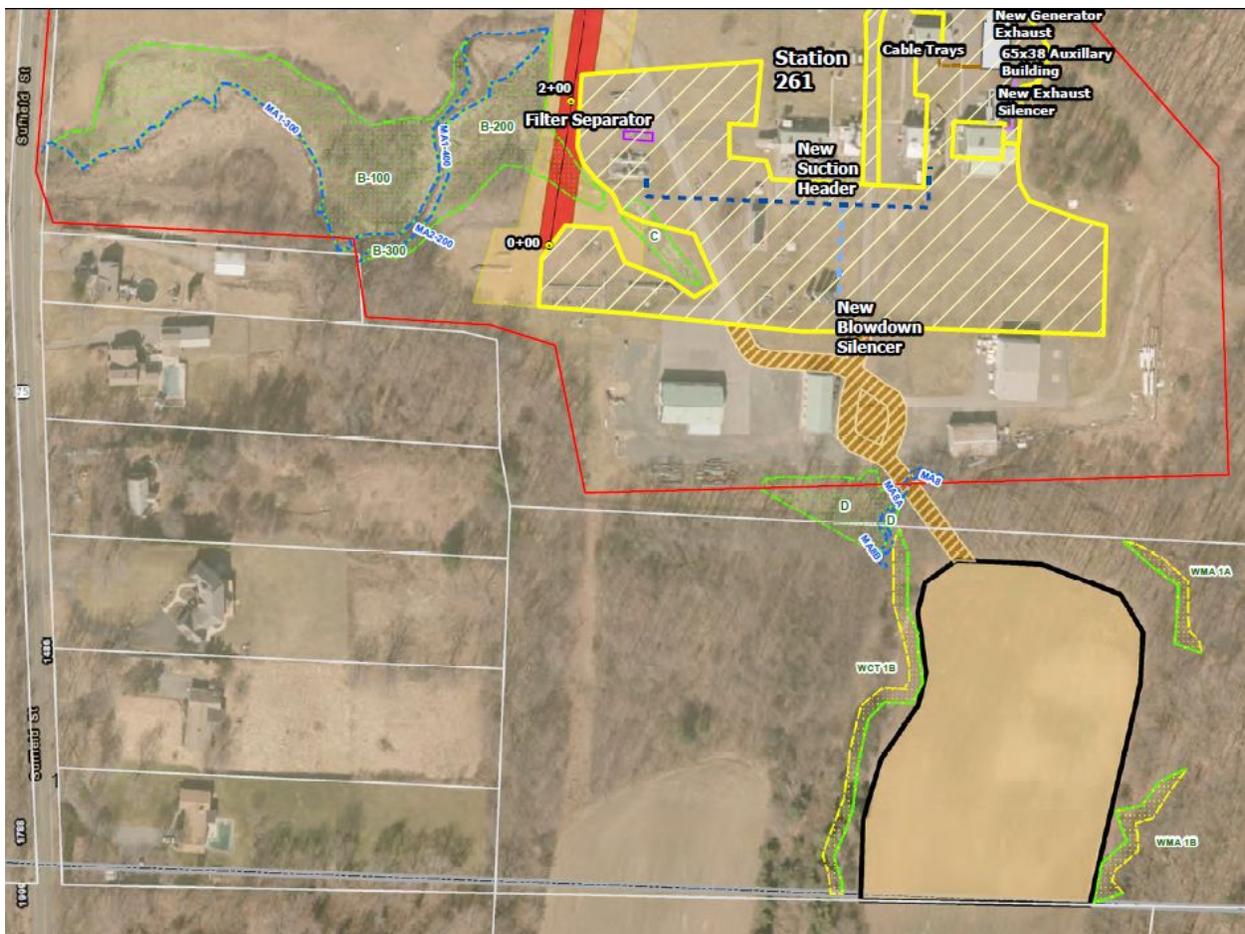
PLAN disputes TGP’s assertions regarding the inappropriateness of an electric motor rather than a gas turbine for the HP Upgrade Project, including TGP’s allegations of siting constraints for a substation. TGP asserts that in addition to the need to site a substation, electric-powered compression would not be as reliable as gas-powered, but the Applicant provides no examples of failures at electric-powered compressor stations. Not only does TGP have other

² Gas Transportation Contract between TGP and CMA dated August 28, 2018 (available in Exhibit I to the FERC Application.)

electric-powered compressor units in the region, these facilities include backup generators to enhance reliability.

Without more thorough analysis of the electric option, FERC is poised to allow TGP to disregard the climate policies of the Commonwealth of Massachusetts, as well as the ongoing shift in the region's electric grid towards renewable electric generation sources with lower greenhouse gas emissions than natural gas.

As included in our comments to FERC, the image below from the Draft Environmental Impact Report for the Projects³ shows where TGP plans to clear trees for a temporary access road to the pipeyard site that TGP already owns. If a substation is necessary, this pipeyard appears to be one viable location.



Moreover, requiring electric-driven compression has been shown to reduce not just emissions but also overall costs, which could result in savings for ratepayers.⁴

Air Quality Monitoring

TGP reports in its Application to FERC that the nearest air monitoring stations are 5.5 and 11.5 miles away in Springfield and Westfield.⁵ Recently, legislation has been filed⁶ requiring air monitoring stations to be installed within one half-mile of gas compressor stations. The air permit recently granted for the gas compressor station in Weymouth requires that such an air monitoring station be installed. The same must be required of TGP in Agawam, where the Applicant proposes to increase both horsepower and emissions from Station 261. (Furthermore, even if an electric option is chosen for the HP Replacement Project, large gas turbines will remain in operation at the site; air quality monitoring would still be appropriate given the area's history of NAAQS nonattainment designations.)

Please hold TGP to strict compliance with the regulations and policies of the Commonwealth.

Respectfully submitted,



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⁴ "Install Electric Compressors," PRO Fact Sheet No. 103, *Partner Reported Opportunities (PROs) for Reducing Methane Emissions* (available at <https://www.epa.gov/sites/production/files/2016-06/documents/installelectriccompressors.pdf>).

⁵ Resource Report 9 - Air and Noise Quality, at 9-16, available at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15078261>.

⁶ See <https://malegislature.gov/Bills/191/H2909>.