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PIPE LINE AWARENESS NETWORK
 FOR THE **NORTH EAST, INC.**
www.plan-ne.org

June 21, 2019

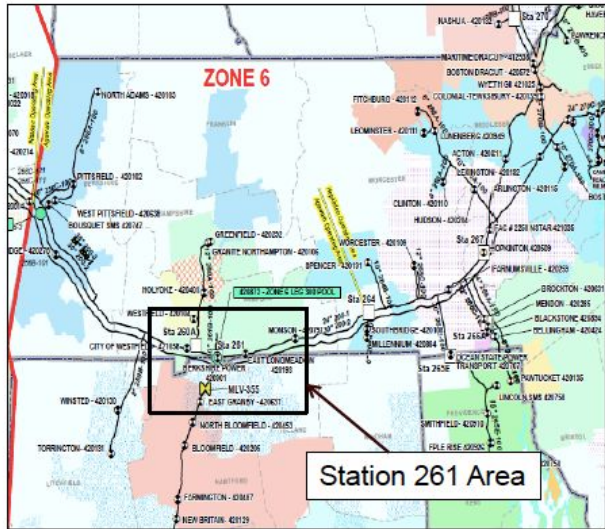
Secretary Kimberly Bose
 Federal Energy Regulatory Commission
 888 First Street, NE
 Washington, DC 20426


Re: TGP 261 Upgrade Projects, Docket No. CP19-7-000
Supplemental Information Proving Project Segmentation

Dear Secretary Bose:

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) respectfully submits the image below of a slide that exposes the “no segmentation” claim made by Tennessee Gas Pipeline Company, LLC (“TGP”) in the above-referenced docket as a bald-faced lie.

Line 261 Upgrade – *Regulatory / Permitting Phase*

Details	
<ul style="list-style-type: none"> ➤ Commercial Driver: <ul style="list-style-type: none"> <input type="checkbox"/> Residential/commercial gas demand growth ➤ Capacity: 101,400 Dth/d ➤ Customer: Columbia Gas of Mass (96,400 Dth/d) / Holyoke (5,000 Dth/d) ➤ Phased In-service 2019-2021 timeframe ➤ Project Scope: <ul style="list-style-type: none"> <input type="checkbox"/> New delivery meter <input type="checkbox"/> HP Replacement at Station 261 <input type="checkbox"/> 2 miles of looping Springfield Lateral 	



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

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The slide is part of a TGP presentation made at the Northeast Gas Association’s “Regional Market Trends Forum” on May 3, 2018 in Hartford, Connecticut.¹ Prior to filing its Application for a Certificate of Public Convenience and Necessity (the “Application”) with the Commission for its 261 Upgrade Projects (the “Projects”), TGP described the 261 Upgrade “Project Scope” as follows:

- New Delivery Meter
- HP Replacement at Station 261
- 2 miles of looping Springfield Lateral.²

The “New Delivery Meter” is of course the Longmeadow Meter Station (the “Meter Station”). TGP cannot credibly recast the Meter Station as “separate and distinct from the Projects,” although that is precisely what it has tried to do, beginning with a filing with state regulators the month after the industry forum in Hartford.³

It is worth noting that this single slide demonstrates that TGP was also misleading the forum’s participants by describing the Projects as including its entire 96,400 Dekatherm per day (“Dth/d”) contract with Bay State Gas Company dba Columbia Gas of Massachusetts; its filings with all regulatory agencies indicate, however, that only 40,400 Dth/d of that contract pertain to the Projects (or 46,400 Dth/d, when the capacity pertaining to the Meter Station is included).

In sum, TGP cannot be taken at its word. The Commission must find and declare that **the Meter Station is in fact a component of the Projects**. PLAN reiterates our request for a **site visit** by FERC staff and a **full environmental impact statement** to better inform the alternatives analyses for any Project components that the Commission does not deny certification outright.

Respectfully submitted,



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¹ Full TGP presentation available at available at https://www.northeastgas.org/pdf/a_stringer_2018.pdf (last visited June 20, 2019).

² *Id.*

³ See Expanded Environmental Notification Form dated June 29, 2018 (available at <https://elibrary.ferc.gov/IDMWS/common/OpenNat.asp?fileID=15135221>) (“The Longmeadow Meter Station is separate and distinct from the Projects submitted with this EENF”).