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**PIPE LINE AWARENESS NETWORK**  
FOR THE **NORTH EAST, INC.**  
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October 17, 2019

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20216

Re: Docket No. CP19-7-000, TGP 261 Upgrade Projects

Dear Secretary Bose:

Submitted herewith is the announcement<sup>1</sup> made Friday, October 11th by Columbia Gas of Massachusetts (“CMA”) regarding the company’s abandonment of plans to construct the “Alternate Backfeed” pipeline to deliver gas to Holyoke Gas & Electric (“HG&E”), the other of the two customers driving the above-captioned Projects. While it behooves the Massachusetts Department of Public Utilities (“DPU”) to reopen the proceeding in which it approved CMA’s precedent agreement with Tennessee Gas Pipeline Company, LLC in the spring of 2018, the Commission is not required to rely on this DPU approval as evidence of project need. Indeed, the facts demand a look beyond this outdated (and fundamentally flawed) state approval of the CMA contract.

Lack of interest in increased gas capacity is cited as a reason for CMA’s abandonment of the Alternate Backfeed. As stated by Mark Kempic, President of CMA: “[T]here is likely to be limited new growth in Northampton. More importantly, Mayor Narkewicz and the City Council of Northampton have stated they are not interested in additional gas service to their community.” As set forth on this docket, the City of Holyoke has similarly rejected gas pipeline expansion and is working to develop a plan to transition to clean, renewable energy.

As the Commission is aware, the subscribed portion of the Agawam Projects is 5,000 Dth/d for HG&E and 40,400 Dth/d for CMA, with the unsubscribed portion of 27,000 Dth/d, for a Project total of 72,400 Dth/d. The Alternate Backfeed capacity totaled approximately 17,000 Dth/d (conservatively, at least 16,800 Dth/d), equivalent to the volume that would be created by the Looping Project. Without the abandoned Backfeed, the Projects are only 40% subscribed—well below a level that would justify certification by the Commission.

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<sup>1</sup> Available at <https://www.columbiagasma.com/our-company/news-room/article/columbia-gas-modifies-greater-springfield-service-territory-reliability-project>.

WHEREFORE, for the foregoing reasons and as further set forth by PLAN in this docket, PLAN respectfully reiterates our request that the Commission deny, at a minimum, the Looping Project—based on lack of need, as well as unjustifiable use of eminent domain and avoidable environmental impacts.

Respectfully submitted,



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Cc:

Matthew H. Nelson, Chair, Massachusetts Department of Public Utilities  
Massachusetts Attorney General Maura Healey  
Andy Greene, Director, Massachusetts Energy Facilities Siting Board  
U.S. Senator Elizabeth Warren  
U.S. Senator Edward Markey  
Holyoke Mayor Alex Morse  
Northampton Mayor David Narkewicz



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## NEWS

October 11, 2019

# Columbia Gas Modifies Greater Springfield Service Territory Reliability Project

[i=true&url=https://www.columbiagas.com/our-company/news-room/article/columbia-gas-modifies-greater-springfield-service-territory-reliability-project](https://www.columbiagas.com/our-company/news-room/article/columbia-gas-modifies-greater-springfield-service-territory-reliability-project)  
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Columbia Gas of Massachusetts today announced changes to its planned [Greater Springfield Service Territory Reliability Project](#) (<https://www.columbiagas.com/docs/librariesprovider3/email-documents/reliability-project-update.pdf>). What was proposed in November 2017 as a series of five projects has been reduced to four separate projects with the elimination of the Alternate Backfeed component – a 6 mile 12" pipe that had been proposed to allow lifting the moratorium in the Northampton Market.

Mark Kempic, President and Chief Operating Officer of Columbia Gas of Massachusetts stated, "Our determination is that we can accomplish the goals of removing leak prone pipe in Agawam and West Springfield, as well as enhance operational flexibility, with the four remaining projects. However, as a result, the moratorium on new gas service in Northampton and Easthampton will remain in place indefinitely."

Columbia Gas plans to continue to remove leak-prone pipe and offer energy efficiency measures and load management solutions to maintain the safety, reliability and efficiency of its natural gas distribution system in Northampton as well as the rest of its service territory.

Kempic cited several reasons for the cancellation of the Northampton project. "The costs associated with the Alternate Backfeed Project are not in line with expected project and customer benefits," said Kempic. "In addition, there is likely to be limited new growth in Northampton. More importantly, Mayor Narkewicz and the City Council of Northampton have stated they are not interested in additional gas service to their community," Kempic noted, referring to an October 4, 2018 vote by the Northampton City Council which unanimously approved a resolution to oppose the growth of fossil fuel infrastructure in the city.

Columbia Gas says critical reliability issues remain in the Greater Springfield area – encompassing both supply and delivery of supply. The four remaining separate projects are designed to meet the challenges for uninterrupted and reliable service to customers.

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The projects include: 1) the Longmeadow Supply Strategy Project which is a new Point of Delivery to be installed by Tennessee Gas Pipeline (TGP) in the Town of Longmeadow that will enhance system reliability for customers on both sides of the Connecticut River, and offer economic growth opportunities through enhanced gas supply availability; 2) the Agawam Compressor Station Enhancement project, in which TGP will upgrade equipment at its existing compressor station to improve operating efficiency and deliver enhanced services to Columbia Gas that will increase reliability to its customers; 3) the TGP Agawam 2 Mile Pipeline Loop will provide additional capacity and operational pressure that ensures reliable service on the western end of the Springfield operating area; and 4) the Columbia Gas ConEd Transmission Line Replacement which replaces an 8,500 foot existing line with new pipe in Springfield to increase reliability and improve system flexibility.

“Columbia Gas currently has an existing and growing winter season deficiency due to transmission pipeline constraints,” said Kempic. “The four remaining projects allow the current supply volume on the system to be distributed more efficiently, safely and reliably as well as enable greater system operating flexibility.”

News of the project update has been shared with local, state and federal leaders including Congressman Neal, the Massachusetts Department of Public Utilities and the mayors in affected communities. Columbia Gas said it will issue additional updates as the company develops specific plans for each of the remaining Reliability Projects.

The Columbia Gas decision to cancel the Alternate Backfeed project is based on review and analysis over the past few months of the cost impact and benefits to customers. This decision is separate from and unrelated to the work moratorium imposed by the Massachusetts Department of Public Utilities on the Columbia Gas system.

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