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

November 13, 2019

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

**Re: Atlantic Bridge Project, Docket No. CP16-9, Opposition to Notice to Proceed
Algonquin Gas Transmission, LLC and Maritimes & Northeast Pipeline, L.L.C.**

Dear Secretary Bose:

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) writes in response to the filings submitted by Enbridge today in this docket.

For the record, PLAN’s assertion concerning the elimination of reliance upon the Weymouth compressor station referred specifically to the termination of specific shipper obligations on the Maritimes & Northeast pipeline (“M&N”) upon assumption of certain contracts by National Grid (as specified in fn. 4 of PLAN’s November 1, 2019 comment). In addition, capacity contracts involving Exelon and their assignees have been reduced in volume. Separate from the reductions in contractual obligations on the M&N, the Algonquin contract quantity dependent on the Weymouth compressor has dropped from 79,705 Dth/day to 57,871 Dth/day, a reduction of 27%.

Simultaneously, upstream gas supply arrangements are being made¹ that feed into the PNGTS Portland Xpress and Westbrook Xpress expansion projects. Currently the U.S. and Canadian markets connected to PNGTS and M&N receive pipeline-delivered gas from TCPL (via PNGTS) and, during the winter, vaporized LNG from the Repsol Canaport import and storage facility. While it is true that not building the Weymouth compressor station could, in the short run, further increase these markets’ dependence on LNG, in the long run there are alternatives to pipeline expansion for Maine and Canada. For example, renewable resources under development such as wind could be further developed in Maine and Canada, obviating any need for additional gas facilities.

¹ See <https://www.naturalgasintel.com/articles/116964-atlantic-canada-consumers-scrambling-for-western-natural-gas-supply-as-output-dries-up>; <https://www.cbc.ca/news/canada/new-brunswick/discounted-natural-gas-approved-sale-atlantic-1.5229351>.

These changes in the energy markets are significant enough to warrant further Commission review, irrespective of Enbridge's cries of "collateral attacks". The Commission should concern itself with the integrity of its process and whether its certificates hold up with the passage of time and the shifts in the markets.

The Commission's certificate policy demands a balancing of impacts with need. The realities of "need", and the evident decrease in need, cannot be divorced from evaluation of the increasingly clear environmental destruction that would be wrought by completing this project.

Weymouth should not be sacrificed to Enbridge.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Eiseman', with a long horizontal flourish extending to the right.

Kathryn R. Eiseman, President & CEO
Pipe Line Awareness Network for the Northeast, Inc.
17 Packard Road
Cummington, MA 01026
eiseman@plan-ne.org
(413) 320-0747