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PIPE LINE AWARENESS NETWORK
FOR THE **NORTH EAST, INC.**
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November 18, 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 (the “Projects”)

Dear Secretary Bose:

We write to inform the Commission that on October 30, 2019, Bay State Gas dba Columbia Gas of Massachusetts (“Columbia Gas” or “Columbia”) filed a new long-range forecast and supply plan (“F&SP”) with the Massachusetts Department of Public Utilities (“DPU”). The F&SP proceeding is able to elucidate, through a detailed review, whether Columbia’s forecasts justify a finding of need for the TGP 261 Upgrade Projects (the “Projects”), as well as the implications of cancellations and changes to Columbia’s related projects over the past two years. Specifically, as part of its review, the DPU will consider, among other things, that Columbia’s plans justifying these TGP Projects have been downscaled.

Columbia is now, *de facto*, the sole shipper for these Projects, and Columbia’s basic competence as a distribution company is in question.¹ Accordingly, the DPU’s assessment in the F&SP

¹ Columbia’s competence has become a concern in light of the Merrimack Valley disaster and ongoing incidents across its service area as noted in recent articles in the region: “Rivera stresses need to pull license from Columbia Gas: NTSB releases final report on Valley disaster,” *Eagle-Tribune*, Oct. 24, 2019 (available at www.eagletribune.com/news/merrimack_valley/rivera-stresses-need-to-pull-license-from-columbia-gas/article_175f1c91-af85-5790-9ed7-8a5145f5a67e.html); “Gas line disaster cited in push for comprehensive safety bill,” *Taunton Gazette*, Nov. 12, 2019 (www.tauntongazette.com/news/20191112/gas-line-disaster-cited-in-push-for-comprehensive-safety-bill); “DPU launches two investigations into Columbia Gas,” *Salem News*, Oct 25, 2019 (available at www.salemnews.com/news/dpu-launches-two-investigations-into-columbia-gas/article_823f40d1-de09-5650-945d-88c77533d605.html); “Lawmakers eye banning Columbia Gas work in Mass.,” *Andover Townsman*, Oct. 10, 2019 (available at https://www.andovertownsman.com/news/local_news/lawmakers-eye-banning-columbia-gas-work-in-mass/article_0905634d-53bd-5308-91f6-371b2982cf05.html); “State utility regulator slams Columbia Gas,” *Andover Townsman*, Oct. 10, 2019 (available at www.andovertownsman.com/news/local_news/state-utility-regulator-slams-columbia-gas/article_2ae64bd2-1ede-5ebd-a024-97ce45532511.html); “Columbia Gas ordered to stop all non-emergency work in Mass.,”

proceeding is pivotal to any determination of continued need for the Projects, and the Commission should consider the DPU's review before it determines whether certification of the Projects is warranted.

In its filings with the Commission, PLAN has documented significant changes that impact the Projects. As the Commission is aware from our October 17, 2019 comment,² Columbia Gas has canceled one of the major components of its Greater Springfield Area Reliability Plan for which the Projects were designed. Specifically, the "Alternate Backfeed" that had been planned to deliver gas to Holyoke Gas and Electric ("HG&E") as part of a capacity exchange is no longer being pursued by Columbia. With the cancelation of the Alternate Backfeed, the conditions of HG&E's capacity contract cannot be met, leaving Columbia Gas the sole shipper for the Projects.

In addition, as noted in our August 28, 2019 comment,³ Columbia Gas has downscaled (or downplayed) its role in Longmeadow as well. The August mailing to customers describes the Longmeadow Meter Station as solely a TGP project, and also omits any mention of a pipeline previously described by Columbia as a 200 psi line planned to run north from the Longmeadow Meter Station into Springfield. The significance of these omissions is unclear, and may bear further on the question of how much capacity is now needed under Columbia's contract with TGP.

The DPU review will provide a focused opportunity to reevaluate the Projects given these recent changes and reductions in overall forecast demand in Massachusetts. The Massachusetts Attorney General's office has already filed to intervene⁴ in the F&SP at the DPU and is expected to hire experts to review Columbia's forecasts and need for the Projects. Municipalities across Columbia's service territory are now looking at all of Columbia's activities with a skeptical eye and with heightened scrutiny. A rigorous analysis of Columbia's forecasts and revised resource planning will be undertaken in the coming months, and it is not unlikely that the approved contract with TGP will be revised to reflect new market realities and protect ratepayers.

WHEREFORE, for the foregoing reasons, PLAN respectfully requests that the Commission withhold any certificate decision on these Projects until the Commonwealth of Massachusetts has

CBS Boston, Oct 3, 2019 (available at [boston.cbslocal.com/2019/10/03/columbia-gas-ordered-to-stop-all-non-emergency-work-massachusetts-lawrence-gas-leak/](https://www.cbslocal.com/2019/10/03/columbia-gas-ordered-to-stop-all-non-emergency-work-massachusetts-lawrence-gas-leak/)).

² See <https://elibrary.ferc.gov/IDMWS/common/opennat.asp?fileID=15382740>.

³ See <https://elibrary.ferc.gov/IDMWS/common/opennat.asp?fileID=15336461>.

⁴ See <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/11435185>.

conducted its review of the updated F&SP plan put forth by the Projects' sole remaining shipper, Columbia Gas.

Respectfully submitted,

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

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