



November 1, 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 Anticipated 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”) is an intervenor in this proceeding. PLAN hereby submits new information regarding the lack of need for the compressor station planned for construction in Weymouth, Massachusetts as part of the Atlantic Bridge Project (the “Project”), and respectfully states as follows:

Boston Gas Company dba National Grid (hereinafter, “National Grid”) has petitioned the Massachusetts Department of Public Utilities (the “DPU”) for approval of a 19,000 Dekatherm per day (“Dth/d”) firm transportation contract with Algonquin Gas Transmission, LLC (“AGT”). As part of this arrangement, New England NG Supply Limited (“NENG”) and its parent J.D. Irving, Ltd. must assign their Atlantic Bridge precedent agreements to National Grid. In other words, the New Brunswick-based NENG is withdrawing from the Atlantic Bridge Project.<sup>1</sup>

Importantly, “The incremental capacity of up to 19,000 Dth/day can be delivered on a primary firm basis to [National Grid]’s gate station **without the installation of the Weymouth compressor station.**”<sup>2</sup> National Grid further states: “Public opposition and permitting issues prevented Algonquin from receiving permits necessary to complete construction of the Weymouth facilities in time to meet all their original contract commitments and as a result, **certain anchor shippers have**

---

<sup>1</sup> See NENG and National Grid’s Joint Petition for Temporary Waiver of Capacity Release Regulations, Sept. 20, 2019 (Accession No. 20190920-5145, available at [https://elibrary.ferc.gov/idmws/file\\_list.asp?document\\_id=14800896](https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14800896)).

<sup>2</sup> Boston Gas Company, Mass. DPU Docket No. 19-132, Oct. 25, 2019, *Joint Testimony of Elizabeth D. Arangio Deborah M. Whitney and Samara A. Jaffe* in support of Petition for Approval of Gas Supply Contract with Algonquin Gas Transmission, LLC, at 16 (available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/11364814>).

**expressed interest in exercising their right to terminate and/or assigning previously executed precedent agreements for service on Atlantic Bridge.”<sup>3</sup>**

The filings indicate that the assignment of contracts to National Grid, and their amendment,<sup>4</sup> eliminate reliance upon a Weymouth compressor station.

We note that Eversource, the largest domestic shipper for this Project, is awaiting no more than 16,000 Dth/d from the construction of the Weymouth compressor station. As specified in the most recent Forecast & Supply Plan filed by Eversource with the Massachusetts DPU, Eversource “had access to 34,000 of the total of 50,000 Dth/day of Atlantic Bridge volumes beginning November 2017.”<sup>5</sup> While PLAN does not have insight into Eversource’s intentions, that company is facing the same pressures and realities confronted by other shippers. To the extent that Eversource was at one point counting on the completion of the Atlantic Bridge Project as part of a least-cost supply plan, no responsible utility would continue to rely on the construction of the Weymouth compressor station for reliability purposes. Eversource can turn to its back up plans.

In sum, construction of the Weymouth Compressor Station cannot be justified by market demand or any reasonable measure of need. **Please do not issue a Notice To Proceed with construction of the Weymouth Compressor Station before all legal proceedings, rehearings, and appeals concerning lack of that Project component’s need are concluded.**

Respectfully submitted,



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

---

<sup>3</sup> *Id.* at 14.

<sup>4</sup> “Immediately following the assignment to the Company, Algonquin and Maritimes will enter into a new amended and restated precedent agreement with the Company which sets forth each of the parties’ obligations and will also terminate all obligations between the Company and Maritimes. For avoidance of doubt, the Company **will have no contractual obligations or liabilities with Maritimes.**” *Id.* at 18 (emphasis added).

<sup>5</sup> See DPU Docket No. 18-47 (available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9163798>).

Document Content(s)

PLAN opposition to anticipated NTP.PDF.....1-2