



ATTORNEYS AT LAW

The firm has attorneys also admitted
to practice in District of Columbia,
Idaho, New York and Vermont

271 WAVERLEY OAKS ROAD, SUITE 203
WALTHAM, MASSACHUSETTS 02452
617.244.9500

FACSIMILE: 802.419.8283
E-MAIL: bckboston@bck.com
WEBSITE: www.bck.com

December 9, 2019

***VIA ELECTRONIC MAIL
ORIGINAL BY HAND DELIVERY***

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: D.P.U. 19-135
Bay State Gas Company d/b/a Columbia Gas of Massachusetts
2019/2020 – 2023/2024 Forecast and Supply Plan

Dear Secretary Marini:

On behalf of the Town of Longmeadow, Massachusetts (the "Town"), enclosed for filing please find the Town's Written Comments and Certificate of Service in the above-referenced matter.

Please feel free to contact me if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Rebecca F. Zachas".

Rebecca Zachas

RFZ/drb
Enclosures

cc: Sarah Smegal, Hearing Officer (via email only)
DPU 19-135 Service List (via email and first class mail)
Lyn Simmons, Longmeadow Town Manager (via email and first class mail)

VERMONT OFFICE:
P.O. Box 205
Woodstock, Vermont 05091
Telephone: 802.457.9050
Facsimile: 802.419.8283
E-Mail: bckvt@bck.com

MOUNTAIN STATES OFFICE:
P.O. Box 3625
Hailey, Idaho 83333
Telephone: 617.584.8338
Facsimile: 802.419.8283
E-Mail: bckidaho@bck.com

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

_____)	
Bay State Gas Company d/b/a)	
Columbia Gas of Massachusetts)	D.P.U. 19-135
2019 Long-Range Forecast and Supply Plan)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. §1.05(1) (Department's Rules of Practice and Procedure).

Dated at Waltham, Massachusetts this 9th day of December, 2019.



Jeffrey M. Bernstein, Esq. (jbernstein@bck.com)
BCK Law, P.C.
271 Waverley Oaks Road, Suite 203
Waltham, Massachusetts 02452
Telephone: (617) 244-9500
Facsimile: (802) 419-8283



Town of

Longmeadow, Massachusetts

20 Williams Street, Longmeadow, MA 01106
Tel. (413) 565-4110 • Fax (413) 565-4112



Town Manager

Lyn N. Simmons

Select Board

Marie Angelides, Chair Person
Richard Foster, Vice Chair
Marc Strange, Clerk
Thomas Lachiusa
Mark Gold

***VIA ELECTRONIC MAIL
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Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: D.P.U. 19-135, Comments
Bay State Gas Company d/b/a Columbia Gas of Massachusetts
2019/2020 – 2023/2024 Forecast and Supply Plan

Dear Secretary Marini:

On behalf of the Town of Longmeadow, Massachusetts (the “Town”), I submit these Comments in the above-referenced docket on the Long-Range Forecast and Supply Plan filed by Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA”) on October 30, 2019 (the “Plan”). The Town filed a petition to intervene as a full party in this proceeding on December 2, 2019. I am the Chair of the Longmeadow Select Board.

CMA is the local gas distribution company in our Town, serving the Town itself and those residents and commercial and industrial users who wish to take its retail gas service. The Plan being discussed here includes CMA projects that would be sited in our Town as part of its Reliability Plan for the Springfield Division. The Plan also updates CMA’s plan from a few years ago. What it does not do is clearly and fully explain what its plans are for our Town or our area, nor does it explain the changes that it is making from its previous plan. The well-founded concerns about the safety and reliability of CMA’s distribution system and operations serve to underscore the need for the Department of Public Utilities (“Department”) to require CMA to fully comply with its requirements in this proceeding to ensure that the Plan is accurate and thorough.

CMA came and spoke to the Town at a Select Board meeting in May 2018. It spoke of repairing leaks, but it denied that there would be expansion of facilities in the Town. As Chair of the Select Board, it is particularly frustrating to look back at the opportunity CMA had during that meeting to explain its plans for the area, but chose not to. CMA’s Plans in this docket directly reference the Town, albeit superficially. You have before you a company under a moratorium for poor service; you must ensure that that company presents a clear and complete explanation in this proceeding about its future projects. Instead, the Plan has a single page on CMA’s intentions for entire area (page 84).

We know from CMA’s 2017 Long-Range Plan (filed in D.P.U. 17-166) that, in the Springfield Division, CMA considered the Alternate Backfeed and the Longmeadow Gate Station as crucial aspects of its Gas System Enhancement Programs. In CMA’s new Plan, though, the Alternate Backfeed is being cancelled with little to no explanation. And information to the Town about the Longmeadow Gate Station

is lacking in the Plan. CMA has also not shared any information about that station with the Town and has left the Town confused as to the project.

The Town's concerns here are based in part on previous experience with CMA in Longmeadow. Besides the May 2018 meeting mentioned above, CMA took about a year to respond to the Town's requests for an incident report after gas had to be cut off from homes after a serious incident involving pressure issues.

In addition, the Town has as yet to hear from CMA about a meter station/lateral project sited at the Longmeadow Country Club. The Town learned about the joint project by CMA and Tennessee Gas Pipeline Company ("Tennessee") when Tennessee was required to file some information on the project as part of its 261 Upgrade Project at the Federal Energy Regulatory Commission. The project is a new Meter Station and new expanded distribution system for areas north of Longmeadow in our Town. We are still waiting for detailed site plans and piping and instrumentation diagrams from Tennessee and have heard nothing from CMA on the project. We would expect to host joint meetings for a joint project being sited in our Town, but it is clear that the parties have no intention of doing that.

Tennessee has told the Town that there is no need for this Meter Station if CMA does not build its facilities to connect to the Meter Station. This raises concerns regarding whether CMA is moving forward with its portion of the project and how the moratorium may impact the project. Given the system-wide moratorium on CMA and the fact that the Town has heard nothing from CMA on this project, the Town has significant concerns about the Meter Station being constructed especially where all signs point to Tennessee being construction ready (e.g., equipment is purchased and the easement agreement in place).

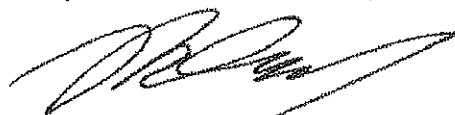
Given the lack of information and confusion over the Meter Station and other related CMA projects as well as operating incidents, our Town has legitimate concerns about CMA's Plan. The Town is responsible for protecting the health, safety, and welfare of its inhabitants, including through exercise of its Town Bylaws, which it cannot do without proper information. For pipeline infrastructure projects, the Town needs detailed plans to properly develop an emergency management plan and lead time to manage the additional financial burden of hosting new facilities, including preparing the Town budget. The Town, through its Zoning Board or Planning Board, will need to consider whether CMA's project(s) are subject to the Town Bylaws (as well as related projects such as the Meter Station). Without an understanding of the overall facilities that will be constructed (and the need for them), the Town is substantially handicapped in crafting appropriate mitigation and in otherwise applying its Town Bylaws (e.g., Special Permit standards) in protecting the health, safety, and welfare of its inhabitants. The Town is in the process of figuring out how to exercise its regulatory authority in light of a new Town Bylaw passed by its residents in May 2019 which was recently certified in large part by the Office of the Attorney General, Municipal Law Unit, on November 25, 2019. That Bylaw includes consideration of noise, lighting, setbacks, health impacts and emissions.

Based on these significant concerns, the Town looks forward to participating in this proceeding. The Town appreciates the Department's consideration of these Comments.

Respectfully submitted,

TOWN OF LONGMEADOW, MASSACHUSETTS

By its Select Board Chair,



Marie Angelides