



May 31, 2016

Kimberly D. Bose
Secretary, Federal Energy Regulatory Commission
888 First Street NE, Room1A
Washington, D.C. 20426

Re: Algonquin Gas Transmission, LLC, Access Northeast Project, Docket #PF16-1

Dear Secretary Bose:

On behalf of our 60,000 members and supporters across the Commonwealth, the Massachusetts Sierra Club appreciates this opportunity to submit comments regarding Docket #PF16-1, Algonquin Gas Transmission, LLC's proposed Access Northeast Project.

We respectfully wish to bring your attention to the following points, requesting further information and/or clarification.

In regard to the Access Northeast Project:

- 1.) Please extend the deadline for comments. One month to absorb a lengthy assessment on a proposal that would have far-reaching effects on the directly-affected communities and the Commonwealth is not sufficient. This project must not be railroaded through without sufficient review and opportunity for comment
- 2.) The Massachusetts Attorney General (AG)'s study¹ concluded that no additional natural gas pipelines are required for New England at this time or in the foreseeable future. The AG, as the primary voice for the protection of the public interest in Massachusetts, finds this pipeline to be unnecessary. It is the responsibility of the proponent of this project to prove otherwise.
- 3.) Access Northeast is directly linked to the Atlantic Bridge and the Algonquin Incremental Market projects. Treating these projects apart, in separate dockets, is unlawful segmentation and should not be permitted. The dockets should be consolidated and one application be submitted for a single project.
- 4.) Given the interconnectedness of the New England ISO region, a full Environmental Impact Statement (EIS) on the entire New England system is warranted. Such an EIS ought to include a no-build as well as other feasible alternatives, including taking into account the effect of (i) energy efficiency and conservation measures which have alone flattened demand for natural gas in the last two years, (ii) energy demand management and response, and (iii) renewables of solar and the currently planned precedent-setting offshore wind project south of Martha's Vineyard, and future offshore wind projects planned for New England coastal waters, as well as the effect of energy storage development and implementation in Massachusetts and the region.

¹ Power System Reliability in New England, Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas, Analysis Group, Inc., Paul J. Hibbard, Craig P. Aubuchon, November 2015

Specific questions and comments follow:

- (1) What will be the financial consequences to energy consumers in Massachusetts and New England when new pipelines become under-utilized or stranded assets, due to our switch to clean, renewable energy and energy efficiency and conservation efforts?
- (2) How would this project affect Massachusetts and New England's ability to meet our Clean Power Plan requirements?
- (3) The project will make the attainment of the MA Global Warming Solutions Act virtually unattainable. A recent decision of the MA Supreme Judicial Court upheld the need of the Commonwealth of Massachusetts to satisfy this act on an annual basis. (Kain v. Department of Environmental Protection, 474 Mass. 278, Mass., 2016)
- (4) What is the effect on the goal of Massachusetts to develop a 100% clean and renewable energy economy if investment dollars are put into more natural gas pipeline capacity?
- (5) This project requires the construction of a compressor station in Weymouth MA, although the station is not formally a part of this project. The area is densely developed, with several schools nearby.
- (6) This project includes the construction of a major LNG facility in Acushnet MA. Has the alternative of storage in existing LNG facilities been examined? Has there ever been a shortage of LNG storage in this area? If so, when?
- (7) The proposed route traverses many sensitive areas - population centers as well as natural locales. It is proposed to cross a sanctuary in Sharon, MA: Mass Audubon's Moose Hill Wildlife Sanctuary, adjacent to the Trustees Moose Hill Farm. Are less-sensitive areas under consideration?
- (8) What are the impacts of this project on wildlife, rare and endangered species, protected natural lands, invasive species, habitat fragmentation, and floodplains?
- (9) What are the noise, water and air quality effects on humans, wildlife, and property values?
- (10) The MA Constitution provides protection for designated parcels of natural land. This proposal would traverse many of those protected areas.
- (11) The existing gas leaks in the area will be exacerbated whenever pressures in local lines are increased. Please prohibit any increases in pressure in local lines until all leaks have been repaired. Require the documentation of the magnitude of the increase in methane leakage if such repairs were not done and increased pressures were allowed. Using the accepted twenty-year multiplier of 86 for methane, compute the greenhouse gas (GHG) equivalent due to the expected leak rate with the higher pressure pipeline scenario.
- (12) Was there a price put on carbon in the planning of this project? What was it? Did it include both the emissions from the burning of fossil fuels as well as leakage?

(13) Have the climate impacts of activities outside of the pipeline environment, but directly associated with it, been considered, such as the flaring and leakage of methane or the impact on drinking water in the Marcellus shale region?

(14) Is the project intended to serve peak-demand needs? If so, why not continue with LNG supplied through the Everett facilities? This alternative would be significantly less expensive and disruptive. Also, the MA Attorney General's study indicates that winter electricity peaking will become less of a concern as we continue energy efficiency and conservation and move toward renewable energy.²

(15) This project includes the construction of high-pressure pipelines in high-density locations such as Weymouth, Braintree and many other communities along the Access Northeast route. This is contrary to government and industry safety standards.

(16) High-pressure pipelines are potential targets for intentional attacks. Please provide information regarding reviews of this application by U.S. and state-level security authorities.

(17) In case of explosion at the proposed LNG facility in Acushnet, what is the blast zone?

(18) Identify the blast zone along the entire route. Carry out emergency training for all fire departments within and adjacent to blast zones.

(19) A Spectra pipeline exploded in Pennsylvania on April 29, 2016, and "blew a 12 foot deep, 1500 square foot hole and scorched 40 acres."³ It was a rural area, and there was only one victim, with third-degree burns over 75 percent of his body. Please document the effect of an explosion on the Access Northeast line in terms of potential loss of life, injuries, and property damage.

(20) The initial diagnosis of the cause of that Spectra Pennsylvania explosion is pipe corrosion. This project should be put on hold until authorities have determined the cause, and ensured that such an event could not occur here.

(21) After the Pennsylvania explosion, it took over an hour to turn the gas off. An explanation of how long it would take to turn off the gas at each location of the pipeline needs to be included in the EIS.

(22) The natural gas traditionally transported by pipelines has been replaced by fracked gas. What testing has been done on pipeline materials to ensure that the chemicals used for fracking do not have an adverse impact on the integrity of new and existing pipelines?

(23) What testing has been done to ensure that the chemicals used for fracking are not leaking into our homes and businesses, and if they are leaking, what health threats do they pose?

(24) The project would have an adverse impact on the economy of Massachusetts and other New England states. It would slow the growth in clean energy jobs and continue the export of our energy

² ISO-NE Capacity, Energy, Load and Transmission (CELT) Report, System Planning, May 1, 2015.

³ <https://stateimpact.npr.org/pennsylvania/2016/05/04/pa-pipeline-explosion-evidence-of-corrosion-found/>

dollars, a serious socio economic issue that must be addressed. The project is not in the public interest of the Commonwealth of Massachusetts or the other New England states. What is the justification for it?

The following fourteen points were presented at the Scoping Session in Acushnet, Massachusetts, on May 18, 2016. We include them here to ensure that they are part of the public record.

1. Who are the customers for all of the expected line capacity? What is the market for the excess capacity, i.e., whatever is not yet subscribed for?
2. What will be the resulting pressure, in the major transmission line and in all the distribution lines? Is that in excess of the current gas transport pipe system and local distribution system connected to it?
3. Will all new pipelines and infrastructure be leak free? Are zero-leak facilities now a FERC requirement? If not, why not? If not, what is the design leak range in cubic feet per day?
4. Does the facility have to be leak free in order to meet Clean Air Act standards?
5. Does not the facility have to be leak free in order to meet state Global Warming Solutions Act Green House Gas (GHG) emission standards, especially in light of the Massachusetts Supreme Judicial Court decision of May 17, 2016?⁴
6. Is FERC entitled to approve new natural gas facilities that leak natural gas and thereby burden the state with additional GHG emissions over which it cannot exercise control? Is that not an expense, i.e., reducing GHG emissions per a state mandate, that FERC has no authority with which to burden a state?
7. The study should require an inventory of present leaks. How will those leaks be affected by increased pressure in the new lines?
8. Is there any plan to export any of the gas that will be transported by the expanded pipe? If exports occur, will there be any guarantees that we, who would be burdened by the new gas infrastructure, be immune from price increases due to higher prices abroad?
9. Would this facility be subject to the EPA's new methane emission rules?⁵
10. Will the power plants fed by the proposed expanded pipeline be subject to the EPA's new methane emission rules?⁶
11. What ambient noise levels exist now and how would they be affected by construction and operation of these proposed facilities?

⁴ <http://www.mass.gov/courts/docs/sjc/reporter-of-decisions/new-opinions/11961.pdf>

⁵ <https://www3.epa.gov/airquality/oilandgas/>

⁶ <https://www3.epa.gov/airquality/oilandgas/>

12. What is the temperature range of the pipeline? How would that temperature vary from the temperature of the ground through which it travels? What effect would that difference in temperature (between the pipeline and the ground through which it travels) have on wildlife and plant life in the area?
13. Are there any endangered species - plant or wildlife - that would be impacted by the proposed pipeline and associated infrastructure?
14. What funds would be set aside to mitigate against any harm brought to property or persons by the proposed project? What guarantees would there be to prevent the companies in question to declare bankruptcy and avoid damages, thereby throwing cost burdens on taxpayers?

Thank you very much for your consideration.

Sincerely,



Cathy Ann Buckley
Chapter Chair