

**BEFORE THE NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DOCKET NO. IR 15-124**

**ELECTRIC DISTRIBUTION UTILITIES**

**Investigation into Potential Approaches to Ameliorate Adverse Wholesale  
Electricity Market Conditions in New Hampshire**

**Portland Natural Gas Transmission System's Responses to Initial Staff Questions**

---

Portland Natural Gas Transmission System ("PNGTS") is grateful for the opportunity to provide the New Hampshire Public Utilities Commission (the "Commission") with information that may be useful in addressing electricity market conditions in the state. Previously, Commission Staff issued initial questions to PNGTS and met with PNGTS representatives to address some of the issues raised. PNGTS now hereby submits its written responses to Staff's initial questions.

**Question 1:** The developers of the Access Northeast project propose to make available a total of 0.9 Bcf/day of incremental firm natural gas capacity to affiliated EDCs and LDCs of Eversource Energy and National Grid. Subject to the approval of state regulators, the EDCs will purchase under long-term contracts specific amounts of the available firm gas capacity and then offer that capacity to New England electric generators using competitive auctions that target gas-fired generators. The auction winners are expected to utilize the capacity to access low cost gas supplies particularly during the coldest winter months. Please state how much incremental firm pipeline capacity PNGTS could make available to New England EDCs and LDCs through its next expansion project and identify any EDCs or LDCs that PNGTS has had discussions with regarding the procurement of such capacity. Please also provide the status of those negotiations.

**Response:** By utilizing pipe that currently exists in the ground, PNGTS can efficiently expand its system. It presents two alternatives in this response. First, it can add 0.6 BCF/day of incremental deliverability above its C2C volumes to EDC, LDC and other markets in New England, via efficient compression additions to its system. The second scenario is an expansion of 0.9 BCF/day over its C2C volumes, which would be available to the same markets, but require looping of its system as well as compression additions.

Discussions with LDCs and EDCs are ongoing and preliminary at this point.

**Question 2:** Please describe the route of PNGTS' next expansion project and specify any new facilities that would be needed to provide the incremental firm pipeline capacity. To the extent the route includes the purchase of firm transportation capacity on the Iroquois and TransCanada pipelines, please discuss the availability of incremental capacity on those lines. Also, if PNGTS has existing agreements with the Iroquois and TransCanada pipelines that provide for the expansion of their systems, please discuss.

**Response:** Future expansions on PNGTS would most likely follow the pipeline route that already exists in the ground. The same is true for any concurrent expansion on Iroquois pipeline or the TransCanada Canadian Mainline. PNGTS, TransCanada's Canadian Mainline and Iroquois are separate pipelines and, as such, do not have agreements amongst themselves to provide for expansion of each other's pipelines. However, the three pipelines typically work together to simultaneously offer full path expansion opportunities from production areas to consuming areas.

**A) Expansion options on PNGTS:**

Two scenarios for incremental expansion on PNGTS over the C2C volumes were evaluated: 0.6 BCF/day and 0.9 BCF/day. Incremental addition of 0.6 BCF/day of firm capacity can be achieved via the addition of three compressor stations on PNGTS' system. Looping would not be necessary. Alternatively, to add 0.9 BCF/day of incremental firm pipeline capacity from East Hereford to Westbrook, PNGTS would need to loop the existing 24" line and potentially design alternative compression facilities.

The build options for both volume scenarios utilize existing natural gas infrastructure owned by PNGTS. Please note that the final facility design would be a function of volume commitments and could entail variations on these designs. A high level facility requirement under two expansion scenarios is outlined in Table 1 below.

**Table 1: PNGTS Facility Requirements**

Incremental Volume Scenario	Pipe Facility Requirements	Compressor Facility Requirements	Metering Facility Requirements
<b>0.6 BCF/day</b>	Not Required	Three (3) new 11 MW Compressor Stations located at MLV 6, MLV 9 & Westbrook Meter Station	Meter upgrade at Westbrook
<b>0.9 BCF/day</b>	130 miles of 24" loop	Two (2) new 11 MW Compressor Stations located at MLV 7 & Westbrook Meter Station	Meter upgrade at Westbrook

To determine PNGTS' southbound expansion requirements of that part of its system, an analysis of the PNGTS Joint Facilities system from Westbrook to Dracut will need to be

performed in conjunction with other changes proposed by its co-owner, MNE.

**B) Incremental capacity on TransCanada’s Canadian Mainline and the Iroquois pipeline:**

Additional compressor and pipeline facilities are required for incremental capacity on the TransCanada Canadian Mainline system upstream of PNGTS. As was done in the PNGTS analysis, a high level design analysis of TransCanada’s Canadian Mainline from Iroquois (Waddington) to East Hereford (Pittsburg) was performed for the two volume scenarios. The build options for both volume scenarios utilize existing natural gas infrastructure. The facility requirements are outlined in Table 2 below.

**Table 2: TransCanada’s Canadian Mainline Facility Requirements (From Iroquois to East Hereford)**

Incremental Volume Scenario	Pipe Facility Requirements	Compressor Facility Requirements	Metering Facility Requirements
<b>0.6 BCF/day</b>	65 miles of 30” loop	Additional 57 MW of total new compression distributed over 5 locations.	Not Required
<b>0.9 BCF/day</b>	145 miles of 30” loop	Additional 65 MW of total new compression distributed over 5 locations.	Not Required

The Iroquois pipeline currently has 1.2 BCF/day of firm North-to-South firm capacity. The changes that would be required to reverse flows from Wright to Waddington are shown below on Table 3.

**Table 3: Iroquois Facility Requirements (From Wright to Waddington)**

Incremental Volume Scenario	Pipe Facility Requirements	Compressor Facility Requirements	Metering Facility Requirements
<b>0.6 BCF/day</b>	Not Required	None	Addition of new meter station at Waddington
<b>0.9 BCF/day</b>	Not Required	Yard piping to reverse flow direction at existing Boonville and Croghan compressor stations	Addition of new meter station at Waddington

**Question 3:** Please identify the receipt point for PNGTS' next expansion project and explain how that receipt point enhances the project's value.

**Response:** PNGTS has many existing and potential new receipt point options available for its next expansion project. For example, PNGTS can access Alberta Western Canadian Sedimentary Basin and British Columbia Shale gas via TransCanada's Canadian Mainline at Empress. It can access Mid-Continent and Marcellus gas at Dawn, Niagara and Chippawa, also via TransCanada's Canadian Mainline. Existing and new Marcellus gas connected to Iroquois pipeline at the Wright, Canajoharie and Brookfield points can be transported to the interconnect between Iroquois and TransCanada's Canadian Mainline at Waddington, NY and then over to PNGTS via TransCanada's Canadian Mainline.

The combination of low build requirements and plentiful Marcellus supply at Wright make it a desirable receipt point option, and the Commission should take this into account when comparing PNGTS' projects to other pipeline projects sourced at that point.

Wright is expected to be a liquid and reliable source of Marcellus supply following the completion of the Constitution pipeline, which will add an initial 0.65 BCF/day into the Iroquois pipeline. In addition, any supplies brought to Wright by TGP's proposed "Supply Path" can also be transported north on Iroquois to TransCanada's Canadian Mainline and PNGTS.

PNGTS and TransCanada also have the advantage of access to Marcellus supplies at existing interconnects at Niagara and Chippawa. In addition, the Dawn storage facility in Ontario, accessed by TransCanada's Canadian Mainline, is also a preferred receipt point for many current LDC and trading customers and indeed could be an excellent option for generation markets that need to balance their intraday load swings.

PNGTS' shippers benefit from this access to plentiful and diverse supplies at these receipt points, and the Commission should consider this when evaluating projects. Of specific importance, if the cost or availability of supplies at Wright were to change, PNGTS' access to supplies from Dawn and Alberta provides flexibility and options.

**Question 4:** Please provide an estimate of the unit cost of firm transportation service on PNGTS' next expansion project together with the term of the long-term contract for pipeline capacity.

**Response:** PNGTS typically enters into firm transportation contracts with terms of 15 to 20 years, depending on the scope of the project. The unit costs for PNGTS' next expansion project are confidential and preliminary. However, to the extent permitted under confidentiality agreements with shippers, PNGTS would be willing to share this information with the Commission under an appropriate protective order, and with the assurance that the Commission will take all necessary action to maintain the confidentiality of this information. PNGTS is filing a motion for such protection concurrently with these responses.

**Question 5:** Eversource contends in its Initial Comments at page 14 that projects that comprise only pipeline capacity may not entirely satisfy the large hourly load swings associated with gas-fired generation. Will PNGTS' next expansion project offer specific enhanced transportation services to accommodate such load swings? If yes, please describe the services that PNGTS would offer and explain how the pricing for each would differ from the pricing for standard firm transportation service. If no, please elaborate.

**Response:** PNGTS has a Tariff Hourly Reserve Service ("HRS"), which is available now and would also be available to any future expansion customers. This service was specifically designed to help electric generation customers manage variations in their hourly load needs. The HRS Rate Schedule is attached as Attachment A. More information may be found in PNGTS' FERC Gas Tariff, which is available online at [pngts.com](http://pngts.com).

While the HRS service only applies to generators on its system, PNGTS also has a Park and Loan ("PAL") service which generators can use to balance loads being delivered from upstream or into downstream pipelines, if those pipelines will allow the swings on an hourly or NAESB cycle basis. The PAL Rate Schedule is attached hereto as Attachment B. As with PNGTS' HRS service, more information may be found in PNGTS' FERC Gas Tariff, which is available online at [pngts.com](http://pngts.com).

In addition, PNGTS is evaluating LNG options to offer with its pipeline service.

**Question 6:** How would a precedent agreement between PNGTS and an EDC for the purchase of firm transportation capacity provide for the delivery of gas to multiple gas-fired generators directly served by PNGTS' next expansion project?

**Response:** Assuming all of the conditions within the precedent agreement are satisfied, the precedent agreement will lead to a firm transportation ("FT") contract between PNGTS and the EDC. The FT contract would have primary and secondary delivery point options that the EDC could use to deliver to multiple power plants, or, if desirable, it could release capacity to the power plants, or other market entities, pursuant to the provisions set forth in PNGTS' FERC Gas Tariff.

**Question 7:** Please describe the process PNGTS believes should be used to get EDC-purchased capacity into the hands of New England gas-fired generators. For example, would PNGTS support the use of an independent third-party capacity manager to release the capacity, first to gas-fired generators and, if necessary, to the secondary market?

**Response:** As long as it conforms to the laws, regulations and FERC policies governing PNGTS, PNGTS supports any reasonable method that the Commission selects to get capacity into the hands of New England gas-fired generators, such as the "NESCOE" model proposed by Eversource. A method that has already been approved by FERC is the use of Asset Management Arrangements. This regulatory framework is currently in place and provides for independent third-party asset managers to optimize the value of LDCs' capacity portfolios under FERC-approved Asset Management Arrangement deals. If a similar structure is applied to an EDC model, it could be a useful mechanism to similarly mitigate costs of capacity. PNGTS is a provider of firm transportation services, and would not control how the capacity holder decides to manage its capacity, once acquired.

**Question 8:** Please identify each and every New England gas-fired generator directly served by PNGTS. Also, clarify whether the next PNGTS expansion project will directly serve all gas-fired generators that are currently directly served by the PNGTS system.

**Response:** The following gas-fired generators are directly served by PNGTS and could also be served in a future PNGTS expansion:

**Table 4: Gas Generators directly Served by PNGTS**

Plant	MW
Androscoggin	688
Rumford Power	269
Westbrook Energy Center	548
PSNH Newington	400
EP Newington Energy	560

**Question 9:** Will the next PNGTS expansion project be able to supply gas-fired generators that are currently directly served by other pipelines? If so, does PNGTS intend to offer gas supply services to such generators?

**Response:** The next PNGTS expansion project could theoretically serve any pipeline-fed gas-fired generator in New England. PNGTS can directly serve generators on its system. Generators located on other pipelines can access PNGTS gas by transporting it on the pipeline(s) that connect it to PNGTS. PNGTS is an open access pipeline and provides non-discriminatory transportation service to any credit-worthy counterparty willing to contract for it.

**Question 10:** If the next PNGTS expansion project incurs costs to transport gas to gas-fired generators directly served by other regional pipelines, will those incremental costs be rolled-in with the costs of the expansion project and recovered from all expansion project shippers or will they be recovered only from gas-fired generators directly served by other regional pipelines? Will existing gas-fired generators currently served by other pipelines have primary firm rights to receive gas from PNGTS under the expansion project?

**Response:** A FERC-regulated interstate pipeline can only charge for service on its own pipeline. An expansion project that is designed to serve incremental load may not be rolled into existing rates if it would economically disadvantage existing shippers. On the other hand, an expansion serving incremental load may be rolled in to existing rates if the rolling in of the expansion lowers rates for existing shippers.

Typically, all costs associated with a particular project designed to serve incremental load, including costs to access shippers that are currently served by other pipelines, will be recovered from all expansion shippers that have contracted for capacity on that particular project, and shippers that subscribe to firm capacity on an expansion project will have associated primary firm capacity rights under the project.

A shipper in any particular market, be it generation, distribution or industrial, needs to contract for pipeline capacity from where it wants to source the gas to where it wants to consume it. It would do this by contracting on all pipelines in the path between supply and market. This gives it the ultimate flexibility and optimization capabilities for resale of the capacity when not in use, as it has many more supply and market options on multiple pipelines.

A generator or EDC holding capacity on PNGTS would have primary firm rights from whatever receipt and delivery points that it chooses on the PNGTS system. They would similarly have primary receipt and delivery points on whatever pipelines are in the path to its ultimate point of consumption.

An analysis framework was created to evaluate the costs of serving any generator in New England via the Wright to Dracut route through PNGTS, the TransCanada Canadian Mainline, and the Iroquois pipeline, and is shown on Attachment C. This is simplified from the standpoint that it uses existing tariff rates on each of the pipelines in the path and is not meant to represent expansion rates or volumes on PNGTS or other pipelines. It is nevertheless useful as an overlay model of efficient expansion of existing pipelines. Please note the following assumptions:

1. The PNGTS C2C Rate of \$0.60/Dth/day was used for the PNGTS portion of the path.
2. Assumes delivery by PNGTS into TGP at Dracut, backhaul on TGP for generators located on the TGP system.
3. Assumes delivery by PNGTS into TGP at Dracut, backhaul on TGP to Mendon and forward haul on AGT for generators located on the AGT system.
4. Assumes delivery by PNGTS into MNE at Westbrook and backhaul on MNE for generators located on the MNE system.

5. Existing Tariff FT rates on other pipelines were used.
6. Does not include lateral or LDC charges, if applicable.
7. Does not account for potential plant-specific or pipeline-specific constraint points.
8. TransCanada rates are shown in \$US/Dth, converted from \$C/GJ, in order to make them uniform with the US pipeline rates.

**Question 11:** Please provide all milestones for the next PNGTS expansion project.

**Response:** Discussions with interested parties are ongoing and it is premature to provide milestones at this point in time. At a very high level, PNGTS projects that an open season will be held, and precedent agreements will be negotiated, in the 4th Quarter of 2015 or 1st Quarter of 2016, with FERC pre-filing and certificate application, state and federal approvals, and construction to follow, leading to a projected in-service of November 2018.

**Question 12:** In comments submitted in the Mass DPU's investigation, PNGTS states that it could be capable of providing total delivery capacity of up to 600,000 Dth/day into Massachusetts and New England as early as 2018. Please clarify whether the 600,000 Dth/day represents pipeline capacity that is incremental to C2C capacity and, if so, provide a full description of the project including the need for incremental purchases on Iroquois and TransCanada pipelines. Please also provide an estimate of the associated unit cost of firm transportation for this project.

**Response:** The 600,000 Dth/day referred to in the Massachusetts DPU's investigation is incremental to C2C. See responses to questions 1, 2 and 4 for a project description and unit costs of transportation.

**Question 13:** Lander for CLF testified in the Maine proceeding that the pipeline expansion projects AIM, Atlantic Bridge and TGP Connecticut will substantially decrease the basis differential in New England when they come online in the next two years. NEPGA and UES have made similar arguments in this investigation. What is PNGTS's opinion regarding these claims?

**Response:** Generally speaking, an addition of pipeline capacity typically reduces basis differentials. While it may not be easy to project how the basis differential will react to increased capacity, PNGTS' project offers the Commission an opportunity to observe the effects of such increases without having to commit to a threshold volume, since PNGTS' projects are scalable and its capacity can thus be increased in discrete portions.

**Question 14: Provide copies of all discovery requests served on PNGTS in the Maine PUC proceeding 2014-00071. Also provide copies of PNGTS responses to such requests.**

**Response:** Please see Attachment D.

PNGTS appreciates the Commission's attention to this information. In the event the Commission has any further questions, PNGTS would be glad to discuss them.

Respectfully Submitted,

PORTLAND NATURAL GAS  
TRANSMISSION SYSTEM



---

Cynthia Armstrong  
Director, Marketing and  
Business Development  
1 Harbour Place, Suite 375  
Portsmouth, NH 03801  
Tel: (603) 559-5527  
Fax: (603) 427-2807  
Email: [cynthia\\_armstrong@transcanada.com](mailto:cynthia_armstrong@transcanada.com)



---

Richard D. Bralow  
Legal Counsel  
TransCanada USPL  
700 Louisiana St.  
Houston, Texas 77002  
Tel: (832) 320-5177  
Fax: (832) 320-6177  
Email: [richard\\_bralow@transcanada.com](mailto:richard_bralow@transcanada.com)  
Counsel for PNGTS

# ATTACHMENTS

# **ATTACHMENT A**

Statement of Transportation Rates  
 (Rates per DTH)

Rate Schedule	Rate Component	Base Rate	ACA Unit Rate 1/
HRS	Recourse Capacity Reservation Rate		
	Per Dth of MDQ Monthly for all Flow Rates		
	--Maximum Rate	\$12.9921	-----
	--Minimum Rate	\$00.0000	-----
	Recourse Deliverability Reservation Rate		
	Per Dth of MDQ Monthly:		
	--Maximum Rates		
	4.16%, 1/24 MDQ Hourly Flow Rate	\$12.9921	-----
	5.00%, 1/20 MDQ Hourly Flow Rate	\$15.5906	-----
	6.25%, 1/16 MDQ Hourly Flow Rate	\$19.4882	-----
	7.14%, 1/14 MDQ Hourly Flow Rate	\$22.2685	-----
	8.33%, 1/12 MDQ Hourly Flow Rate	\$25.9843	-----
	--Minimum Rates	\$00.0000	-----
	Recourse Usage Rate		
	Usage-1		
	--Maximum	\$00.0000	3/
	--Minimum	\$00.0000	3/
	Usage-2 (Authorized Overrun) 2/		
	--Maximum		
	4.16%, 1/24 MDQ Hourly Flow Rate	\$0.8543	3/
	5.00%, 1/20 MDQ Hourly Flow Rate	\$0.9397	3/
	6.25%, 1/16 MDQ Hourly Flow Rate	\$1.0678	3/
	7.14%, 1/14 MDQ Hourly Flow Rate	\$1.1593	3/
	8.33%, 1/12 MDQ Hourly Flow Rate	\$1.2814	3/
	--Minimum	\$00.0000	3/

The following adjustment applies to all Rate Schedules:

MEASUREMENT VARIANCE:

Minimum down to -1.00%  
 Maximum up to +1.00%

- 1/ ACA assessed where applicable under Section 154.402 of the Commission's regulations and will be charged pursuant to Section 6.18 of the General Terms and Conditions at such time that initial and successive ACA assessments are made.
- 2/ Usage-2 (Authorized Overrun) applies to volumes exceeding Shipper's MDQ on any day or MHQ for any hour, but only to the extent such volumes are nominated by Shipper and scheduled by Transporter.
- 3/ The currently effective ACA unit charge as published on the Commission's website ([www.ferc.gov](http://www.ferc.gov)) is incorporated herein by reference.

## **ATTACHMENT B**

Statement of Transportation Rates  
 (Rates per DTH)

Rate Schedule	Rate Component	Base Rate	ACA Unit Charge 2/
FT	Short Term Recourse Reservation Rate		
	-- Maximum	See Table 1 Below	
	-- Minimum	\$00.0000	-----
	Recourse Usage Rate		
	-- Maximum	\$00.0000	3/
	-- Minimum	\$00.0000	3/
IT	Recourse Usage Rate		
	-- Maximum	See Table 1 Below	
	-- Minimum	\$00.0000	3/
PAL	Usage Rate		
	-- Maximum	See Table 1 Below	
	-- Minimum	\$00.0000	3/

-- Table 1 --

The following maximum rates apply (by month, as applicable) to all service provided pursuant to: (a) Short Term FT service under Rate Schedule FT (i.e., firm service that has a term of less than one year); (b) IT Service under Rate Schedule IT; and (c) Park and Loan Service under Rate Schedule PAL.

Month	Rate Multiplier	Maximum Base Unit Rate 1/ (\$/Dth/day)	ACA Unit Charge 2/
January	150%	\$1.2814	3/
February	150%	\$1.2814	3/
March	60%	\$0.5126	3/
April	60%	\$0.5126	3/
May	60%	\$0.5126	3/
June	100%	\$0.8543	3/
July	100%	\$0.8543	3/
August	100%	\$0.8543	3/
September	60%	\$0.5126	3/
October	60%	\$0.5126	3/
November	150%	\$1.2814	3/
December	150%	\$1.2814	3/

- 1/ The Maximum Base Unit Rate is stated in \$/Dth/Day. For Short Term FT Service contracts with terms of one month or greater, the maximum Short Term Recourse Reservation Rate shall be calculated as  $30.4167 \times$  the Maximum Base Unit Rate for each applicable month.
- 2/ ACA assessed where applicable under Section 154.402 of the Commission's regulations and will be charged pursuant to Section 6.18 of the General Terms and Conditions at such time that initial and successive ACA assessments are made.
- 3/ The currently effective ACA unit charge as published on the Commission's website ([www.ferc.gov](http://www.ferc.gov)) is incorporated herein by reference.

## **ATTACHMENT C**

**Delivered Cost to New England Gas Fired Generators from Wright via Iroquois, TransCanada, PNGTS and downstream pipe, if applicable**

Inputs/Assumptions:

- 1) Used PNGTS C2C Rate of \$0.60/Dth/day
- 2) Assumes delivery by PNGTS into TGP at Dracut, backhaul on TGP for TGP Plants
- 3) Assumes delivery by PNGTS into TGP at Dracut, backhaul on TGP to Mendon and forward haul on AGT for AGT Plants
- 4) Assumes delivery by PNGTS into MNE at Westbrook and backhaul on MNE for MNE plants
- 5) Used existing Tariff FT rates on other pipelines
- 6) Does not include lateral or LDC charges, if applicable
- 7) Does not account for potential plant-specific or pipeline-specific constraint points
- 8) The TransCanada Tolls used are from the Final Mainline Transportation Tolls eff. July 1, 2015 and the exchange rate from Canadian to US Currency is the June 2015 average rate of \$1.23660455  
 TCPL Demand includes TransCanada Daily Equivalent FT rate (C\$0.4571/GJ) + Abandonment Surcharge (C\$0.0217/GJ) + Delivery Pressure (C\$0.03328/GJ), converted to \$US/Dth. Fuel of 1.000% is an estimate

Plant	MW	City	State	P/L Svce	LDC Territory of Plant Location	EDC	Assume d Wright Price	IGTS, Z1-	IGTS, Z1-	IGTS, Z1-	TCPL, Wadd-	TCPL, Wadd-	TCPL, Wadd-	PNGTS	PNGTS	PNGTS	MNE	MNE	MNE	AGT, AFT-1	AGT, AFT-1	AGT, AFT-1	TGP, FT-	TGP, FT-	TGP, FT-	Total Transport Cost
								Z1	Z1	Z1	E,Hereford	E,Hereford	E,Hereford	Demand	Cmmdty	Fuel	Demand	Cmmdty	Fuel	Demand	Cmmdty	Fuel	Demand	Cmmdty	Fuel	
Lake Road	857	Dayville	CT	AGT	Eversource Energy	Connecticut Light & Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Middletown Stations Combined	197	Middletown	CT	AGT	Eversource Energy	United Illuminating Company	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Kleen Energy	620	Middletown	CT	AGT	Eversource Energy	Connecticut Light & Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
New Haven Generating Station	453	New Haven	CT	AGT	S. CT	PSE&G	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Montville Station 5	82	New London	CT	AGT	Eversource Energy	United Illuminating Company	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Wallingford Unit 1 thru 5	244	Wallingford	CT	AGT	Eversource Energy	United Illuminating Company	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Pierce Station	95	Wallingford	CT	AGT	Eversource Energy	United Illuminating Company	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Waterbury Generation Facility	99	Waterbury	CT	AGT	Eversource Energy	Connecticut Light & Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Dexter 1	38	Windsor Locks	CT	AGT	Eversource Energy	Connecticut Light & Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Dexter 2	4	Windsor Locks	CT	AGT	Eversource Energy	Connecticut Light & Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
ANP Bellingham Combined	532	Bellingham	MA	AGT	CMA	Eversource OR National Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
NEA Bellingham	337	Bellingham	MA	AGT	CMA	Eversource OR National Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Medical Area Total Energy Plant (MATEP)	49	Boston	MA	AGT	National Grid	Eversource Energy	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Potter 2 CC	90	Braintree	MA	AGT	National Grid	Braintree Municipal Light & Cable	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Thomas A. Watson Unit 1	57	Braintree	MA	AGT	National Grid	Braintree Municipal Light & Cable	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Thomas A. Watson Unit 2	57	Braintree	MA	AGT	National Grid	Braintree Municipal Light & Cable	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
ANP Blackstone 1	258	Cambridge	MA	AGT	Eversource Energy	Eversource Energy (Cambridge)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
ANP Blackstone 2	257	Cambridge	MA	AGT	Eversource Energy	Eversource Energy (Cambridge)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
BG Dighton Power	185	Dighton	MA	AGT	National Grid	National Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Fore River 11 & 12	843	East Braintree	MA	AGT	National Grid	Braintree Municipal Light & Cable	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Mystic Steam 7	575	Everett	MA	AGT	National Grid	National Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Kendall Steam 1-3	63	Middlesex	MA	AGT	Eversource Energy	Eversource Energy	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76

Plant	MW	City	State	P/L Svce	LDC Territory of Plant location	EDC	Assume d Wright Price	IGTS, Z1-	IGTS, Z1-	IGTS, Z1-	TCPL, Wadd- E.Hereford	TCPL, Wadd- E.Hereford	TCPL, Wadd- E.Hereford	PNGTS	PNGTS	PNGTS	MNE	MNE	MNE	AGT, AFT-1	AGT, AFT-1	AGT, AFT-1	TGP, FT- BH	TGP, FT- BH	TGP, FT- BH	Total Transport Cost
								Demand	Cmmdty	Fuel																
Milford Power L.P.	171	Milford	MA	AGT	Eversource Energy	National Grid (Mass Electric)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Canal 2	547	Sandwich	MA	AGT	National Grid	Eversource Energy (Commonwea	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Brayton Point 4	446	Somerset	MA	AGT	National Grid	National Grid (Mass Electric)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Cleary 9 CC	110	Taunton	MA	AGT	CMA	Taunton Municipal Electric	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Tiverton Power	265	Tiverton	RI	AGT	New England Gas	Nat Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Manchester Street Combined	450	Providence	RI	AGT via LDC	New England Gas	Nat Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	\$0.2161	\$0.0112	1.036%	\$0.0801	\$0.0734	0.370%	\$1.76
Bucksport Energy	153	Bucksport	ME	M&NE	Bangor Gas	Central Maine Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	\$0.5500	\$0.0050	0.667%	N/A	N/A	N/A	N/A	N/A	N/A	\$1.91
Maine Independence Station / Casco Bay Energy Facility	538	Veazie	ME	M&NE	Bangor Gas	Emera Maine	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	\$0.5500	\$0.0050	0.667%	N/A	N/A	N/A	N/A	N/A	N/A	\$1.91
Androscoggin	688	Jay	ME	PNGTS	None	Central Maine Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$1.33
Rumford Power	269	Rumford	ME	PNGTS	None	Emera Maine	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$1.33
Westbrook Energy Center	548	Westbrook	ME	PNGTS	Maine Natural Gas	Central Maine Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$1.33
PSNH Newington	400	Newington	NH	PNGTS	Northern Utilities	Eversource (PSNH)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$1.33
EP Newington Energy	560	Newington	NH	PNGTS	Northern Utilities	Essential Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$1.33
CDECCA (Capital District Energy Center)	61	Hartford	CT	TGP	S.CT	Connecticut Light & Power	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Milford Power Combined	570	Milford	CT	TGP	S.CT	United Illuminating Company	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Berkshire Power	246	Agawam	MA	TGP	CMA	Eversource Energy (Western	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Millennium	384	Charlton	MA	TGP	National Grid	National Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Dartmouth Power	89	Dartmouth	MA	TGP	Eversource Energy	Eversource Energy (Commonwea	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Ipswich Diesel 1,2,6,9-12	10	Essex	MA	TGP	National Grid	National Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Mass Power	280	Indian Orchard	MA	TGP	CMA	Eversource Energy (Western Mass Electric)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Lenergia Energy Center	78	Lowell	MA	TGP	National Grid	National Grid (Mass Electric)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Stony Brook GT1A, GT1B & GT1C	354	Ludlow	MA	TGP	CMA	Eversource Energy (Western	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Waters River 1	22	Peabody	MA	TGP	National Grid	Peabody Municipal Electric	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Waters River 2	40	Peabody	MA	TGP	National Grid	Peabody Municipal Electric	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Altresco	183	Pittsfield	MA	TGP	Berkshire	Eversource Energy (Western	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49

Plant	MW	City	State	P/L Svce	LDC Territory of Plant location	EDC	Assume d Wright Price	IGTS, Z1-	IGTS, Z1-	IGTS, Z1-	TCPL, Wadd-	TCPL, Wadd-	TCPL, Wadd-	PNGTS	PNGTS	PNGTS	MNE	MNE	MNE	AGT, AFT-1	AGT, AFT-1	AGT, AFT-1	TGP, FT-BH	TGP, FT-BH	TGP, FT-BH	Total Transport Cost
								Demand	Cmmdty	Fuel	Demand	Cmmdty	Fuel													
West Springfield 1	47	Springfield	MA	TGP	CMA	Eversource Energy (Western)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
West Springfield 2	47	Springfield	MA	TGP	CMA	Eversource Energy (Western)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
West Springfield 10	22	Springfield	MA	TGP	CMA	Eversource Energy (Western Mass Electric)	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Ocean State Power I	317	Providence	RI	TGP	New England Gas	Nat Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Ocean State Power II	318	Providence	RI	TGP	New England Gas	Nat Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Pawtucket Power	61	Providence	RI	TGP	New England Gas	N/A	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
RISEP (RI State Energy Partners)	612	Providence	RI	TGP	New England Gas	Nat Grid	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49
Granite Ridge Energy	763	Concord	NH	TGP via LDC	Liberty Utilities	Liberty Utilities	\$2.00	\$0.2169	\$0.0030	1.000%	\$0.4369	\$0	1.000%	\$0.6000	\$0.0019	1.000%	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0801	\$0.0734	0.370%	\$1.49

## **ATTACHMENT D**

**INVESTIGATION OF PARAMETERS FOR EXERCISING AUTHORITY PURSUANT TO  
MAINE ENERGY COST REDUCTION ACT, 35-A M.R.S.A. SECTION 1901  
2014-00071  
RESPONSE TO REQUESTOR ODR-011  
BY PORTLAND NATURAL GAS TRANSMISSION SYSTEM**

**18-AUG-14**

**ODR-011-001**

**Q.** Please provide any methane emissions reports made by your pipeline for its interstate systems extending into the Marcellus region.

**A.** Because there is no compression on PNGTS, it is not required to report under the EPA Mandatory Greenhouse Gas Reporting rule. Therefore, PNGTS has made no methane emissions reports, and thus has no documents to produce. Although the Canadian TransCanada pipeline and the Iroquois pipeline are not intervenors in this proceeding and PNGTS is not representing them herein, they have informed PNGTS that: - Regarding the Canadian TransCanada pipeline, emissions data submitted to the Canadian federal Greenhouse Gas Reporting Program (GHGRP) are available by year on the Environment Canada website (<https://www.ec.gc.ca/ges-ghg/default.asp?lang=En&n=8044859A-1>) by searching for TransCanada and selecting the appropriate asset. Reports submitted to the Ontario and Quebec provincial governments are not published, but can be requested through a Freedom of Information (FOI) request. - Iroquois currently does not have facilities extending into the Marcellus region but will be receiving gas at the Wright Hub from the Constitution Pipeline that originates from the Marcellus Region.

**Author Of Response:**  
**Cynthia Armstrong**

**Witness Responsible For Response:**  
**Cynthia Armstrong**

**List of Attachments**

**INVESTIGATION OF PARAMETERS FOR EXERCISING AUTHORITY PURSUANT TO  
MAINE ENERGY COST REDUCTION ACT, 35-A M.R.S.A. SECTION 1901  
2014-00071  
RESPONSE TO REQUESTOR ODR-011  
BY PORTLAND NATURAL GAS TRANSMISSION SYSTEM**

**18-AUG-14**

**ODR-011-002**

**Q.** Please explain whether your company employs the best leak detection and control available . If the best leak detection and control differs that required under state and federal standards, please specify which your company employs and where.

A. PNGTS follows federal standards and employs stringent safety procedures to monitor and prevent leaks on its system. PNGTS has not had a regulatory reportable leak on its system since being commissioned in 1999. Although the Canadian TransCanada pipeline and the Iroquois pipeline are not intervenors in this proceeding and PNGTS is not representing them herein, they have informed PNGTS that: - TransCanada utilizes several methods to prevent the occurrence of all leaks on the pipeline system through application of integrity management programs. Data from remote control valve sites and meter station sites is continuously transmitted via the SCADA system to the Gas Control Center, which is manned 24/7. Alarms are pre-programmed in the SCADA system to identify pressure deviations from predefined standards notifying the controllers of deviations from the standards. - Iroquois employs a leak detection contractor that uses instrumentation and methods prescribed in the EPA's Mandatory Greenhouse Gas Reporting regulations. These include an infrared imaging camera, a combustible gas indicator and a high-flow sampler. Applicable regulations do not require leak controls, but Iroquois employs compressor seal gas leak controls recommended by the EPA for Iroquois' centrifugal natural gas compressors in the form of dry seals.

**Author Of Response:**

**Witness Responsible For Response:**

**List of Attachments**

**INVESTIGATION OF PARAMETERS FOR EXERCISING AUTHORITY PURSUANT TO  
MAINE ENERGY COST REDUCTION ACT, 35-A M.R.S.A. SECTION 1901  
2014-00071  
RESPONSE TO REQUESTOR ODR-011  
BY PORTLAND NATURAL GAS TRANSMISSION SYSTEM**

**18-AUG-14**

**ODR-011-003**

**Q.** Please provide the subscription level reached in precedent agreements to date for your pipeline project (Atlantic Bridge, C2C, or Northeast Direct) and indicate whether this level is sufficient for the project to move forward. If not sufficient or the decision has not been made, please specify what level or ranges of commitment would be sufficient to move the project forward, how and when the decision will be made.

**A.** Certain information responsive to this request is highly sensitive commercial data. PNGTS will provide this information to the Commission, but requests that it be protected from disclosure to any entities outside of the Commission, including but not limited to all intervenors to this proceeding. PNGTS does not believe any protective order currently in place provides such protection. As such, PNGTS will submit a motion for a protective order requesting such protection of this information. PNGTS will submit the information after the Commission rules on the motion.

**Author Of Response:**  
**Cynthia Armstrong and Richard Bralow**

**Witness Responsible For Response:**  
**Cynthia Armstrong**

**List of Attachments**

**INVESTIGATION OF PARAMETERS FOR EXERCISING AUTHORITY PURSUANT TO  
MAINE ENERGY COST REDUCTION ACT, 35-A M.R.S.A. SECTION 1901  
2014-00071  
RESPONSE TO REQUESTOR ODR-011  
BY PORTLAND NATURAL GAS TRANSMISSION SYSTEM**

**18-AUG-14**

**ODR-011-005**

**Q.** Please indicate what, if any, compressor or other equipment failures occurred over the last 12 years on systems transporting gas from the Marcellus region into New England that resulted in outages, interruption or reduction in the pipeline's delivery of scheduled volumes.

**A.** There are no compressors on PNGTS. Further, there were no other equipment failures that resulted in outages, interruption or reduction in the pipeline's delivery of scheduled volumes. Although the Canadian TransCanada pipeline and the Iroquois pipeline are not intervenors in this proceeding and PNGTS is not representing them herein, they have informed PNGTS that: - In the past 12 years, various force majeure notices that were associated with compressor issues were posted on the Canadian TransCanada pipeline's electronic bulletin board. However it is not possible to determine with certainty if those events impacted scheduled deliveries into New England, if at all. - Iroquois has historically maintained a reliability rating better than 98% from its fleet of compressors.

**Author Of Response:**  
**Cynthia Armstrong**

**Witness Responsible For Response:**  
**Cynthia Armstrong**

**List of Attachments**

---