

**STATE OF NEW HAMPSHSIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

In the matter of:

Petition for approval of a
Firm Transportation Agreement
(Precedent Agreement) with Tennessee
Gas Pipeline Company, LLC

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NHPUC Docket No. 14-380

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SUPPLEMENT TO PETITION TO INTERVENE OF THE TOWN OF DRACUT

Pursuant to N.H. Admin Rule Puc 203.02 (a), RSA 541-A:32, and the Order of Notice (“Notice”) issued by the Public Utilities Commission (the “Commission”), the Town of Dracut (the “Town”) hereby petitions the Commission to intervene in this proceeding. In support of this petition, the town states as follows:

1. The Town is a municipal corporation, duly organized under the laws of the Commonwealth of Massachusetts, with offices located at 62 Arlington Street, Dracut, Massachusetts 01826.
2. Liberty Utilities/EnergyNorth (“Liberty”) filed with the Department a petition for approval of a Firm Transportation Agreement or Precedent Agreement (the “Liberty Filing”) with Tennessee Gas Pipeline Company, LLC (“TGP”) on December 31, 2014.
3. The petition filed by Liberty states on page 2 that the company seeks to procure transportation services on “the proposed Northeast Energy Delivery (“NED”) pipeline.” This pipeline project is described at the web site of Kinder Morgan (www.kindermorgan.com) and in the filings in Federal Energy Regulatory Commission (“FERC”) Docket PF14-22 (available at <http://ferc.gov/docs-filing/elibrary.asp>).
4. The proposed route of the NED project as announced on December 8, 2014 includes a major expansion of pipeline infrastructure in Dracut. That expansion, as detailed on the Project System Map (<http://www.kindermorgan.com/content/docs/nedprojectmap.pdf>) and related materials, would include a 23,000 horsepower compression station, a main 36” pipeline trunk coming from Pelham, NH, and four lateral pipelines.
5. Many Dracut residents have expressed opposition to the route and to the size of the NED project and the possibility of eminent domain takings and environmental impacts related to construction and to the operation of a compression station. These residents have spoken at all three meetings of the Dracut Board of Selectmen held thus far in 2015 in opposition to the project.
6. The Liberty filing addresses two alternative pathways for additional natural gas to reach New Hampshire – the PNGTS Continent to Coast project and the Spectra Algonquin Atlantic Bridge project. Both alternative pathways, according to the filing, would also route gas through Dracut. However, the details on the alternative delivery route or method are redacted.
7. Testimony of Francisco C. DaFonte page 31, presented as part of Liberty filing, states that “EnergyNorth could transport 50,000 Dth per day... using its existing Dracut capacity

However, in order to effectuate incremental deliveries of the remaining 65,000 Dth on the...[remainder of paragraph blacked out]"

8. According to NH PUC filings, the Concord Lateral was expanded in or around the year 2001 by installation of a 20" pipeline to replace an 8" pipeline, within the existing right of way which also includes a 12" pipeline (<http://www.nhsec.nh.gov/projects/2000-01/documents/order.pdf>). Also, the lateral capacity was expanded again in 2008-9, but the new capacity not fully utilized at the time, according to page 7 of the document: (<http://www.puc.state.nh.us/regulatory/Orders/2012orders/25317g.pdf>).

9. The Town of Dracut, as the destination hub for the NED project and as a town which may or may not be affected by the (redacted) expansion alternative presented by Liberty, is "substantially and specifically affected" by this proceeding. The Town has a direct and immediate interest in this outcome of this proceeding which cannot be adequately protected by any other party.

10. The Town seeks to participate as a full intervenor in this matter and, where appropriate, to file comments, attend conferences, file discovery, and submit briefs.

WHEREFORE, for the reasons set forth above, the Town respectfully requests that the Commission grant its Petition to Intervene.

Respectfully submitted,
TOWN OF DRACUT



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