



October 15, 2015

Kimberly D. Bose,
Secretary Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Comments of the Nashua Regional Planning Commission, Merrimack NH
Re: Tennessee Gas Pipeline Company, L.L.C. ("TGP")
Docket No. PF14-22-000: Proposed Northeast Energy Direct ("NED")

Dear Ms. Bose:

The Nashua Regional Planning Commission (NRPC) serves 13 municipalities in southern New Hampshire, including Nashua, Hudson, Amherst, Brookline, Hollis, Litchfield, Lyndeborough, Mason, Merrimack, Milford, Mont Vernon, Pelham, and Wilton. The Commission focuses on developing and implementing innovative planning strategies that preserve and improve the quality of life of the residents and is dedicated to promoting the orderly development of the region.

Nine of the 13 NRPC member communities are directly impacted by the Proposed Northeast Energy Direct ("NED") pipeline. Many of these communities have taken a position or made a public statement to oppose the proposed pipeline. NRPC needs to obtain more information to help our communities to evaluate risks and potential benefits of the NED proposal and impacts to the orderly development of the region. Attached please find a copy of the NRPC "Status Report and Summary of Findings as of September 16, 2015 Relative to The Proposed Northeast Energy Direct Pipeline" which sets forth some of the issues that we believe must be addressed by Kinder Morgan and considered by FERC going forward. In addition, we respectfully request the project applicant address and FERC consider the following questions and concerns.

1. The proposed co-location of the pipeline in Pelham and Hudson, New Hampshire is in direct conflict with an approved expansion of Eversource electric transmission lines known as the Merrimack Valley Reliability Project. Please have Kinder Morgan provide alignment sheets or other design drawing that describe exactly how the pipeline will be "co-located" along the permanent electric utility right-of-way as it will be laid out to accommodate the Merrimack Valley Reliability Project.
2. Please have Kinder Morgan quantify the reduction in electric rates that residential, commercial and industrial consumers will realize should the proposed project go online. In addition, please have Kinder Morgan evaluate implications of the reduced electric rates in attracting economic

development. Particular attention should be paid as to how well New Hampshire will compete with other areas of the country, in terms of lower energy costs, due to the presence of additional natural gas supplies in the region.

3. Please have Kinder Morgan justify the need for a lateral through the town of Mason, New Hampshire. The proposed lateral is intended to provide gas to the Fitchburg Massachusetts area, however it is our understanding that no end-customer has committed to purchasing the gas at this time. NRPC strongly urges FERC to require that Kinder Morgan justify in detail this lateral or see that gas needs in the Fitchburg area are met through other projects in Massachusetts. NRPC further requests that Kinder Morgan justify the need to locate this lateral through undisturbed land as opposed to existing right of ways through the area.
4. Require Kinder Morgan to provide a detailed assessment of the ability of local emergency services to respond to incidents involving gas pipeline facilities, and to outline resources needed to keep their training, supplies and equipment up to an adequate standard to respond to those incidents.
5. Kinder Morgan should quantify and FERC should consider the direct economic benefits to the communities in New Hampshire along the proposed pipeline route. For instance, in Hillsborough County, NH the proposed pipeline is anticipated to provide little benefit to the communities directly impacted since the region is largely unserved by natural gas supplies for home heating or businesses. To our knowledge, Liberty Utilities is the only LDC in NH that has contracted for capacity on the NED project. It has committed to purchase 115 dekatherms per day from Kinder Morgan which represents only approximately 8.8% of the 1.3 Bcf/day of pipeline capacity.
6. Kinder Morgan should provide and FERC should consider a detailed analysis of the tax revenue impacts as a result of the construction of the pipeline. The methodology utilized for developing the revenue figures should be clearly explained.
7. The proposed pipeline would cross a variety of types of roadways, including unmaintained "Class VI" roads. While "Class VI" roads in New Hampshire are not maintained, it is critical that they not be viewed as "not used". Any roadways in NH, including those classified as "Class VI" can be - and in some cases are regularly - used by fully-loaded logging trucks which are of substantial weight. The NRPC concurs with the 15 towns of the NH Municipal Pipeline Coalition and request's FERC require that Kinder Morgan:
 - Use construction techniques across all roadways in New Hampshire, including all unmaintained "Class VI" roads that will account for the heavy loads presented by logging trucks or emergency vehicles.
 - We ask that, at a minimum, this includes using pipe under all roadways consistent with that required of a state road.

8. Finally, the NRPC requests Kinder Morgan provide and FERC consider a thorough explanation of the need for the project and the justification for the project to be located in New Hampshire.

Given the unprecedented scale of the project and magnitude of potential impacts to the region the NRPC respectfully requests a response to the questions and comments outlined in this letter.

Sincerely,

NASHUA REGIONAL PLANNING COMMISSION



Tim Roache, Executive Director
Michael Fimbel, Vice Chair-Town of Mont Vernon
Dan Kelly, City of Nashua
James Battis, Town of Hudson
Sarah Marchant, City of Nashua

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