BEAT
Berkshire Environmental
ACTION TEAM

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no fracked gas in mass.com
Protect Our Common Wealth
A Program of Berkshire Environmental Action Team

Working with you to protect the environment for wildlife

June 6, 2019

Re: Eversource Pipeline Project - Docket Number 18-02

Environmental Impact: *Increase of natural gas capacity in violation of state law and IPCC recommendations*

The IPCC says we need to decarbonize within 12 years. Adding new infrastructure to increase capacity is a multi-decade commitment to increased fossil fuel use, making it likely to end up stranded assets as energy efficiency efforts expand and renewable energy projects move forward.
We don't know exactly what percent of the methane will leak in Massachusetts, we do know that overall leakage from well-head to burner-tip is in the vicinity of 4.1%[1].

Scientists have made clear that it will not be possible to prevent the world from warming more than 2 degrees celsius unless we stop releasing methane and black carbon (two potent, short-timeframe radiative forcing agents) within the next decade or so[2]. Shindell also calculates the social cost of carbon for CO2 when looking at impacts to health, agriculture and environment at $38 per ton and for methane at $2,900 per ton, stressing the importance of cutting methane emissions as quickly as possible.

Global Warming Solutions Act:

It is essential that the state require an Alternatives Analysis that really considers energy efficiency's ability to reduce "natural" gas use on this pipeline by as much or more than the proposed increase.

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[1] "The Role of Shale Gas Development In the Global Methane Cycle - 3.1.19", R. Howarth, Cornell University. https://www.youtube.com/watch?v=1NPuYr1LGMI&feature=youtu.be

[2] Drew Shindell 2.8.19 as cited by Robert Howarth, ibid. Also Table 4, page 25, "The Social Cost of Atmospheric Release", Drew T. Shindell, October 24, 2013.
http://www.economics-ejournal.org/economics/discussionpapers/2013-56/file

Cost:

"Natural" gas is no longer the least cost option for electric generation. According to Navigant Research, a market research and advisory team:

"The accurate valuing and positioning of storage-plus by utilities will continue to drive the market in coming years as storage-plus PPAs are already less expensive than levelized cost of energy for combined cycle natural gas in the US."[3]

DEMAND FOR ENERGY IS DECREASING:

According to a study by Synapse Energy "By 2023 … "natural" gas-fired generation is estimated to be 27 percent lower than in 2015. And by 2030, "natural" gas-fired electric generation is estimated to be 41 percent lower than in 2015."[4]

Energy Efficiency is driving down energy demand:

Energy efficiency has not just slowed our previously increasing electric demand in New England, but has actually begun to show an annual decrease in electric demand. Consider these "Fast Stats" from ISO-New England:

- **-0.9%** average annual growth in regional electricity demand forecasted through 2027, after factoring in energy efficiency (EE) and distributed generation (DG)
- **-0.04%** average annual growth in summer peak demand forecasted through 2027 under normal weather conditions after subtracting EE and DG; **-0.2%** under extreme summer weather
- **-0.7%** average annual growth in winter peak demand forecasted through 2027 under both normal and extreme weather conditions after subtracting EE and DG[5]

The Massachusetts Comprehensive Energy Plan will further reduce demand for energy:

> " 'The Commonwealth is already implementing the Comprehensive Energy Plan recommendations in our 2019-2021 Three Year Energy Efficiency Plan by prioritizing fuel switching and active demand reduction,' said Energy and Environmental Affairs Secretary Matthew Beaton." From Press Release Baker-Polito Administration Releases First Comprehensive Energy Plan: Report Recommends Diverse Energy Portfolio and Targeted Deployment of Energy Efficiency to Continue Nation-Leading Progress.[6]

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[3] How Utilities Can Look Beyond Natural Gas with Cost-Effective Solar Plus Storage Strategies. https://www.navigantresearch.com/reports/how-utilities-can-look-beyond-natural-gas-with-cost-effective-solar-plus-storage-strategies

[4] ibid.

[5] "Key Grid and Market Stats: New England's Electricity Use", ISO New England website. https://www.iso-ne.com/about/key-stats/electricity-use

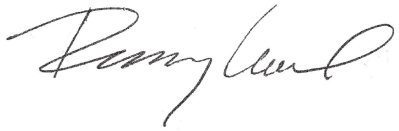
[6] "Baker-Polito Administration Releases First Comprehensive Energy Plan: Report Recommends Diverse Energy Portfolio and Targeted Deployment of Energy Efficiency to Continue Nation-Leading Progress", Baker Administration press release, 12/12/2018. https://www.mass.gov/news/baker-polito-administration-releases-first-comprehensive-energy-plan

A troubling time for capacity increase:

Between expected decrease in demand - both from the state's estimates[7] and analyst estimates [8], and the mandate of Massachusetts state law (GWSA) to reduce emissions, this project appears to be a waste of ratepayers' money on what would become stranded assets. Under any one or combination of these circumstances, it is hard to argue that the doubling of capacity along this pipeline route meets the EFSB's criteria of minimum impact and lowest possible cost. This is especially true given alternatives that are already being undertaken across the state and the ease and ever decreasing expense of implementing more energy efficiency, clean energy and energy storage.[9]

Sincerely,

Jane Winn, *Executive Director*
Berkshire Environmental Action Team



Rosemary Wessel, *Program Director*
No Fracked Gas in Mass, A Program of Berkshire Environmental Action Team

cc:
Charles Baker, Governor of the Commonwealth of Massachusetts
Kathleen Theoharides, Secretary of Energy and Environmental Affairs

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[7] "Baker-Polito Administration Releases First Comprehensive Energy Plan: Report Recommends Diverse Energy Portfolio and Targeted Deployment of Energy Efficiency to Continue Nation-Leading Progress", Baker Administration press release, 12/12/2018.
https://www.mass.gov/news/baker-polito-administration-releases-first-comprehensive-energy-plan

[8] "New England's Shrinking Need for Natural Gas: Analysis of policy impacts on natural gas use in New England's electric sector", prepared for the Connecticut Fund for the Environment, Consumers for Sensible Energy, Mass Energy Consumers Alliance, Pipe Line Awareness Network for the Northeast Sierra Club Connecticut, and Sierra Club Massachusetts February 7, 2017, Authors Pat Knight, Patrick Luckow, Bruce Biewald, Ariel Horowitz, PhD, Avi Allison Frank Ackerman, PhD, Synapse Energy.
http://www.synapse-energy.com/sites/default/files/New-Englands-Shrinking-Need-for-Natural-Gas-16-109.pdf

[9] "Massachusetts attorney general seeks deeper review of need for natural gas projects in constrained area" by Maya Weber and Grant Gunter, Editor Keiron Greenhalgh, S&P Global, January 7, 2019.
https://www.spglobal.com/platts/en/market-insights/latest-news/natural-gas/010719-massachusetts-attorney-general-seeks-deeper-review-of-need-for-natural-gas-projects-in-constrained-area