BEAT
Berkshire Environmental
ACTION TEAM

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A Program of
Berkshire Environmental Action Team

Working with you to protect
the environment for wildlife
October 1, 2021

Comments to the EFSB on Northeast Energy Center, LLC LNG Facility EFSB 18-04 / D.P.U. 18-96

Please accept the following comments to the Massachusetts Energy Facilities Siting Board (EFSB) from No Fracked Gas in Mass & the Berkshire Environmental Action Team (BEAT). BEAT works to protect the environment for wildlife in support of the natural world that sustains us all. No Fracked Gas in Mass works to stop the expansion of fossil fuel infrastructure in the Northeast states and to promote energy efficiency and sustainable, renewable sources of energy and local, permanent jobs in a clean energy economy.

After so many years of reviewing the various iterations of this project, we are left with the same conclusions and an increasing need to ask this question:
How is the approval of any additional fossil fuel infrastructure in line with the current laws of the Commonwealth?

Northeast Energy Center, LLC (NEC)'s chief arguments for the project are Market Need and Reliability.

Even if need for the project could be proven, which we have yet to see, our organization sees consideration of these needs as secondary to the environmental impact to the host communities of Charlton and nearby Southbridge, to the need of the Commonwealth to achieve its Next Generation Climate Roadmap goals and the global climate impacts of continued fossil fuel use.

We Don't Need Additional Infrastructure to Increase Reliability

Power System Reliability in New England Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas, a study on the behalf of the Massachusetts Office of the Attorney General, states that addressing winter peak reliability, a key focus of NEC's petition, can be addressed by changes to New England's energy market structure, and that the electric sector shows no reliability deficiency, despite the heating sector's first dibs on our gas distribution system:

> *"We find that under existing market conditions, there is no electric sector reliability deficiency through 2030, and therefore that no additional pipeline gas capacity is needed ... New England's*

existing market structure – including recent changes to address reliability during challenging system conditions (such as at the time of winter peak demand) – will likely provide the resources and operational practices needed to maintain power system reliability"[1]

And yet, the EFSB sees fit to approve a project that is admittedly grossly oversized for the stated needs of its sole firm customer National Grid.

"Additional LNG Market Opportunities in the Commonwealth: NEC proposes to finance and construct liquefaction and storage capacity for the Project beyond the amounts needed to meet its firm commitments to National Grid (Exhs. EFSB-N-2; EFSB-N-3; EFSB-N-6). Specifically, the Company stated that the Project would have approximately 80,000 gallons per day of liquefaction capacity and 1.0 million gallons of LNG storage capacity beyond what is contractually required to serve National Grid"[2]

Construction of long-term fossil fuel infrastructure such as this, in support of our current gas-reliant energy system, commits the region to fossil fuel use for the decades-long life of that infrastructure and disincentivizes moving toward cleaner energy solutions.

Instead of propping up our fossil fuel infrastructure, the Commonwealth needs to be making bold moves AWAY from fuel-based solutions altogether. To meet our Next Generation Climate Roadmap Act goals and its timeline for decarbonization, we need to be incentivizing moves to high efficiency, net-zero building retrofits and high efficiency heat pumps for heating demands, and solar and wind with grid scale storage for electric generation and meeting peak demand.

Extreme Cold Weather Scenarios

NEC is also citing reliability in extreme cold weather scenarios as an indicator of need for this proposed project. This has become a standard argument for nearly all energy infrastructure proposals in Massachusetts, yet ISO New England is reporting that systems are adequate to handle events as severe as the cold snap experienced in the winter of 2017-2018.[3]

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[1] *Power System Reliability in New England Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas,* study on the behalf of the Massachusetts Office of the Attorney General, November 2015. https://www.mass.gov/files/documents/2016/11/pe/reros-study-final.pdf

[2] Petition of Northeast Energy Center LLC for Approval to Construct a New Natural Gas Liquefaction and Storage Facility, Tentative Decision, Massachusetts EFSB, September 20, 2021. https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13985729

[3] *"ISO New England has implemented near-term changes based on lessons learned from historic cold snap. ISO New England, operator of New England's power system, expects the region to have the necessary resources this winter to meet consumer demand, which is expected to peak at 20,357 megawatts (MW) under normal weather conditions or 21,057 MW at extreme temperatures." 2018/2019 winter outlook: New England expected to have adequate resources*, ISO New England website, November 28, 2018. http://isonewswire.com/updates/2018/11/28/20182019-winter-outlook-new-england-expected-to-have-adequat.html

The clash between heating and electric generation demand in extreme cold weather scenarios is a transitory condition, only lasting a few hours a day of a few days a year. To propose an increase in fossil fuel infrastructure such as this facility to provide potential increased reliability during these brief periods is like proposing to build an eight-lane highway to the beach because of heavy traffic on Memorial Day and Labor Day weekends.

Peak shaving can also be achieved by strong increases in energy efficiency, which lower demand year-round, and by decreasing fuel demand for electric generation through increased renewable generation and storage. Any degree of implementation of these methods will also decrease demand on already existing pipeline and local distribution networks, rendering the need for more capacity or greater reliability unnecessary. That would be the most environmentally sound and cost effective way to address any current peak demand, ***as is the mandate of the EFSB.***

Risk of Stranded Assets

Because of advances in clean energy and storage technologies, and the added benefit of NO FUEL COSTS for these systems, there is an increasing risk of new natural gas infrastructure like the proposed project becoming stranded assets within the next decade or so, leaving the Commonwealth's rate payers to foot the bill.

> *"... because of recent innovation and rapid cost declines in renewable energy and DER (distributed energy resources) technologies, clean energy portfolios can often be procured at significant net cost savings, with lower risk and zero carbon and air emissions, compared to building a new gas plant. More dramatically, the new-build costs of clean energy portfolios are falling quickly, and likely to beat just the operating costs of efficient gas-fired power plants within the next two decades—a sobering risk for investors and customers ..."*[4]

AIR QUALITY CONCERNS

Environment New Jersey rated Millennium Power Plant in Charlton the 5th most polluting in Massachusetts in its report on America's most polluting power plants[5]. This facility and the nearby Tennessee Gas 264 Compressor Station run on fracked gas, which carries significant emissions through normal operations. This proposal will yield even more emissions from fracked-gas-driven equipment to this same industrial corridor and the homes it contains.

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[4] *The Economics of Clean Energy Portfolios*, Mark Dyson, Alex Engel, Jamil Farbes of Rocky Mountain Institute, 2018. https://rmi.org/wp-content/uploads/2018/05/Economics-of-Clean-Energy-Portfolios.zip

[5] *America's Dirtiest Power Plants: Polluters on a Global Scale.* Jordan Schneider and Julian Boggs, Environment New Jersey, September 2014, pg. 31
https://environmentnewjerseycenter.org/sites/environment/files/reports/NJ_Dirtiest_power_plants_scrn_2.pdf

The chemical profile of emissions from this facility is very similar to those of compressor stations and gas-fired electric generation plants[6], both of which are within 1.3 miles or less of the proposed LNG facility, and located within the same valley.

Effects of these chemicals are a rise in malignant neoplasms, blood, immune, and endocrine system disruption, chromosomal abnormalities, mental, behavioral and nervous system disruption and more. This is an added health burden to communities already dealing with similar air pollution and heavily impacted water supplies.

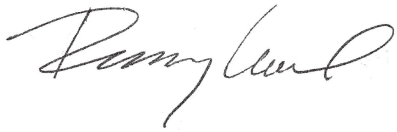
This proposed project is not even tenable in light of the Energy Facility Siting Board's mandated scope of review:

> *NOTE: The Electric Restructuring Act of 1997 altered the scope of the Siting Board's review of generating facility proposals and revised the Siting Board's fundamental mandate, directing it to provide a "reliable," rather than a "necessary," energy supply for the Commonwealth with a* ***minimum impact on the environment*** *at the* ***lowest possible cost***[7]*.*

We demand that the Tentative Decision "approval" of this project be reversed and NEC's LNG facility project petition of EFSB18-04 be DENIED.

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

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[6] *Health Effects Associated with Stack Chemical Emissions from NYS Natural Gas Compressor Stations: 2008-2014: A Technical Report Prepared for the Southwest Pennsylvania Environmental Health Project underwritten by the Park Foundation,* October 2017, Russo & Carpenter, Institute for Health & the Environment, Rensselaer, NY, pgs. 123 & 124.
https://gallery.mailchimp.com/288ec92ff904f6e9cb80bdb20/files/cd1e56fb-508a-4edd-9e8f-36ee43142c14/Health_Effects_Associated_with_Stack_Chemical_Emissions_from_NYS_Natural_Gas_Compressor_Stations_2008_2014.pdf

[7] *Proposed Rulemaking to Amend the Regulations Governing the Conduct of Energy Facilities Siting Board Adjudicatory Proceedings and General Information and Conduct of Board Business: Final Decision: ADOPTION OF FINAL REGULATIONS AT 980 CMR § 1.00 AND 980 CMR § 2.00,* Energy Facilities Siting Board, M Katherine Sedor and Stephen August, Presiding Officers, January 14, 2010.
https://www.mass.gov/files/documents/2017/09/20/1-14-10.pdf