

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

Petition of Eversource Gas Company of)
Massachusetts d/b/a Eversource Energy Pursuant)
to G.L. c. 164, § 69J for Approval to Construct) EFSB 22-05
and Operate a New Natural Gas Pipeline in the)
Town of Longmeadow and the City of Springfield)

**PETITION OF EVERSOURCE GAS COMPANY OF MASSACHUSETTS d/b/a
EVERSOURCE ENERGY FOR APPROVAL TO CONSTRUCT AND OPERATE A
NEW NATURAL GAS PIPELINE AND RELATED ANCILLARY FACILITIES IN
PORTIONS OF LONGMEADOW AND SPRINGFIELD**

I. INTRODUCTION

Now comes Eversource Gas Company of Massachusetts d/b/a Eversource Energy (“Eversource” or the “Company”), seeking approval from the Energy Facilities Siting Board (the “Siting Board”) pursuant to G.L. c. 164, § 69J (“Section 69J”) to undertake the “Western Massachusetts Gas Reliability Project” (the “Project”). The Project involves the construction of 5.3 miles of new 16-inch gas pipeline in the Town of Longmeadow (“Longmeadow”) and the City of Springfield (“Springfield”). The work includes building a new point of delivery (“POD”) in Longmeadow to receive natural gas from Tennessee Gas Pipeline Company, L.L.C. (“TGP”) and the upgrading of the Company’s Bliss Regulator Station in Springfield. The POD in Longmeadow is being built jointly with TGP for the distribution of natural gas from TGP’s interstate system to this area of western Massachusetts.¹ The proposed Project is designed to ensure reliability of natural gas distribution to customers in Western Massachusetts by providing gas from a new source at a

¹ TGP has an exclusive easement for the property upon which the POD will be located and will be constructing its portions of the POD pursuant to its blanket Certificate from the Federal Energy Regulatory Commission (“FERC”). Tennessee Gas Pipeline Co., 20 FERC ¶ 62,409 (1982).

new POD and delivering it via a proposed gas line to the Bliss Street Regulator Station. The Company's proposed Project includes: (1) installation of POD equipment at the TGP meter station to be constructed in Longmeadow; (2) installation of approximately 5.3 miles of new 16-inch pipeline in Longmeadow and Springfield; and (3) Bliss Street Upgrades to allow interconnection of the Project to the existing distribution system serving Agawam, West Springfield, Southwick, Springfield, Longmeadow, East Longmeadow and Chicopee (the "Greater Springfield Area").

In support thereof, the Company states as follows:

1. Eversource is a Massachusetts corporation and a "gas company" as defined by G.L. c. 164, § 69G and is subject to the provisions of G.L. c. 164, §§ 69H-69R.

2. Pursuant to G.L. c. 164, § 69J, a gas company seeking to construct a "facility" must first obtain approval from the Siting Board. Pursuant to G.L. c. 164, § 69G, jurisdictional facilities are defined to include "a new pipeline for the transmission of gas having a normal operating pressure in excess of 100 pounds per square inch gauge which is greater than one mile in length" and any "ancillary structure which is an integral part of the operation of any transmission line which is a facility." The proposed new 16-inch pipeline will have a normal operating pressure of approximately 200 pounds per square inch gauge ("psig") and will be approximately 5.3 miles in length.

II. PROJECT DESCRIPTION

3. The Project entails the construction of approximately 5.3 miles of new underground gas pipeline located in public roadways, all beginning at the new POD to be constructed on Hazardville Road in Longmeadow. The Preferred Route for the Project begins at the Longmeadow POD and extends north and west within streets of the Town of Longmeadow (e.g., north on Shaker Road and Laurel Street, west on Converse Street, and then north on Longmeadow Street). The Preferred Route then extends around the western side of Forest Park within the I-91 right-of-way

(“ROW”). After passing west of Forest Park, the route turns back eastward on Longhill Street and extends north along Longhill Street, west on Main Street, and north on Hall of Fame Avenue to the Bliss Street Regulator Station.

4. The Company has also identified two variations to the Preferred Route. The Williams Street Variation follows the path of the Preferred Route from the Longmeadow POD, but then diverges west on to Williams Street and then extends north on Longmeadow Street until it intersects back into the Preferred Route again at Converse Street. From that point, it follows the path of the remainder of the Preferred Route. The Forest Park Variation begins in Longmeadow at the proposed Longmeadow POD off Hazardville Road. The route then extends north along Shaker Road, crosses Williams Street, and continues north along Laurel Street to Forest Glen Road. The route then extends west along Forest Glen Road and then extends north into Forest Park via a foot path through a forested area closed to traffic (e.g., South Magawiska Road) which transitions to a park roadway for vehicles (North Magawiska Road) until it reaches the north side of the park. Once north of the park, the route follows the path of the Preferred Route to its terminus at the Bliss Street Regulator Station.

5. The Company has also identified a Noticed Alternative Route, which begins at the Longmeadow POD and heads north along Shaker Road, turns northeast on Converse Street, extends northeast along Dickenson Street, turns west on Cliftwood Street, and then extends northwest until it reaches Sumner Avenue. At Sumner Avenue, the Noticed Alternative Route then extends west to the intersection of Longhill Street and follows East Columbus Avenue north to State Street, turns west under I-91 and then south on East Columbus until it reaches the Bliss Street Regulator Station.

6. In addition to the proposed gas pipeline, the Project also requires the construction of a new POD in Longmeadow to receive gas supply from TGP’s interstate system. TGP and Eversource each will own and manage portions of the POD based on their agreement to use this

location as the POD for the Project. TGP's portion of the POD will be constructed under its blanket construction certificate issued by the FERC. Eversource's portion of the Project requires review and approval by the Siting Board. For completeness, a description of TGP's portion of the Project is also included. A summary of the facilities owned and operated by each company is listed below: Those facilities owned and operated by Eversource, and part of this Siting Board petition and analysis, include:

- Pressure regulations facilities to be in a 28-foot by 50-foot regulator building;
- Instruments and controls to be in an instrument and control ("I&C") building;
- Gas odorizer injection facilities to be in a 16-foot by 32-foot building;
- Gas heating facilities to be in a 20-foot by 20-foot boiler building;
- Power generator for backup power supply; and
- Interconnect piping and associated valving from TGP's meter building to Eversource's facilities.

Other facilities to be owned and operated by TGP, to be constructed under its FERC blanket construction certificate, include:

- Instruments and controls to be in a Remote Terminal Unit ("RTU") Building;
- Two new 8-inch taps on TGP's existing 200-1 and 200-2 Lines;
- Filter separator;
- One new 4-inch and one new 8-inch meter to be in a 25-foot by 50-foot meter building;
- Interconnect piping from the taps to the filter separator and meter building and associated valving; and
- An improved driveway from Hazardville Road to be used as access.

7. The Project also contemplates modifications to Eversource's existing Bliss Street Regulator Station to allow interconnection of the Project to the existing distribution system serving the Greater Springfield Area. Modifications to this station include installing new regulators and tie-in of the new 16-inch steel line; all upgrades will be located within the existing station property and fence line.

8. Simultaneously herewith, the Company is submitting: (a) a petition with the Department of Public Utilities (the “Department”) seeking zoning exemptions pursuant to G.L. c. 40A, § 3 (“Zoning Petition”); and (b) motions filed with the Department and the Siting Board requesting that the Department refer the Zoning Petition to the Siting Board and that the Siting Board consolidate each of the petitions for its review. See G.L. c. 25, § 4; G.L. c. 164 § 69H(2). The Company incorporates by reference the Zoning Petition together with all attachments into this Section 69J Petition. The Section 69J Petition and Attachment A appended thereto, a document entitled *Western Massachusetts Gas Reliability Project: Analysis to Support Petition Before the Energy Facilities Siting Board* (the “Analysis”), provide the factual basis for the Company’s conclusion that the Project is necessary to maintain a reliable supply of natural gas in the Commonwealth while balancing issues of cost and environmental impacts in accordance with G.L. c. 164, §§ 69H, 69J.

III. STANDARD OF REVIEW

9. In accordance with Section 69J, before approving a petition to construct a proposed energy facility, the Siting Board requires an applicant to justify its proposal in four phases. First, the Siting Board requires the applicant to show that additional energy resources are needed (see Analysis, Section 2). Second, the Siting Board requires the applicant to establish that, on balance, its proposed project is superior to alternative approaches in terms of reliability, cost and environmental impact, and in its ability to address the identified need (see Analysis, Section 3). Third, the Siting Board requires the applicant to show that it has considered a reasonable range of practical facility siting alternatives and that the proposed site (or route) for the facility is superior to a noticed alternative site (or route) in terms of cost, environmental impact and reliability of supply (see Analysis, Sections 4 and 5). Finally, the applicant must show that its plans for construction of its new facilities are consistent with the current health, environmental protection and resource use

and development policies as developed by the Commonwealth (see Analysis, Section 6). As demonstrated throughout the Analysis, the Project satisfies the Siting Board’s standards and relevant precedent for jurisdictional facilities.

A. The Project Is Needed.

10. In carrying out this statutory mandate with respect to proposals to construct natural gas pipelines, the Siting Board evaluates whether there is a need for additional natural gas facilities in the Commonwealth to meet reliability, economic efficiency, or environmental objectives. See NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-03/D.P.U. 19-15, at 7 (2021) (“Eversource Andrew Sq./Dewar”); Colonial Gas Company d/b/a National Grid, EFSB 18-01, at 7 (2019) (“Colonial Gas (2019)”); Colonial Gas Company, EFSB 16-01, at 5-6 (2016) (“Colonial Gas (2016)”); Colonial Gas Company, EFSB 05-2, at 5-6 (2006) (“Colonial Gas (2006)”); The Berkshire Gas Company, EFSB 05-1, at 3-4 (2006) (“Berkshire Gas (2006)”).

11. As a local natural gas distribution company, Eversource’s core obligation is to provide safe, reliable, and least-cost gas service to its customers. The Project is needed to provide necessary system reliability and supply security to the Greater Springfield Area, which is currently served by a single, aged pipeline system. During cold winter periods, the Company’s gas system from the Agawam Gate Station and across the Memorial Avenue Bridge in Springfield is the single source of supply for approximately 58,000 customers, consisting of approximately 40,000 customers on the east side of the Connecticut River and 18,000 customers west of the Connecticut River.

12. If there is an interruption of supply along this pathway for any reason, customers served via the facilities along this route could be out of service for the duration of the interruption. This would be particularly problematic during a cold weather period. If such a contingency occurred on the west side of the Connecticut River, all 58,000 customers (which encompasses over 200,000 people) could lose gas service for an extended period of time lasting weeks or even months. If the

contingency occurred on the east side of the Connecticut River, 40,000 customers (encompassing over 138,000 people) would lose gas service.

13. Within this potentially affected area, there are a significant number of sensitive customer loads, such as public safety entities, hospitals, long-term care facilities, government offices, transportation centers and universities. Additionally, there are also approximately 1,900 commercial properties and 245 industrial properties.

14. Because there is no alternative way to serve these customers in the event of certain foreseeable contingencies, customers would be without natural gas service for an extended period while the Company implements emergency response and outage restoration plans. Depending on the availability of mutual aid crews from outside the region, the Company estimates that it could take approximately eight weeks or more to restore service to 58,000 customers on both sides of the Connecticut River in the event of an outage. Based upon recent restoration efforts, it is estimated that the cost associated with such a restoration process could be at least \$130 million.

15. Once constructed, the Project will offer an independent, reliable source of supply to customers east and west of the Connecticut River and ensure that gas service is not lost in the event of such a contingency.

B. The Company Considered Alternatives to the Project.

16. G.L., c. 164, § 69J requires a project proponent to present alternatives to the proposed facility, which may include: (1) other methods of transmitting or storing energy; (2) other sources of electrical power or natural gas; and (3) a reduction of requirements through load management. See Eversource Andrew Sq./Dewar at 24; Colonial Gas (2019) at 19; Vineyard Wind LLC, EFSB 17-05/D.P.U. 18-18/18-19, at 16 (2019) (“Vineyard Wind”); Colonial Gas (2016) at 11.

3. In implementing its statutory mandate, the Siting Board requires a petitioner to show that, on balance, its proposed project is superior to alternative approaches in terms of

reliability, cost, environmental impact, and ability to meet a previously identified need. See Eversource Andrew Sq./Dewar at 24; Colonial Gas (2019) at 19; Vineyard Wind at 16; Colonial Gas (2016) at 11. In addition, the Siting Board requires a petitioner to consider reliability of supply as part of its showing that the proposed project is superior to alternative project approaches. See Eversource Andrew Sq./Dewar at 24; Colonial Gas (2019) at 19; Vineyard Wind at 13-14; Colonial Gas (2016) at 11; Berkshire Gas (2006) at 12-13.

4. Eversource evaluated a number of potential alternatives to the Project, including non-pipeline and pipeline alternatives, including: (1) no-build alternative; (2) the proposed Project; (3) alternative POD locations; (4) use of Compressed Natural Gas (“CNG”) or Liquefied Natural Gas (“LNG”); and (5) non-pipeline alternatives and emerging technologies, such as energy efficiency. Eversource analyzed these potential alternatives according to their ability to meet the identified Project need as well as considerations of reliability, cost and environmental impacts. As demonstrated in Section 3 of the Analysis, the Project is the superior alternative and solution to satisfy the Project need, while also appropriately balancing reliability, cost, and environmental impacts.

5. Accordingly, the proposed Project was advanced to the routing analysis presented in Section 4 of the Analysis to determine potential routes between the new POD to be constructed in Longmeadow and the Company’s existing Bliss Street Regulator Station in Springfield.

C. The Company Properly Evaluated Alternative Routes.

6. The Siting Board has a statutory mandate to implement the policies of G.L. c. 164, §§ 69J-69Q to provide a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost. G.L. c. 164, §§ 69H, 69J. Further, Section 69J requires the Siting Board to review alternatives to planned projects, including “other site locations.” In implementing this statutory mandate, the Siting Board requires a petitioner to

demonstrate that it has considered a reasonable range of practical siting alternatives and that the proposed facilities are sited at locations that minimize costs and environmental impacts while ensuring supply reliability. See Eversource Andrew Sq./Dewar at 34; Colonial Gas (2019) at 31; Vineyard Wind at 19; Colonial Gas (2016) at 20. To do so, an applicant must satisfy a two-pronged test: (1) the applicant must first establish that it developed and applied a reasonable set of criteria for identifying and evaluating alternative routes in a manner that ensures that it has not overlooked or eliminated any routes that, on balance, are clearly superior to the proposed route; and (2) the applicant must establish that it identified at least two noticed sites or routes with some measure of geographic diversity. See Eversource Andrew Sq./Dewar at 34; Colonial Gas (2019) at 31; Colonial Gas (2016) at 20-21

7. The Company engaged in a comprehensive route selection process to determine the best routes that contribute to a reliable energy supply at the lowest possible cost and that result in the least environmental impact with respect to the construction and operation of the Project. The route selection process for the new gas pipeline, which resulted in the selection of a Preferred Route with variations and a Noticed Alternative Route, is described in Section 4 of the Analysis.

D. Environmental Impacts, Cost and Reliability of the Preferred Route and the Noticed Alternative Route Have Been Appropriately Identified, Evaluated and Compared.

8. In implementing its statutory mandate to ensure a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost, the Siting Board requires a petitioner to show that its proposed facility is sited at a location that minimizes costs and environmental impacts while ensuring a reliable energy supply. To determine whether such a showing is made, the Siting Board requires a petitioner to demonstrate that the proposed site for the facility is superior to the noticed alternative on the basis of balancing cost, environmental impact and reliability of supply. See Eversource Andrew Sq./Dewar at 44; Colonial Gas (2019) at

42; Vineyard Wind at 35; Colonial Gas (2016) at 29. In order to determine if a petitioner has achieved the proper balance among various environmental impacts and among environmental impacts, cost and reliability, the Siting Board determines if the petitioner has provided sufficient information regarding environmental impacts and potential mitigation measures to enable the Siting Board to make such a determination. The Siting Board then determines whether environmental impacts would be minimized. Similarly, the Siting Board must find that the petitioner has provided sufficient cost and reliability information in order to determine if the appropriate balance among environmental impacts, cost and reliability is achieved. See Eversource Andrew Sq./Dewar at 44-45; Colonial Gas (2019) at 42-43; Vineyard Wind at 35; see also Berkshire Gas (2006) at 31; Colonial Gas (2006) at 59-60.

9. Accordingly, the Siting Board examines the environmental impacts, reliability and cost of the proposed facilities along the Preferred and Noticed Alternative Routes to determine: (1) whether environmental impacts would be minimized; and (2) whether an appropriate balance would be achieved among conflicting environmental impacts as well as among environmental impacts, cost and reliability. In this examination, the Siting Board compares the preferred and alternative routes to determine which is superior with respect to providing a reliable energy supply for the Commonwealth with a minimum impact to the environment at the lowest possible cost. See Eversource Andrew Sq./Dewar at 44-45; Colonial Gas (2019) at 42-43; Vineyard Wind at 35; see also Berkshire Gas (2006) at 31; Colonial Gas (2006) at 59-60.

10. The Company conducted a comprehensive analysis of the environmental impacts associated with the Project and will take steps to appropriately minimize and mitigate such impacts. Overall, the Company's analysis demonstrates that the Project will achieve an appropriate balance among conflicting environmental concerns as well as among environmental impacts, reliability and cost. The cost, reliability and environmental impacts analyses are set forth in Section 5 of the

Analysis.

E. The Project Meets the Siting Board’s Consistency Standards in Accordance with Section 69J and Precedent.

11. Section 69J states, *inter alia*, that the Siting Board shall approve a petition to construct a facility if it determines that “plans for expansion and construction of the applicant’s new facilities are consistent with current health, environmental protection, and resource use and development policies as adopted by the Commonwealth.”

12. The Project is necessary to ensure the reliable supply of natural gas to customers in the Greater Springfield Area. Section 6 of the Analysis demonstrates that the construction and operation of the Project is consistent with current health, environmental protection and resource use and development policies as adopted by the Commonwealth of Massachusetts, including the Electric Utility Restructuring Act of 1997, the Green Communities Act (c. 169 of the Acts of 2008), the Global Warming Solutions Act (c. 298 of the Acts of 2008), the Energy Diversity Act (c. 188 of the Acts of 2016), the Clean Energy Act (c. 227 of the Acts of 2018), and An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy (c. 8 of the Acts of 2021).

IV. CONCLUSION

WHEREFORE, Eversource respectfully requests that the Siting Board, pursuant to G.L. c. 164, § 69J, conduct a public hearing on this Petition (and on any matters referred to the Siting Board from the Department) and take such other action as may be necessary to: (i) grant the authority to construct the Project as more particularly described in the attached Analysis; (ii) find that such construction is required in order to provide a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost; and (iii) find that the construction of the Project is consistent with current health, environmental, and resource use and development policies as adopted by the Commonwealth of Massachusetts and the

policies stated in G.L. c. 164, § 69H.

Respectfully Submitted,

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