

**COMMONWEALTH OF MASSACHUSETTS  
ENERGY FACILITIES SITING BOARD**

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Petition of NSTAR Gas Company	)	
d/b/a Eversource Energy for Approval to Construct	)	
a Transfer Line Replacement Project in the	)	EFSB 18-02
Town of Hopkinton and the Town of Ashland	)	
Pursuant to G.L. c. 164, § 69J	)	

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**PETITION OF NSTAR GAS COMPANY d/b/a EVERSOURCE ENERGY FOR  
APPROVAL OF A GAS TRANSFER LINE REPLACEMENT PURSUANT TO  
G.L. c. 164, § 69J**

Now comes NSTAR Gas Company d/b/a Eversource Energy (“Eversource” or the “Company”), and hereby petitions the Energy Facilities Siting Board (the “Siting Board”) pursuant to G.L. c. 164, § 69J for approval to replace approximately 3.71 miles of buried 6-inch diameter steel natural gas pipe with a new 12-inch diameter steel pipe in the Town of Hopkinton (“Hopkinton”) and Town of Ashland (“Ashland”). Named the “Hopkinton-Ashland Transfer Line Replacement Project (the “Project”), the Project will replace portions of an existing natural gas pipeline system serving the Greater Framingham area with new, larger diameter pipeline. The Project will eliminate an existing pressure drop along the Company’s Hopkinton-Ashland Transfer Line (“Transfer Line”) and therefore improve the performance, reliability and integrity of the natural gas distribution system in the region. The Project will also allow Eversource to meet anticipated future load growth in the Greater Framingham area. In support of this Petition, Eversource respectfully represents as follows:

1. Eversource is a Massachusetts corporation, is 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. Eversource is represented by David S. Rosenzweig, Esq. and Erika J. Hafner, Esq., Keegan Werlin LLP, 99 High Street, Suite 2900, Boston, Massachusetts 02110.

3. Pursuant to G.L. c. 164, § 69J, a gas company seeking to construct a “facility” must obtain approval from the Siting Board. Pursuant to G.L. c. 164, § 69G, a jurisdictional facility is defined as a “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 except restructuring, rebuilding, or relaying of existing transmission lines of the same capacity.”

4. The Project includes the replacement of 19,600 feet of the existing Transfer Line with new 12-inch diameter coated-steel pipeline to be installed via open-cut trenching. The Project is more specifically described in Section 1.0 of the *Hopkinton-Ashland Transfer Line Replacement Project Application* (the “Application”), provided as Attachment A hereto.

5. The Company has determined that the Project is needed to upgrade portions of the Transfer Line to ensure the continued reliability of natural gas distribution to the Greater Framingham area. Upon completion, the replacement of the 3.71 miles of existing 6-inch diameter pipeline with 12-inch diameter pipeline will relieve the existing pressure drop in the Transfer Line, so that it can operate as an independent feed into the Pond Street Take Station in the event that an alternative supply of gas is unavailable. The replacement pipeline will be installed along the same route as the existing 6-inch diameter pipe within the existing easement limits. The Project also provides additional reliability and capacity benefits for the System. The Company’s need analysis is more specifically described in Section 2 of the Application.

6. The Company comprehensively identified and evaluated a number of potential alternatives to the Project, including: (1) a no-build alternative; (2) a High-Pressure Feed Line alternative; and (3) non-pipeline alternatives such as energy efficiency, compression and portable

LNG. The Company analyzed these potential alternatives by their ability to meet the identified Project need as well as considerations of reliability, cost and environmental impacts. The Company's proposed Project best meets the needs identified in Section 2.0 of the Application while balancing reliability, cost, and environmental considerations. The Company's analysis of Project alternatives is described in Section 3.0 of the Application.

7. The Petitioner engaged in a comprehensive route selection process to determine the least costly and most reliable routes that result in the least environmental impact with respect to the construction and operation of the Project. The Company's analysis compared routing alternatives based upon environmental, constructability, cost and reliability considerations. The Company also has included an analysis of its route selection process, which identified a Preferred Route, a Noticed Alternative Route and potential route variations. The route selection process is discussed more fully in Sections 4.0 and 5.0 of the Application, and demonstrates clearly that the Company's Preferred Route is the superior solution to satisfy the Project. Based on the evaluation of data collected, the Preferred Route meets the identified need, while minimizing costs and environmental impacts.

8. The Company conducted a comprehensive analysis of the environmental impacts of the Project and has appropriately minimized and mitigated the environmental impacts associated with the construction of the Project. The Project will also 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 Application.

9. The Application also 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, as are more particularly set forth in Section 6 of the Application.

**WHEREFORE**, the Petitioner respectfully requests that the Siting Board, pursuant to G.L. c. 164, § 69J, conduct a public hearing on this Petition 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 Application; (ii) 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; and (iii) find that such construction is required in order to provide a necessary energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost.

Respectfully Submitted,

**NSTAR GAS COMPANY  
d/b/a EVERSOURCE ENERGY**



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