

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

Tennessee Gas Pipeline Company, LLC,
Northeast Energy Direct Project

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Docket No. CP16-21-000

MOTION TO INTERVENE OF MASSACHUSETTS ATTORNEY GENERAL MAURA HEALEY

Pursuant to Sections 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC”) promulgated at 18 C.F.R. § 385.212 and 385.214, respectively, the Office of Massachusetts Attorney General Maura Healey (the “AGO”) hereby respectfully moves to intervene in the above captioned proceeding.

On November 20, 2015, the Tennessee Gas Pipeline Company, L.L.C. (“Tennessee Gas”) filed an application for a certificate of public convenience and necessity (“CPCN”) for the Northeast Energy Direct interstate gas pipeline project (the “NED Project”) pursuant to sections 7(b) and 7(c) of the Natural Gas Act (NGA). On December 7, 2015, FERC issued a Notice of Application for Tennessee Gas’s CPCN application and set a January 6, 2016 deadline for motions to intervene in this proceeding.

The Market path for the proposed NED Project calls for construction of a 188-mile, 30-inch pipeline designed to deliver up to 1.3 billion cubic feet per day (“Bcf/day”) of natural gas from Wright, New York, to Dracut, Massachusetts. As proposed by Tennessee Gas, 64 miles of the main pipeline would be located in Massachusetts, as would additional miles of lateral delivery pipelines and newly constructed compressor stations.

Statement of Interest and Grounds for Intervention

Attorney General Maura Healey is the chief law enforcement officer for the Commonwealth of Massachusetts. The AGO, through its Energy and Environment Bureau, works to protect utility ratepayers and our environment, and to reduce the threat of climate change for the people and families of the Commonwealth. As the state’s Ratepayer Advocate, the Bureau’s Energy and Telecommunications Division represents consumers in matters involving the price and delivery of natural gas, electricity, water, and telecommunication services before state and federal regulators. The Bureau’s Environmental Protection

Division and Environmental Crimes Strike Force enforce the laws that protect our air and water, preserve our lands and open space, require the clean-up of contaminated sites, and govern the use of pesticides and the handling and disposal of hazardous waste. The Bureau's integration of energy and environmental advocacy ensures that our office speaks with one voice in addressing the intertwined ratepayer and environmental protection matters that impact the Commonwealth and our residents.

The AGO is committed to a clean energy future in Massachusetts built around cleaner, renewable energy sources that allow Massachusetts to achieve regional and federal climate goals, as well as to meet the mandates of the Massachusetts Global Warming Solutions Act ("GWSA"), M.G. L. c. 21N §§ 1-9. The AGO also seeks to protect ratepayers by ensuring that when the Commonwealth makes long-term decisions about additional gas capacity investments, it is done on the basis of facts that quantify future natural gas demand, and take into account all cost-effective sources that can be deployed to meet that demand, including energy efficiency, renewables, large scale hydropower, LNG, and natural gas.

The AGO actively participated in pre-filing for the NED Project under docket PF 14-22-000, including by filing detailed scoping comments dated October 16, 2015. In particular, the AGO's scoping comments questioned New England's need for the natural gas capacity proposed by the NED Project and called on FERC to scrutinize and condition any approval of the NED Project on adherence to the greenhouse gas emission reduction targets and other requirements of the GWSA and on compliance with all substantive and procedural requirements of Article 97 of the Massachusetts Constitution for all Article 97-protected parcels of conservation land impacted by the NED Project.

On November 18, 2015, the AGO filed on the PF 14-22-000 docket for the NED Project its study of New England electric reliability options, *Power System Reliability in New England: Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas*, prepared by Analysis Group, Inc. (the "Study"). The Study evaluated options to address regional electricity reliability in New England, including natural gas capacity needs, through 2030. Among the Study's findings was that under the status quo, the reliability of New England's power system can and will be maintained over time, including during periods of peak winter demand, without adding any new interstate natural gas pipeline capacity to service the New England region. Upon granting of this motion for intervention, the AGO will be filing the Study in the docket for this proceeding.

If the AGO is not permitted to intervene as a party to this proceeding, its interests will not be adequately represented by other parties and it may be adversely affected and bound by actions, determinations and decisions in this proceeding without opportunity to participate and be heard. The AGO's participation as a party in this proceeding is in the public interest.

SERVICE AND CONTACT INFORMATION

The AGO designates Assistant Attorney General Matthew Ireland for service and all communications in this proceeding and requests that this contact be added to the official FERC service list for this proceeding with the email and other contact information listed below:

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CONCLUSION

For all the above stated reasons, the AGO respectfully requests that this motion to intervene as a party be granted and that the AGO be afforded all rights attendant thereto, including, without limitation, the right to appear and participate fully in this proceeding.

Respectfully submitted,



Melissa A. Hoffer,
Chief, Energy and Environment Bureau,
Christophe Courchesne,
Chief, Environmental Protection Division,
Matthew Ireland,
Assistant Attorney General, Environmental Protection Division
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CERTIFICATE OF SERVICE

I hereby certify that on this day I have caused to be served electronically a copy of the foregoing Motion to Intervene of Massachusetts Attorney General Maura Healey on all parties listed on the official service list compiled by FERC in this proceeding in accordance with the applicable FERC regulations.

Dated: December 19, 2015



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