



FERC Docket # PF 14-22-000

Statement to the Federal Energy Regulatory Commission July 29, 2015

## **The Amherst and the Northampton League of Women Voters Oppose Construction of the Proposed Kinder Morgan / Tennessee Gas Company (TGP) Pipeline**

### **Environmental Damage is Severe**

Construction of the proposed TGP pipeline would cut an environmentally destructive path across productive farmland, forests, and conservation land in western Massachusetts, as well as residential communities. It would also lock in dependence on fracked natural gas for many decades, contrary to the long-term environmental goal of reducing greenhouse gases.

### **The Pipeline is Designed for Export**

The large diameter and high capacity of the proposed pipeline far exceed even the highest projected future demand for natural gas in Massachusetts. The pipeline would link the Marcellus shale gas fields in Pennsylvania with the Maritimes and Northeast Pipeline to Canada. These facts indicate that the main purpose of the proposed pipeline is for exporting Marcellus shale gas, not for serving Massachusetts needs.

Thus, any tax or tariff imposed on Massachusetts ratepayers in order to pay for the pipeline would be subsidizing a private, for-profit enterprise, with only minor benefit to residents of Massachusetts.

### **Need for Pipeline has not been Established**

The Synapse Report projected a potential shortfall in future electricity generation capacity in Massachusetts only for peak demand on certain days of the year. The Report has been criticized for not adequately taking into account future benefits from improved energy efficiencies, as well as the growth of renewable sources. Moreover, ISO-NE has expressed concern about over-reliance on natural gas as the primary means of electricity generation.

The League believes that energy conservation and renewable energy are the first priority for meeting future energy needs -- green buildings, energy efficient appliances, flattening peak energy demand, wind generation, etc. and that more can be done to reduce reliance on fossil fuel sources.

### **Future Energy Requirements Must be Analyzed**

Before undertaking any new natural gas pipeline construction project, objective analysis of Massachusetts future energy needs must be carried out, taking into account trends in energy conservation and growth of renewable energy sources. Would investment in energy storage for variable energy sources (wind, solar) be more cost-effective than the proposed pipeline?

***Existing Pipeline Infrastructure Must be Reviewed***

An independent analysis of existing gas pipeline infrastructure must be conducted, including capacity of the Northampton Lateral and Berkshire Gas local feedlines in Western Massachusetts. What prompted the sudden moratorium on new customers this year? Why is the upgraded Southwick Compressor Station suddenly inadequate?

Would smaller, less costly upgrades to the pipeline infrastructure in Massachusetts provide the modest additional capacity needed? How much could be gained from an aggressive leak detection campaign?

***We urge the FERC to delay any decision on the proposed TGP pipeline until the key studies have been completed:***

***-Comprehensive environmental impact assessment***

***-Analysis of future energy requirements in Massachusetts, fully incorporating improved energy efficiencies and projected growth in renewable energy***

***-Independent analysis of existing gas pipeline infrastructure***

***The FERC decision must take into account the national goals of preserving the environment, reducing dependence on fossil fuels, and protecting the rights of individuals.***

***The benefit of the proposed TGP pipeline to Massachusetts residents is negligible, the environmental and economic price high.***

*The League supports environmentally sound policies that reduce energy growth rates, emphasize energy conservation, and encourage the use of renewable resources. The League supports practices that preserve the physical, chemical, and biological integrity of the ecosystem, with maximum protection of public health and the environment.*

*The League of Women Voters is a non-partisan organization that encourages informed and active participation in government. The League comments publicly on issues when these issues are relevant to published local, state, or national positions. League positions are established after League members study issues and there is general consensus among members.*

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