

New England States
Committee on Electricity

June 26, 2015

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Limited Comments in *Tennessee Gas Pipeline Company, L.L.C.*
Docket No. PF14-22-000

Dear Ms. Bose:

The New England States Committee on Electricity (“NESCOE”) respectfully submits these limited comments to the Federal Energy Regulatory Commission (“FERC”) to clarify the record concerning NESCOE activities and positions that are contained in above captioned docket regarding Tennessee Gas Pipeline Company, L.L.C.’s proposed Northeast Energy Direct (“NED”) project. In particular, NESCOE seeks to clarify a series of unfortunate mischaracterizations in a letter dated June 8, 2015 from the Town of Amherst, New Hampshire (“June 8 Letter”) regarding this project.¹

NESCOE is the Regional State Committee for the New England region and is governed by a board of managers appointed by the Governors of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. NESCOE’s mission is to represent the interests of the citizens of the New England region by advancing policies that will provide electricity at the lowest reasonable cost over the long term, consistent with maintaining reliable service and environmental quality. NESCOE has not provided any earlier comments in this docket and does not take any substantive position on the merits of this proceeding, including issues raised in the June 8 Letter.

I. NESCOE Has Never Supported or Endorsed any Pipeline Proposal

At several places, the June 8 Letter suggests or implies that NESCOE has been or is a proponent of the NED project.² Such an assertion is simply incorrect as a matter of fact. NESCOE has never indicated support or endorsement for any specific pipeline project. This includes any proceeding before FERC, where NESCOE is an active and frequent advocate on behalf of the New England states and their electricity consumers. It is additionally important for the record to reflect that NESCOE has no authority to approve the implementation or funding of any proposed pipeline project.

¹ NESCOE does not address here the characterizations about NESCOE organizationally, which are unsubstantiated, inaccurate, and exceedingly beyond the scope of this proceeding.

² June 8 Letter at 2, 4-5.

II. There Is no Active Tariff Proposal Under Consideration

The June 8 Letter references a “NESCOE tariff” and states that “FERC is seriously considering a proposal championed by NESCOE” regarding the NED project.³ These points warrant clarification.

First, regarding reference to a “tariff,” NESCOE understands that to mean a proposed generic cost recovery mechanism for energy infrastructure through the ISO New England (“ISO-NE”) tariff that was proposed in 2014, but never executed.

At the direction of the six New England states, NESCOE worked in early 2014 to develop such a proposal for consideration by and discussion with ISO-NE and stakeholders through the New England Power Pool (NEPOOL). Like any other proposed ISO-NE tariff, had the region wished to advance this particular proposal further, it would need to be filed with FERC for review in its open and public process.

However, this tariff approach has not been substantively discussed with stakeholders in almost a year, and NESCOE is unaware of any such tariff before FERC for its consideration and has not made any filing in that regard.⁴ Indeed, the New England states’ April 2015 articulation of current actions in furtherance of cleaner and more reliable and affordable energy does not include the tariff proposal in question.⁵

It is also important to clarify that the proposed tariff advanced for discussion purposes never included the selection of any particular project, such as NED; would only have been executed after public processes at both the state and federal levels; and would have created a new charge for ratepayers only after a competitive solicitation process conducted by appropriate state authorities to ensure that consumer benefits outweighed consumer costs.

³ *Id.* at 4-5.

⁴ NESCOE understands that some information on its website dates back to 2014 postings. NESCOE is in process of reworking its website, which should help avoid any confusion as to current and prior activities.

⁵ See www.nescoe.com/uploads/6_State_Action_Plan_FINAL_4-22-15_1-5.40_pf.pdf. The six New England Governors concurrently issued a joint statement on “Regional Cooperation on Energy Infrastructure,” available at <http://governor.nh.gov/media/news/2015/documents/pr-2015-04-23-new-england-governors-statement.pdf>.

III. Conclusion

NESCOE appreciates the opportunity to provide these limited comments.

Respectfully submitted,

/s/ Heather Hunt

Heather Hunt

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on Electricity

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