


**From:** Joyce, Mike mike.joyce@enablemidstream.com   
**Subject:** Comments on Governors' Infrastructure Initiative in New England – Incremental Gas for Electric Reliability concept (“IGER”) concept and Electric Distribution Companies proposal (“EDC”)  
**Date:** July 3, 2014 at 5:26 PM  
**To:** regionalinfrastructure@nescoe.com  
**Cc:** Sweeney, Jason N jason.sweeney@enablemidstream.com, Burchfield, Carol H carol.burchfield@enablemidstream.com, Kalmbach, Leslie I leslie.kalmbach@enablemidstream.com, Jewell, David R david.jewell@enablemidstream.com, Ditzel, Chris T christopher.ditzel@enablemidstream.com

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**Via Electronic Mail**

Ms. Heather Hunt  
Executive Director  
New England States Committee on Electricity  
655 Longmeadow Street  
Longmeadow, MA 01106  
[regionalinfrastructure@nescoe.com](mailto:regionalinfrastructure@nescoe.com)

Re: Comments on Governors' Infrastructure Initiative in New England – Incremental Gas for Electric Reliability concept (“IGER”) concept and Electric Distribution Companies proposal (“EDC”)

Dear Ms. Hunt:

Enable Midstream Partners appreciates this opportunity to provide comments in response to the April 30, 2014 memorandum from the New England States Committee on Electricity (“NESCOE”), which outlined and requested feedback on the IGER concept and related EDC proposal.

Enable Midstream Partners is a publicly traded master limited partnership launched in May of 2013 that owns, operates and develops strategically located natural gas and crude oil infrastructure assets serving major producing basins and markets. Formed as a joint venture by affiliates of CenterPoint Energy, Inc., OGE Energy Corp and Arclight Capital Partners, LLC, Enable Midstream's general partner is equally controlled by CenterPoint Energy and OGE. Enable currently manages and operates across eight states some 10,000 miles of interstate and intrastate pipelines, 11,000 miles of gathering lines, 2.1 Bcfd of processing capability at 12 processing plants and 86 Bcfd of natural gas storage capacity.

Inasmuch as the respective New England energy markets have suffered for many years under a troublesome lack of gas pipeline infrastructure, Enable Midstream Partners believes that the IGER concept represents the first material chance for New England to finally redress this persistent threat to energy reliability and economic growth.

Enable believes the highest value to regional electric customers lies in an entity taking an equity position in a new gas pipeline and owning such asset. While we acknowledge the quality of the legacy pipeline companies already operating in New England, we would hasten to point out that there are many qualified pipeline operators equally as capable of developing solutions to the region's gas pipeline infrastructure deficit. Indeed, given the extraordinary level of investment that will need to be brought to bear in this initiative, Enable Midstream Partners would assert that it is an RFP, alone, that represents the surest way to an optimal solution that balances reliability with ratepayer protections.

We appreciate very much NESCOE's consideration of the foregoing.

## **K. Michael Joyce**

Senior Director

End User Marketing and Business Development, Pipelines



1111 Louisiana, CNP 1073

Houston, TX 77002

Office (713) 207-5114

Cell (713) 855-9848

[Mike.Joyce@EnableMidstream.com](mailto:Mike.Joyce@EnableMidstream.com)

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