

ELECTRONICALLY FILED

**STATE OF MAINE  
PUBLIC UTILITIES COMMISSION**

PUBLIC UTILITIES COMMISSION  
Investigation of Parameters for Exercising  
Authority Pursuant to the Maine Energy  
Cost Reduction Act, 35-A M.R.S. § 1901  
Docket No. 2014-00071

NORTHEAST ENERGY  
SOLUTIONS' MOTION FOR  
LEAVE TO AMEND ITS  
COMMENTS ON THE ENERGY  
COST REDUCTION ACT  
PROPOSALS

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Northeast Energy Solutions ("NEES") hereby files this motion, in the above-captioned proceeding, concerning the Maine Energy Cost Reduction Act<sup>1</sup> (the "Act") requesting leave to amend its comments (timely filed on January 20, 2015) with the information contained herein.

Due to an internal NEES governance requirement, NEES was unable to include the proceeding comments in its original filing. Subsequent to January 20, 2015, NEES completed its governance protocols allowing for these amended comments. Therefore, to enhance the thoroughness of its original comments, pursuant to Chapter 110, Section 1(c) of the Rule of Practice and Procedure before the Maine Public Utilities Commission, NEES respectfully requests leave to amend its comments with the information contained herein. Said Section 1(c) allows for deviation from procedural requirements or deadlines where good cause exists and such deviation is permitted by law. In this case, good cause exists to grant such leave, after the initial deadline to file comments, since NEES' protocols required internal approval for these amended comments and its original comments are less thorough without this amendment. NEES is unaware of any law that would prohibit such leave and amendment. No other party would be prejudiced by allowing such leave and amendment.

On page 1, in footnote 1. a) of its original comments, NEES stated, as follows: "Portland Natural Gas Transmission System ("PNGTS") has presented an option that seemingly minimizes new construction and maximizes existing infrastructure by increasing operating pressure within its existing network. If this is a potential solution that can be accomplished without any new construction, NEES may be supportive of a PNGTS project that does achieve the goals of the Act. For NEES to be supportive of increasing operating pressure, as a solution, the results of this Investigation, in addition to other information, would need to be evaluated."

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<sup>1</sup> 35-A M.R.S. § 1901 *et seq.*

NEES herewith amends its original comments by adding the following itemized comments in support of PNGTS' proposal<sup>2</sup>:

- PNGTS' Continent-to-Coast Expansion Project ("C2C") provides indigenous capacity and has direct benefits for Maine's end-users. The other proposals do not provide singular benefits to Maine. Simply, the infrastructure proposed to be developed outside of Maine will serve markets other than Maine; but, Maine rate-payers will likely burden the costs.
- NEES agrees that PNGTS' liquid market points, as set forth in their proposal, should increase the resale potential of C2C capacity and better achieve the objectives of the Act.
- In this proceeding it has been asserted that Maine is not able to access sufficient gas without significant greenfield disruption. However, PNGTS' back-feeding solution refutes those assertions. NEES supports PNGTS' bypass solution in order to provide supply with minimal upgrades to existing, underground pipe.
- As articulated in PNGTS' comments, PNGTS' "already runs through Maine," and C2C can be custom tailored for Maine's actual requirements in accordance with the Act. Therefore, it is apparent to NEES that PNGTS' proposal, as comparative to the other proposals, is best suited to achieve the Act's objectives.
- In brief, PNGTS's proposal utilizes existing pipeline to meet Maine's, and only Maine's, capacity needs.
- While NEES believes a regional solution to the region's concerns is optimal, NEES does not believe that the Act requires or suggests that the Maine Public Utility Commission solely undertake a provincial endeavor (with only hypothetical benefits to Maine ratepayers) when an alternative proposal, specific for Maine end-users, is offered.

WHEREFORE, NEES respectfully requests that its motion be granted, the amended information contained herein is accepted as part of its comments, and for any and all further legal and equitable relief to which NEES may be justly entitled.

Respectfully submitted on this 10th day of February, 2015.



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<sup>2</sup> Including as moved to be supplemented on February 9, 2015.