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March 13, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Re: Comments of Northeast Energy Solutions (“NEES”)
Tennessee Gas Pipeline Company, L.L.C. (“TGP”)
Docket No. PF14-22-000: Proposed Northeast Energy Direct (“NED”)

Dear Ms. Bose:

On Wednesday, July 30, 2014, Kinder Morgan, Inc. published the following regarding TGP, its subsidiary:

“Kinder Morgan Energy Partners, L.P. today announced it has reached agreement, subject to customary approvals, with key local natural gas distribution companies (LDCs) throughout New England to transport approximately 500,000 dekatherms per day (Dth/d) of long-term firm transportation on the market path component of Tennessee Gas Pipeline Company’s (TGP) Northeast Energy Direct Project. Included in this key group are: The Berkshire Gas Company, Columbia Gas of Massachusetts, Connecticut Natural Gas Corporation, Liberty Utilities (EnergyNorth Natural Gas) Corp., National Grid, Southern Connecticut Gas Corporation and three other LDCs. Negotiations with additional customers on both the market path and supply path components of the Northeast Energy Direct Project are continuing and agreements are expected to be announced soon.”

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Not “soon;” but, nearly two-thirds of a year later, on Thursday, March 5, 2015, Kinder Morgan, Inc. published virtually the identical announcement concerning TGP:

“Anchor shippers that have executed binding precedent agreements include: National Grid, 186,963 Dth/d; Liberty Utilities, 115,000 Dth/d; Columbia Gas of Massachusetts, 114,300 Dth/d; and Connecticut Natural Gas Corporation, Southern Connecticut Gas Corporation, The Berkshire Gas Company, The City of Westfield Gas & Electric Light Department and others. TGP is continuing to negotiate with potential shippers on the NED Project, including electric distribution companies (EDCs) and others, and expects to announce additional commitments at a later date.”

NEES takes exception with TGP’s decision to release, essentially, the same information in a fashion designed to trumpet progress, with regards to TGP’s purported shipper contracts, when, in-fact, no real progress has occurred. Further, the March 5th information is different from information produced by the company, in the field, during so called open houses and informational and stakeholder meetings.

The numbers provided in TGP’s March 5, 2015 press release total 416,263 Dth/d for precedent agreements. However, just last month in a February 24th presentation, TGP stated the total for precedent agreements was 492,263 Dth/d. Last fall, in a document released by TGP in an offensive against Access Northeast, on September 30, 2014, TGP set forth: “Tennessee has also reached commercial agreement with a group of local gas distribution companies in Connecticut, Massachusetts and New Hampshire for 500,000 dekatherms per day.”

Simply, TGP’s consistently inconsistent information frustrates the ability of stakeholders to conduct fact-based analyses so that the the Federal Energy Regulatory Commission (“FERC”), and other rule and policy makers, can be provided with truthful information. TGP must account for these discrepancies and others as they are revealed by NEES during this docket.

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On February 27, 2015, FERC requested of TGP additional information to be incorporated into its revised resource reports. NEES encourages TGP to fully respond, in sufficient time, for stakeholders to provide truthful analysis and comments to FERC in advance of TGP's professed certificate application.

When TGP filed its initial pre-application for the proposed NED project, TGP was wildly ridiculed for its aged data and lack of accuracy. Hence, TGP has done little to right their public, regulatory, and legal informational ship concerning the proposed NED project.

Moreover, in view of the time lapse since TGP's initial announcement of shippers, the probable unavailability of additional shippers, recent state regulatory rulings, and TGP's continuous representation that it does not intend to export outside the United States, it is quite likely that TGP already knows that NED is not financially viable. If such is indeed the case, TGP has an affirmative duty to duly inform, all, now.

Thank you for the opportunity to provide this information; and, if you have any questions, or require additional information, please do not hesitate to contact me.

Respectfully submitted,



Vincent DeVito

VD:ss

cc: Mr. Rich McGuire (FERC Staff)
Mr. Michael McGehee (FERC Staff)
Mr. Eric Tomasi (FERC Staff)

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