

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Tennessee Gas Pipeline Company, L.L.C.

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Docket No. CP16-21-000

OBJECTION OF
NORTHEAST ENERGY SOLUTIONS, INC.
TO
TENNESSEE GAS PIPELINE COMPANY, L.L.C.
MOTION FOR LEAVE TO ANSWER

Northeast Energy Solutions, Inc. (“NEES”) hereby objects to Tennessee Gas Pipeline Company, L.L.C.’s (“Tennessee”) motion for leave to answer in the above-captioned proceeding concerning Tennessee’s Northeast Energy Direct Project (“NED Project”) certificate application (“Application”) as filed with the Federal Energy Regulatory Commission (“Commission”).

1. In support of this Objection, NEES states, as follows: The exact legal name of the Objector is as set forth in the above, unnumbered paragraph. NEES is a multi-jurisdictional nonprofit corporation comprised of energy, land, environmental, end-user, and related economic interests. Uniquely, NEES, through its founding members, represents over 101,850 individuals in Massachusetts and New York who collectively own or hold conservation restrictions on over 46,211 acres of land in the Massachusetts. NEES also includes municipalities

and a state legislator among its members. NEES is an educational resource and advocacy group (before state and federal government officials) that works to ensure that economically viable and environmentally responsible energy projects account for its member's collective and respective interests. NEES was founded to represent its members in providing energy infrastructure analysis and advocacy regarding the economics of energy projects and transactions in the Northeastern United States.

2. The name and mailing address of the person upon whom all communications concerning the proceeding should be served is, as follows:

Vincent DeVito, Partner
Bowditch & Dewey, LLP
300 New Jersey Avenue, NW, Suite 900
Washington, DC 20001
Telephone: 617-757-6518
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3. On or about November 20, 2015, Tennessee filed the Application pursuant to sections 7(b) and 7(c) of the Natural Gas Act, and the Commission regulations thereunder, seeking authority to: (i) construct, install, modify, and operate certain pipeline and compression facilities to be located in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut; and (ii) to abandon certain facilities, all as part of a proposed Northeast Energy Direct Project ("NED"). The proposed NED is comprised of two components:

a. Supply Path Component: Comprised of the proposed facilities from Troy, Pennsylvania to Wright, New York, including approximately 174 miles of pipeline facilities in Pennsylvania and New York, the proposed construction of three new compressor stations and

modifications to one existing compressor station, further construction of two new meter stations, and purported appurtenant facilities.

b. Market Path Component: Comprised of proposed facilities from Wright, New York to Dracut, Massachusetts. These proposed facilities include approximately 188 miles of mainline pipeline facilities in New York, Massachusetts, and New Hampshire, laterals located in Massachusetts and New Hampshire, and Connecticut), proposed construction of six new compressor stations, 13 new meter stations and modification of 14 existing meter stations, and purported appurtenant facilities.

4. The Commission issued a Notice of Application for the Application on December 7, 2015 and NEES timely moved to intervene in this proceeding. No opposition was not filed against NEES' motion to intervene within 15 days after it was filed. As such, NEES is a party in this proceeding.

5. Tennessee filed its Motion for Leave to Answer and Answer of Tennessee Gas Pipeline Company, L.L.C. to Interventions, Protests, Comments, Motion for Stay and Motion for Summary Disposition ("Motion") on March 22, 2016.

6. NEES respectfully and timely objects to the Motion as follows:

a. To the extent certain Interventions are in fact Protests, the Commission should not waive the prohibition set forth in Rule 213(a)(2) of the Commission's Rules of Practice and Procedure as requested by Tennessee. Rule 213(a)(2) is clear and prohibits the filing of Answers to Protests.

b. The Commission should not grant Tennessee's request for a waiver of Rule 213(d) to afford Tennessee additional time to respond to certain Interventions in one document. Rule 213(d) is clear in setting the filing time limits, and each Intervention is important in its own right and deserves to be addressed by Tennessee on a timely basis.

WHEREFORE, for all of the aforementioned reasons, NEES respectfully requests the relief sought herein be granted, including but not limited to denying Tennessee's Motion.

Respectfully submitted,

/s/ Vincent DeVito

On behalf of NEES:
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April 6, 2016

cc: Governor Charles D. Baker (MA)
Governor Daniel Malloy (CT)
Governor Andrew M. Cuomo (NY)
Senator Lisa A. Murkowski (AL)
Congressman Peter T. King (NY)
Congressman James P. McGovern (MA)
Commissioner Tony Clark, FERC
Commissioner Cheryl A. LaFleur, FERC
Chairman Norman C. Bay, FERC
Commissioner Philip D. Moeller, FERC
Commissioner Colette D. Honorable, FERC
Attorney General Maura T. Healey (MA)
President Stanley C. Rosenberg (MA Senate)
Speaker Robert A. DeLeo (MA House of Representatives)
Ann F. Miles, Director, Office of Energy Projects, FERC
Eric J. Tomasi, Environmental Project Manager, Office of Energy Projects, FERC
Michael McGehee, Deputy Director, Office of Energy Projects, FERC
State Senator Michael Brady (Brockton, MA)
State Representative Bradley H. Jones, Jr. (North Reading, MA)
Matthew A. Beaton, Secretary, Office of Energy and Environmental Affairs (MA)
Judith Judson, Commissioner, Department of Energy Resources (MA)
Rob Klee, Commissioner, Department of Energy and Environmental Protection (CT)
Basil Seggos, Acting Commissioner, Department of Environmental Conservation (NY)
Rebecca Tepper, Chief, Energy and Telecommunications, Attorney General (MA)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all parties listed on the official service list compiled by the Secretary in this proceeding and attached hereto.

Dated at Boston, Massachusetts this 6th day of April, 2016.

By: */s/ Vincent DeVito*

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