

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Tennessee Gas Pipeline Company, LLC

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Docket No. CP16-21-000

**MOTION TO INTERVENE OF
NORTHEAST ENERGY SOLUTIONS, INC.**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission (“Commission”) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, Northeast Energy Solutions, Inc. (“NEES”) hereby moves to intervene in the above-captioned proceeding.

1. In support of this motion, NEES states, as follows: The exact legal name of movant 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
Fax: 508-929-3019
vdevito@bowditch.com

3. On or about November 20, 2015, Tennessee Gas Pipeline Company, LLC (“TGP”), filed an application pursuant to sections 7(b) and 7(c) of the Natural Gas Act (NGA), and the Federal Energy Regulatory Commission (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. During this proceeding, NEES may seek to verify that TGP can locate the proposed NED within or adjacent to existing rights-of-way; and, further, NEES may investigate whether appropriate pre-filing and application protocols were followed.
- 5. NEES herewith reserves it right to submit comments and other information during this proceeding.
- 6. NEES has direct interests that will be affected by the outcome of this proceeding.
- 7. NEES' interests cannot be adequately represented or protected by any other party.

8. If NEES is not permitted to intervene in this proceeding, it is highly likely to be adversely affected and bound by action taken in this proceeding without having had an opportunity to be heard.

WHEREFORE, NEES respectfully requests that it be permitted to intervene in this proceeding and that it be granted all the rights of a party thereto, including the right to notice of, and to participate in, all hearings and other proceedings.

Respectfully submitted,

/s/ Vincent DeVito

On behalf of NEES:
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December 14, 2015

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 14th day of December, 2015.

By: /s/ *Vincent DeVito*

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