



Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

September 15, 2014

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

Re: Tennessee Gas Pipeline Company, L.L.C., Docket No. PF14-____-000
Request to Use Pre-filing Procedures
Proposed Northeast Energy Direct Project

Dear Ms. Bose:

Tennessee Gas Pipeline Company, L.L.C. (“Tennessee”) submits to the Federal Energy Regulatory Commission (“Commission”) this request to use the pre-filing procedures (“Request”) for Tennessee’s proposed Northeast Energy Direct Project (“NED Project” or “Project”). Tennessee submits this Request in compliance with Section 157.21 of the Commission’s regulations.¹

The proposed NED Project, as described in further detail herein, consists of approximately 167 miles of new and co-located pipeline and two pipeline looping segments on Tennessee’s existing 300 Line in Pennsylvania, and compression facilities designed to receive gas from Tennessee’s 300 Line for deliveries to Tennessee’s system near Wright, New York, Iroquois Gas Transmission System, LP, and/or the proposed Constitution Project (referred to as the supply path component of the NED Project), and approximately 177 miles of new and co-located pipeline facilities extending from Wright, New York to an interconnect with the Joint Facilities of Maritimes & Northeast Pipeline System and Portland Natural Gas Transmission System (“Joint Facilities”) at Dracut, Massachusetts and Tennessee’s existing 200 Line near Dracut, Massachusetts (referred to as the market path component of the NED Project). In addition, the Project includes the construction of eight (8) new compressor stations, modifications at an existing compressor station, and approximately 73 miles of market delivery laterals and pipeline looping segments located in the states of Pennsylvania, New York, Massachusetts, Connecticut, and New Hampshire.

The Project will provide up to 2.2 billion cubic (“Bcf”) per day (“Bcf/day”) of additional natural gas transportation capacity to meet the growing energy needs in the Northeast U.S., particularly in New England. This includes needs of local distribution companies (“LDCs”),

¹ 18 C.F.R. § 157.21 (2014).

gas-fired power generators, industrial plants, and other New England consumers. As noted above, the NED Project is planned to interconnect with the Joint Facilities in Dracut, Massachusetts and Tennessee's existing 200 Line near Dracut, Massachusetts. The interconnection with the Joint Facilities, together with the anticipated reversal of the primary flow direction of the Joint Facilities, will enable the NED Project to access more New England customers in New Hampshire and Maine and in the Atlantic Canada region, as well as Algonquin Gas Transmission's system through the HubLine. Potential Atlantic Canada customers include LDCs, power generators, industrials, and liquefied natural gas ("LNG") export projects. Additionally, the interconnection of the NED Project with Tennessee's existing 200 Line will enable Tennessee to provide customers with increased volumes of natural gas to flow south from Dracut, Massachusetts to Tennessee's customers in Massachusetts, Connecticut, and Rhode Island.

The NED Project is being developed to meet the growing energy needs in the Northeast and, more specifically, the New England region. The New England region as a whole stands to benefit from the NED Project as it will enable New England to sustain its electric grid and lower energy costs to compete on a more level economic playing field with other regions of the nation with access to low-cost gas. As part of Tennessee's fully integrated natural gas pipeline transportation system, the Project will provide additional access to diverse supplies of natural gas to expansion customers in the New England region. As demand for natural gas in the region increases, Tennessee's LDC customers have expressed the need for additional firm transportation capacity to serve their growing markets. In addition, multiple studies have concluded that additional pipeline infrastructure is needed in the region to serve increasing demand from LDCs and the power sector.² As a result of the fact that current natural gas transportation infrastructure is inadequate to meet the growing demand in the New England region, gas prices in New England are the highest in the United States.³ Limited natural gas transportation infrastructure also has led to extremely high electricity prices in the Northeast U.S., and threatens the reliability of the region's electric grid.⁴ Additional natural gas infrastructure may benefit the region in the form of lower energy costs and enhanced reliability to both the gas transmission system and the power grid, while also reducing the region's reliance on higher polluting coal and oil fired power plants. A recent study by the INGAA Foundation and ICF International predicted that 6.0

² Current natural gas transportation infrastructure is inadequate to meet the growing demand in the New England region. *See, e.g.*, U.S. Dept. of Energy, Quadrennial Energy Review Meeting, Statement of Gordon van Welie, President and Chief Executive Officer of ISO New England, at pp. 4-5 (Apr. 21, 2014), available at www.iso-ne.com/pubs/pubcomm/pres_spchs/2014/van_welie_statement_4-21-14.pdf; U.S. Dept. of Energy, Energy Information Administration, High Prices Show Stresses in New England Natural Gas Delivery System at 1 (Feb. 7, 2014), available at www.eia.gov/naturalgas/issuesandtrends/deliverysystem/2013/pdf/newengland_natgas.pdf. *Id.* at 8; *see also* U.S. Dept. of Energy, Energy Information Administration, Natural Gas Explained: Natural Gas Prices (Jun. 29, 2010), available at www.eia.gov/energyexplained/index.cfm?page=natural_gas_prices.

³ *See* ISO New England, *2013 Wholesale Electricity Prices in New England Rose on Higher Natural Gas Prices: Pipeline Constraints and Higher Demand Pushed Up Prices for Both Natural Gas and Power* at 1 (Mar. 18, 2014), available at http://www.iso-ne.com/news/pr/2014/2013_price%20release_03182014_final.pdf.

⁴ *Id.* at 2. *See also* Massachusetts Office of The Attorney General, *Overview of Electricity & Natural Gas Rates*, available at <http://www.mass.gov/ago/doing-business-in-massachusetts/energy-and-utilities/energy-rates-and-billing/electric-and-gas-rates.html>.

Bcf/day of new natural gas pipeline capacity will be needed in the Northeast U.S. by 2020, and 10.1 Bcf/day of capacity will be needed by 2035.⁵

This Project will add significant new pipeline capacity, alleviating the transportation constraint in the region and leading to lower natural gas costs over time. To the extent that the region increases its gas-fired generation, it will also provide generation resources to support the intermittent generation resources contributed by wind and solar resources. Thus, increased natural gas supplies available to the region will support wind power and solar power development. Similar co-existence profiles have developed in other regions of the country, including the Midwest, Southeast, Southwest, and Northwest.

To meet this expansive demand, Tennessee is scaling the NED Project to provide up to 2.2 Bcf/day of capacity into the market, expected to be operational by November 2018. During the non-binding open season for the NED Project conducted in February and March 2014, Tennessee received significant interest from a wide range of potential customers, and it has numerous ongoing discussions and marketing efforts aimed at executing long-term binding agreements. As of the date of this Request, Tennessee has reached commercial agreement, subject to the customary approvals, for approximately 500,000 dekatherms per day (“Dth/day) of long-term firm transportation capacity on the market path component of the proposed NED Project with 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. Tennessee will continue discussions with additional potential shippers during the pre-filing process to secure long-term binding agreements for NED Project capacity. Tennessee will build facilities for incremental capacity as required by the present or future public convenience and necessity, demonstrated in part by executed long-term binding firm precedent agreements reflecting sufficient revenues to justify proceeding with the substantial risks associated with the certification and construction of a project of this scale.

For purposes of the environmental review of the Project in pre-filing process, Tennessee has proposed the facilities described in more detail below, including a 36-inch diameter pipeline from Wright, New York to Dracut, Massachusetts capable of transporting up to 2.2 Bcf per day of natural gas on a firm basis. Tennessee may, depending on market conditions and regional developments, ultimately propose to proceed with a 30-inch diameter pipeline from Wright, New York to Dracut, Massachusetts in the certificate application for the Project that is anticipated to be filed at the conclusion of the pre-filing process in the latter half of 2015.

The NED Project, employing either the 36-inch design capacity or the 30-inch design capacity, will serve the emergent need for significant natural gas transportation capacity into New England to begin delivering sufficient additional supplies that should, based upon basic market forces of supply and demand, put favorable downward pressure on commodity prices,

⁵ The INGAA Foundation, North American Midstream Infrastructure through 2035: Capitalizing on Our Energy Abundance at 12 (Mar. 18, 2014), available at <http://www.ingaa.org/File.aspx?id=21498>.

now among the highest in the United States, while also assuring greater reliability in the electric markets with sufficient supplies of favorably priced fuel for electric generation.

In accordance with Section 157.21(d) of the Commission's regulations, Tennessee submits the following information to support its Request:

1. A description of the proposed schedule for the Project, including the expected application filing date and the desired date for Commission approval.

Tennessee requests approval to commence the pre-filing process by September 30, 2014. During the pre-filing process, Tennessee will continue to conduct field surveys for cultural resources, wetlands, and endangered species to identify and address significant issues. Tennessee will also continue its meetings with federal, state, and local regulatory agencies and governmental officials, including extensive, ongoing discussions with the Commonwealth of Massachusetts regarding Article 97 properties. Tennessee will develop a complete Environmental Report ("ER") for the Project and anticipates submitting two drafts of the ER to the Commission for review and comments prior to submitting the final ER with the certificate application for the Project. Throughout the pre-filing process, Tennessee will also continue its outreach to landowners and other stakeholders not only to obtain survey permission, but also to obtain consultation, both formal and informal, as the resource reports, certificate application, and necessary permit applications are being prepared.

Pursuant to Section 157.21(f)(4) and (5) of the Commission's regulations, 18 C.F.R. § 157.21 (f)(4) and (5) (2014), Tennessee recognizes that it must file drafts of Resource Report 1, General Project Description ("RR1") and Resource Report 10, Alternatives ("RR10") for the Project, as well as the stakeholder mailing list, within thirty (30) days of the issuance of the Commission's notice commencing the pre-filing process pursuant to this Request. Tennessee respectfully requests that the Commission's notice commencing the pre-filing process specifically permits Tennessee to submit its draft RR1 and RR10 and the stakeholder mailing list by October 31, 2014, the date by which Tennessee will have such information prepared for submittal to the Commission. Tennessee plans to host approximately 12 open houses during the months of November and December 2014 between Wright, New York and Dracut, Massachusetts, and approximately 5 open houses during the months of January and February 2015 between Troy, Pennsylvania and Wright, New York. Further details regarding the open houses are set forth in the Public Participation Plan, attached as Appendix F to this Request. These open houses and ongoing consultations with federal and state agencies and government officials will provide valuable input as Tennessee prepares the draft ER for the Project. Tennessee proposes that it will prepare and file a first draft of the ER by March 6, 2015, and a second draft of the ER by June 5, 2015.

Tennessee anticipates filing its Natural Gas Act ("NGA") Section 7(c) certificate application for the Project in September 2015. The application will request that the Commission issue a certificate authorizing the Project by October 31, 2016. Approval by

this date will provide Tennessee a reasonable opportunity to meet its anticipated in-service date of November 1, 2018 for the core Project facilities (all Project facilities with the exception of two proposed pipeline looping segments in Connecticut), consistent with the terms and conditions of the precedent agreements executed with Tennessee’s customers. It is anticipated that two proposed pipeline looping segments in Connecticut will be placed in-service by November 1, 2019.

The proposed Project timeline is as follows:

June 2014	Began civil surveys
July 2014	Began environmental surveys
September 15, 2014	Submit pre-filing request letter
September 30, 2014 (anticipated)	Staff issues pre-filing notice
October 31, 2014	File draft Resource Report 1 and draft Resource Report 10 and updated stakeholder mailing list
November and December 2014	Conduct open houses (Wright, New York to Dracut, Massachusetts)
January and February 2015	Conduct open houses (Troy, Pennsylvania to Wright, New York)
March 2015	File first draft of ER
June 2015	File second draft of ER
September 2015	File Section 7(c) Certificate Application (including final ER)
October 2016	Requested issuance of Certificate Order
January 2017	Anticipated start of tree felling for 2017 construction
April 2017	Anticipated start of 2017 construction
October 2018	Anticipated start of tree felling for 2018 construction
April 2018	Anticipated start of 2018 construction
November 2018	Anticipated In-Service Date for NED Project
November 2018	Anticipated start of tree felling for 2019 construction (two pipeline looping segments in Connecticut)
April 2019	Anticipated start of 2019 construction (two pipeline looping segments in Connecticut)
November 2019	Anticipated In-Service Date (two pipeline looping segments in Connecticut)

2. For LNG terminal facilities, a description of the zoning and availability of the proposed site and marine facility location.

There are no LNG terminal facilities related to or proposed as part of the Project.

3. For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, an explanation of why the prospective applicant is requesting to use the pre-filing process under this section.

Tennessee requests that the Commission grant Tennessee's request to use the pre-filing process for its Project for two primary reasons. First, implementing the pre-filing process will provide early receipt of stakeholder and participating agency input, thus establishing and maintaining constructive stakeholder relations. Second, early identification and consideration of issues will result in the most expedient processing of Tennessee's certificate application for the Project and the development of a supporting record of decision. Early review of environmental documentation by Commission staff and its consultants as well as its participation in Tennessee's public outreach effort will facilitate the development of a complete record, including a well-documented environmental document as required by NEPA and the Commission's regulations in support of a finding by the Commission that the Project is required by the present or future public convenience and necessity and the issuance of a certificate at the earliest practicable time.

4. A detailed description of the project, including location maps and plot plans to scale showing all major plant components, that will serve as the initial discussion point for stakeholder review.

The proposed NED Project currently includes the following components:

- The installation of new (greenfield) pipeline from Troy, Pennsylvania to Wright, New York, totaling approximately 135 miles of 30-inch pipeline.
- The installation of new (greenfield) pipeline from Wright, New York to Dracut, Massachusetts, totally approximately 177.16 miles of 36-inch pipeline.
- The installation of two (2) pipeline looping segments in Pennsylvania along Tennessee's existing 300 Line, totaling approximately 32 miles of 36-inch pipeline (one pipeline looping segment is approximately 22.92 miles in length beginning at existing Station 317, and the other pipeline looping segment is approximately 9.05 miles in length beginning at existing Station 319).
- The installation of the following pipeline laterals and loops:
 - Haverhill Lateral (approximately 6.99 miles of 16-inch pipeline in Massachusetts and New Hampshire).
 - Lynnfield Lateral (approximately 16.62 miles of 20-inch pipeline in Massachusetts).
 - West Nashua Lateral (approximately 11.95 miles of 12-inch pipeline in Massachusetts and New Hampshire).
 - Fitchburg Lateral Extension (approximately 4.97 miles of 12-inch pipeline in Massachusetts).

- North Worcester Lateral (approximately 14.13 miles of 12-inch pipeline in Massachusetts).
 - 300 Line CT Loop (approximately 14.57 miles of 24-inch pipeline looping in Connecticut).
 - Stamford Loop (approximately 1.51 miles of 12-inch pipeline looping in Connecticut).
 - Pittsfield Lateral (approximately 1.78 miles of 12-inch pipeline in Massachusetts).
- Modifications to the existing Station 319 in Pennsylvania, including restaging the existing compressor, adding an ESD silencer, and modifying the existing station piping to accommodate the new 36-inch loops.
 - Installation of the following new compressor stations in Pennsylvania, New York, and Massachusetts:
 - Supply Path Head Station -- This new compressor station, to be located in Susquehanna County, Pennsylvania, will include two (2) Mars 100 turbines, for a total of 32,000 horsepower.
 - Supply Path Mid Station -- This new compressor station, to be located in Delaware County, Pennsylvania, will include one (1) Titan 130 turbine, for a total of 20,500 horsepower.
 - Supply Path Tail Station -- This new compressor station, to be located in Schoharie County, New York, will include one (1) Titan 250 turbine, for a total of 30,000 horsepower.
 - Market Path Head Station -- This new compressor station, to be located in Schoharie County, New York, will include two (2) Taurus compressors, for a total of 20,000 horsepower
 - Market Path Mid Station 1 -- This new compressor station, to be located in Columbia County, New York, will include four (4) Titan 250 turbines, for a total of 120,000 horsepower.
 - Market Path Mid Station 2 -- This new compressor station, to be located in Franklin County, Massachusetts, will include four (4) Titan 250 turbines, for a total of 120,000 horsepower.
 - Market Path Mid Station 3 -- This new compressor station, to be located in Middlesex County, Massachusetts, will include four (4) Titan 250 turbines, for a total of 120,000 horsepower.
 - Market Path Tail Station -- This new compressor station, to be located in Middlesex County, Massachusetts, will include a 23,000 horsepower electrical unit.
 - Installation of the following fifteen (15) metering and regulation facilities, including tap, metering, heating, flow control, overpressure protection, and communications facilities, as necessary:

- Fitchburg Lateral Check -- Worcester County, Massachusetts
 - 200-1 Check -- Essex County, Massachusetts
 - Haverhill Check -- Essex County, Massachusetts
 - 200-2 Check -- Middlesex County, Massachusetts
 - North Adams Check -- Berkshire County, Massachusetts
 - 200 Line OPP and Check -- Schoharie County, New York
 - ITG-Constitution Custody -- Schoharie County, New York
 - Longmeadow -- Hampden County, Massachusetts
 - Gardner -- Worcester County, Massachusetts
 - Dalton -- Berkshire County, Massachusetts
 - West Nashua -- Hillsborough County, New Hampshire
 - Maritimes -- Middlesex County, Massachusetts
 - North Worcester -- Worcester County, Massachusetts
 - Everett -- Middlesex County, Massachusetts
 - West Greenfield -- Franklin County, Massachusetts
- Modifications to the following seven (7) existing metering and regulation facilities in Massachusetts, Connecticut, and Rhode Island:
 - Long Ridge -- Fairfield County, Connecticut (installation of new interconnecting station piping).
 - Stamford -- Fairfield County, Connecticut (installation of an additional hot tap assembly, as well as upgraded interconnecting station piping and metering).
 - Bridgeport -- Fairfield County, Connecticut (installation of new interconnecting station piping and cathodic protection).
 - New Britain -- Hartford County, Connecticut (installation of two (2) new tap assemblies and new interconnecting station piping).
 - Bloomfield -- Hartford County, Connecticut (installation of a new tap assembly that includes fitting, tap valve, riser, check valve, and appurtenances).
 - North Adams Custody -- Berkshire County, Massachusetts (installation of a new tie-in assembly that includes fitting, tap valve, riser, and check valve, and new interconnecting station piping and metering).
 - Lawrence -- Essex County, Massachusetts (installation of a new tie-in assembly that includes fitting, valve, and riser, modifications to the existing interconnecting station piping and metering, and the addition of cathodic protection).

(Tennessee notes that increased flow is anticipated at three existing metering and regulation facilities as a result of the proposed Project (Milford in New Haven County, Connecticut; Cranston in Providence County, Rhode Island; and Granite/Pleasant St. in Essex County, Massachusetts), but no modifications to existing facilities at these meter stations are necessary to accommodate the anticipated increased flow).

Location maps for the pipeline facilities (including new metering and regulations facilities) and a representative plot plan showing all major plant components for new compressor stations for the Project are included in Appendix A to this Request. Tennessee notes it is continuing to determine the specific locations for the new compressor stations and has identified in this Request the county/state for these proposed facilities. Tennessee will include the specific locations for the new compressor stations, including location-specific plot plans for each facility, no later than when it submits the first draft of the ER for the proposed Project in March 2015.

Tennessee is continuing to evaluate potential route alternatives for the proposed Project, including alternatives in the Commonwealth of Massachusetts regarding Article 97 properties and mitigation and co-location opportunities and will continue to meet with officials in the Commonwealth of Massachusetts in the coming months. Tennessee will continue its evaluation of potential route alternatives as part of the pre-filing process. In the event that Tennessee determines, based on its review and information received from stakeholders, that a potential route alternative should be incorporated as part of the proposed Project, Tennessee will notify the Commission and revise the proposed Project facility scope accordingly.

5. **A list of the relevant federal and state agencies in the project area with permitting requirements. For LNG terminal facilities, the list shall identify the agency designated by the governor of the state in which the project will be located to consult with the Commission regarding state and local safety considerations.**

Relevant federal and state agencies are aware of Tennessee's intention to use the Commission's pre-filing process as Tennessee has initiated consultation with the relevant federal and state agencies, which includes outlining the Commission's pre-filing process to such agencies, and requesting such agencies' participation in the Commission's pre-filing process. Appendix B to this Request provides a table that includes a list of relevant federal and state regulatory agencies within the Project area with permitting requirements, including contact names and telephone numbers for those agencies. The table also identifies those agencies that have responded to Tennessee's request to participate in the pre-filing process as of the date of this filing. Examples of the consultation letters are provided in Appendix C to this Request. Also included in Appendix B is a table listing the anticipated federal and state environmental permits, approvals, and consultations for the Project that have been identified as of the date of this Request. Tennessee anticipates that applications for all federal environmental permits, approvals, and consultations for the Project will be filed on or before the date that the certificate application is submitted for the Project. Tennessee will provide a schedule of the anticipated dates for submitting the applications for federal and state environmental permits, approvals, and consultations for the Project in the draft Resource Report 1 for the Project, to be submitted October 31, 2014.

Information regarding LNG terminal facilities is not applicable as the Project does not include any LNG terminal facilities.

6. A list and description of the interest of other persons and organizations who have been contacted about the project (including contact names and telephone numbers).

Appendix D to this Request includes a preliminary list of landowners affected by the Project along the proposed mainline pipeline, pipeline looping segments, and lateral routes. As noted above, Tennessee has not determined the specific locations for the new compressor stations, but has identified the county/state for these proposed facilities. Once those locations are identified and that information provided to the Commission, Tennessee will provide the Commission with updated landowner lists for the affected landowners at those locations and provide notification to those landowners. Due to privacy concerns, Tennessee is requesting privileged and confidential treatment of this information in accordance with Section 388.112 of the Commission's regulations, 18 C.F.R. § 388.112 (2014). An original copy of Appendix D is being filed in a separate section marked "Contains Privileged Information - Do Not Release." Appendix E to this Request includes a list of the representatives of affected federal, state, and local political jurisdictions. Additionally, a list of Native American tribes that Tennessee has contacted to obtain input on the Project is included as part of Appendix B to this Request.

7. A description of what work has already been done, e.g., contacting stakeholders, agency consultations, project engineering, route planning, environmental and engineering contractor engagement, environmental surveys/studies, and open houses. This description shall also include the identification of the environmental and engineering firms and sub-contractors under contract to develop the project.

Activities conducted to date include a comprehensive feasibility study addressing engineering requirements to meet market demand, a critical issues analysis for Project development, agency discussions, initial stakeholder outreach, desk-top environmental analysis of the proposed route and primary alternatives, as well as right-of-way, engineering, and preliminary alternative route assessments that have included aerial and field-based reconnaissance.

Initial routing for the NED Project began in the second quarter of 2013. Refinement of the initial routing commenced in the third quarter of 2013 and will be a continuing effort throughout this pre-filing process. As of the date of this Request, field engineers, land agents, and operations personnel have been mobilized to examine pipeline road crossings and access points and to identify possible locations for construction workspace, as well as pipeyards/contractor yards. Review and confirmation of possible horizontal directional drill crossing locations is underway, and a geotechnical investigation plan for the Project is under development.

Environmental, safety, and public awareness training of field crews was conducted in June and July 2014. Civil and environmental surveys (including wetlands and cultural resources) and property survey efforts began the first week of July 2014 and are currently ongoing. These survey efforts are expected to continue through December 2014

(weather permitting), and then resume in spring 2015 when weather conditions permit.

Engineering progress as of the date of this Request has been crucial in advancing the development of the proposed Project and is continuing. Aerial photography covering 95 percent of the proposed route has been developed for the Project as a result of specific fly-overs completed in July 2014. The next phase of detailed design will begin as detailed survey information is obtained as a result of the field surveys and that information is used to develop the draft resource reports for the Project.

Line lists, tract maps, and related right-of-way activities are well underway. As of the date of this Request, Tennessee has:

- received survey permission from approximately 46 percent of the landowners along the proposed pipeline corridor;
- staked approximately 60 miles of the proposed pipeline corridor for civil and environmental surveys; and
- completed approximately 18 miles of the wetland surveys and approximately 3 miles of the cultural surveys, all in New York.

Consultants contracted to work on the Project include:

- Hatch Mott MacDonald (“HMM”) is the primary contractor that has been engaged by Tennessee for engineering services, environmental services, civil surveys, and route planning for the Project.
- HMM has subcontracted with AECOM to assist Tennessee in managing the environmental aspects of the Project, including but not limited to preparation of the drafts of the Environmental Report that will be submitted to the Commission during the pre-filing process, the final Environmental Report that will be submitted to the Commission as part of the application for a certificate of public convenience and necessity for the Project, all federal and state permit applications, and wetland and threatened and endangered species consultation.
- AECOM has subcontracted with (a) The Louis Berger Group, Inc. to manage the cultural resource portion of the Project; and (b) the firms Epsilon Associates, Inc., Normandeau Environmental Consultants, and Oxbow Associates, Inc. to conduct specialty surveys and wetlands and threatened and endangered species-specific surveys, as well as to assist in the preparation of the applicable federal and state permit applications for the Project.
- The NLS Group and Atwell Field Services are providing right-of-way services for the proposed Project, including coordination of efforts to determine land ownership, obtain survey permissions, and eventual acquisition of rights-of-way/easements for the Project.

Consistent open and forthright communications with stakeholders throughout the NED Project area is a priority for Tennessee. Beginning in early 2014, Tennessee has held numerous meetings and distributed information through the Project area to keep stakeholders updated and receive feedback on the proposed Project. Tennessee plans to continue this extensive outreach throughout the pre-filing and certificate processes in order to keep stakeholders and members of the public informed about the proposed Project.

As part of the Project's proactive stakeholder outreach and public participation plan, Tennessee has spent the past seven months engaging individuals and organizations in Pennsylvania, New York, Massachusetts, Connecticut, and New Hampshire. Tennessee representatives have had multiple contacts with all 93 impacted municipalities. As part of that contact, Tennessee representatives have given 34 public presentations about the proposed Project that were attended by over 3,500 members of the public and where over 1,100 questions about the proposed Project were answered. Tennessee representatives have briefed the offices of the Governors, ten U.S. Senators, 16 U.S. members of the Congress, and over 150 state legislators and members of their staff in the five states affected by the proposed Project. In addition, Tennessee has made it a priority to engage with non-governmental organizations, holding meetings about the proposed Project with over 45 business, environmental, and civic and labor organizations.

Tennessee has distributed information about the Project to stakeholders, including more than 900 informational letters that were sent to government officials who represent affected areas. Tennessee has also prepared and distributed hundreds of Project fact card brochures, fact sheets, and frequently asked question documents, and has provided detailed preliminary route maps to various stakeholders. A Project website has been developed (http://www.kindermorgan.com/business/gas_pipelines/east/neenergydirect/) and is frequently updated. Tennessee has created a Project email address (nedinfo@kindermorgan.com) that members of the public and elected officials have used to provide feedback and ask questions regarding the proposed Project. Also, Tennessee has done extensive media outreach regarding the proposed Project, including interviews with local press outlets.

Other initial outreach activities include:

- In August 2014, Tennessee sent letters to federal and state agencies requesting their participation in the Commission's pre-filing process.
- In September 2014, Tennessee is sending letters to federal and state agencies (Pennsylvania, New York, and Connecticut) requesting consultation regarding environmental resources.
- Initial meetings with applicable U.S. Army Corps of Engineers districts (Baltimore District, Pennsylvania Section; New York District; Buffalo District; and New England District), as well as discussions with the North Atlantic Division Headquarters, have been conducted.

- Initial meetings with Massachusetts and New York state environmental permitting agencies have been conducted.
- Tennessee has had initial and follow-up meetings with officials of the Commonwealth of Massachusetts Department of Energy and Environment and Department of Transportation regarding the Project impacts in Massachusetts, including but not limited to impacts to Article 97 properties and mitigation for routing Project facilities through or around such properties, and will continue these discussions throughout the pre-filing process. This includes a follow-up meeting with the Massachusetts Department of Energy and Environment in mid-October 2014.
- An initial cultural resource meeting and records review with the New York State Office of Parks, Recreation and Historic Preservation has been conducted. Cultural resource surveys (following environmental, safety, and public awareness training of field crews) began in high probability areas in New York the week of August 18, 2014.
- An initial cultural resource meeting and records review was held with the Pennsylvania Historical and Museum Commission.

8. For LNG terminal projects, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document.

Not applicable. There are no LNG terminal facilities related to or proposed as part of the Project.

9. For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, proposals for at least three prospective third party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document, or a proposal for the submission of an applicant-prepared draft Environmental Assessment as determined during the initial consultation described in paragraph (c) of Section 157.21.

Tennessee has forwarded directly to Commission staff a copy of one bid from a qualifying third party environmental contractor and anticipates providing directly to Commission Staff copies of other bids from qualifying third party environmental contractors as those bids are received.

10. Acknowledgement that a complete Environmental Report and complete application are required at the time of filing.

Tennessee acknowledges that a complete Environmental Report and a complete certificate application are required at the time of filing and will be submitted as required under Section 7(c) of the NGA. The certificate application submitted by Tennessee will meet all filing requirements of the Commission's regulations, including but not limited to those regulations implementing NEPA, 18 C.F.R. Part 380 (2014).

Tennessee anticipates submitting the certificate application, including the complete Environmental Report, to the Commission in September 2015.

11. **A description of a Public Participation Plan which identifies specific tools and actions to facilitate stakeholder communications and public information, including a project website and a single point of contact. This plan shall also describe how the applicant intends to respond to requests for information from federal and state permitting agencies, including, if applicable, the governor's designated agency for consultation regarding state and local safety considerations with respect to LNG facilities.**

The Public Participation Plan is enclosed as Appendix F to this Request.

12. **Certification that a Letter of Intent and a Preliminary WSA have been submitted to the U.S. Coast Guard or, for modifications to an existing or approved LNG terminal, that the U.S. Coast Guard did not require such information.**

Not applicable. There are no LNG terminal facilities related to or proposed as part of the Project.

Accordingly, Tennessee respectfully requests the assistance of the Commission Staff in implementing the Commission pre-filing review process for the NED Project. Any questions concerning the enclosed filing should be addressed to Ms. Jacquelyne Rocan at (713) 420-4544 or to Mr. Richard Siegel at (713) 420-5535

Respectfully submitted,

TENNESSEE GAS PIPELINE COMPANY, L.L.C.

By: /s/ J. Curtis Moffatt
J. Curtis Moffatt
Deputy General Counsel and Vice President
Gas Group Legal

Enclosures

cc: Mr. Rich McGuire
Mr. Michael McGehee
Mr. Eric Tomasi