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March 11, 2015

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. PF14-22-000

Dear Secretary Bose:

We respectfully request that you include the following criteria as you review the pipeline application:

1. FERC is required to avoid segmentation in reviewing projects Thus, we ask that you evaluate the cumulative impacts of the **five major pipeline projects planned for New England that would carry a total of *4.5 billion cubic feet of gas per day — more than four times the amount any independent study has suggested the region needs*** to meet future demand. Considering the effects of each of the pipelines individually amounts to segmentation.
2. Included in FERC's determination of public necessity is export. The public harmed by the pipeline is not the same public that will obtain the exports. Why are customers outside of the United States given more consideration and higher priority than the American people who would experience direct impact by the pipeline? Please do not count export as public necessity.
3. In the FERC process corporate applicants must propose several alternate routes to prove that their preferred route is best. Corporations regularly propose terrible alternate routes to guarantee that the route they prefer is approved. If Kinder Morgan's proposed routes are all problematic, rather than allowing the least troubling route, please send Kinder Morgan back to the drawing board.
4. In your economic analysis, please do not dismiss, out of hand, the option of not building the pipeline FERC's assumption that there is no economic benefit to *not* building this pipeline may be misguided. FERC is not counting the ecosystem capital provided by acres of undisturbed land. Ecosystem capital — the goods and services provided by natural ecosystems — is often overlooked when making decisions because it is free and we take it for granted. If the pipeline were to be built, those ecosystem benefits would be lost and possibly impossible to replace, even with huge monetary expenditures. Also, there is a substantial economic benefit in having a broad portfolio of energy sources. If we become more dependent upon "natural" gas, then we will be that much more vulnerable to its price spikes

The building of a high-pressure gas pipeline results in economic losses for nearby homeowners and their communities as their home values are reduced. Building the pipeline would provide a few temporary construction jobs and a handful of permanent full-time jobs, whereas developing energy conservation programs and distributed renewable-energy projects and infrastructure creates numerous permanent jobs for local workers. Building this pipeline would increase our reliance on natural gas as the gas industry encourages more homeowners to convert to gas, and would make it that much more difficult for energy conservation programs and renewable energy projects to compete. That would result in slower growth of energy sector jobs.

FERC ignores the economic costs of health problems caused by methane and other toxin releases. It does not even mention, let alone consider, the costs a community must bear for emergency preparedness, disaster response to an "incident", and rebuilding post-disaster, nor the costs associated with emergency care for people affected in a disaster and loss of life and limb.

Please consider, quantify and validate those economic benefits inherent in *not* building the pipeline.

5. In its "environmental analysis," FERC does not give thought to the substances intended to be carried in the pipelines. It merely considers the environmental impact of clearing the land, digging a hole, and burying an empty pipe in the ground. Methane, an explosive and potent greenhouse gas, and toxic chemicals will be flowing through and leaking from the pipelines and compressor stations . Maybe a short sentence about blow downs? Let's be straightforward here, leakage is certain. How can such an "environmental analysis" have any validity or meaning? In December you received a guidance document requiring you to consider the effects of climate change during the NEPA process. Now is the time to do so. Please consider the effects of the methane leaks and combustion from this proposed pipeline as you determine its potential environmental impact.
6. When FERC "compares and contrasts the environmental impacts" of the several routes proposed by the applicant, FERC merely tallies numbers: How many wetlands, waterways, and endangered species habitats are crossed by each route, etc. FERC must consider the *quality* of each habitat. .In the Constitution Pipeline "analysis," the alternate route next to a highway crossed over a greater number of wetlands than the greenfield route, so FERC deemed that the route along the highway would be more damaging to the environment than the greenfield route. FERC failed to assess the *quality* of the wetlands. A wetland bisected by a highway is already degraded, as opposed to a healthy wetland in an undisturbed natural area. In this case, the greenfield pipeline route is likely more environmentally damaging than the route adjacent to the highway.

   In the environmental analysis, please consider the nature of the material transported through the pipeline, its effects on climate change, water quality, health and safety, and habitat integrity.
7. The FERC process requires the industry applicant to provide alternate ways of supplying energy to the region than via the fossil fuel-carrying pipelines it permits. But FERC's analysis of alternate energy projects needs to be updated. It completely ignores solar installations on private property, claiming that it has no authority over those installations. FERC does not consider **combinations** of renewable energy sources such as wind, solar, geothermal, air exchange, and, most important of all, energy conservation and efficiency; it merely claims to "consider" —and immediately discount—each option separately because that option *alone* can't solve the entire energy need. However, such enterprises are all real, critical components of the regional, national, and global energy supply solution, and FERC should validate those in its analysis.

FERC is the deciding body, the commission with the power to say "yes" or "no" to business as usual. FERC holds in its hands the ability to steer our country and the world on a sustainable course. We need you to

decide what action truly protects the survival of current and future generations, the foundation of all levels of government, by providing for public convenience and necessity.

Sincerely,

Emily Norton, Co-Chairman

Veronica Kell, Clerk

John Hussey

James Deroian, Co-Chairman

Jennifer Pettit

Cc: Senator Edward Markey
Senator Elizabeth Warren
Representative Niki Tsongas
Governor Charles Baker
Representative Sheila Harrington
Matthew Beaton, Secretary of Energy and Environmental Affairs
Townsend Board of Selectmen