



**THE COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

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February 12, 2016

David Rosenzweig, Esq.
Keegan Werlin LLP
265 Franklin Street
Boston, MA 02110-3113

RE: Colonial Gas Company d/b/a National Grid, EFSB 05-2

Dear Mr. Rosenzweig:

By final decision dated May 17, 2006, the Energy Facilities Siting Board (“Siting Board” or “Board”) approved the request of Colonial Gas Company d/b/a KeySpan Energy Delivery New England, now doing business as National Grid (“Company” or “Colonial Gas”), to construct three new non-contiguous segments of natural gas distribution pipeline in the Towns of Sandwich, Barnstable, Dennis, and Harwich, Massachusetts. Colonial Gas Company, 15 DOMSB 269 (2006) (“Final Decision”). The three segments identified by the Company were the Western Segment (to be located in the Towns of Sandwich and Barnstable); the Middle Segment (to be located in the Towns of Yarmouth, Dennis, and Harwich); and the Eastern Segment (to be located in the Town of Harwich). The Final Decision requires the Company to notify the Board of “any changes other than minor variations to the proposal so that the Siting Board may decide whether to inquire further into a particular issue.” Final Decision at 121.

By letter dated December 15, 2015 (“December 15 Letter”), with accompanying attachments A and B, Keegan Werlin LLP, acting on behalf of the Company, has informed the Board staff of some modifications to plans for the construction of the Eastern Segment. The first change is to the testing of the Eastern Segment pipeline. In the Final Decision, the Board approved the Company’s initial plan to pneumatically test said pipeline for a maximum allowable operating pressure (“MAOP”) of 200 psig. Final Decision at 3, 59. Now, the Company proposes to hydrostatically test the new pipeline along the Eastern Segment before it goes into service to qualify the pipe to operate in the future at an MAOP of 270 psig. However, the Company also states that it will remain consistent with the originally approved plan to operate the line only at 200 psig. December 15 Letter, at 2, 4. The Company asserts that testing the pipeline for a higher MAOP before it becomes operational is more convenient than testing the pipeline at a later time, when it would need to be taken out of service for the duration of the test. Id. at 4.

The Company asserts that the environmental impacts associated with the change from pneumatic testing to hydrostatic testing would be minimal. Id. at 5. Once the pipe has been tested, the water would be released into holding tanks. Id. The filled water tanks would then be transported off-site by Clean Harbors to an approved wastewater treatment facility. Id.

The second change relates to the tie-in location of the western terminus of the Eastern Segment. Id. at 3. As originally permitted, the western terminus of the Eastern Segment would tie into the existing 8-inch, 200-psig distribution main located at the intersection of Route 39 and Depot Road in Sandwich. Id. at 3; Final Decision at 45-46, 54. Due to recent events, however, the Company now plans to replace 18.1 miles of 200-psig main located in Yarmouth, Dennis, Harwich, and Brewster (the "Replacement Project"). The Replacement Project would eliminate the need to construct a short section along Route 39 between Depot Road and the Route 39/Queen Anne Road rotary. December 15 Letter, at 3. Consequently, the Company would now like for the western terminus of the Eastern Segment to tie into the existing 6-inch main at the northeast portion of the Route 39/Queen Anne rotary in Harwich. Id. The revised tie-in of the western terminus would shorten the Eastern Segment by approximately 800 feet, and would not affect any new abutters. Id. The Company will seek approval of this connection to the Eastern Segment as part of the Replacement Project Petition. Id.

After reviewing your December 15, 2015 letter and attachments, the Siting Board staff has concluded that no further inquiry is necessary. We note that the Company has not proposed any change in the plan to operate the Eastern Segment at 200 psig referenced in the Final Decision, although it would now be hydrostatically tested for a MAOP of 270 psig. We remind the Company that neither the Final Decision nor this Project Change Letter authorizes the Company to operate the Eastern Segment above 200 psig. Should the Company seek to increase the actual operating pressure above 200 psig at some future time, such a change would require the Company to notify the Siting Board of "any changes other than minor variations to the proposal so that the Siting Board may decide whether to inquire further into a particular issue." Final Decision at 121. See also Colonial Gas Company, EFSB 05-2A (August 14, 2014) ("Western Segment Project Change Decision").¹

Sincerely,



Robert J. Shea
Presiding Officer

¹ In the Western Segment Project Change Decision, the Siting Board authorized the Company to switch from pneumatic to hydrostatic testing of the Western Segment pipeline. Similarly, the Company did not intend to operate the Western Segment above the 270 psig authorized in the Final Decision, but the hydrostatic testing allowed the Company to test the pipeline to an MAOP of 575 psig. The Board directed the Company to submit a compliance filing if the Company wanted to operate the Western Segment above 270 psig. Western Segment Project Change Decision, at 38-39.

cc: Andrew Greene
James A. Buckley, Esq.
John Young