

Executive Summary

Tennessee Gas Pipeline Company, L.L.C. (“Tennessee” or “TGP”) plans to construct, install, and operate the Northeast Energy Direct Project (“NED Project” or “Project”). Tennessee proposes to expand and modify its existing pipeline system in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut. The NED Project is being developed to meet the increased demand in the Northeast United States (“U.S.”) for transportation capacity of natural gas. The Project includes the following facilities:

- Approximately 41 miles of pipeline looping on Tennessee’s 300 Line in Pennsylvania;
- Approximately 133 miles of new pipeline, of which 102 miles are proposed to be generally co-located with the certificated Constitution Pipeline Project (“Constitution”)¹ in Pennsylvania and New York (extending from Tennessee’s existing 300 Line near Auburn, Pennsylvania to Wright, New York);
- Approximately 54 miles of pipeline generally co-located with Tennessee’s existing 200 Line and an existing utility corridor in New York;
- Approximately 64 miles of pipeline generally co-located with an existing utility corridor in Massachusetts;
- Approximately 70 miles of pipeline generally co-located with an existing utility corridor in New Hampshire (extending southeast to Dracut, Massachusetts);
- Approximately 58 miles of various laterals and a pipeline loop in Massachusetts, New Hampshire, and Connecticut to serve local markets;
- Construction of nine new compressor stations and 15 new meter stations, and modifications to an existing compressor station and 14 existing meter stations throughout the Project area; and
- Construction of appurtenant facilities, including mainline valves (“MLVs”), cathodic protection, and pig facilities through the Project area.

The Project is under the jurisdiction of the Federal Energy Regulatory Commission (“Commission”) and Tennessee filed its application seeking the issuance of a certificate of public convenience and necessity from the Federal Energy Regulatory Commission (“Commission”) for the construction and operation of the proposed Project on November 20, 2015. Tennessee anticipates commencing construction activities in January 2017 and placing the facilities in-service by November 2018 (with the exception of one proposed pipeline looping segment in Connecticut, which will be placed in-service by November 2019).

The Project has taken measures to minimize or avoid adverse effects to water resources and has sited the Project adjacent to existing right-of-ways (“ROW”) to the extent practicable. In addition, appurtenant facilities and access roads have been sited in a manner to limit impacts to wetlands and watercourses.

¹ On December 2, 2014, the Commission issued an Order Issuing Certificates and Approving Abandonment, Constitution Pipeline Company, LLC, 149 FERC 61,199 (2014), for the Constitution Pipeline Project, which adopted the recommendations from the Constitution “Final Environmental Impact Statement: Constitution Pipeline and Wright Interconnect Projects,” FERC Environmental Impact Statement (“EIS”) No. 0249F, Docket Numbers CP13-499-000, CP13-502-000, and PF12-9-000 (“Constitution Final EIS [“FEIS”]”) issued October 24, 2014. Information contained within this Application related to the Constitution Pipeline Project was based on the routing included in the FEIS, as approved by the certificate order.

The maps provided in each Section show the Project’s activities within the Waters of The United States (“U.S.”) for those resources that have been field verified. Tennessee is continuing to survey areas as landowner permission is granted. As of September 2, 2015, approximately 185 miles (44%) of the Project has been surveyed. Tennessee has utilized a combination of biological field survey and interpolated data in order to assess potential impacts to wetlands and waterbodies located within the Project’s proposed workspaces. Completion of field surveys will be dependent upon weather and the acquisition of survey permission on all affected parcels. Supplemental data will be provided to the USACE as field surveys are completed.

The approximate land requirements for the pipeline facilities are summarized in Table 1. The varying construction ROW widths are assigned to accommodate the outer diameter of the pipeline proposed for each pipeline segment. These widths will be maintained through uplands and a reduced construction ROW width of 75 feet is proposed for areas crossing wetlands and waterbodies and has been incorporated into the pipeline workspace (with the exception of certain site-specific areas). Varying amount of additional temporary workspace (“ATWS”) will also be required at certain locations for safe construction of the pipelines and will be located at least 50 feet from wetlands and waterbodies (with the exception of site-specific areas).

**Table 1
Proposed Construction ROW Widths for Pipeline Facilities**

Facility Name	Diameter (inches)	Construction ROW Width (feet) ¹	Operational ROW Width (feet) ^{2,3}
Pennsylvania			
Loop 317-3	36	100	50
Loop 319-3	36	100	50
Pennsylvania to Wright Pipeline Segment	30	100	50
New York			
Pennsylvania to Wright Pipeline Segment	30	100	50
Wright to Dracut Pipeline Segment	30	100	50
Massachusetts			
Wright to Dracut Pipeline Segment ⁴	30	100-120	50
Maritimes Delivery Line ⁴	30	120	50
Lynnfield Lateral	24	90	50
Peabody Lateral	24	90	50
Haverhill Lateral ⁵	20	75	50
Fitchburg Lateral Extension	12	75	50
New Hampshire			
Wright to Dracut Pipeline Segment	30	100-120	50
Haverhill Lateral ⁵	20	75	50
Fitchburg Lateral Extension	12	75	50
Connecticut			
300 Line CT Loop	24	90	50

Table 1
Proposed Construction ROW Widths for Pipeline Facilities

Facility Name	Diameter (inches)	Construction ROW Width (feet) ¹	Operational ROW Width (feet) ^{2,3}
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¹ Construction workspace acreage impacts were calculated along the pipeline facilities according to the following construction ROW widths (which encompasses TWS and the operational ROW widths described in footnote 2). Construction workspace through wetlands and waterbodies will be reduced to 75 feet (with the exception of site-specific areas) as required and where practicable, as shown on the project mapping.

Pipe Diameter Construction ROW Width (ft)

- 8" - 16" = 75
- 18" - 24" = 90*
- 26" - 36" = 100-120

*exception is the Haverhill Lateral which will be constructed within a 75 ft ROW.

² Operational workspace acreage impacts were calculated along the pipeline facilities according to the following permanent ROW widths:

Pipe Diameter Operational ROW Width (ft)

- 8" - 16" = 50
- 18" - 24" = 50
- 26" - 36" = 50

³ This includes 25 ft of existing Tennessee ROW in areas where the proposed pipeline is looped with an existing TGP pipeline.

⁴ The construction ROW width is 120 ft where the Maritimes Delivery Line and a portion of the Wright to Dracut Pipeline Segment parallel each other in Massachusetts.

⁵ Due to encroachments and development near the Haverhill Lateral, construction will be conducted within a 75 ft construction ROW instead of the 90 ft proposed construction ROW width for pipelines with diameters of 18"-24".

Tennessee will maintain a permanent easement centered over the pipeline after construction is complete. Tennessee will permanently maintain a 10-foot wide corridor through scrub-shrub wetlands and a 30-foot wide corridor through forested wetlands. Within these areas, forested and scrub-shrub wetland vegetation will require removal to safely operate the new pipeline. As a result, forested wetlands along the proposed new permanent ROW will be converted to scrub-shrub or emergent marsh wetland types. This will not create a loss of overall wetland habitat, but rather a long-term change in habitat type, from forested to shrub-scrub or emergent marsh and from scrub-shrub to emergent marsh. In certain areas, permanent fill of wetlands may be necessary in order to accommodate the construction of permanent facilities or access roads. In environmentally sensitive areas such as wetlands, clearing will be accomplished using either low impact clearing or mechanical clearing techniques. Such techniques typically consist of cutting wetland vegetation by hand (chain or hand saw) and removing the felled trees with low ground pressure or track vehicles to minimize compaction and disturbance. In cases where low impact or low-pressure equipment cannot be used, temporary corduroy or mat roads would be installed to facilitate clearing and removed after the work is completed.

Tennessee has been coordinating with the appropriate historical preservation offices in each state and has sent correspondence to federal recognized Tribes, non-federal recognized Tribal Organizations and State Agency Tribal Representatives for review of the Project for compliance with Section 106 of the National Historic Preservation Act ("NHPA"). Interim Progress Reports detailing the results of surveys conducted through September 2, 2015 were filed with the Commission and were submitted as "Privileged and Confidential-Do Not Release" on November 20, 2015 (Volume III, Appendix CC Docket No. PF15-22-000). Copies of the reports were sent to the agencies detailed in Table 2 and to tribal representatives. Cultural and tribal agency correspondence were also filed with the Commission as "Privileged and

Confidential-Do Not Release” on November 20, 2015 (Volume III, Appendix DD and EE. Docket No. PF15-22-000).

Tennessee’s representatives submitted written consultations to the United States Fish and Wildlife (“USFWS”) and National Marine Fisheries Service (“NMFS”) in order to document federal listed species in the Project Area. At the state level, each appropriate agency was consulted on state-listed endangered, threatened, or species of special concern, rare plant and animal species. Based upon the information subsequently received from these agencies, Tennessee has identified areas of the Project alignment where the potential exists for occurrence of federal and/or state-listed threatened and endangered species. Tennessee is working cooperatively with the stakeholder agencies in developing approved field survey protocols to identify and document occurrences of rare plant and animal species in the Project area. Qualified biologists initiated field surveys in the spring of 2014. Additional surveys occurred throughout 2015 and are anticipated to continue in spring 2016. A status of federal species-specific surveys and reporting is provided for the Project in Section 4, Appendix 6.

Rare species agency correspondence and reports detailing the results of surveys conducted through September 2, 2015 were filed with the Commission and were submitted as “Privileged and Confidential-Do Not Release” on November 20, 2015 (Volume III, Appendix BB and FF. Docket No. PF15-22-000). Copies of these reports were sent to the agencies detailed in Table 2.

Table 2
Cultural Resources and Rare Species Agency Consultations

Permit/Approval	Administering Agency	Status
Federal		
Endangered Species Act Section 7 Clearance, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act	United States Fish and Wildlife- Pennsylvania Field Office	Consultations in Progress
	United States Fish and Wildlife- New York Field Office	
	United States Fish and Wildlife- New England Field Office	
National Oceanic and Atmospheric Administration	Northeast Region	Consultation in Progress
Pennsylvania		
State Species Consultations	Pennsylvania Department of Conservation and Natural Resources	Consultation in Progress
	Pennsylvania Fish and Boat Commission	Consultation in Progress
	Pennsylvania Game Commission	Consultation in Progress
Section 106, National Historic Preservation Act Consultation	Pennsylvania Historical and Museum Commission	Consultation in Progress

Table 2
Cultural Resources and Rare Species Agency Consultations

Permit/Approval	Administering Agency	Status
New York		
State Species Consultation	New York Department of Environmental Conservation- Division of Fish, Wildlife and Marine Resources	Consultation in Progress
Section 106, National Historic Preservation Act Consultation	New York State Office of Parks, Recreation and Historic Preservation	Consultation in Progress
Massachusetts		
State Species Consultation, Massachusetts Endangered Species Act	Massachusetts Division and Wildlife and Fisheries; Massachusetts Natural Heritage and Endangered Species Program	Consultation in Progress
Section 106, National Historic Preservation Act Consultation	Massachusetts Historical Commission	Consultation in Progress
New Hampshire		
State Species Consultations	New Hampshire Department of Environmental Services- Natural Heritage Bureau	Consultation in Progress
	New Hampshire Fish and Game Department	
Section 106, National Historic Preservation Act Consultation	New Hampshire Division of Historical Resources	Consultation in Progress
Connecticut		
State Species Consultation	Connecticut Natural Diversity Database	Consultation in Progress
Section 106, National Historic Preservation Act Consultation	Connecticut State Historic Preservation Office	Consultation in Progress

Inland wetlands and watercourses located within the ROW were field identified and delineated in June-November 2014 and in March-September 2015 in accordance with the US Army Corps of Engineers' ("USACE") *Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region* (Environmental Laboratory October 2009) where survey permission was obtained. Included within this application are state-specific Inventory and Delineation of Wetland and Watercourse Reports that document the federal wetlands and waterbodies within the surveyed portions of the Project ROW, including data sheets and photographs. Tennessee also conducted vernal pool surveys along the pipeline ROWs in the spring of 2015 in Massachusetts, New Hampshire and Connecticut.

In summary, the Project will implement measures to minimize and avoid adverse impacts to wetlands and waterbodies. Tennessee's minimization measures are detailed in the Project-specific Environmental Construction Plans ("ECPs") for each state. Tennessee is continuing to assess potential impacts to wetlands and watercourses as field survey of the Project areas is ongoing based on access permissions. Mitigation for these wetland impacts is being developed and proposed consistent with current federal requirements, and a Conceptual Compensatory Mitigation Plan is provided in Section 4, Appendix 4.

Project Purpose and Need

Tennessee proposes to construct, install, and operate the Project facilities to meet the growing demand for natural gas transportation capacity in the Northeast U.S. and, particularly New York and New England. The Project has been designed to provide a long-term solution to the problems associated with New York and New England's high natural gas and electric prices. Current and future projected demand demonstrates that there is a genuine market need for the pipeline capacity to be created by the NED Project. Existing natural gas pipeline constraints have resulted in New England consumers paying the highest heating and electricity costs in the continental U.S., stifling economic growth and straining household budgets. These high energy costs disproportionately affect low to middle income households, small businesses, and charitable organizations and community service providers that can least afford it. The NED Project will bring needed incremental natural gas supplies to New York and New England and will do so in a cost effective, safe, and environmentally sound manner.

The Project, as described further herein, is a major new pipeline project that consists of: (1) approximately 174 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, Iroquois Gas Transmission System, LP, and/or the Constitution Pipeline Project for deliveries to Tennessee's existing 200 Line system, Iroquois Gas Transmission System, and/or Market Path Component of the NED Project, as defined below, near Wright, New York (may be referred to as the "Supply Path Component" of the NED Project); and (2) approximately 188 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 ("PNGTS") ("Joint Facilities") at Dracut, Massachusetts and Tennessee's existing 200 Line near Dracut, Massachusetts (may be referred to as the "Market Path Component" of the NED Project). In addition, the Project includes: (1) the construction of nine new compressor stations, and modifications at an existing compressor station throughout the Project area; (2) construction of 15 new meter stations and modifications to 14 existing meter stations throughout the Project area; and (3) approximately 58 miles of market delivery laterals and pipeline looping segments located in Massachusetts, New Hampshire, and Connecticut.

The Project will provide up to 1.2 Bcf/day on the Supply Path Component and up to 1.3 Bcf/d on the Market Path Component of additional natural gas transportation capacity to meet the growing energy needs in the Northeast U.S., particularly in New York and New England. This includes needs of local distribution companies ("LDCs"), gas-fired power generators, electric distribution companies, industrial plants, natural gas producers, and other New England consumers. The NED Project has significant market support as evidenced by the executed precedent agreements to date with various shippers for transportation service on both the Market Path Component and Supply Path Component facilities (the "Project Shippers"). Tennessee has executed precedent agreements with four New England LDCs, two natural gas producers, a municipal light department, and a power generator for 751,650 dekatherms per day ("Dth/d") of long-term firm transportation capacity on the Supply Path Component, and has executed precedent agreements with seven New England LDCs, a municipal light department, an industrial end-

user, and a holding corporation for 552,262 Dth/d of long-term firm transportation capacity on the Market Path Component.² Tennessee is confident that the significant demand for natural gas and pipeline capacity in the northeast U.S., particularly the demand from the electric power generation market as a result of the initiatives underway with five of the six states in New England to facilitate the ability of electric distribution companies to contract for pipeline capacity and recover the costs in their rates, will result in additional contract commitments for the full Project capacity. Tennessee is in ongoing negotiations with other additional potential Project shippers and as additional precedent agreements are executed, Tennessee will supplement the record in this proceeding.

Multiple studies have concluded that there is a critical need in the northeast U.S. for additional pipeline capacity to lower energy costs, reduce volatility of natural gas and electric prices, and foster more reliable natural gas and electric service to New England consumers. 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 U.S.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 For example, National Grid received approval to increase its customers' electric rates by an average of 37 percent for winter 2014-2015 due to "continued constraints on the natural gas pipelines serving the region, which decrease natural gas availability at times of peak demand, causing some generators to buy gas on the spot market at higher prices, switch over to alternate fuels, or not run at all."⁵ National Grid has applied for approval to increase its customers' electric rates by approximately 21 percent for winter 2015-2016, citing electric supply volatility due to continued gas pipeline constraints.⁶ A January 21, 2015 presentation by Gordon van Welie, President and Chief Executive Officer of ISO-New England, discussed that the New England region is challenged by a lack of natural gas pipeline infrastructure, and is losing non-gas power plants, resulting in serious threats to power system reliability. The presentation further noted that "electricity prices are on an upward trajectory until the needed energy infrastructure is added."⁷

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

² Project Shippers on the Supply Path Component and Market Path Component are identified in Exhibit I to the certificate application.

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 (March 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>.

⁵ National Grid, National Grid Files for Winter Rates in Massachusetts (September 24, 2014), available at https://www.nationalgridus.com/aboutus/a3-1_news2.asp?document=8764. Massachusetts DPU Docket No. 14-115, National Grid petition approved on 11/7/14. <http://web1.env.state.ma.us/DPU/FileRoomAPI/api/Attachments/Get/?path=14-115%2f14115approval11072014.pdf>.

⁶ National Grid, New England's Winter Electricity Supply Prices Remain Volatile (September 15, 2015), available at https://www.nationalgridus.com/masselectric/a3-1_news2.asp?document=9743. Massachusetts DPU Docket No. 15-BSF-D3. http://web1.env.state.ma.us/DPU/FileRoomAPI/api/Attachments/Get/?path=15-BSF-D3%2finitial_filing.pdf.

⁷ van Welie, Gordon. 2015. State of the Grid: Managing a System in Transition. ISO-New England Inc., ISO on Background Informational Briefing, January 21, 2015, available at http://www.iso-ne.com/static-assets/documents/2015/01/stateofgrid_presentation_01212015.pdf

region's reliance on coal and oil-fired power plants with the added benefit of reducing greenhouse gas ("GHG") emissions. A recent study by the Interstate Natural Gas Association of America ("INGAA") Foundation and ICF International predicted that 6.0 Bcf/d of new natural gas pipeline capacity will be needed in the Northeast U.S. by 2020, and 10.1 Bcf/d of capacity will be needed by 2035.⁸ Another recent study by the Competitive Energy Services ("CES") estimated that to provide the ISO-NE with natural gas to meet the needs of electric generators in the winter at competitive prices, New England needs an additional 2.4 Bcf/d of pipeline capacity, resulting in an annual economic value of \$2.988 billion per year to the region's electricity consumers alone⁹.

The New England region as a whole will benefit from the 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 U.S. with access to low-cost gas. As part of Tennessee's fully integrated natural gas pipeline transportation system, direct access to natural gas supplies via the Project Supply Path Component and larger group of producers, the Project will provide incremental direct access to diverse and economic supplies of natural gas to customers in the New England region. As demand for natural gas in New England increases, Tennessee's LDC Project Shippers have expressed the need for additional firm transportation capacity to serve their growing residential, commercial, industrial, and power generation markets. In addition to the benefits to New England, the Project deliveries to the Iroquois Gas Transmission System and existing Tennessee system at Wright, New York will provide more supply diversity to Iroquois and Tennessee markets in New York currently served by those pipelines. These include residential, commercial, industrial, and power generation markets.

The staff of the New Hampshire Public Utility Commission ("NHPUC") released a report on September 15, 2015 analyzing the need for additional natural gas capacity and the potential for energy cost savings as a result of increased capacity. The estimates total annual average wholesale energy cost savings for the Project to range from \$2.1 billion to \$2.8 billion. This savings is significantly higher than other pipeline projects proposed for New England due to increased pipeline capacity delivered by the NED Project.¹⁰ In addition, the Massachusetts Department of Public Utilities ("MADPU") has indicated that electric distribution companies may enter into long-term contracts to purchase natural gas in order to reduce winter electricity price increases.

Construction of the Project will help alleviate the natural gas pipeline capacity constraints in the region by increasing capacity in high-demand markets in New York and New England. The Project will serve the emergent need for significant natural gas transportation capacity into New England by delivering sufficient incremental supplies that will, based upon basic market forces of supply and demand, put considerable downward pressure on energy commodity prices, which currently are among the highest in the U.S. The expanded natural gas pipeline transportation infrastructure will ensure greater reliability and fuel certainty in the electric generation sector. The proposed interconnection with the Joint Facilities,

⁸ The Interstate Natural Gas Association of America Foundation, *North American Midstream Infrastructure through 2035: Capitalizing on Our Energy Abundance* (March 18, 2014). Available at <http://www.ingaa.org/File.aspx?id=21498>.

⁹ Silkman, Richard and Mark Isaacson. 2014. *Assessing Natural Gas Supply Options for New England and their Impacts on Natural Gas and Electricity Prices* (February 12, 2014). Prepared for the Industrial Energy Consumer Group. Available at: http://competitive-energy.com/docs/2014/02/CES_REPORT_NaturalGasSupply_20140131_FINAL.pdf.

¹⁰ New Hampshire Public Utility Commission. 2015. *Report on Investigation into Potential Approaches to Mitigate Wholesale Electricity Prices*. (September 15, 2015) Available at: <http://www.puc.state.nh.us/electric/Wholesale%20Investigation/IR%2015-124%20Staff%20Report.pdf>.

together with the anticipated reversal of the primary flow direction of the Joint Facilities and Maritimes & Northeast Pipeline, will potentially enable the Project to access more markets in the region, including those in New Hampshire and Maine, the Atlantic Canada region, as well as markets on Algonquin Gas Transmission's ("AGT") pipeline system through its HubLine Pipeline. Additionally, the Project significantly increases capacity via a backhaul on Tennessee's existing 200 Line system and will increase deliverability at an important supply feed to the AGT pipeline system via an existing Tennessee-AGT interconnect at Mendon, Massachusetts. Backhaul refers to transporting gas in the opposite direction from historical operation. The existing Tennessee system generally flows from west to east in New England. Bringing gas into the eastern end of the existing system via the Project will allow Tennessee to use the existing pipes to instead transport gas from east to west – first via displacement, and then if volumes become large enough via physical east to west flow.

A significant portion of the Market Path Component facilities are proposed to be co-located with existing utility corridors (*i.e.*, generally located parallel and adjacent to, and, in certain cases, overlaps existing utility easements [pipeline or powerline]) rather than with Tennessee's existing ROW through the Commonwealth of Massachusetts. Tennessee's existing system is located in densely populated and developed parts of Connecticut and Massachusetts. When Tennessee evaluated the market need in New England, and the scope of facilities that will be required to provide the infrastructure that New England needs to reduce its high energy costs and enhance electric reliability, Tennessee conducted extensive evaluation of options to: (1) construct the pipeline along its existing 200 Line pipeline corridor in southern Massachusetts; (2) construct a new pipeline along a route across northern Massachusetts, utilizing existing utility corridors where feasible; or (3) construct a new pipeline along a route across eastern New York, western Massachusetts and southern New Hampshire, utilizing existing utility corridors where feasible. An evaluation of the alternatives that Tennessee has and continues to consider and evaluate are set forth in Section 4, Appendix 3 of this Application. Based on an evaluation that includes environmental and landowner impacts, quickest time-to-market gas delivery, constructability, and other factors, Tennessee has selected the New York, Massachusetts, and New Hampshire route which predominantly follows the existing utility corridors for the Market Path Component of the Project.

The Project will provide the transformative solution that the northeast U.S. need to reduce energy costs, enhance electric reliability, and stimulate economic growth in the New England region. It will provide the region with direct access to low-cost gas supplies, on the large scale necessary to significantly lower energy costs to the region's homes and businesses. Tennessee's proposed route for the Project will disturb significantly fewer stakeholders and result in lower costs to consumers than it will have if Tennessee were to expand only along its existing 200 Line system corridor. The Supply Path Component involves looping of the existing 300 Line and co-location with the certificated Constitution Pipeline, to minimize impacts. Additionally, the New York, Massachusetts, and New Hampshire route of the Market Path Component, which predominantly follows existing utility corridors, will provide economic service to several geographic areas in northern Massachusetts and southern New Hampshire that are not currently served by an interstate pipeline.

In summary, the purpose of the Project, to create new natural gas transportation capacity to meet the growing demand for natural gas transportation capacity in the northeast U.S., particularly New York and New England, is clear. The new capacity created by the Project will help reduce natural gas costs for homes and businesses in the region, lower electricity prices, increase the reliability of the electric grid, and stimulate economic growth. The Project will also have ancillary environmental benefits by reducing the region's reliance on GHG-emitting coal and oil-fired power plants.