

Northeast Supply Enhancement (NESE) Project is a Public Threat – not a Public Convenience

NJ Clean Energy Goals would be thwarted by NESE.

- NESE is one of a dozen currently proposed fossil fuel-burning projects in NJ.
 - Building it would not comport with Governor Murphy’s goals for increased clean energy and reduced greenhouse gas emissions.
 - Building it would guarantee reliance on fossil fuels for decades if NESE is built.
 - Operating NESE would create increased greenhouse gas and other toxic chemical emissions, and NJ is already an ozone-compromised region.
 - Most projects of Williams/Transco in NJ have been expanded within a few years.
 - Though the Marcellus Shale region has a lot of gas, NJ should not bear the safety & health risks of company profits to become the Pipeline State.
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There is a Questionable Need for this Added Gas in New York.

Despite the claims of Williams/Transco and National Grid, the outlook for natural gas demand in the region simply does not warrant increasing the supply. The Northeast Supply Enhancement Project is an expensive project that nobody needs.

Williams/Transco and National Grid claim that the NESE project is necessary because NYC needs more natural gas, but there is no publicly available data that backs this up. In its application to FERC, Williams/Transco says that “National Grid has forecasted a need for additional natural gas supply to meet residential and commercial demands due to population and market growth within its service territory.” However, Williams/Transco requested that the supporting market data be kept out of the public record because it contains “confidential commercial information” from National Grid. Yet, National Grid is a monopoly; it is the only supplier of natural gas for its service area with no competitors who could benefit from such information. Similarly, National Grid has said that it needs the NESE to support increasing demand, but simply asserts this with no supporting data.

NESE would deliver more than twice as much additional natural gas to New York City than it needs, even if it achieves the unlikely goal of converting all of its residential and commercial buildings’ oil use to natural gas.

- According to the reports noted below, New York does not need the amount of additional natural gas planned to be delivered by the NESE Project. Adding natural gas infrastructure does not help New York or New Jersey reach their goals of higher renewable energy sources. (a, b) Even if National Grid converted all residential and commercial heating units from oil to gas, the NESE would deliver twice as much gas as would be needed.
 - (a) According to ICF International’s 2012 report for the NYC Mayor’s Office of Long-Term Planning and Sustainability, conversion of New York City’s boilers from oil to gas would require a maximum increase of National Grid’s gas supply by 6%, yet the NESE Project would increase National Grid’s capacity by more than 64%.

This report stated that National Grid had “pipeline capacity contracts” for approximately 622,000 dt/day. The NESE project would add 400,000 dt/day of capacity, *an increase of 64%*. Moreover, a Mayor’s report, issued in 2013 in response to Superstorm Sandy, said that NYC’s overall supply of natural gas was sufficient except on cold winter days. Since then, Con Edison’s access to natural gas, which it supplies to customers in the Bronx, Manhattan, and northern Queens, was expanded by the construction of a pipeline under the Hudson, completed in late 2013, that brought 800,00 dt/day to the west side of Manhattan, a dramatic increase in the city’s natural gas supply. The necessity of a second dramatic expansion in the form of this proposed NESE pipeline, given that there is no current shortage, seems improbable.

Source: http://www.nyc.gov/html/om/pdf/2012/icf_natural_gas_study.pdf

- (b) In comments to FERC on May 14, 2018, National Grid noted that they only need approximately a 10% increase in natural gas to cover both New York City and Long Island: “Over the next ten years, Peak Day gas demand in the National Grid NY and National Grid LI service territories is expected to grow by more than ten percent due to the continued conversion of oil-fired heating systems to run on natural gas as well as increased demand from new construction customers. Furthermore, in assessing the adequacy of its current gas supply portfolio, National Grid has identified a need for additional gas supply beginning in the 2019/2020 heating season in order to support this customer demand growth in downstate New York.” (FERC Accession No. 20180514-5995)
- **National Grid claims that it needs more access to gas because of ongoing boiler conversions from heating oil to natural gas, but this is overstated.** In the short term, new New York City regulations requiring building boilers to convert from No. 6 and No. 4 heating oil to a less polluting fuel will continue to encourage conversions to natural gas. However, even if every boiler so affected were to convert to natural gas, this would only raise demand by 6% - and many of these are in Con Ed’s service area, not National Grid’s. Moreover, NYC is moving ahead with plans to mandate building retrofits to improve energy efficiency. In addition, New York State is now encouraging the conversion of fossil fuel heating systems to ground-source heat pumps, a development particularly relevant to areas with stand-alone homes and commercial buildings like much of Staten Island, Brooklyn, Queens, and Long Island. All of these factors translate into only a modest increase in demand for natural gas, if at all.
 - There is no proof that converting from dirty oils to natural gas provides climate benefits, since even small amounts of methane leakage (which exists in all natural gas pipelines) erodes the benefits of switching from oil to natural gas.
Source: PSE Healthy Energy, “The Greenhouse Gas Impacts of Proposed Pipeline Buildout in New York,” Feb 2018, 28. Accessed at: <https://earthworks.org/cms/assets/uploads/2018/02/NY-Pipelines-PSE-TECHNICAL-REPORT.pdf>
 - NESE is not needed to replace the most polluting #6 fuel oil as they originally claimed. The #6 oil furnaces in NYC have already been removed as part of the NYC DEP OneNYC goals of an 80 percent reduction in greenhouse gas emissions by 2050. Accessed at: <https://www1.nyc.gov/office-of-the-mayor/news/152-16/mayor-de-blasio-dep-that-all-5-300-buildings-have-discontinued-use-most-polluting>

NESE would thwart New York's clean energy goals & efforts to address impacts of climate change.

Forces are converging that will *reduce* demand for natural gas, not increase it.

- Given clear awareness of the danger that fossil fuel extraction, transportation and use poses on severe weather-related impacts from climate change, the question that New York is currently addressing is how to transition from dirty fossil fuel to clean renewable energy sources, and New York City's plans focus on clean energy technologies including offshore wind, solar, energy efficiency and energy storage. New York City has committed to reducing greenhouse gas emissions 80% below 2005 levels by 2050, and according to a 2017 publication, *1.5 Aligning New York City with the Paris Climate Agreement* (September 2017), burning of fossil fuel in NYC for heat and hot water accounted for the City's biggest source of greenhouse gas emissions (39%).
Accessed at: <https://www1.nyc.gov/assets/sustainability/downloads/pdf/publications/1point5-AligningNYCwithParisAgrmtFORWEB.pdf>
- Along with New York City's plans for increasing energy efficiency through building retrofits, New York State also has ambitious energy efficiency goals and well as support for more efficient ways of heating buildings. New York State also has ambitious plans for building out its solar and wind capacity, and for accelerating battery storage, which will lower demand for fracked gas as a power plant fuel. New York State has set a goal of 50% of electricity generation as coming from renewable sources by 2030.
- According to Elena Krieger at PSE, NESE would make it impossible to NYC to reach NYC's climate goals. Accessed at: <https://earthworks.org/cms/assets/uploads/2018/02/NY-Pipelines-PSE-TECHNICAL-REPORT.pdf>
- **Think about this:**
 - The pipeline can transmit a maximum of 400,000 dekatherms of natural gas per day.
 - According to the 2017 Inventory of New York City Greenhouse Gas Emissions, all stationary fuel oil ¹ uses combined equal about 61 million dekatherms of energy.
 - 400,000 dekatherms of natural gas per day would total about 146 million dekatherms per year.
 - According to the Inventory, about 4.3 million tons of CO₂ equivalent are produced every year from these stationary fuel oil uses.
 - According to the Greenhouse Gas Equivalencies calculator on the EPA website , 146 million dekatherms of natural gas ² would, if combusted, produce about 7.7 million tons of CO₂ a year - a locked-in net increase of 79%
 - CO₂ equivalent emissions - and that assumes a 100% replacement for fuel oil, 100% combustion efficiency, and no fugitive methane leaks, which is not possible.
 - Hydrocarbon leakage from this pipeline or its downstream customers, combined with associated greenhouse gas emissions, will cause more climate-altering gas emissions than if the pipeline were not constructed. This is a mathematical certainty if the pipeline is effectively, efficiently, and safely used.

¹ http://www.dec.ny.gov/docs/administration_pdf/nycghg.pdf Appendix H, pg. 51 note one dekatherm = ~1,000,001 BTU

² <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

References:

New York State's ambitions: Governor Cuomo's State of the State address, January 3, 2018:

<https://www.governor.ny.gov/news/governor-cuomo-unveils-20th-proposal-2018-statestate-new-yorks-clean-energy-jobs-and-climate>

New York State's energy plan: <https://energyplan.ny.gov/Plans/2015>

New York City's climate plan:

https://www1.nyc.gov/assets/sustainability/downloads/pdf/publications/New%20York%20City's%20Roadmap%20to%2080%20x%2050_20160926_FOR%20WEB.pdf