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

As Governor Murphy said in the press release for stakeholder meetings for the State's new Energy Master Plan (08/15/2018):

"Being responsible stewards of the environment is not a campaign promise, it's a moral, philosophical, and economic obligation that we have to ensure a strong economy and quality of life for all New Jersey residents today and for generations to come."

NESE is not in the Public Interest.

If NESE's Compressor Station 206 and pipeline in & by the Raritan Bay are constructed, we and future generations will be subjected to risks from air and water pollution, potential explosions, and extreme weather events. We believe that exposure to pollutants, carcinogens and poisons, and safety risks for the profits of the fossil fuel industry should not be acceptable.

According to a statement on the governor's website, the Renewable Energy bill (P.L. 2018, Chapter 17), passed and signed by Governor Phil Murphy in May of 2018, "establishes one of the most ambitious renewable energy standards in the country by requiring 21 percent of the energy sold in the state be from Class I renewable energy sources by 2020; 35 percent by 2025 and 50 percent by 2030. ... In addition, Governor Murphy signed Executive Order No. 28 directing state agencies to develop an updated Energy Master Plan (EMP) that provides a path to 100 percent clean energy by 2050. The new EMP is to be completed and delivered by June 1, 2019 and will provide a blueprint for the total conversion of the State's energy production profile to 100 percent clean energy sources by January 1, 2050."

Source: https://nj.gov/governor/news/news/562018/approved/20180523a cleanEnergy.shtml

The "public interest in preservation of natural resources" would not be served by the NESE Project.

- There is no public safety & health benefit for people in New Jersey from NESE.
- The NESE Project would not deliver an energy supply to New Jersey.
- The legally guaranteed 14% rate of return on equity will make NESE profitable regardless of demand for gas, while passing much of its \$926.5 million construction price tag onto ratepayers. (see references)
- Approval of the NESE Project would ensure decades of increased greenhouse gas emissions, cancercausing airborne emissions, and risks from aging pipelines that are supposed to be overseen by agencies that are short-staffed.
- Approval of the NESE Project without a recognition of plans of Williams/Transco to rapidly expand their
 infrastructure to move fracked gas from the Marcellus Shale region in Pennsylvania through New Jersey
 is an irresponsible action that neglects to consider compound and cumulative impacts that threaten the
 health, safety and economic security of our State as well as increase our long-term dependence on fossil
 fuels at a time when we have the commitment to transition to clean and renewable sources of energy.

Williams/Transco expands compressor stations within a few years after they are initially built, yet they
initially do not divulge their expansion plans. Thus, added environmental damages and risks are not
considered when considering permit applications for one project at a time. Examples of their
expansions in New Jersey are:

Compressor Station	Town	FERC Application Date		Change in horsepower
STA 205	Lawrenceville		-	Station opened in 1981
		5-21-98	add	15,000
		6-19-01	add	Uprate 1,000
		4-9-13	add	Uprate 5,000
		12-18-14	add	Uprate 2,000
		2-18-15	add	Uprate 14,600
STA 207	Old Bridge	10-20-06	new	10,000
		4-9-13	add	5,400
		7-8-15	add	New unit: 11,000
STA 303	Roseland	12-14-11	new	25,000
	_	7-8-15	add	Uprate 2,500
		11-16-17	add	New unit: 33,000

As NJDEP is considering the outstanding permit applications for the NESE Project, they recently approved another Williams/Transco project in Roseland, the Gateway Expansion Project, to add a new 33,000 horsepower compressor unit to a station where the current 27,500 horsepower compressor unit only runs during peak demand times. Though it was not specifically identified as the reason for expansion, the belief of many is that this new compressor unit is to provide gas to the proposed power plant in North Bergen, but there was no apparent consideration of the dangers of passing more gas at higher velocity through the 60 year old pipelines here as well as the fact that, at this site, Roseland experienced three 100-year floods and storms within the past 10 years. This compressor station is next to an existing PSEG station with high-voltage, interstate transmission electrical lines whose capacity was doubled via a Susquehanna-Roseland upgrade several years ago.

Expansion plans of Williams/ Transco in Pennsylvania should not be ignored since there is the possibility that new infrastructure there will affect New Jersey via future expansions through our state as well as impact from increased compression on older pipeline in NJ that is part of this delivery system. For example, in November 2018, Williams/Transco applied to FERC for the Leidy South Project (PF19-1) to transport 582,400 million cubic feet per day (MMcf/d) of Marcellus gas from northeast and southwest PA to "growing demand centers along the Atlantic Seaboard." In Pennsylvania, they plan to replace 6 miles of 24" pipeline with 36" pipeline, add 3.55 miles of 42" pipeline, uprate two electric compressor units from 15,000 HP to 21,000 HP and another two from 20,000 HP to 21,000 HP, add a 31,871 HP gas-fired turbine-driven compressor unit to a station with 42,000 HP already, and add two new compressor stations – one with two 23,465 HP gas-fired turbine-driven compressor units, and the other with one 31,871 HP gas-fired turbine-driven compressor unit.

References:

For rates of return on pipeline construction:

Phil McKenna, "Pipeline Payday: How Builders Win Big, Whether More Gas Is Needed or Not," Inside Climate News, Aug. 3, 2017. Accessed at: https://insideclimatenews.org/news/02082017/natural-gas-pipeline-boom-corporate-profitbubble-limited-demand-climate-emissions

For National Grid's ability to pass costs on to customers:

"National Grid Annual Report and Accounts, 2016/17" (UK). Page 176. Accessed at: http://investors.nationalgrid.com/~/media/Files/N/National-Grid-IR/reports/ara-2016-17-plc-0606-2017.pdf