

## **Concern: There is a Questionable “Need” for additional natural gas in National Grid’s NY area.**

For accountability, public participation, and use of science-based decision-making, the following comments are provided for consideration during the current comment period for the January 2020 applications by Williams/Transco for the following permits for the proposed Northeast Supply Enhancement Project: Freshwater Wetlands Individual Permit with Section 401 Water Quality Certification, Flood Hazard Area Individual Permit and Verification, Waterfront Development Individual Permit with Section 401 Water Quality Certification, and Coastal Zone Management Act Consistency Determination. I also ask that you consider all previous comments submitted during the previous commenting periods.

Williams/Transco and National Grid have not provided accurate data to support the “need” for extra gas supply in New York even though National Grid has subscribed to the gas. Though the NJDEP is not required to **determine if there is a need for the gas in New York**, misleading information is being published that should not sway decisions about meeting the regulations for NJ’s Freshwater Wetlands Act Protection Rules.

- Williams/Transco used old 2014 NYSERDA data on the capacity of energy efficiency to claim that natural gas demand must increase, and the U.S. Energy Information Administration (EIA) and the New York Independent System Operator (NYISO) project a flat or declining need for natural gas in that area over the next ten years.
- There was a gross overestimation of the required oil-to-gas conversions in New York City that formed the basis for the purported need for more gas. Williams/Transco claims that National Grid, aided by the gas from NESE, could convert 8,000 oil-burning boilers to gas each year, but there are fewer than 450 oil-burning boilers in National Grid’s service area.
- Their data does not reflect the fact that New York City is requiring a number of changes to the operation of building boilers and to building retrofits that will lower the need for gas. Independent studies document the questionable need for the gas in NYC, including the indication that any issues the city might have with insufficient gas supply (and thus the ability to convert boilers more quickly) stem from the distribution networks within the city, not with the amount of gas available to them via pipelines like the Williams/Transco NESE. Furthermore, the New York City Council questioned the need for NESE in a recently adopted Resolution opposing the Project – See: Resolution No. 0845, New York City Council.
- 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) erode the benefits of switching from oil to natural gas. A recent report commissioned by National Grid<sup>1</sup> (the sole customer for gas through NESE) claims that building the NESE would be better for the climate than if it were not built. However, the report systematically underestimates the climate impacts of natural gas and the pipeline in general, relying on misleading assumptions, the omission of pertinent available data, and the use of incorrect data to make its claims. These include using the wrong calculation for methane which seriously underestimates its impact as a greenhouse gas; omitting impacts of upstream methane emissions and the leaks from the local distribution networks, underestimating the emissions impact of the pipeline construction itself, and other pertinent impacts. In addition, the report overestimates the emissions it predicts for the “No NESE” path in several ways, including the use of flawed assumptions about electricity’s contribution to greenhouse gas emissions.
- The NESE pipeline is intended to last 50-60 years, that is, until 2070 or 2080. The Bradley report<sup>1</sup> only considers the first ten years of the life of the pipeline although National Grid has signed a fifteen-year contract for this gas. The graphs of GHG emissions, whether using the DoE-based figures or the EDF-based figures, shows a steady rise in emissions, which leaves the question open about how serious the impact of this pipeline would be in the years following 2030.

The misleading information contained in the application and supportive reports undermines the contention that the gas which would be transported through the Williams/Transco pipeline is truly needed in New York or would be helpful in combatting climate change. This questionable “need” then poses a serious imbalance

when compared to the health and safety risks which would be borne by New Jersey residents with no benefit to them.

For these reasons, I request that the DEP deny the January 21, 2020 permit applications referenced above, and maintain its authority to protect the environment of New Jersey.

Respectfully submitted,

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<sup>1</sup> M.J. Bradley & Associates. (11 June 2019). Life Cycle Analysis of the Northeast Supply Enhancement Project. **Accessed at:** <https://www.mjbradley.com/reports/life-cycle-analysis-northeast-supply-enhancement-project> or [https://www.mjbradley.com/sites/default/files/MJBA\\_NESE\\_LCA\\_06112019.pdf](https://www.mjbradley.com/sites/default/files/MJBA_NESE_LCA_06112019.pdf)