

From: Stephen Holcomb/NCS/Enterprise
To: climate.strategies@mass.gov
Cc: Shaela Collins/NCS/Enterprise@NISOURCE, Susan Kullberg/BSG/Enterprise@NISOURCE, Sara Rundell/NCS/Enterprise@NISOURCE, "Buffone Jr, Robert J" <robert.buffone@eversource.com>, "Gionfriddo, Tracy A" <tracy.gionfriddo@eversource.com>
Date: 09/17/2020 04:36 PM
Subject: Columbia Gas Response to Data Request

As requested, Columbia Gas of Massachusetts is providing the following information as it pertains to the methane program review:

• **annual projected growth of miles of pipeline and number of services for each year from 2020 through 2024**

	2020	2021	2022	2023	2024
Mains (miles)	13	14	14	14	14
Services	1,952	2,500	2,500	2,500	2,500

• **remaining number of miles of pipeline that could yet be reclassified from cathodically- to noncathodically-protected steel.**

No reclassification of steel pipe from cathodically protected to non-cathodically protected is expected at this time.

Stephen Holcomb | Team Leader, Environmental Policy
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From: Simpson, Carleton
Sent: Friday, September 18, 2020 10:20:35 AM (UTC-05:00) Eastern Time (US & Canada)
To: Strategies, Climate (DEP)
Subject: FG&E/Unitil 310 CMR 7.73 Program Review Information Request

On behalf of Fitchburg Gas and Electric Light Company d/b/a Unitil, please find responses to the MassDEP Information Request as part of the 310 CMR 7.73 Program Review: Reducing Methane Emissions from Natural Gas Distribution Mains and Services. In addition to the responses below, Unitil will be filing written comments today regarding suggested program changes with other Local Distribution Companies (LDCs).

Please let me know if you have any questions. Thank you.

Questions:

MassDEP requests that by 5pm on Friday, September 18, 2020 the LDCs email climate.strategies@mass.gov:

- annual projected growth of miles of pipeline and number of services for each year from 2020 through 2024, and
- remaining number of miles of pipeline that could yet be reclassified from cathodically- to noncathodically-protected steel.

Answer:

Please see the table below providing annual projected growth of miles of pipeline and number of services for each year from 2020 through 2024, and FG&E's remaining number of miles of pipeline that could yet be reclassified from cathodically to noncathodically protected steel.

Category	Year				
	2020	2021	2022	2023	2024
Projected Growth - Miles of Main	0.25	0.25	0.25	0.25	0.25
Projected Growth - New Services	100	100	100	100	100
Miles of Main to be reclassified from CP to Non-CP	6.86	0	0	0	0

Best,

Carleton B. Simpson

Regulatory Counsel



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From: Brendan Vaughan
Sent: Friday, September 18, 2020 4:40:15 PM (UTC-05:00) Eastern Time (US & Canada)
To: Strategies, Climate (DEP)
Cc: Robert Buffone; Danielle Winter; Gionfriddo, Tracy A
Subject: 310 CMR 7.73 Program Review – Eversource Growth Mains and Services and Reclassification

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

All,

Please see below for information on NSTAR Gas Company d/b/a Eversource Energy's anticipated growth mains and services, and reclassification of main.

Growth Mains and Services

		2020	2021	2022	2023	2024
	Mains	13	11	11	11	11
	Services	1,350	1,500	1,500	1,500	1,500

The Company does not have any steel pipe to be reclassified from cathodically protected to non-cathodically protected.

Thanks,

Brendan

Brendan P. Vaughan
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From: R.J. Ritchie

Sent: Friday, September 18, 2020 11:28:20 AM (UTC-05:00) Eastern Time (US & Canada)

To: Strategies, Climate (DEP)

Subject: Liberty Utilities Responses to 220 CRM 7.73 IRs

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

On behalf of Liberty Utilities (New England Natural Gas Company) Corp. (the "Company"), please find the company's responses to the following information requests:

- annual projected growth of miles of pipeline and number of services for each year from 2020 through 2024,

Company Response: Please see the table below for the annual projected growth of miles of main and number of services for the requested years:

	Miles of Main	Services
2020	1.8	270
2021	1.8	270
2022	1.9	275
2023	1.9	275
2024	1.9	280

- remaining number of miles of pipeline that could yet be reclassified from cathodically- to noncathodically-protected steel.

Company Response: Zero

Thanks,

R.J.

R.J. Ritchie | [Liberty Utilities \(East Region\)](#) | Director, Legal and Regulatory Affairs

P: 774-627-2910 | C: 774-320-5801 | E: R.J.Ritchie@libertyutilities.com

36 Fifth Street, PO Box 911, Fall River, MA 02721

BERKSHIRE GAS COMPANY

	2020	2021	2022	2023	2024
Total Miles of Mains	764.26	764.80	765.33	765.87	766.40
Additional Miles of Main from previous year	0.53	0.53	0.54	0.54	0.54
Total Number of Services	32485	32540	32596	32651	32707
Additional No of services from previous year	55	55	55	55	56

Via Electronic Mail to climate.strategies@mass.gov

September 18, 2020

Sharon Weber
Massachusetts Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Re: Program Review of 310 C.M.R. 7.73

Dear Ms. Weber:

On behalf of Boston Gas Company and former Colonial Gas Company, each d/b/a National Grid (“National Grid” or the “Company”)¹, attached please find the Company’s responses to the information requests of the Massachusetts Department of Environmental Protection associated with its program review of 310 CMR § 7.73: Reducing Methane Emissions from Natural Gas Distribution Mains and Services.

Please contact me with any questions. Thank you for your attention to this matter.

Very truly yours,



Andrea G. Keefe

Enclosure

cc: Sue Ann Richardson, Massachusetts Department of Environmental Protection

¹ Effective March 15, 2020, Colonial Gas Company was merged with Boston Gas Company, with Boston Gas Company as the surviving legal entity, as approved in Boston Gas Company and Colonial Gas Company d/b/a National Grid, D.P.U. 19-69 (2019).

Information Request 1:

Please provide the annual projected growth of miles of pipeline and number of services for each year from 2020 through 2024.

Response:

Below is a high-level forecast for new gas connections for Boston Gas Company and the former Colonial Gas Company. As this is a projection, please note that actual growth will vary based on many factors, including but not limited to: market conditions; budgetary approvals; availability of resources; and potential impact due to COVID-19.

Boston Gas Company	2020	2021	2022	2023	2024
Miles of Main	15 miles	20 miles	20 miles	21 miles	21 miles
Number of new service connections	3,400	4,300	4,300	4,500	4,500

Former Colonial Gas Company	2020	2021	2022	2023	2024
Miles of Main	6 miles	7 miles	7 miles	8 miles	8 miles
Number of new service connections	1,200	1,800	1,800	2,000	2,000

Information Request 2:

Please provide the remaining number of miles of pipeline that could yet be reclassified from cathodically- to noncathodically-protected steel.

Response:

To date, National Grid has not identified any specific miles of pipe that require reclassification. However, the Company estimates that approximately 1,600 miles of pipe installed prior to 1970 and not subject to PHMSA requirements for cathodic protection, may require reclassification. If reclassification is necessary, emissions reduction targets should be adjusted to reflect pipe reclassification.