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By Electronic Mail

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Boston, MA 02108

Re: In the Matter of Algonquin Gas Transmission, LLC
 OADR Docket Nos. 2019-008, 2019-009, 2019-010, 2019-011, 2019-012 and 2019-013

Dear Counsel:

As you know, we represent the Town of Weymouth and associated petitioners in these consolidated proceedings. On July 24, Algonquin Gas Transmission, LLC (“Algonquin”) submitted to the Southeast Regional Office (“SERO”) Staff an “Addendum to Non-Major Comprehensive Air Plan Approval,” prepared by Trinity Consultants (the “EMD BACT Analysis”), and supporting prefiled witness testimony. Pursuant to the Commissioner’s remand schedule, SERO now has until August 7 to review the Electric Motor Drive (“EMD”) BACT Analysis and request from Algonquin such additional information and analysis that it requires to complete its BACT determination (following a public comment period) on September 29.

We write to you because Weymouth’s own experts have preliminarily reviewed the EMD BACT Analysis and believe that there are additional information and analysis that are necessary to reach a final BACT determination, and that SERO should therefore request from Algonquin. Rather than identifying these items during a public comment period or a post-determination adjudication, we believe that they are better raised now while SERO still has an opportunity to request that Algonquin supplement the record. Doing so also gives SERO an opportunity to see Weymouth’s concerns about missing information and analysis in advance, with an opportunity to consider those concerns thoroughly as part of its own process.

1. Communications with National Grid.

The Prefiled Direct Testimony of John Heintz, on page 3, refers to “communications in June 2020 with representatives from National Grid,” but does not supply copies of those communications. We suggest that SERO request copies of any written documentation of communications to or from National Grid concerning the proposed Weymouth Compressor Station’s use of an EMD, not restricted to only June 2020 or the specifically referenced communications. If Algonquin is relying on technical or other information from National Grid, SERO should have access to those documents so that SERO can properly consider that information.

2. Edgar Substation Information.

An important issue related to the EMD BACT alternative is the potential use of the Edgar substation to provide electrical power. We suggest that SERO request from Algonquin the rated megavolt amperes (“MVA”) capacity of the Edgar substation and the actual annual peak MVA load on the Edgar Substation, for calendar years 2015 through and including 2019. Such data are necessary to evaluate the representation that the Edgar substation “does not have the capacity to provide the level of service that would be required to power the EMD.”

3. Explanation for 115 kV Transmission Voltage Supply.

Algonquin’s vendors propose to install a 115 kV high voltage transmission supply from the Edgar substation, instead of 13.8 kV distribution voltage supply also available at Edgar substation, and a 30 MVA substation capacity for the proposed 6 MVA load, medium voltage EMD. We suggest that SERO request that Algonquin evaluate installation of a 13.8 kV distribution voltage supply for its medium voltage EMD.

4. National Grid Unit Costs for 13.8-kV Underground Transmission Line.

Algonquin provides certain cost estimates to construct an underground transmission line from the Edgar substation to the proposed Compressor Station. In relation to the request immediately above, we suggest that SERO request from Algonquin documentation of National Grid’s unit cost to install an underground 13.8-kV transmission line.

5. Underground Transmission Line Route.

Algonquin states that an underground transmission line from the Edgar substation would be approximately 0.5 miles and pass under a road and bridge. We suggest that SERO request that Algonquin supply a map (properly scaled so as to determine distance) that contains its proposed transmission line route and that depicts any alternative routes considered by Algonquin.

6. Currently Configured Electric Supply to the Compressor Station.

As currently configured for a combustion turbine, the proposed Weymouth Compressor Station receives electrical power. We suggest that SERO request from Algonquin details about that electrical power supply, including: origin point; length of the conductor from the origin point to the Compressor Station; route of the conductor (ideally depicted on a map); whether the conductor is an overhead transmission line or undergrounded; and the type (e.g. 477AAC), voltage, and amperage rating of the conductor.

7. Electric Power Supply Infrastructure Costs.

We suggest that SERO require Algonquin to explain whether and to what extent National Grid will be responsible for any costs referenced in the EMD BACT Analysis for electric power supply infrastructure (including but not limited to interconnection with the proposed Compressor Station). We suggest that SERO require any such response to include all D.P.U.-approved and other National Grid documents relevant to those costs and calculations, including the relevant D.P.U.-approved tariff and National Grid connection terms and conditions.

8. Natural Gas Costs.

In its prior BACT analyses (most recently in 2018), Algonquin used the Massachusetts statewide industrial retail natural gas rate (in 2015 dollars, \$11.34/MMBtu) when calculating BACT costs. But in the EMD BACT Analysis, Algonquin changes that price assumption to what appears to be the wholesale rate and, in any event, a much lower rate: \$3.04 MMBtu. We suggest that SERO request that Algonquin explain the rationale for this change from its prior analyses.

9. Natural Gas Source.

We suggest that SERO ask Algonquin to confirm that the natural gas referenced in the May 2018 BACT SCR cost-effectiveness calculation is the natural gas fuel used by the proposed Taurus 60 gas turbine, and that the additional natural gas fuel cost shown in the SCR cost-effectiveness calculation is associated with overcoming the pressure drop across the SCR.

10. Industrial Electrical Power Retail Rate.

Algonquin uses an industrial retail rate for electrical power of \$0.1437 per kW-hour. We suggest that SERO ask Algonquin to provide documentation confirming that rate where the U.S. Energy Information Administration lists the rate as \$0.1387 for May 2020.

(https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a)

11. Spartan EMD Technical Information.

We suggest that SERO confirm from Algonquin that the Spartan EMD it proposed for the Weymouth Compressor Station includes an input transformer and request that Algonquin supply 13.8 kV distribution voltage, available from the Edgar substation, to the input transformer.

12. Analysis of Transmission Losses.

Algonquin calculated certain, purported electrical grid efficiency losses as part of its EMD BACT analysis. Algonquin, however, omits any analysis of natural gas pipeline transmission losses, including in the form of compressor station power demand and natural gas consumption at compressor stations from the source of the natural gas to Weymouth. We suggest that SERO request from Algonquin such an analysis. Further, we suggest that SERO request from Algonquin the gearbox efficiency for the Solar Taurus 60 combustion turbine it proposed to operate at the Weymouth Compressor Station.

* * *

Thank you in advance for your consideration of this letter. Please also relay our similar thanks to SERO. Should SERO have any questions concerning the content of this letter, it should not hesitate to contact us (through your office). Finally, please note that we provide this letter to assist SERO in its decision-making. In doing so, we do not intend to waive Weymouth's rights to advance any arguments concerning these or other matters (including the relevance of any of this information to BACT for the Weymouth Compressor Station) in the future, for any reason. To the contrary, Weymouth reserves, and does not waive, all rights.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Miyares", with a stylized flourish at the end.

J. Raymond Miyares
Bryan F. Bertram
Katherine E. Stock

cc: Service List