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By Electronic Mail

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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:

This letter will supplement the correspondence sent to you on August 4. Since that letter, our experts have conducted additional reviews of the EMD BACT Analysis and supporting prefiled written testimony submitted to the Southeast Regional Office ("SERO") and believe that still more information and analysis are necessary to reach a final BACT determination, which SERO should therefore request from Algonquin. In making its requests to Algonquin, we suggest that SERO should seek supporting materials, notes, studies, and workbooks (with formulae intact) related to the requested information and analysis, in order to allow for SERO and the public to understand and evaluate the submissions provided.

13. Storage Options.

The EMD BACT Analysis states that installing an electric motor drive (EMD) instead of a natural gas-fired turbine would "cause substantial upstream air emissions" (p. 4-8), and that "natural gas delivery to the Maritimes system would cease during a power outage, preventing the delivery of natural gas from south of the compressor station to points north" (p. 4-7). We suggest that SERO ask Algonquin whether it considered battery or other storage options in order to mitigate natural gas delivery disruptions during a power outage and upstream emissions. If so, we suggest that SERO request that its analysis of storage options be provided.

14. Grid Reliability.

The EMD BACT Analysis states that (p. 4-6) "The Facility would be unable to meet its basic business purpose with an EMD when power from the grid is unavailable. That is, during electric power outages, Algonquin would not be able to transport gas from the lower pressure Algonquin system into the higher pressure system." We suggest that SERO request information on the number, extent and duration of blackouts that have impacted the project area, or the greater Boston area, in the 21st century.

15. Taurus 60 Gas Turbine Availability.

We suggest that SERO ask Algonquin to provide data on the frequency and duration of periods when gas turbines in the MW capacity range of the Taurus 60 MW have historically been offline for maintenance and, separately, on the subset of periods involving forced outages due to mechanical failures. We further suggest that SERO ask Algonquin to confirm that Taurus 60 maintenance outages or forced outages will disable the proposed Weymouth compressor whether or not there is an adequate supply of natural gas to run the gas turbine.

16. Behind-the-Meter Generation Options.

We further suggest that SERO ask Algonquin whether it considered onsite solar or other behind-the-meter generation options in order to mitigate natural gas delivery disruptions during a power outage and upstream emissions. If so, we suggest that SERO request that its analysis of behind-the-meter generation options be provided.

17. Need for New Construction.

The EMD BACT Analysis states that "electric driven compression would necessitate the construction of a new building, electric substation, and ancillary equipment within TGP's existing CS 261 site." (Appendix A, p. 8 of 50). We suggest that SERO request that Algonquin provide its analysis justifying the need for the new building, electrical substation or ancillary equipment associated with the EMD alternative and demonstrating the capital costs thereof.

18. Wetlands Analysis.

The EMD BACT Analysis also states that "[g]iven the existing facilities on the site, the only location where these facilities could be located would be in the southwest portion of the site, which has a large wetland system associated with Worthington Brook" (Appendix A, p. 8 of 50). We suggest that SERO request that Algonquin provide its analysis demonstrating that the wetland system adjacent to the existing site is the only suitable location available.

19. Upgrades and Additional Infrastructure Analysis.

The EMD BACT Analysis states that: "[t]he additional major infrastructure identified for the Weymouth Station to power EMD, based on information collected for this BACT Addendum, includes the following:

- Upgrades to Existing Edgar Substation
- High Voltage Transmission Line Installation
- Right of Way Land Purchase Costs (High Voltage Transmission Line);
- Weymouth Site Substation Installation; and
- Medium Voltage Line at Weymouth Station."

(p. 4-5). We suggest that SERO request that Algonquin provide its analysis demonstrating the necessity of the station and transmission upgrades and justifying the need for additional infrastructure. Of particular interest would be any analysis of alternatives to these upgrades and new infrastructure.

20. Level of Service.

In our August 4 letter, we noted the Prefiled Direct Testimony of John Heintz, which refers to communications with representatives of National Grid. Specifically, Mr. Heintz states that, "[i]n order to provide power to an EMD for the Weymouth Compressor Station, additional infrastructure improvements are required, including, but not limited to: (1) upgrades to the existing Edgar Substation located at the Calpine Fore River Energy Center, including a new breaker ("Edgar Substation")" (p. 3, ¶9). He then states that, "the existing Edgar Substation does not have the capacity to provide the level of service that would be required to power the EMD." (p. 3, ¶10). We suggest that SERO ask Algonquin to define "level of service" as used in this testimony, and to clarify what "level of service" is required to power the EMD and what "level of service" can currently be provided at the existing Edgar Substation.

21. Need for and Cost of the Transmission Line.

In his Prefiled Direct Testimony Mr.Heintz states that: "To transmit the electricity necessary to power an EMD at the Weymouth Compressor Station, approximately one-half mile of underground high voltage transmission line would need to be installed connecting the Edgar Substation to the Weymouth Compressor Station site" (p. 4, ¶12). We suggest that SERO ask Algonquin how this need was determined, including any analysis of alternatives, and the basis for the $8.5 million cost estimate for the high voltage (115 kV) transmission line installation (EMD BACT, Table 4-6, p. 4-15).

22. New Substation.

Mr. Heintz's Pre-Filed Direct Testimony also states that, "in order to transform the transmission level voltage from the Edgar Substation down to a useable voltage, Algonquin would need to construct a new substation at the Weymouth Compressor Station site." (p. 5, ¶15). We suggest that SERO ask Algonquin how this need was determined—specifically identifying the current transmission level voltage of the Edgar Substation and providing a definition of "useable voltage" in the context of transforming the transmission level voltage of the Edgar Substation.

23. Right of Way Land Purchase Costs.

The EMD BACT Analysis lists the "Right of Way Land Purchase Costs (High Voltage Transmission Line)" as $619,460 (Appendix C, Table 2). We suggest that SERO ask Algonquin to provide the basis for this figure.

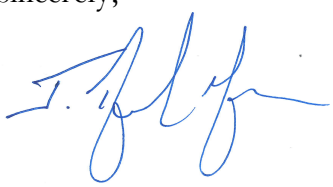
24. Medium Voltage Line Costs.

The EMD BACT Analysis lists the ""Medium Voltage Line at Weymouth Station" costs as $693,764 (Appendix C, Table 2). We suggest that SERO ask Algonquin to provide the basis for this figure.

* * *

Again, thank you in advance for your consideration of this letter, and please also relay our similar thanks to SERO. Should SERO have any questions, it should not hesitate to contact us (through your office). Finally, as stated previously, 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,



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cc: Service List