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UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

In the matter of:

	)	
Pieridae Energy (USA) Ltd.	)	FE Docket No. 14–179–LNG
	)	
	)	

MOTION TO INTERVENE AND PROTEST OF THE MASSACHUSETTS PIPELINE AWARENESS NETWORK AND REQUEST FOR EXTENSION OF DEADLINE FOR STAKEHOLDERS TO COMMENT AND INTERVENE

Pursuant to 10 C.F.R. §§ 590.303 and 590.304, the Massachusetts PipeLine Awareness Network ("MassPLAN") files this motion to intervene, protest and request for extension of the deadline for comment and intervention in the above-captioned docket. MassPLAN states as follows:

I. COMMUNICATIONS

Any communications regarding this pleading should be addressed to:

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II. BACKGROUND

On October 24, 2014, Pieridae Energy (USA) Ltd. ("Pieridae") filed an application (the "Application") with the Department of Energy's Office of Fossil Energy ("DOE/FE") seeking a long-term multi-contract authorization to export domestically produced natural gas, up to the equivalent of 0.8 billion cubic feet ("Bcf") per day to non-Free Trade Agreement countries as liquefied natural gas ("LNG") via export into Canada by pipeline, re-exporting some or all of that gas as LNG from a proposed terminal in Goldboro, Nova Scotia.

III. INTERVENTION AND PROTEST

MassPLAN is a coalition of organizations and groups allied to pursue a safe and sustainable energy infrastructure for the Commonwealth of Massachusetts. Individual members of MassPLAN's constituent organizations include electric and gas ratepayers as well as individuals whose land would be adversely impacted and taken by eminent domain to construct one of the natural gas pipelines that would, if built, provide gas to the Maritimes & Northeast Pipeline system (hereinafter referred to as the "M&N Pipeline").

Specifically, since last February, MassPLAN's member organizations have been working to educate the public about the Kinder Morgan Northeast Energy Direct ("NED") pipeline project and that project's potential to harm the local environment, increase the long-term use of fossil fuels to the detriment of the climate, and send natural gas overseas instead of using it for domestic purposes. It is clear upon reading the Pieridae Application (page 20 & Appendix E) that its export plans would likely depend on the completion of the Kinder Morgan NED project and/or an alternative plan by Spectra Energy.

Currently, New England depends on the M&N Pipeline, from Baileyville to Dracut, to supply up to 0.85 billion cubic feet of gas to Maine, New Hampshire, and Massachusetts meter stations. Page one of the Kinder Morgan NED pre-file application (FERC Docket PF14-22, dated September 15, 2014) states that the NED project would entail "reversal of the primary direction of the joint facilities," referring to the M&N Pipeline from Dracut, Massachusetts to Westbrook, Maine, which currently flows south with a peak capacity of 833 mmcf per day. Although Pieridae states that it has not contracted with any pipeline company for capacity, it is clear that if approved, the intent of Pieridae is to contract for the new northbound capacity that would be made available as a result of the NED project.

Pieridae's Application must acknowledge the potential source of natural gas, and in doing so it must also acknowledge the potential environmental impact of a new greenfield pipeline project like NED. The NED project would create new and expanded rights of way that would impinge upon the rights of hundreds of homeowners and landowners to enjoy their properties. It would cross conservation lands and forests, the water supplies of numerous towns across Massachusetts, and it would endanger the safety of residents due to the crossing of many highly developed towns where a future pipeline incident could prove catastrophic.

Approval of the Pieridae export plan would not only drive the development of large pipelines, but it could result in the depletion of natural gas winter storage and peak supply that are critical to all of New England. In 2014, natural gas "inventories fell 1,000 Bcf below the five-year average in mid-April," according to EIA (http://www.eia.gov/forecasts/steo/report/natgas.cfm, accessed 2/8/15). That reduction in inventory was largely responsible for high spot prices for gas in January through October of 2014. Exporting 292 billion cubic feet of natural gas from this region would result in lower inventories of gas and, thus, would contribute to higher New England gas prices than if these exports were not allowed.

In addition, the extraction, combustion, and release of natural gas into the atmosphere, as well as the energy-intensive process of liquification and transport of natural gas for export, all have severe climate impacts when considered together.

Cumulative impacts of proposed natural gas export plans must be considered. If only some of the gas transported through NED is exported via Pieridae's Goldboro terminal (while some is exported through other terminals), and conversely, only some of the gas for Pieridae is coming from Kinder Morgan's pipeline (while some of it is coming from Spectra), without considering cumulative impacts, these companies are configured like a firing squad – no one company, no one contract, is specifically held responsible for the consequences of its actions, but they are all pulling the trigger. Pieridae, other exporters, and the pipeline companies must be held accountable for the impacts of their actions, which, together, create an overall scheme of massive pipeline expansion and export of natural gas – a scheme that is not in the public interest, for the reasons set forth above.

As pointed out by U.S. Senator Edward Markey last year, the total amount of natural gas approved by the U.S. DOE for export since May of 2011 already "has far exceeded the level that DOE's own study said would increase domestic natural gas prices by more than 50 percent." (See http://www.markey.senate.gov/news/press-releases/markey-new-natural-gas-export-approval-

crosses-cost-threshold-for-american-consumers-businesses). Attached and incorporated into this Motion and Protest is a letter signed by 22 U.S. Senators calling on the DOE to consider the cumulative impacts of potential natural exports before granting authorizing such contracts as those contemplated in Pieridae's Application.

Because MassPLAN represents natural gas consumers, and because MassPLAN represents individuals across the Commonwealth of Massachusetts along the proposed route of the NED pipeline, referenced in the Pieridae Application (Appendix E-3, E-4) as a possible source for gas, MassPLAN has a direct and immediate interest in this docket that cannot be adequately protected by any other party. Accordingly, MassPLAN should be permitted to intervene in this docket with full rights as a party.

IV. REQUEST FOR EXTENSION OF DEADLINE TO COMMENT AND INTERVENE

In addition to vigorously protesting the Application on the grounds outlined above, MassPLAN requests an extension of the time for public comment, protest and intervention in this proceeding. Many organizations and individuals whose rights and interests would be impacted by approval of the Application are only learning of this proceeding today. The public interest would be served by the transparency and opportunity for public participation afforded by a thirty-day extension of time.

V. CONCLUSION

For the reasons stated above, MassPLAN respectfully requests that DOE/FE grant this timely motion to intervene and that MassPLAN be accorded fully party status in any proceedings held by DOE/FE in this docket, and requests a thirty-day extension of time for all stakeholders to comment, protest, and intervene.

Respectfully submitted,

Director
Massachusetts PipeLine Awareness Network

Dated: February 9, 2015

United States Senate
WASHINGTON, DC 20510

May 8, 2014

President Barack Obama
The White House
1600 Pennsylvania Avenue NW
Washington DC 20500

Dear Mr. President:

We write to express our concern regarding the impact that large-scale exports of natural gas could have on American consumers and businesses.

Families and businesses depend on affordable and reliable supplies of natural gas. This winter many parts of the country faced tight supplies of propane and natural gas and families were left to face high energy bills. During February, Henry Hub natural gas prices more than doubled to over $8 per million British thermal units and prices in some regions of the country were far higher. Our natural gas inventories are now 55 percent below the five-year average. This winter served as a reminder that high natural gas prices can hurt family budgets and be a drag on our economy.

Taking a longer-term view, the United States has benefited from rising supplies and lower prices for natural gas since 2008. Thanks in part to lower natural gas prices, America's manufacturing sector has created more than 600,000 jobs since 2010. The Boston Consulting Group concluded that affordable natural gas prices could lead to 5 million more manufacturing jobs by the end of the decade. We must ensure that we do not squander what is clearly an American competitive advantage right now for American manufacturers and for the American economy.

Recently, the Department of Energy approved exports of liquefied natural gas from a sixth export facility. This means that total approved exports, combined with existing and approved export pipelines, now exceeds the total amount of gas that is currently used in every single American home and commercial business. This level of exports well exceeds the "high export scenario" referenced by a Department of Energy study in 2012 that indicated prices could increase by up to 54 percent. Price increases of this scale could translate into more than $60 billion a year in higher energy costs for American consumers and businesses.

Liquefied natural gas shipments to China, India, Japan, South Korea, and other Asian nations account for about 70 percent of the global trade of liquefied natural gas. Based on the contracts U.S. exporters already have in place, Asia would likely be the primary destination of U.S. natural gas exports as well. Natural gas prices in Asia are currently *three to four times higher* than those in the United States. Integration of U.S. and Asian natural gas markets through U.S. exports could lead to further increases in prices for American consumers and businesses, which may fundamentally reverse many of the economic benefits that have led to the current surge in manufacturing job growth in the United States. Large-scale exports of natural gas to Asia could also jeopardize America's goal of achieving energy independence, a goal made more achievable by the recent increase in domestic gas production.

It is imperative, both for American jobs and for the environment, that the Department of Energy continue to consider the public interest and the cumulative impact of potential exports on U.S. consumers and businesses before granting approval of natural gas exports to countries with which the United States does not have a free trade agreement. We ask that you pay close attention to the effects that large-scale natural gas exports could have on businesses, workers, and residential consumers.

Thank you for your attention to this matter.

Sincerely,

Debbie Stabenow

Edward J. Markey

Angus King

Sherrod Brown

Tammy Baldwin

Dianne Feinstein

Elizabeth Warren

Carl Levin

Al Franken

Sheldon Whitehouse

Ron Wyden

Bernard Sanders

Tom Harkin

Jack Reed

Bill Nelson

Patrick Leahy

Susan Collins

cc: Secretary of Energy Ernest Moniz