

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

DOCKET NOS. CP14-96-000  
PF13-16-000

ALGONQUIN GAS TRANSMISSION, LLC

TOWN OF DEDHAM'S MOTION FOR  
LATE INTERVENTION

The Town of Dedham, Massachusetts ("Dedham") hereby moves that the Federal Energy Regulatory Commission ("Commission") grant Dedham leave to intervene in the above matter, pursuant to 18 CFR 385.214(d). As reasons therefor, Dedham states as follows:

1. The above matter concerns an application for the construction of a natural gas transmission pipeline and other facilities ("Project"). Several miles of the pipeline will be located within Dedham, within the right of way of public streets and on other property owned by Dedham.
2. The Commission published the Notice of Application for the Project on March 18, 2014. The Notice of Application stated that a party seeking to become a party to the proceedings for the Project should file a motion to intervene by April 8, 2014, the date listed for comments on the application ("Comment Date").
3. On March 25, 2014, the former Dedham Town Administrator wrote a letter to the Commission concerning the Project ("Letter"). In the Letter, the Town Administrator stated that "the Town of Dedham would like to be added as an intervener in the project." The Letter was received by the Commission on March 31, 2014, prior to the Comment Date. A copy of the Letter is attached hereto as Exhibit A.
4. Notwithstanding Dedham's stated and timely request to be a party to the proceeding, the current service list for the Project application does not list Dedham as a party.

5. Dedham was not aware that it had not been listed as a party in this proceeding until reviewing the service list on September 17, 2014.
6. Had Dedham become aware, prior to the Comment Date, that the Letter was insufficient to establish Dedham's status as a party, Dedham would have submitted another document labeled as a motion to intervene, prior to the Comment Date.
7. Dedham and its residents will be directly affected by the construction and operation of the pipeline within the municipality. The pipeline is proposed to be installed within public streets that pass through a business park, commercial areas, and residential areas. The pipeline route, as proposed, will also cross through a municipal park, thus directly affecting Dedham's interests as a landowner. Dedham has concerns as to construction-related impacts on the safety and convenience of residents and businesses, and as to the impacts of the completed pipeline on public health and safety.
8. Where Dedham intended to become a party in this matter, expressed that intent prior to the Comment Date, and believed in good faith that its Letter did, in fact, provide it with the status of a party, there is good cause for Dedham to have not filed a separate motion to intervene previously, and for the Commission to now allow Dedham to intervene.
9. The allowance of this motion will not disrupt or delay the proceeding. The Commission recently issued the draft Environmental Impact Statement (for which comments and motions to intervene will be accepted through September 29, 2014), and, therefore, the Commission has not yet issued a decision on the Application.

10. No prejudice to, or additional burdens upon, the existing parties will result from allowing Dedham's motion to intervene.

WHEREFORE, the Town of Dedham respectfully requests that this Motion for Late Intervention be allowed.

TOWN OF DEDHAM

By its attorneys,



Lauren F. Goldberg (BBO# 631013)

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Kopelman and Paige, P.C.

Town Counsel

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Date: \_\_\_\_\_

9.19.14

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CRIMINAL

Michael L. Butler, Chairman  
James A. MacDonald, Vice Chairman  
Carmen E. Dellolacono  
Sarah E. MacDonald  
Paul A. Reynolds

William G. Keegan, Jr.  
Town Administrator

Nancy A. Baker  
Asst. Town Administrator



TOWN OF DEDHAM  
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March 25, 2014

Kimberly D Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20406

RE: Algonquin Gas Incremental Market Project  
Docket Numbers: PF13-16-000  
CP14-96-000

SECRETARY OF THE  
COMMISSION  
2014 MAR 31 A 11: 20  
FEDERAL ENERGY  
REGULATORY COMMISSION

Dear Ms. Bose

Algonquin Gas Transmission, LLC has filed its application with the Federal Energy Regulatory Commission and the Town of Dedham would like to be added as an intervener in the project. This project will pass within feet from our residents' homes and we want to ensure that the project is safe.

Please be advised that on April 11, 2014, I will be leaving my post as Town Administrator for a new position as Town Manager of Foxborough, MA. After that date Nancy Baker will be serving as the Interim Town Administrator while the search process for my replacement is conducted. Ms. Baker will, along with our DPW Director- Joe Flanagan and Town Engineer- Jason Mammone will very competently keep the Town and the Board of Selectmen fully apprised of all actions associated with this construction project. Ms. Baker can be reached at the same address and telephone numbers listed above. Her e-mail address is [nbaker@dedham-ma.gov](mailto:nbaker@dedham-ma.gov).

Thank you for assistance in this matter.

Very truly yours,

William G. Keegan, Jr., ICMA-CM  
Town Administrator

Cc: Board of Selectmen  
Asst. Town Administrator  
DPW Director  
Town Engineer

EXHIBIT "A"