

James A. MacDonald, Chairman
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TOWN OF DEDHAM
Board of Selectmen

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Nancy A. Baker
Interim Town Manager

September 26, 2014

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington DC 20426

Re: Town of Dedham: Comments on Algonquin Incremental Market Project
Docket No. CP14-96-000

Dear Ms. Bose:

On behalf of the Town of Dedham, Massachusetts ("Dedham"), the Dedham Board of Selectmen hereby states its opposition to the Algonquin Incremental Market Project ("Project"). Dedham will be particularly affected by the construction of the West Roxbury Lateral, which will pass from south to north through densely developed commercial and residential areas of Dedham, as well as across a Town recreational area. Based on the description of the Project, the alternatives considered, and the assessment of impacts presented in the Draft Environmental Impact Statement ("DEIS"), Algonquin has not shown that the Project is either necessary or optimally designed to achieve its stated objective of increasing natural gas supplies to New England.

The DEIS does not address the need for the West Roxbury Lateral, which is intended to provide additional gas supplies to Boston Gas (a division of National Grid). The DEIS does not present information as to projections of demand in the area served by Boston Gas, or the quantity of gas that the Project will supply to Boston Gas. The DEIS seems to take as a "given" that Boston Gas's expressed interest in additional supplies justifies this portion of the Project.

Even assuming that Boston Gas has a need for additional gas supplies, the DEIS does not analyze all the available alternatives for providing that supply, or alternatives to locating a new metering and regulation ("M&R") station in West Roxbury, which is the predicate for the construction of the West Roxbury Lateral through Dedham. Why is the West Roxbury Lateral, coupled with the construction of a new West Roxbury M&R Station, the chosen alternative? Are there other potential locations in the Greater Boston area where a connection between the Algonquin transmission system and the Boston Gas system could be located? Why cannot

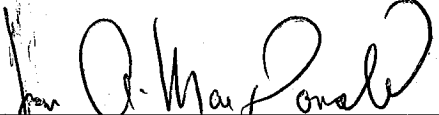
existing connections and M&R stations be used and/or upgraded to provide the additional supplies to Boston Gas? If a new M&R station is necessary, why has West Roxbury been chosen as the location for it?

Further, even if it a truly open-minded and objective alternatives analysis were to result in the selection of the West Roxbury M&R Station as the environmentally preferable means for Boston Gas to receive additional natural gas supplies from Algonquin, the DEIS does not fully examine alternative routes from Algonquin's existing or proposed transmission lines to the West Roxbury site. Why is the lateral routed northeasterly through Westwood and Dedham, rather than from another direction? What determines the starting point for the lateral?

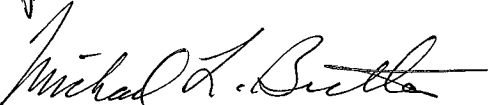
Having concluded (without sufficient foundation) that the supply to Boston Gas must be provided by a lateral transmission line passing through Dedham, Algonquin and FERC fall short in evaluating the alternatives presented for a route through Dedham. A route that runs from Westwood within the Route 95/128 right-of-way, before running along the Providence Highway, would reduce impacts to residential areas and narrow streets in Dedham, but the DEIS rules out this alternative as being inconsistent with Massachusetts Department of Transportation policies for the use of such right-of-ways. The DEIS fails to explain why MassDOT policies should outweigh the safety and convenience of Dedham residents.

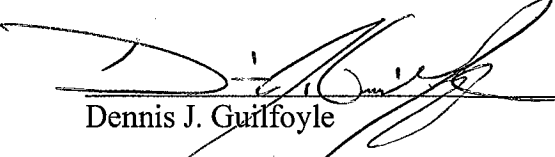
A more detailed explanation of Dedham's objections to the Project is being submitted separately on behalf of the Town by Kopelman and Paige, P.C., as Town Counsel.


Very truly yours,
DEDHAM BOARD OF SELECTMEN


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