

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

In the Matter of)
Tennessee Gas Pipeline Company, L.L.C.)
Northeast Energy Direct Project)

Docket No. CP16-21-000

MOTION TO INTERVENE AND PROTEST

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, the Town of Hudson, New Hampshire ("Hudson" or the "Town") hereby submits this timely motion to intervene and file comments in the above-captioned proceeding. The Town opposes the construction of a natural gas transmission pipeline and other facilities known as the Northeast Energy Direct project ("Project") due to the adverse impacts that will be sustained by the Town, and therefore seeks party status to protest the proposed pipeline, and fully protect the Town's interests.

I. IDENTITY AND INTERESTS OF PETITIONER

1. The Town is committed to enhancing and protecting the quality of life of all its residents, workers, and businesses, and is greatly concerned for those who live, work, and recreate near the proposed pipeline route. There are substantial and real environmental, economic, and health threats to the Town arising from the construction and operation of the pipeline within the municipality.
2. The proposed pipeline will run through 2.53 miles of the Town and within the right of way of public streets and on other property owned by the Town. It will cross conservation lands, forestland, wetlands, public infrastructure, private homes and private wells. The proposed location of the pipeline is intrusive, and threatens to disrupt the rural character of the area that our residents currently enjoy. Additionally, construction will impede

roadways and cause traffic and transportation disruptions along with related interruptions of public services along Kienia Road, and Route 111.

3. There are also approximately 43 residences that the pipeline will intersect and an additional 95 residences within 500 feet of the proposed pipeline and these residents are deeply worried about the reduction in value of their homes, and the difficulties they may encounter in refinancing, and in obtaining homeowner's insurance for their properties. Faced also with the looming threat of the forcible taking of their property to facilitate the construction of the Project, these citizens are uniquely harmed by the Project and the Town is obligated to defend them from encroachment by the pipeline. Moreover, the Project threatens public safety by placing fire and explosion hazards in proximity to residential areas and subjects the Town and its residents to an ongoing fear of such catastrophic incidents.
4. Hudson is responsible for the protection of both its natural environment and the health and welfare of its residents and would like to ensure that the aforementioned local concerns are adequately addressed in the environmental review of the Project. Accordingly, Hudson has a substantial interest in the outcome of this proceeding. Moreover, given the Town's expertise and familiarity with the locale of the proposed pipeline and the proposed alternative site locations, its participation in the above-captioned proceeding will significantly benefit the Commission.

II. COMMUNICATIONS AND CORRESPONDENCE

The following individual should be included on the service list for this docket and all communications should be sent to:

Mr. Stephen A. Malizia
Town of Hudson
12 School Street
Hudson, NH 03051
(603) 886-6024
smalizia@hudsonnh.gov

III. CONCLUSION

WHEREFORE, the Town of Hudson respectfully requests that it be permitted to intervene in this proceeding with full rights to participate in all further proceedings.

Respectfully submitted

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Dated: January 14, 2016

4819-9285-8412.1