

February 6, 2018

Mark D. Marini,  
Secretary, Department of Public Utilities  
One South Station, 5th Floor  
Boston, Massachusetts 02110

**RE: Bay State Gas Company d/b/a Columbia Gas of Massachusetts, D.P.U. 17-172**

Dear Secretary Marini:

In 2014 Columbia Gas of Massachusetts imposed a moratorium on homes and businesses installing new or expanded gas hookups in Easthampton and Northampton, stating that there was insufficient capacity in Kinder Morgan's Northampton Lateral pipeline to serve needs on "peak use" days in winter. In November 2017, Columbia Gas proposed that it would lift the moratorium on both cities by 2021 if it is allowed to build a series of new gas pipelines in its Greater Springfield Service Area. The size of the proposed build-out is based on a presumption of increased gas consumption in Northampton and Easthampton of 2.2% annually which will amount to an increase of over 25% in less than ten years.

Climate Action Now members and all residents of the lower Connecticut River Valley in Massachusetts will be directly affected by this proposal. The life of a pipeline is at least 40 years, so building these new pipelines means investment in gas-burning for decades. This is in direct contradiction to the court-mandated emission reductions of the Global Warming Solutions Act. The pipeline proposal offers us a choice: shall we spend millions of dollars of ratepayer money on new pipelines that contribute to air pollution and the climate crisis, or on investment in clean technology and energy use reduction?

We choose the latter.

Columbia Gas has not taken into account the commitment of our region to moving toward a fossil fuel free future. Northampton City Council unanimously passed a resolution in support of 100% renewable energy ([R-18.003](#)) on February 1, 2018. Smith College, the largest gas consumer in Northampton, has cut its overall usage by 15% since the moratorium began, and is planning major energy conservation measures that will further lessen its reliance on the Northampton Lateral Pipeline. Northampton's [Heat Smart](#), air source heat pump installation program, converts home heating from oil or gas boilers to efficient electric heat. The [ener-G-save](#) program is bringing energy use reduction advances to tens of thousands of homeowners in the Valley.

Because this proposal in large part is designed to resolve the moratorium in Northampton and Easthampton -- and there are diverging views on whether lifting the moratorium is even an appropriate goal, let alone how to achieve that goal -- we request that you schedule a public comment hearing to take place in Northampton.

We also request a stay of this contract proceeding until the review of the Columbia Gas long-range Forecast and Supply Plan has been completed in Docket No. 17-166. Columbia Gas should not be moving forward with specific contracts before its broader plan has been approved or modified.

We understand that a traditional gas company business model encourages selling more gas, to more customers, year after year. The realities of gas extraction, transportation, and distribution, and the associated greenhouse gas footprint from wellhead to burner tip, make this model untenable, given the reality of climate change. The Columbia Gas presumption of "business as usual" in their proposal is antithetical to fulfilling our Commonwealth's emissions reduction mandate. The climate chaos we face demands bold action to rapidly move our energy system away from fossil fuels and towards 100% clean renewable sources. It is up to you, the Department of Public Utilities, to keep the fossil fuel industry in check. We at Climate Action Now respectfully request that you deny Columbia Gas this contract aimed to increase gas consumption in our region.

Respectfully submitted,

Climate Action Now Western Massachusetts

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