

Wayne L. Wiethel, AICP
Director of Planning**Federal Energy Regulatory Commission**Attn: Kimberly Bose, Secretary
888 First St NE, Room 1A
Washington, DC 20426

March 14, 2016

RE: Nexus Pipeline Route and Purpose & Need Considerations

In a continued effort to outline the concerns of the City of Green, this letter will address the alternative routes and the purpose and need of the Nexus pipeline.

We would like to restate that the alternate route presented by the City of Green was developed to demonstrate that a more logical, less impactful route could easily be accomplished. We were clearly successful to that end. From our viewpoint, Nexus continues to pursue an irrational route justified only by their questionable market connections. With their extensive existing networks of gas distribution in Ohio, Dominion East Ohio (DEO) and Columbia Gas Transmission (CGT), as Nexus customers, could be equally served on a route south of Summit County. The only location that would not be served on a southerly route is the Brickyard Industrial Park. However, DEO has sufficient capacity to serve future users at The Brickyard. **Therefore the named market connections are a moot point in consideration of an alternate route south of the City of Green.**

Resource Report 10 ~ Alternatives

However, if Nexus *could* prove the need to serve these market connections in the locations indicated, there is an obvious alternate route that was not mentioned in Resource Report 10. Begin on either the *Southern Route Alternative* or the *City of Green Alternative* (see attached map) as they go south of Canton, then utilize the eastern-most lateral to travel north to meet the first market connection. In this way, all indicated market connections would be met while avoiding the more densely populated areas of Stark County and Summit County. It is clear, looking at Figure 10.4-1A, that this is the more compelling solution. The analysis for this route should be readily available from the analyses already performed by the applicant.

Perhaps the only viable argument the applicant would have to adopting a less-impactful south alignment would be that the effort to develop the alignment may extend the anticipated project timeline. With all due respect to the applicant, any schedule commitments that they may have made to provide gas along

the pipeline route would be speculative at best, considering the process required for study, review and approval. This is a big project with ramifications to communities and property owners. It shouldn't be rushed through simply because the applicant has a speculative schedule commitment. Some are hoping to delay the project in hopes of it just going away. That is not our goal. **We're simply asking for the best possible project to proceed. The route through Green is clearly not the best possible project.**

We have recently learned that the ET Rover pipeline, a large project consisting of dual 42" pipes, will be constructed in 2017. The Utopia East pipeline by Kinder Morgan and the Leach Express project by Columbia Gas Transmission are also scheduled to be under construction in 2017. To have ET Rover, Utopia East, Leach Express and Nexus constructing in the same year would overwhelm the region. **We request that the construction of the Nexus project be planned for 2018 at the earliest.** This would provide the applicant with sufficient time to develop a southern route that has far fewer regional impacts, while relieving the region from the burden of overlapping construction schedules.

Nexus makes several references to the conversion of coal-fired power plants to gas-fired power plants. While it is true that several Ohio power plants may convert from coal to gas, **at no point does the applicant demonstrate that the gas they deliver would serve this need.** It would be understandable that they would try to position the pipeline in close proximity to existing and proposed power plants to potentially serve them in the future. However, **a route south of Summit County can still achieve this goal.**

10.5.1.2 City of Green Alternative

What is lacking from the applicant's discussion of the City of Green Alternative is any indication showing how market connections could be served on this alternative. The alternative crosses the Dominion East Ohio (DEO) system and parallels the Columbia Gas Transmission (CGT) system for some distance. This close proximity should eliminate the need for extended customer laterals. The City requests FERC to study the existing natural gas distribution system in the region before accepting the applicant's premise that DEO and CGT could only be served by the points indicated on their proposed route.

Nexus claims four laterals would be required if the City of Green Alternative is adopted. In reviewing Figure 10.4-1A, this assertion is not substantiated. The extended customer laterals for DOE and CGT could be dropped by serving the customers elsewhere in their existing distribution networks. That leaves the stated lateral for NRG Power. However NRG has indicated they are not moving forward with a coal to gas conversion¹. Furthermore, it is stated in the application submitted to the Ohio Power Siting Board that the proposed pipeline that would serve the Avon Power Plant would tie in with the existing Dominion East Ohio system. Regardless, the alternate route could easily be modified at the north end to align with an NRG connection point, **thereby eliminating the need for any lateral.**

Table 10.5-2 Comparison of the City of Green Alternative with the Corresponding Segments of the Proposed Nexus Pipeline Route

Please note the analysis that the applicant completed for the City of Green Alternative. The line item for

¹ http://www.cleveland.com/business/index.ssf/2015/09/nrg_to_keep_burning_coal_at_av.html

“Residential Structures within 50 feet of Construction ROW” indicates there would be 80 structures along the Alternative Route while the Proposed Route would have 76. Meanwhile on Table 8.3-2 *Buildings within 50 Feet of the Construction Workspace for the Nexus Project* in Resource Report 8 shows that there are a total of 182 structures indicated between MP 1.8 to 98.8 of the Proposed Route. **This gross misrepresentation has us questioning their entire analysis.**

In the time between the June draft resource reports and the filing of their application, Nexus was able to refine the proposed route. We are confident that a route alternative south of Summit County could similarly be refined to minimize any potential impact even further, and easily produce the best route for a project of this scope.

Finally, in regard to purpose and need, the U.S. Energy Information Administration released a February 2016 Drilling Productivity Report (attached). **The report indicates that the Utica Region produced 3.248 bcf/day in the month of January.** Recent newspaper reports suggest that production levels may be dropping with the pervasively low price of oil and natural gas. Please consider with this amount of natural gas being produced, existing infrastructure transporting the gas, and the number of additional pipelines currently under review; **does a need really exist for the Nexus pipeline?**

Sincerely,



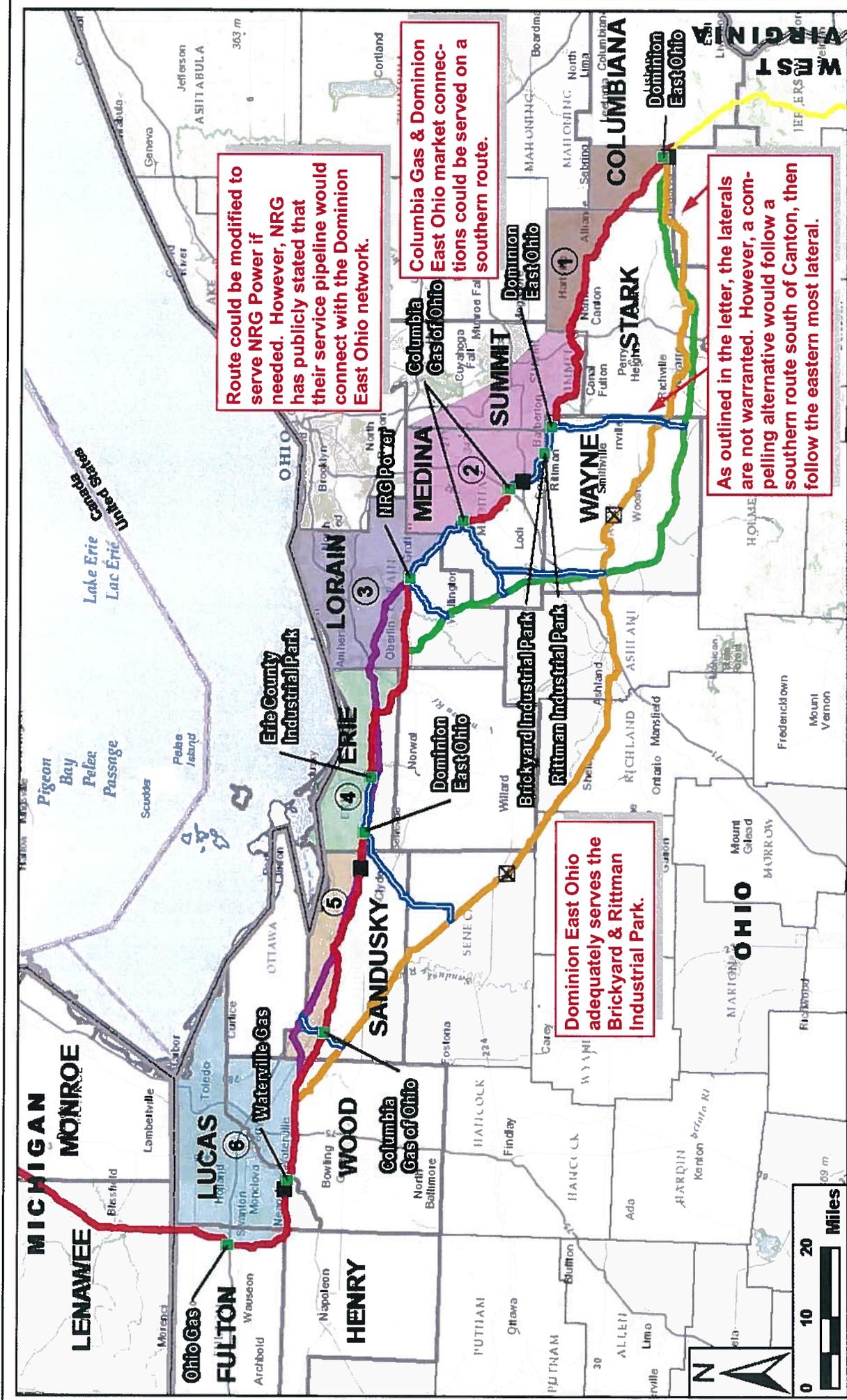
Wayne L. Wiethe, AICP
Director of Planning
WW/CL/NB



Chrissy Lingenfelter, GISP
GIS Administrator

Attachments(2)

cc: *Sherrod Brown, U.S. Senator*
Rob Portman, U.S. Senator
Jim Renacci, Congressman
John Kasich, Governor
Frank LaRose, Ohio State Senator
Anthony DeVitis, Ohio State Representative
Russ Pry, Summit County Executive
John Sheridan, Director of State Gov Affairs Spectra Energy
Brian Hicks, Hicks Partners
David Slater, Executive Vice President-Gas Storage & Pipeline



Route could be modified to serve NRG Power if needed. However, NRG has publicly stated that their service pipeline would connect with the Dominion East Ohio network.

Columbia Gas & Dominion East Ohio market connections could be served on a southern route.

As outlined in the letter, the laterals are not warranted. However, a compelling alternative would follow a southern route south of Canton, then follow the eastern most lateral.

Dominion East Ohio adequately serves the Brickyard & Rittman Industrial Park.

Figure 10.4-1A
Ohio Market Areas
Major Route Alternatives

Prospective Market Areas

1	2	3	4	5	6
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Major Route Alternatives

- City of Green Alternative
- Southern Route Alternative
- Turpike Alternative
- Alternative Route Laterals Needed to Reach Confirmed Market Connections

Confirmed Market Connections

- Proposed Compressor Sites
- Relocated Compressor Sites for Southern Route Alternative
- Proposed NEXUS Mainline Pipeline
- Texas Eastern Pipeline System

Other Symbols:

- County Boundary
- State Boundary





Monthly additions from one average rig

