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Algonquin Pipeline Relocation (CCC File No. 25012)
Cape Cod Commission
3225 Main St.
Barnstable, MA 02630

On behalf of the Sierra Club Massachusetts Chapter, and our Cape Cod & Islands Group made up of 6,860 members and supporters across the region, we write in response to comments, questions, and discussions during the October 28th hearing held by the DRI Review Subcommittee on the Algonquin Pipeline Relocation (CC#25012) project.

Before offering comments in four areas, we commend Subcommittee members for

- Acknowledging concerns that this project's potential for pipeline expansion could enable increased use of methane gas on Cape Cod, result in increased greenhouse gas emissions, and undermine progress toward state policy goals,
- Requesting more complete information from Algonquin Gas Transmission (AGT) on pipeline operations and the authorized and potential future capacity and throughput of proposed pipeline infrastructure, and
- Suggesting an independent analysis be conducted to investigate possible pipeline expansion in light of *Cape Cod Regional Policy Plan* (RPP) goals and objectives.

FIRST, AGT representatives claimed that this pipeline will not leak, and that no additional blowdown emissions will occur at metering and regulation (M&R) stations. In fact, methane pipelines are prone to leak at various points throughout the system, and these fugitive emissions have historically been underestimated.[1] Further, this project includes two new M&R stations, augmenting the two existing stations to be relocated. M&R facilities leak methane through pressure regulators and pneumatic vents, and higher-pressure pipelines result in more fugitive emissions.[2] M&R station blowdowns deliberately vent methane gas to the atmosphere. Here are questions for AGT:

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[1] https://engineering.jhu.edu/news/study-finds-that-natural-gas-leaks-exceed-epa-estimates-in-transmission-pipelines-on-the-east-coast/;
https://pubs.acs.org/esthag/article-pdf/54/14/8958/66995843/acs.est.0c00437.pdf

[2] https://www.epa.gov/sites/default/files/2016-08/documents/10_metering.pdf;
https://www.epa.gov/natural-gas-star-program/estimates-methane-emissions-segment-united-states;
https://dem.ri.gov/sites/g/files/xkgbur861/files/2025-05/natural-gas-systems-white-paper%20v2.7.pdf

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How will this non-leaking pipeline differ from other pipelines that do leak? Will four M&R stations produce the same amount of fugitive and intentional emissions as existing infrastructure? How much additional greenhouse gas emissions - methane and carbon dioxide - could AGT's infrastructure someday enable?

SECOND, in response to discussion at the Subcommittee's hearing, Sierra Club reiterates the need for clarity in differentiating AGT's current contractual obligations for delivering gas to National Grid on Cape Cod from the upper limits authorized by the Federal Energy Regulatory Commission *and* from the highest potential future delivery capacity of its expanded and modernized infrastructure. AGT might be required to meet obligations up to certificated limits at the moment, but enlarging - rather than simply relocating - pipeline means that in the future far more fracked gas could be delivered to and consumed on the Cape than today. As a Subcommittee member noted, companies are in the business of making money, and AGT and National Grid are no exceptions.

In previous filing documents as well as before the Subcommittee, AGT representatives highlighted upstream constraints as one of the limiting factors to bringing more gas supply onto Cape Cod. It is worth noting that AGT is pursuing two upstream expansion projects on the same gas transmission line.[3] During the Subcommittee hearing, AGT asserted that the sole rationale for employing an 18-inch-diameter pipeline to replace the two 10-inch-diameter bridge-attached pipelines is to account for pressure drop losses due to a longer run under the Cape Cod Canal.

To address uncertainties raised at the Subcommittee hearing, more information is needed about anticipated and potential operating pressures and throughputs and about available capacity and projected future demand on National Grid's distribution network under a variety of growth and development scenarios. **An independent and comprehensive assessment is needed of the potential for "increasing throughput beyond currently authorized and subscribed volumes" at some future point, after AGT's new pipeline has begun commercial operation.**

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[3] https://www.enbridge.com/projects-and-infrastructure/projects/algonquin-reliable-affordable-resilient-enhancement; https://infopost.enbridge.com/GotoLINK/GetLINKdocument.asp?Pipe=10076&Environment=Production&DocumentType=Notice&FileName=AGT_OPN_InfoPostNoticeID_177967_20260518150033.pdf&DocumentId=8a9cae929e28aede019e2cb3c6ad0681

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THIRD, Sierra Club urges Subcommittee members to require a rigorous evaluation of the possible adverse impacts of a potential future expansion leading to increased methane gas use and emissions - a noticeable omission from the applicant's presentation:

- **As proposed, AGT's project does not appear to be consistent with the RPP's Climate Change goal and objectives.** Enabling the potential for pipeline expansion without mitigation would undermine the Commonwealth's decarbonization strategies and emission reduction goals, discourage building electrification and the promotion of low- or no-carbon generation, and help exacerbate climate change impacts.
- **As proposed, AGT's project also does not appear to be consistent with RPP goals and objectives in the areas of Capital Facilities and Infrastructure, Energy, and Economy.** There's no demonstrated future need for expanded infrastructure. Becoming even more reliant on polluting methane gas would be inefficient and unsustainable, would reduce fuel diversity, would increase vulnerability to price volatility, and would undermine competitiveness.

FINALLY, recognizing the urgency of timely DRI review and bridge replacement, Cape Cod Commission's broad authority, and AGT's stated interest in getting out of the way, **Sierra Club encourages immediate attention to drafting project approval conditions under which the applicant would agree not to expand - or would be constrained from expanding - the throughput of proposed pipeline infrastructure so as to protect the Cape's unique values as enumerated under state law.**

Chris Powicki, Chair, Cape Cod & Islands Group, Sierra Club Massachusetts

Vickash Mohanka, State Director, Sierra Club Massachusetts