Kevin F. Galligan
PO Box 1614
Orleans, MA 02653

October 19, 2026

RE: Algonquin Pipeline Relocation (CCC File No. 25012) — Public Comment

Cape Cod Commission
3225 Main St.
Barnstable, MA 02630

Submitted via online comment form

Dear Members of the Cape Cod Commission:

I am writing as a resident of Orleans regarding CCC File No. 25012, the Algonquin Pipeline Relocation project, also referred to as the Cape Cod Canal Pipeline Relocation project. I recognize that this project is a required response to the U.S. Army Corps of Engineers' 2020 determination that gas infrastructure must be removed from the Bourne and Sagamore Bridges to accommodate the Cape Cod Bridges Program, and that uninterrupted gas service to National Grid customers on both sides of the Canal must be maintained throughout construction. I am submitting this comment to respond to concerns raised by other commenters, including the Sierra Club Massachusetts Chapter, regarding (1) the review process itself, and (2) the characterization of this project as a disguised "capacity expansion." I ask the Commission to weigh these concerns against the full factual record already developed through the federal review process.

On the Claim That This Has Been an Expedited Process Lacking Public Involvement

Sierra Club's comment expresses concern that efforts to expedite environmental review of the Cape Cod Bridges Program are leading to incomplete assessments, and other commenters ask for more transparency. The record does not support the view that this project's review has been rushed or closed to the public. This project has been under continuous federal and state review for well over a year, through two linked Federal Energy Regulatory Commission (FERC) dockets, which are fully accessible via the internet (see https://elibrary.ferc.gov/eLibrary/search), plus state environmental review:

- **Pre-Filing Review (Docket No. PF25-4):** FERC opened a formal pre-filing review process for this project well before Algonquin filed its certificate application, specifically to allow early public and agency input on project design before the formal application was submitted. As part of that pre-filing review process, FERC issued a Notice of Scoping Period on April 3, 2025, requesting public comment on environmental issues, and held a Public Scoping Session open to any member of the public, with a court reporter transcribing oral comments for the official record and Algonquin representatives present to answer project-specific questions.

- **Certificate Proceeding (Docket No. CP25-552):** Algonquin's formal application for a Certificate of Public Convenience and Necessity was filed on September 29, 2025, opening a second, fully public docket where any person may file comments, motions to intervene, or protests. This docket has been active: FERC has issued multiple rounds of data requests to Algonquin (including requests dated November 13, 2025, December 11, 2025, January 16, 2026, February 9, 2026 and March 9, 2026), to which Algonquin responded in writing. Formal interventions have been filed by NSTAR Electric, NSTAR Gas, the National Grid Gas Delivery Companies, New York State Gas & Electric, and Maine Natural Gas Company, and comments have been filed by the Cape Cod Chamber of Commerce and other regional Chambers, indicating active participation by multiple parties.

- **Public Open Houses:** Algonquin held at least two in-person open houses specifically for this project, on March 4, 2025, and November 13, 2025, in Bourne, each giving residents a direct opportunity to raise questions and concerns outside of the formal docket process.

- **State and Regional Coordination:** The project has also undergone Massachusetts MEPA review (EEA #16947), including a public comment meeting on the Environmental Notification Form on May 20, 2025. In addition, FERC staff issued an Environmental Assessment for the project, noticed in the Federal Register on June 3, 2026, with an opportunity for public comment.

Taken together, this is not an expedited process that has bypassed public involvement; it is a project that has been subject to sustained, multi-track federal, state, and regional review for over a year, with multiple independent opportunities for public comment still open, including the Commission's own DRI hearing on October 28. I would encourage the Commission to treat the FERC and MEPA records as substantially developed records it can draw on, rather than duplicate scrutiny that is already underway at the federal level.

On the Claim That This Project Is a Disguised Capacity Expansion

Several commenters compare two 10-inch pipelines (combined cross-sectional area of approximately 157 sq. in.) to an 18-inch pipeline (approximately 254 sq. in.) and calculate a 62% increase in cross-sectional area. Sierra Club states that this suggests "at least a doubling of maximum fuel transmission capacity" serving Cape Cod. I'd ask the Commission to weigh several points before accepting that conclusion:

1. **Cross-sectional area of a pipeline segment is not the same as throughput, and MAOP is not the same as operating pressure.** Maximum Allowable Operating Pressure (MAOP) is a regulatory design ceiling set under 49 CFR Part 192 based on pipe grade, wall thickness, and class location — it is a safety limit, not a statement of how the pipeline will actually be operated day to day. Pipelines are designed to meet contractual peak-demand conditions and routinely operate well below MAOP at other times. None of the cross-section calculations submitted account for the pressure the new pipeline will actually be operated at, as distinct from its rated maximum, nor do they reference Algonquin's actual contracted receipt and delivery point transportation obligations to National Grid — which is what governs deliverable gas volumes, not the physical dimensions of a pipe segment.
2. **Algonquin has stated on the record, under the certificate docket itself, that the project will not result in new or incremental capacity and is therefore not an expansion of the Algonquin system.** This is a representation made directly to FERC (see Algonquin's response to the FERC's March 9 data request filed March 16, 2026 – FERC eLibrary accession no. 20260316-5280), in a proceeding in which intervenors, including National Grid and other utilities, have standing to challenge it. If the Commission has reason to doubt this representation, the appropriate venue to compel Algonquin to substantiate it with contracted delivery data is the active FERC docket, which already has mechanisms (data requests, intervention, protest) for exactly that purpose, rather than treating cross-sectional geometry alone as proof of expansion.
3. **A pipe-diameter comparison does not establish the capacity the new facilities must carry.** Some commenters suggest a 14-inch pipeline would be a closer like-for-like replacement. But the capacity required depends on contracted deliveries at the Bourne and Sagamore delivery points, the pressures at which those points are served, the upstream receipt points, and the design of the integrated pipeline system — not on a comparison of the cross-sectional area of the old and new pipe segment. Those are the facts that should be established from the FERC record before a diameter-based substitute is adopted.

Sierra Club's comment acknowledges that relocation of the bridge-attached infrastructure is necessary and urges timely replacement, and I agree. I also recognize that the Commission's Regional Policy Plan and Climate Action Plan include important review criteria, and I don't ask the Commission to disregard climate considerations. But I'd ask that any capacity-expansion finding be grounded in verified contracted delivery data and operating pressure, not in geometric comparisons of pipe diameter alone, particularly where that same question is already being actively tested in an existing federal proceeding with data-request and intervention tools suited to that question. If the Commission seeks added assurance, it could condition any approval on the capacity certificated by FERC in Docket No. CP25-552.

On Project Funding

Several commenters object to the use of bridge-program funds for this project. I ask the Commission to request a cost-allocation breakdown from MassDOT and Algonquin showing what portion of project cost is attributable to the relocation scope required by the Army Corps of Engineers' 2020 Final Major Rehabilitation Evaluation Report versus any additional scope. That would allow the funding question to be resolved on the facts, rather than inferred from pipe diameter alone.

Conclusion

I ask the Commission to proceed with its DRI review on the merits of the full record — including the extensive federal and state review already completed — rather than treating this as an under-scrutinized or rushed proposal. Where open technical questions remain about capacity claims, I'd encourage the Commission to request the specific contracted-delivery and operating-pressure data needed to resolve them, rather than rely on cross-sectional-area comparisons that don't reflect how pipeline capacity is actually determined or regulated.

Thank you for your consideration.

Respectfully submitted,



Kevin F. Galligan