



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 22, 2020

Harold M. Blinderman, Esq.
Day Pitney, LLP
242 Trumbull Street
Hartford, CT 06103

RE: **PETITION NO. 1399** – Iroquois Gas Transmission System, L.P. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and 16-50k, that modifications to its existing natural gas compressor stations located in the Towns of Brookfield and Milford, Connecticut (“Enhancement by Compression Project”) are under the exclusive jurisdiction of the Federal Energy Regulatory Commission.

Dear Attorney Blinderman:

At a public meeting held on May 21, 2020, the Connecticut Siting Council (Council) considered and ruled that the Federal Energy Regulatory Commission (FERC) has exclusive jurisdiction over the proposed “Enhancement by Compression Project” that consists of modifications to the existing natural gas compressor stations located in the Town of Brookfield and the City of Milford. The Council also finds that notwithstanding federal preemption, FERC regulations provide for the participation of interested parties in certification proceedings and state agencies, such as the Council, may intervene as a matter of right.

Consistent with FERC’s encouragement to cooperate with state and local officials, Iroquois has provided the Council with access to detailed information regarding the pending FERC Application and the opportunity to make recommendations to FERC and Iroquois regarding siting, environmental mitigation measures and construction procedures. The Council recommends Iroquois implement erosion and sedimentation control measures in accordance with the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control* as noted in the staff report.

Enclosed for your information is a copy of the staff report on this petition for a declaratory ruling.

Sincerely,

s/Melanie A. Bachman

Melanie A. Bachman
Executive Director

MAB/MP/lm

Enclosure: Staff Report dated May 21, 2020

c: Secretary of the State (via e-mail service)
The Honorable Stephen C. Dunn, First Selectman, Town of Brookfield
Alice Dew, Land Use Director, Town of Brookfield
The Honorable Benjamin G. Blake, First Selectman, City of Milford
David Sulkis, City Planner, City of Milford



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Petition No. 1399
Iroquois Gas Transmission System, L.P.
Brookfield and Milford
Staff Report
May 21, 2020

Introduction

On April 3, 2020, the Council received a petition (Petition) from Iroquois Gas Transmission System, L.P. (Iroquois) for a declaratory ruling, pursuant to Connecticut General Statutes (CGS) §4-176 and 16-50k, that modifications to its existing natural gas compressor stations located in the Town of Brookfield and the City of Milford (known as the Enhancement by Compression Project) are under the exclusive jurisdiction of the Federal Energy Regulatory Commission (FERC). Iroquois filed the Petition to the Council in accordance with CGS §16-50k(d) exempting from the Council's jurisdiction any matter over which the federal government has exclusive jurisdiction and FERC policy requiring applicants to cooperate with state and local agencies in siting pipeline-related facilities.¹ The project is under the exclusive jurisdiction of FERC.

On or about April 3, 2020, Iroquois provided a copy of the Petition to the Town of Brookfield and the City of Milford.

On April 6, 2020, the Council sent correspondence to the Town of Brookfield and the City of Milford stating that the Council has received the Petition and inviting any questions or comments regarding the Petition by May 3, 2020. No comments have been received.

Proposed Project²

Iroquois' pipeline system is divided into two rate zones: Zone 1 from Waddington to Wright, New York; and Zone 2 from Wright to Hunts Point, New York. The pipeline system in Connecticut is in Zone 2. In recent years, Iroquois has experienced significant increases in demand for service in Zone 2, while capacity in Zone 1 has been undersubscribed. Demand for winter period service in Iroquois' Zone 2 between Athens and South Commack, New York has been significant, and that portion of Iroquois' system is both fully subscribed on a firm basis and utilized at a high load factor throughout the winter.

Accordingly, Iroquois has determined that the most advantageous method of adding incremental capacity from an environmental and efficiency standpoint is through the addition of compression and cooling equipment at its Brookfield, Connecticut compressor station and the installation of cooling facilities at its Milford, Connecticut compressor station³. This is a compression-only project that does not require the expansion of Iroquois' pipeline footprint, no looping of existing Iroquois pipeline system, and no need to acquire additional pipeline right-of-way in Connecticut. Iroquois expects to complete the project to meet its milestone of delivery by November 1, 2023.

¹ Iroquois listed the Council as a stakeholder in its FERC application so the Council will receive e-alerts/updates on the progress of the application.

² FERC Docket No. CP20-48, Iroquois Gas Transmission System, L.P. Abbreviated Application for a Certificate of Public Convenience and Necessity, available at https://elibrary.ferc.gov/idmws/docket_sheet.asp

³ Upgrades are also proposed for Athens and Dover, New York, but such upgrades are outside the scope of this Petition.

Brookfield Compressor Station

At the Brookfield Compressor Station, Iroquois would construct a control/office building and install two new turbines of approximately 12,000 horsepower each, known as Unit B1 and Unit B2, respectively, for natural gas compression purposes. The turbine installations would include associated cooling, filter separators and other equipment connecting to Iroquois’s 24-inch diameter main gas transmission line at Brookfield. Incremental cooling equipment would also be added to serve existing Unit A1 and Unit A2.

Certain modifications to existing Unit A1 and Unit A2 would be performed to address noise levels to maintain compliance with FERC standards for the entire Brookfield Compressor Station. Such noise control modifications include the replacement of existing turbine stacks on Unit A1 and Unit A2 and may include other measures such as acoustically designed compressor buildings, turbine unit exhaust and air inlet systems, low noise lube oil coolers, low noise gas coolers, acoustical piping for aboveground gas piping, and unit blowdown silencers.

The applicable FERC noise standard for the proposed project is 55 dBA⁴. The project is not expected to exceed the FERC noise standard. The project would also comply with the Connecticut Department of Energy and Environmental Protection (DEEP) Noise Control Standards for a Class C emitter (industrial) to a Class A (residential) receptor while taking into account that the site is a high background noise level site.

Iroquois plans to install oxidation catalysts (OC) in the exhaust system of each proposed compressor, as well as the two existing gas compressors. The OC media would react with the exhaust gas produced by the gas turbines to reduce carbon monoxide by up to 90 percent or more, as well as reduce volatile organic compounds including formaldehyde and other hazardous air pollutants.

Iroquois plans to install a vent recovery system (VRS). The equipment would be designed and installed to capture the dry seal gas and reinject the gas downstream of the compressor station isolation valves. In addition, the VRS would also capture gas vented during normal controlled unit compressor blowdowns.

To accommodate the project, the existing fence line would be expanded to the north and east. The subject property totals approximately 68.3 acres in size. Directly to the southeast of the Brookfield Compressor Station is the existing natural gas transmission right-of-way. High Meadow Road is located to the northeast with two residences on the opposite side of that street. Undeveloped land is located to the west and southwest.

Two inland wetlands are on the subject parcel.⁵ The project is not expected to impact these wetlands. Iroquois commits to employing FERC’s Upland Erosion Control, Revegetation, and Maintenance Plan and the Wetland and Waterbody Construction and Mitigation Procedures (May 2013) to protect applicable resources.

Proposed temporary and permanent project disturbance areas (all located within upland areas) are listed below.

Land Requirements for Project Activities

Project Component	Location County, State	Permanent Aboveground Facilities (acres)	Temporary Workspace (acres)	Additional Temporary Workspace (acres)	Temporary Access Roads (acres)	Permanent Access Roads (acres)	Totals (acres)
Brookfield Compressor Station	Fairfield, CT	3.15	0.28	7.28	0.62	0.34	11.67

⁴ This is based on a day-night sound level known as L_{dn}.

⁵ FERC Docket No. CP20-48, Iroquois Gas Transmission System, L.P. Abbreviated Application for a Certificate of Public Convenience and Necessity, available at https://elibrary.ferc.gov/IDMWS/file_list.asp?document_id=14833005

Iroquois has acquired the two residential properties (67 & 75 High Meadow Road, Brookfield) located closest to the current and proposed Brookfield compressor station facilities to create a contiguous buffer zone around the facility. The residential structures on one of the properties will be utilized for construction support in lieu of a construction trailer. The residential structure on the other property would be demolished and the property used as a laydown area. No wetlands or watercourses were delineated on either of these two residential properties.

Following construction of the project, the remaining standing residential structure that was utilized for construction support would be demolished, and both properties allowed to return to forested upland conditions similar to existing conditions that currently surround the two properties.

Milford Compressor Station

Iroquois would install new gas cooling equipment for the existing Milford Plant A units and associated piping to allow for compressed discharge gas to be cooled. No gas cooling facilities currently exist at the Milford Compressor Station. Iroquois also plans to install a VRS. This would reduce the aggregate gas emissions from all compressor stations associated with this project by an estimated 70 percent from historical levels.

The applicable FERC noise standard for the proposed project is 55 dBA. The project is not expected to exceed the FERC noise limit. The nearest abutting property is industrial. The project would comply with the DEEP Noise Control Standards for a Class C emitter (industrial) to a Class C (industrial) receptor.

The site consists of a fenced compound on an approximately 4.8-acre property bordered to the west and north by Oronoque Road and to east by a railroad line. The existing fence would not be modified to accommodate the project. No wetlands or watercourses were delineated at this site.

Proposed temporary and permanent project disturbance areas are listed below.

Land Requirements for Project Activities

Project Component	Location County, State	Permanent Aboveground Facilities (acres)	Temporary Workspace (acres)	Additional Temporary Workspace (acres)	Temporary Access Roads (acres)	Permanent Access Roads (acres)	Totals (acres)
Milford Compressor Station	New Haven, CT	2.28	1.29	0.66	0.03	0.03	4.29

Staff Recommendations

Staff recommends Iroquois implement erosion and sedimentation control measures in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.

Brookfield Compressor Station



Milford Compressor Station

