

PHILIP M. SMALL
Counselor at Law
direct dial: 860-509-6575
psmall@brownrudnick.com

185 Asylum
Street
Hartford
Connecticut
06103
tel 860.509.6500
fax 860.509.6501

June 22, 2016

VIA ELECTRONIC MAIL AND UPS OVERNIGHT

Mr. Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

**Re: Petition No. _____ - Iroquois Gas Transmission System, L.P. Petition
Regarding the Addition of an Impressed Current Cathodic Protection
System to the Iroquois Pipeline Parallel to Webb Circle, Monroe,
Connecticut**

Dear Chairman Caruso:

As discussed below, Iroquois Gas Transmission System, L.P. ("Iroquois") files this petition with the Connecticut Siting Council (the "Council") to consult and cooperate with the Council regarding Iroquois' planned addition of an impressed current cathodic protection system ("CP System") to the Iroquois Pipeline, parallel to Webb Circle in Monroe, Connecticut (the "Site").

The CP System is described in detail in the attached document entitled Proposed Ground Bed Monroe, CT and the accompanying sketches. In brief, the CP System will include installation of a 250 linear foot ground bed parallel to Webb Circle, which will terminate at a rectifier; and installation of a cable approximately 550 feet long parallel to Webb Circle, and continuing the cable northerly along the Iroquois right-of-way for an additional 25 feet parallel to pipe casing. Cable leads will be exothermically welded to Iroquois' pipe. A new AC service will be installed to power the rectifier, and will be mounted to a utility pole or pedestal. The location of the proposed AC service has not yet been determined, but will be within the permanent Iroquois right-of-way.

As the Council has previously acknowledged, the Federal Energy Regulatory Commission ("FERC") has exclusive jurisdiction over the Iroquois Pipeline (and any additions thereto) under the Natural Gas Act, 15 U.S.C. § 717 *et. seq.* See *e.g.*, Petition Nos. 540 and 555, *Opinion and Decision and Order* (Sept. 25, 2002); Petition No. 755, *Declaratory Ruling* (Feb. 22, 2006); Petition No. 755A, *Opinion and Recommendations* (June 28, 2006); Petition No. 1168, *Decision Letter* (Sept. 3, 2015). Similarly, Iroquois' addition of the CP system to the Iroquois Pipeline is subject to FERC's exclusive jurisdiction.



Notwithstanding this exclusive federal jurisdiction, FERC policy “encourage[s] applicants to cooperate with state and local agencies with regard to the siting of pipeline facilities, environmental mitigation measures, and construction procedures.” *Maritimes & Northeast Pipeline, LLC*, 81 FERC ¶ 61,166, at 61,729 (1997) (“*Maritimes*”). Such cooperation allows opportunities for state and local authorities to provide recommendations to an applicant and FERC regarding its proposed pipeline route and construction plan. *Id.* at 61,730. As the Council is aware, Iroquois adheres to this policy. *See e.g.*, Petition No. 947A, *Declaratory Ruling* (April 28, 2011); Petition No. 947 *Declaratory Ruling* (June 17, 2010); Petition No. 815, *Opinion and Recommendations* (Nov. 29, 2007).

Under FERC’s regulations, the CP System is an “auxiliary installation” that, when installed on an existing natural gas transmission facility such as the Iroquois Pipeline, does not require any additional approvals from or notice to FERC. *See* 18 C.F.R. § 2.55(a)(2)(i). Nevertheless, while the CP System is not the subject of a FERC application, in the spirit of FERC’s *Maritimes* policy, Iroquois submits this petition to consult and cooperate with the Council regarding the addition of the CP System.

Enclosed is a check for the \$625 filing fee. Thank you for your attention to this matter. If you have any questions, please contact me.

Very truly yours,

BROWN RUDNICK LLP

By: _____
Philip M. Small

PMS/jmb

Enclosures

cc: The Honorable Steve Vavrek, Monroe First Selectman

Iroquois Pipeline Operating Company
One Corporate Drive, Suite 600
Shelton, Connecticut 06484
Attn: Environmental Health & Safety Department

Proposed Ground Bed
Monroe, CT

| Proposed Project Review Form | | |
|--|--|------------------|
| Proposed Project Location: | | |
| Town: Monroe | County: Fairfield | State: CT |
| USGS 7.5 Minute Quadrangle Map: | | |
| Title: Long Hill, CT | Portion of map: Upper Center of map | |
| Coordinates: | 41.36154, -73.18298 | |
| Proposed Project Description: | | |
| <p><u>Brief Description:</u> Iroquois proposes to install an impressed current cathodic protection (CP) system. This will include installation of a 250 ft. ground bed parallel to Webb Circle which will terminate at a rectifier; installation of a cable approximately 550 ft. long parallel to Webb Circle; and continuing the cable northerly along the Iroquois right-of-way for an additional 25 ft. parallel to pipe casing.</p> <p>Cable leads will be exothermically welded to the pipe. A new AC service will be installed to power the rectifier, and will be mounted to a utility pole or pedestal. The location of the proposed AC service has not yet been determined, but will be within the permanent Iroquois' right-of-way.</p> <p>Most of the project will occur off right-of-way in the road easement.</p> <p>Once the project is complete, the contours will be restored, reseeded and mulched.</p> <p><u>Ground Disturbance:</u> Work will be performed within a construction easement ranging from 5 – 15ft. wide. The total area of the construction easement will be approximately 9,975 ft².</p> <p><u>Excavation area</u> = approximately 800 ft. in length 1.5 ft. in width trench and 10 ft. x 10 ft. excavation to depth of pipe to connect the cable to the pipe. Total excavation area will be approximately 1300 ft².</p> <p><u>Wetland Disturbance:</u> All of the work will be within the wetland buffer, upland review area.</p> <p><u>Stream Disturbance:</u> This project is not expected to cause stream disturbance.</p> | | |

Iroquois Pipeline Operating Company
One Corporate Drive, Suite 600
Shelton, Connecticut 06484
Attn: Environmental Health & Safety Department

Proposed Ground Bed
Monroe, CT

Proposed Project Description Continued:

Access and Equipment: Site access will be directly from Webb Circle. Iroquois plans on using an excavator and a dump truck for this project.

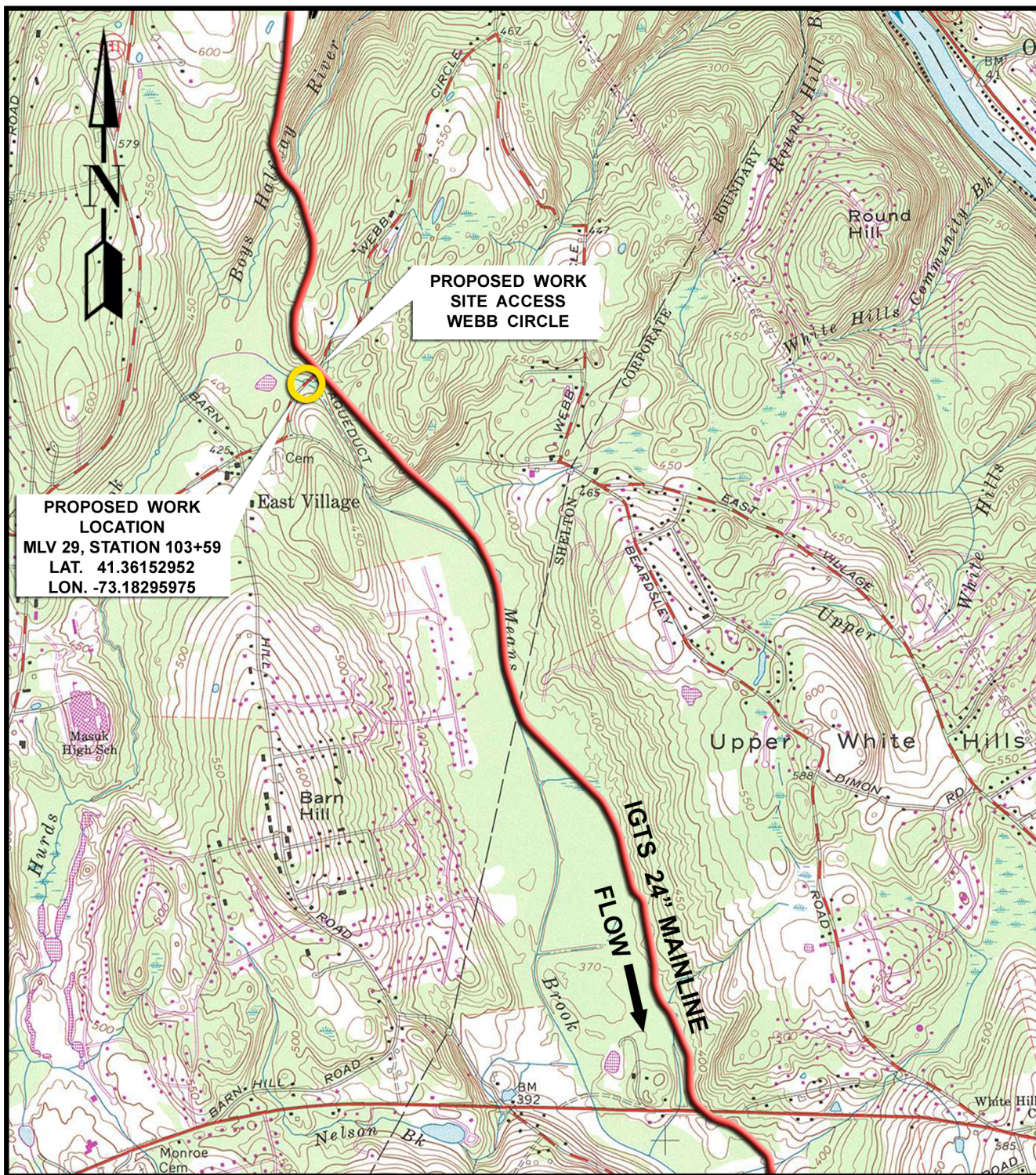
Erosion Control: Environmental Inspector will determine the proper erosion control measures to be used at the site.

Time span: Excavation will require approximately 10 days.

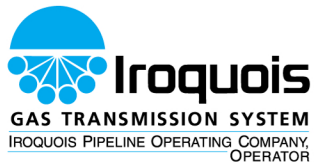
Tentative Work Dates: October, 2016.

Project Leader's Signature:

Note: No work will commence until all clearances or permits are received.



USGS 7.5 MINUTE QUADRANGLE TITLE: LONG HILL, CONNECTICUT
SCALE: 1" = 2000'



| | | | |
|-----------------|--------|-------|------------|
| DRAWN BY: | JOLAH | DATE: | 08/14/2015 |
| ENVIRO. REP.: | C.Y.F. | DATE: | 08/20/2015 |
| PROJECT LEADER: | M.R.B. | DATE: | 08/20/2015 |



LOCATION MAP

**PROPOSED CATHODIC PROTECTION
GROUND BED
MLV 29, STATION 103+59**

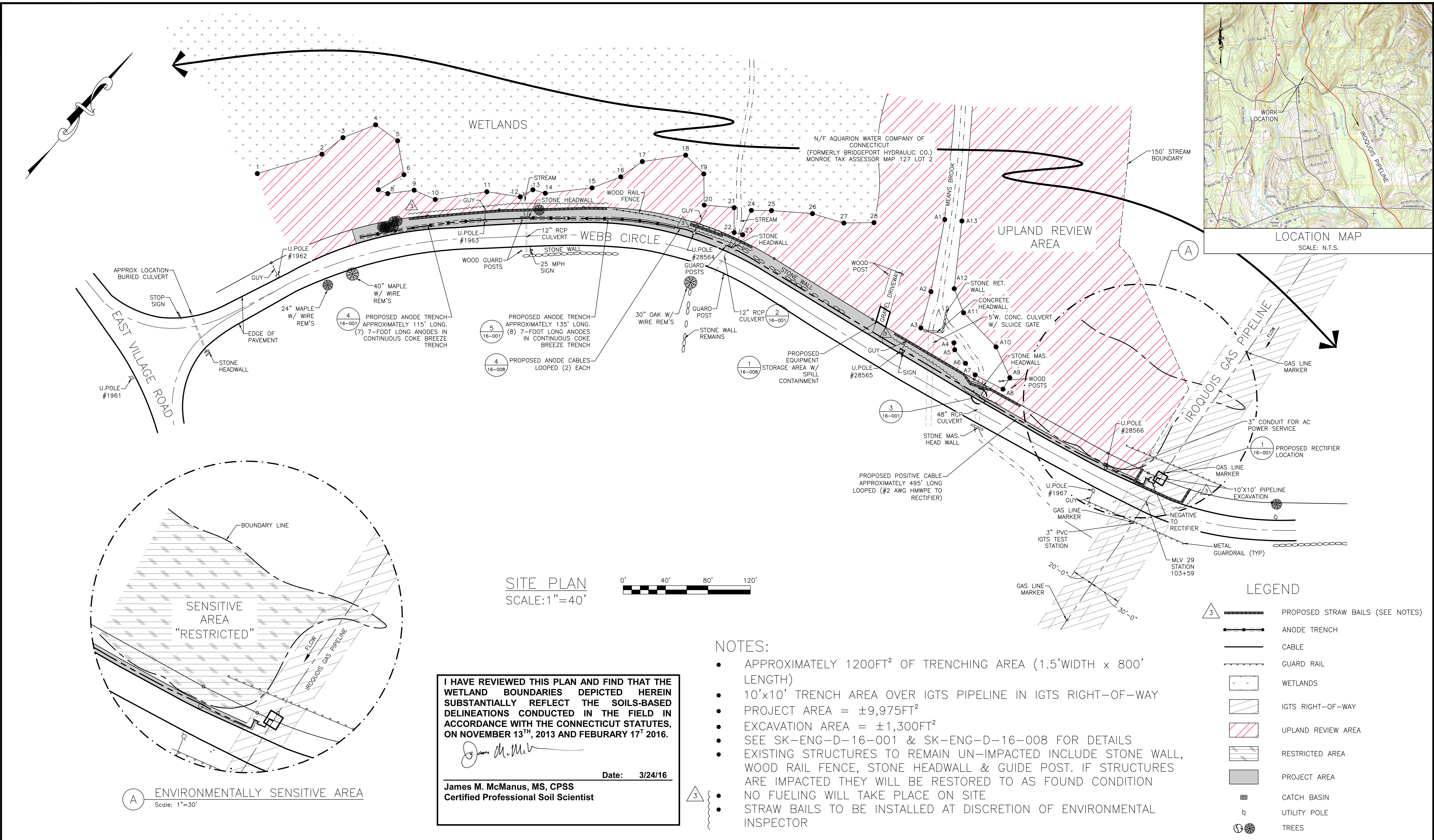
TOWN OF MONROE, FAIRFIELD COUNTY, CT

DRAWING NO.:

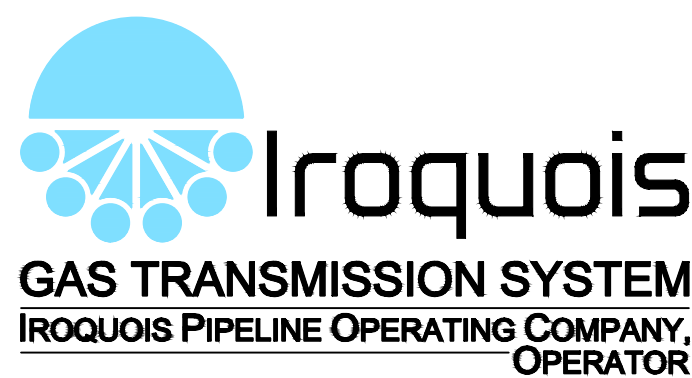
REVISION NO.:

SK-ENV-A-15-015

Drawing File: D:\Current Work\Monroe CP\SK-ENG-D-15-013_REV 03.DWG
Plotted By: billy.pinho
Plotted Date: Jun 17, 2016 - 8:34am



Iroquois Pipeline Operating Company ("IPOC") as agent for Iroquois Gas Transmission System ("IGTS") accepts no liability or responsibility whatsoever for: (i) this documents use by another party; and (ii) for any unauthorized changes to this document. Copying this document without the prior written permission of IPOC is not permitted. Any information contained in this document should be verified in the field prior to performing work.



| REVISIONS | | | | |
|-----------|---------|--|-----|------|
| REV. | DATE | DESCRIPTION | BY | CHK. |
| 1 | 3.1.16 | REVISED PER REMOVAL OF HDD SENSITIVE AREA | GCP | JWO |
| 2 | 5.5.16 | REVISED PER ADDITION OF DETAIL MARKERS & NOTES | GCP | MRB |
| 3 | 6.16.16 | REVISED PER STRAW BAILS ADDITION & REMOVAL OF FUELING AREA | GCP | |

| | | | |
|------------|----------|---------------|---------|
| DRAWN BY | GCP | DATE | 11.5.15 |
| CHECKED BY | CYF | DATE | 12.3.15 |
| ENGINEER | MRB | DATE | 12.2.15 |
| AFE # | | VALVE SECTION | |
| SCALE | AS NOTED | | |

| | |
|----------|------------------|
| LOCATION | CONNECTICUT |
| | FAIRFIELD COUNTY |
| | MONROE |

| | |
|---|-----------------|
| WEBB CIRCLE, MONROE, CT CATHODIC PROTECTION SITE PLAN | |
| DRAWING # | SK-ENG-D-15-013 |
| REVISION | 3 |