

Docket No. CP16-21-00:

Application for a Certificate of Public Convenience and Necessity (Northeast Energy Direct Project) of Tennessee Gas Pipeline Company, LLC.

MOTION TO INTERVENE OF THE TOWN OF AMHERST, NEW HAMPSHIRE

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's (the "Commission") Rules of Practice and Procedure, 18 CFR § 385.212 and § 385.214, the Board of Selectmen of the Town of Amherst ("Town"), New Hampshire, respectfully moves to intervene in the above-captioned proceeding.

I. Background

On March 10, 2015, through a ballot vote at the Annual Town Election the Town of Amherst authorized the Amherst Board of Selectmen to file with the Commission as an intervener to present the claims of Amherst residents and property owners and protect their rights regarding the matter of the proposed Northeast Energy Direct ("NED") project.

On November 20, 2015, the Tennessee Gas Pipeline Company, LLC ("Tennessee Gas") filed its application for a Certificate Convenience and Necessity for the NED Project, which includes approximately three (3) miles of a natural gas transmission pipeline within the Town.

II. Grounds for Intervention

The proposed pipeline includes a three mile segment in the Town that is expected to directly impact approximately twenty-four (24) individual property owners in the Town, and includes construction in the Town's Wetland and Watershed Protection District, the Aquifer Protection District, and within Wellhead Protection areas associated with the Pennichuck Watershed, the drinking water supply for a significant population in Southern New Hampshire and the Town. Accordingly, the Town has a direct and substantial interest in the above docket, on the behalf of its residents, and will be directly impacted by the outcome of this proceeding and the Town's interests cannot be adequately represented by any other party. The Town's participation in this proceeding is in the public interest and the Town respectfully requests that the Commission accept this filing and grant its motion to intervene.

III. Communications

All correspondence and communications related to this proceeding should be directed to the following individuals whose names and addresses should be placed on the official service list maintained by the Secretary for this proceeding:

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