

NYPSC Case 11-T-0654

Application
of
New York State Electric & Gas Corporation
for
Certificate of Environmental Compatibility and Public Need Pursuant to
Article VII, Section 121-a of the Public Service Law

Seneca West Pipeline Interconnect
Towns of Big Flats and Horseheads, and Village of Horseheads
Chemung County, New York

APPENDIX A
Response to Deficiencies

New York State Electric & Gas Corporation

Case 11-T-0654- Application of New York State Electric & Gas Corporation for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII Section 121-a of the Public Service Law for Approval to Construct a 4.9 Mile Natural Gas Transmission Pipeline and Associated Facilities in the Towns of Big Flats and Horseheads and the Village of Horseheads, Chemung County.

Appendix A : Response to Deficiencies

Deficiency No. 1

16 NYCRR 85-1.2 (a) (2) (i): This section requires the applicant to indicate the “length (and the nominal diameter of the transmission line segments)”. Upon review, the application appears to contain inconsistent lengths for the proposed 8 inch gas pipeline. For instance, the “Route Description “on pages 7 through 15 indicates a length of 26, 531 feet. On the bottom of page 5, there is a pipeline length of 25,455 feet, and on the bottom page 6, there is a pipeline length of 25,390 feet. Also, Table 1-2 on page 20 indicates a total linear footage of 25,455 feet. The applicant should clarify these footages, as appropriate, to make sure that the footages described are the same.

Response:

The length of pipeline that should be listed in the application at the bottom of page 5, and indicated in the “Route Description” on pages 7 thru 15 and in Table 1-2 on page 20 is 25,495 feet. The length of pipeline that should be listed at the bottom of page 6 is 25,410 feet. Shown below is revised Table 1-2 with the corrected footages. Included in Attachment 1 to this Appendix A is revised text for pages 7 thru 15 with corrected distances totaling 25,495 feet. The proposed length of 8 inch gas pipeline to operate at 1,100 psi is 25,410 feet measured from the east fence line of the Yawger Road meter and regulating (M&R) station to the east fence line of the Gardner Road M&R. The proposed length of 8 inch pipeline intended to operate 1,341 psi is 85 feet measured from the tap of the Inergy Seneca Lake Storage project west pipeline right of way to the west fence line of the Yawger Road M&R station. These lengths of pipe do not include that located within the fence lines of the Yawger Road and Gardner Road M&Rs.

Table 1-2: Cover Types To Be Transected

Cover Type	Linear Feet (approx.)
Active Agriculture	1,500
Inactive Agriculture	800
Wetland	900
Mature Woodland	1,100
Scrub-Shrub	3,200
Existing Mowed Utility Easement	17,995

Deficiency No. 2

16 NYCRR 255.195(a): Except as provided in section 255.197....each pipeline that is connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of sections 255.199 and 255.201. Upon review, it appears that no relief device is included for the section of main between the outlet of the 8" ball valve at the connection to Inergy to NYSEG's regulators at the Yawger Road station (sheet 11 of 14).

Response:

The section of pipeline between the outlet of the 8" ball valve at the connection to Inergy and the NYSEG regulators will be designed to operate at the maximum operating pressure of the Inergy system. The pressure of the Inergy Seneca Lake Storage west pipeline is protected by relief devices located at each of the inlet points to its system where the upstream supply source has the capability to over pressurize the Seneca Lake Storage Project West Pipeline. Those locations are the Seneca Lake Storage Project compressor station and Saylor Road M&R Station. Because Inergy's Seneca West Pipeline has devices installed that prevent over pressurization of their pipeline, pressure limiting or pressure containing devices are not necessary between the 8 inch ball valve at the connection to Inergy and NYSEG regulators at the Yawger road station.

Deficiency No. 3

16 NYCRR 255.625(a): This section provides that "[a]ll gas transported in transmission lines, and distribution mains operating at 125 psig or more, except gas in route to storage fields, is to be adequately odorized in compliance with subdivision [255.625 (c)] so as to render it readily detectable by the public and employees of the operator at all gas concentrations of one fifth of the lower explosive limit and above." Upon review, it appears that there is no odorization included for the section of main between the outlet of the 8" ball valve at the connection to Inergy to the outlet of the NYSEG station where an odor injection point is indicated at the Yawger Road station (sheet 11 of 14).

Response:

NYSEG will relocate the injection point of the odorizer immediately downstream of the 8 inch check valve to ensure the section of NYSEG's proposed pipeline upstream of the regulators is odorized. This location will prevent influence from fluctuating operating pressures in Inergy's Seneca Lake Storage west pipeline on the odorizer's operation.