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November 10, 2026

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

Cape Cod Commission
3225 Main St.
Barnstable, MA 02630

Submitted via online comment form for the November 12, 2026 continued hearing

Dear Members of the Subcommittee:

I write to supplement my comments of October 19, 2026, in light of the Federal Energy Regulatory Commission's October 29, 2026 Order Issuing Certificate and Approving Abandonment in Docket No. CP25-552-000 (197 FERC ¶ 61,063; accession no. 20261029-3057) (the Order). The Order addresses, on a developed federal record, several questions raised at the October 28 hearing, including the difference between pipe size and capacity that Ms. Ledec and Ms. McManus asked about. Paragraph citations below are to the Order.

What FERC Found on Capacity

FERC found that the project "would not result in a capacity increase" (¶ 41) and is designed to provide "the same amount of natural gas capacity as Algonquin is currently certificated to deliver to National Grid" (¶ 5; see also ¶ 13). Its reasoning tracks the technical points discussed at the hearing:

- **Size alone does not determine capacity.** "Neither pipeline diameter nor operating pressure alone determines how much gas can flow through a pipeline." The new pipelines are longer than National Grid's existing bridge-attached lines, which by itself causes more pressure drop. The larger diameter was chosen to compensate, reducing friction so the required volume reaches the delivery point while meeting minimum pressure requirements (¶ 41).

- **Upstream constraints.** FERC cited Algonquin's March 16, 2026 response to staff's March 9, 2026 data request, which explained that there are upstream capacity constraints on its system and that it physically cannot flow additional capacity to National Grid (¶ 41).

- **No unsubscribed capacity.** Algonquin's electronic bulletin board shows none on its G System (¶ 41).

- **Hydraulic review.** "Based on Algonquin's supplemental information and staff's review of Algonquin's hydraulic models," FERC found the project "properly sized to deliver to National Grid the same level of service as currently contracted" (¶ 41).

I do not dispute that a larger pipe, taken in isolation, has greater potential hydraulic capacity. The Order's point, and mine, is that the delivery system, not a single segment, determines what can flow, and that the certificated and contracted level of service is unchanged. This is the kind of independent validation of Algonquin's "no expansion" representation that commenters have asked the Commission to seek, and it was performed by the federal agency that certificates interstate pipeline service.

Clarifications on Configuration, Funding, and Footprint

- **Configuration.** Only the 18-inch G-31 pipeline (about 2.17 miles) crosses the Canal. The 16-inch G-32 pipeline (about 3.03 miles) does not (¶ 5 & n.7). Comparisons of "two 10-inch pipelines to one 18-inch pipeline" therefore do not describe the project as certificated.

- **Funding.** MassDOT will reimburse Algonquin for the entire cost of the project (about $300 million), Algonquin does not propose to adjust its rates, and FERC found no subsidization by existing customers (¶¶ 6, 11).

- **Footprint.** The project would affect about 209 acres during construction, of which about 56 acres would be permanently affected during operation (¶ 23).

Public Process

The Order also documents the federal public process: pre-filing review in Docket No. PF25-4 beginning January 6, 2025; FERC staff participation in the March 4, 2025 open house; a Notice of Scoping mailed to local officials, public interest groups, Tribes, libraries, newspapers and affected property owners and published April 9, 2025; a public scoping session on April 23, 2025; and an Environmental Assessment issued May 29, 2026 with a 30-day comment period. The Order

notes comments on the Assessment from the Cape Cod Commission itself, among others, and responds to them (¶¶ 18–22, 30, 43, 48).

Requests of the Subcommittee

Consistent with my earlier comment and with Ms. Ledec's request for clear definitions, I respectfully ask that the subcommittee:

1. **Include the Order in the DRI record** and rely on its capacity findings (¶¶ 5, 13, 39–41) in staff's Regional Policy Plan consistency review, rather than treating pipe diameter as a proxy for capacity.
2. **Ask Algonquin to confirm in writing, using the Order's terms,** how it uses "certificated capacity," "contracted quantities," "design capacity," and "operating capacity" at the Bourne, Sagamore and Pave Paws Road delivery points, and that the project does not change the certificated delivery capacity at those points. The draft minutes of October 28 record Mr. Hastey stating that Algonquin cannot increase flow without prior approval; a written confirmation would place that on the record.
3. **Consider notice-type conditions for future capacity.** For example, the Commission could ask that Algonquin provide it with any future FERC application that would increase certificated delivery capacity to National Grid on Cape Cod. I leave to staff and counsel whether such a condition is consistent with ¶ 56 of the Order, which provides that state and local permits must be consistent with the certificate and may not prohibit or unreasonably delay construction. I also note that Environmental Condition 4 provides that Algonquin's eminent domain authority "does not authorize it to increase the size of its natural gas pipeline facilities to accommodate future needs."

I recognize the weight of the Regional Policy Plan's climate goals and the concern of many commenters about future gas supply. The Order indicates that questions about broader upgrades to Algonquin's system are outside this proceeding (¶ 52), and that is a further reason to keep this review focused on what this project would and would not change. On that question, the federal record now supports the conclusion that the project maintains, and does not increase, certificated service to National Grid on Cape Cod. Thank you for your consideration.

Respectfully submitted,



Kevin F. Galligan