



BERKSHIRE ENVIRONMENTAL ACTION TEAM
20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

Public Comment Guide — Concerns over Algonquin Pipeline Pre-Filing Document and Proposal to FERC

Overview

What is PF26-7?

Recently, Algonquin Gas Transmission, LLC (an Enbridge company) released a pre-filing document for a natural gas pipeline expansion project proposal named the Algonquin Reliable Affordable Resilient Enhancement Project (R.A.R.E.), or AGT Enhancement for short. PF26-7 is the FERC pre-filing docket for this proposed project.

What Will AGT's Project Do?

AGT is proposing to replace 8.3 miles of 16-inch G-1 pipeline on their G System lateral with a doubly sized 36-inch pipeline from Mendon, Massachusetts into Cumberland, Rhode Island, adding a 2.2-mile 12-inch G-2 loop next to the existing G System pipeline in Tiverton and Little Compton, Rhode Island, and adding a 3.0-mile 36-inch loop on the mainline (the 'L36D Loop') in Burrillville, Rhode Island, and modifying software at the existing Cromwell Compressor Station in Connecticut to uprate the station's horsepower. The 'Resource Report 1' AGT filed for this interstate natural gas project can be found [HERE](#).

What is a Scoping Session?

When a natural gas company needs to build an interstate pipeline or start a liquified natural gas project, the Federal Energy Regulatory Commission (FERC) needs to perform an environmental review of the company's proposed project. FERC may hold scoping sessions as an in-person way to receive public comments about the proposed interstate natural gas project.

It may be helpful to think of scoping sessions as telling FERC what they need to study and address in an environmental review. In other words, scoping sessions are the opportunity to demand that FERC set a certain scope for their environmental review of a project and come up with solutions to your concerns, environmental or otherwise.

Though all the Scoping Hearings are located in Rhode Island, these scoping hearings are for the entire project. The Cumberland, RI hearing is the closest to the MA towns of Mendon, Bellingham, Franklin and Wretham, which are directly impacted by the same G-1 segment of the project.

When are the Scoping Hearings Where I Can Submit Comments Orally?

FERC will hold scoping hearings at Burrillville, Cumberland, and Little Compton RI on **June 16-18**, Tuesday through Thursday, from 5:30pm to 7:30pm to receive oral comments.



BERKSHIRE ENVIRONMENTAL ACTION TEAM
 20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
 (413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

Date and time	Location
Tuesday, June 16, 2026 5:30-7:30 p.m	Jesse M. Smith Memorial Library, 100 Tinkham Lane, Harrisville, RI 02830, (401) 710-7800.
Wednesday, June 17, 2026 5:30-7:30 p.m	The Lodge at Diamond Hill, 4097 Diamond Hill Road, Cumberland, RI 02864, (401) 799-7372.
Thursday, June 18, 2026 5:30-7:30 p.m	Little Compton Community Center, 34 Commons, Little Compton, RI 02837, (401) 635-2400.

More information about [Natural Gas Scoping Sessions: Public Participation and What to Expect | Federal Energy Regulatory Commission](#).

When are Subsequent Written Scoping Comments due?

Written scoping comments are due **Monday July 6th at 5pm.**

See our [Step by Step guide](#) on how to file written comments with FERC

Recent changes FERC has made to the Scoping process

FERC in recent years has struggled with increasing public opposition to its work by environmental groups and other protesters. Although the Commission is required to collect public comments, FERC has switched from an open meeting format in which people gave public comments to a confessional style one-on-one meeting, where a community member can speak with a FERC official and a court recorder (news media excluded) to present their comments orally. If attendance is high, comment time may be limited. If there is low attendance, allowance may be made for longer comments, or additional comments. All recorded comments will be posted on the public FERC docket.

Although FERC cites the challenges of the town meeting format for its changes in the scoping process, namely the open format potentially preventing everyone from speaking adequately, these issues could have been solved through [clear establishment and enforcement of ground rules](#) during open meetings. Those were even commonly addressed by adhering to the three minute limit with the use of timers. Rather, FERC’s establishment of the new scoping process helps to smother community interaction, cross-learning and outrage on projects that clearly have been of great public interest and prevents immediate media coverage of FERC’s dealings.

Implications



BERKSHIRE ENVIRONMENTAL ACTION TEAM
20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

- ***Directly impacted abutters, or local officials of towns affected by the project should attend the Hearings*** to submit their oral comments in person and then back them up with submitted written comments (as an eComment through FERC’s website).
 - ***This is the one chance for directly impacted parties to voice very specific details of local or personal concerns and consequences of the project. If you’ve had any adverse interactions with Enbridge (aka “Algonquin” or “AGT”), now would be a good time to get complaints on record. These could be interactions of survey without permission, unclear, incomplete or contradictory information provided by the company, any perceived mistreatment or dismissal of concerns, etc.***
- Non-local comments made in person are less effective, making written comments the better option (Written comments can be as long as necessary and should be filed by anyone anywhere concerned about the project).

Key Points to Cite Against Algonquin’s Proposal and Demands to Request From FERC

Important: (Please don’t copy and paste! FERC discounts verbatim comments):

1. AGT has not given a complete document that allows for a meaningful understanding of the project’s impacts

Resource Report 1 defers most of its substantive analysis to ‘upcoming submissions’ to the Commission. The materials that a homeowner would need to reasonably evaluate the effects of the Algonquin Gas Transmission expansion on their property are not in the record. This includes residential construction plans for homes within at least 50 feet of the work area, the Blasting Plan, the Erosion and Sedimentation Control Plan, the Spill Prevention, Control and Countermeasure Plan, the Nighttime Construction and Management Plan, and any Additional Temporary Workspace variance justifications. (A variance justification is in part an exception from a rule or regulation. The fact that AGT has not specified what exceptions they will resort to should concern the public as it may allow AGT to place temporary workspaces on vital natural habitats)

Those giving comments should request the Commission to direct AGT to file these essential deferred jurisdictional materials publicly preferably before the comment period runs out and that the Commission extends the comment period to give adequate time to form written comments. Without these documents, an affected resident and the local community is not able to make specific concerns about AGT’s activity which may be on or near their own land.



BERKSHIRE ENVIRONMENTAL ACTION TEAM

20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org

(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

2. Expansion projects raise concerns about water contamination and reduction

After the initial construction of a new pipeline project, pipeline companies fill their pipelines with pressurized water to make sure nothing ruptures or leaks. This hydrostatic testing water picks up [contaminants](#) like benzene, heavy metals, and other toxic chemicals during testing creating hazardous waste. Additionally, AGT must pump groundwater in some areas to keep a work site dry. These activities can contaminate and lower the level of groundwater that people use in their wells and natural gas companies have historically also used nearby water resources, like ponds, to source the water. In our perpetual drought conditions this is a strain on the natural wetland ecosystems.

Those giving comments who are concerned about AGT's impact on their water should insist that FERC's environmental document (demand an EIS) include a map of the private wells in the areas where AGT will pump groundwater to keep a work site dry and perform hydrostatic testing. Ask FERC to make AGT commit to testing wells before and after construction and make a plan for what happens if water (especially if you have a well) is affected.

3. AGT's expansion project raises serious concerns for homeowners and their land

Natural gas pipelines placed close to homeowner land often result in the government issuing a legal agreement to a gas company granting it an eminent domain right to use a specific portion of private property to construct, maintain, and inspect pipelines. If an easement is put on your property, the way you use your land would be restricted. If the Project requires a new permanent easement, you cannot build permanent structures, plant deep-rooted trees, or dig without prior permission from Enbridge.

Those concerned or affected by easements should demand in their comment that that permanent easements on or near your property (this could be the G-1, G-2 and L36D pipeline segments) be mapped out and that you will be informed of the ways it will restrict your land use and the reasons for why it is necessary to specifically go through your property.

Additionally, request that both timber and stumps that are on landowner property should be available to landowners rather than as Algonquin proposes sold for their profits or used in an alternative way without consent.

Request that the Commission scrutinize the need for 61 residential buildings to be within 50 feet of the construction work areas. Alternative work areas and mitigation plans for those properties should be thoroughly investigated. Additionally, a peak of 400 workers that are there from 7AM to 7PM Monday through Saturday with additional work on Sunday provides almost no relief to those nearby.



BERKSHIRE ENVIRONMENTAL ACTION TEAM

20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

Requisition an analysis from FERC in an EIS of what will be left in the ground (on or near your property if you are homeowner) and that it includes a clear description of how Enbridge will restore the land to its true original condition and how long it will take.

4. AGT's current clearing plans prioritize construction convenience over wetland and rare habitat protection

Whenever the resource report mentions a commitment to preserve the environment, the most likely word afterwards is 'practicable'. Construction Right-of-Way will be reduced in wetlands, 'as practicable'. Algonquin will use existing workspace instead of clearing new land, 'to the extent practicable'. Algonquin will minimize resource impacts, 'to the extent practicable'. Contractor ware yards will be on open land already used for industrial purposes, 'to the extent practicable'. Upland stumps and rootstock are left in place 'wherever practicable,' unless grading is required. Wetland vegetation is cut at ground level, unless 'necessary for safety reasons'. Additional Temporary Workspaces are set back 50 feet from wetlands only when 'topographic and other site-specific conditions' permit with a variance available wherever the setback 'cannot be maintained due to construction limitations'.

Although safety of construction works is a valid consideration, AGT's claims of safety and 'practicability' too easily will be used as an override for mere convenience and cost cutting. Additionally, almost all specifics are deferred. Where will permission to work closer to wetlands be met? Where will grading occur in wetlands? Which areas will wetland clearing need to exceed 75 feet when 'practicable'? No one in the public can know, because none of it is in the filing. Many difficult questions are conveniently pushed back at the stage where the public is commenting. Even more, the clearing plan contains no restrictions for when clearing will happen, no attempt to avoid disturbing the nesting or migration patterns of birds. What seems important instead is that Service starts November 2028.

Those filing comments should request that FERC's environmental document address and locate the impact of grading within ROW construction, and acknowledge that graded wetland cannot be adequately restored to its precondition conditions. In addition to Algonquin's commitment to ensure that any imported soils are free of weeds and other environmental contaminants, request that invasive species be included.

Request that the Commission ensures that ware yard locations which have not been specified by Algonquin avoid rare species habitats be in its environmental document. Request that Initial clearing operations should assess where rubber-tired and/or tracked equipment or hand-cutting is appropriate for cutting of tree and brush, especially in wetlands where mechanical equipment is inappropriate. Request that the Commission take into account the asymmetry between how AGT sets clearing and construction to commence January 2028 while The Migratory Bird Treaty



BERKSHIRE ENVIRONMENTAL ACTION TEAM
20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

Act appears only in the permit and consultation tables as something to be coordinated later instead of an actual constraint on when clearing happens.

Request that the Commission investigate the need for 'open cut' water crossing methods. These methods should be avoided as excavating releases large amounts of sediment that clouding water and destroying habitats for fish and [accelerates long term erosion](#) around the flowing water.

5. AGT's claims of 'minor and temporary' impacts may be adopted by FERC if the public does not push back

The conclusions in AGT's (parent company Enbridge) resource report repeatedly emphasize the 'minor and temporary' impacts of the proposed pipeline expansion. Keep in mind that these are Enbridge's own claims. The report concludes that the environmental impact of the project are 'minor and temporary' largely because most serious environmental analysis that would show otherwise has not been done.

Request that the Commission, in an Environmental Impact Statement, construct a document that reflects FERC's own conclusions formed by independent evaluation of Enbridge's claims rather than merely adopting them because Enbridge said so. These conclusions FERC makes should reflect the Commission's own investigation especially on the issues that concern you. Request that the Commission state on the record who will prepare their environmental document. Was it prepared by FERC staff? By a contractor? By Enbridge? Whoever prepares the environmental document that FERC is responsible for has big implications for what the report will find. If Enbridge will prepare the report, request that the financial interest that Enbridge has in building the pipeline is disclosed in the record and stress that the Commission must supervise the environmental analysis to make sure it is adequately serving the public, homeowners, and their interests.

6. Algonquin's proposed pipeline expansion satisfies the demands of gas shippers while going against the public's interest

Algonquin, despite claiming to have "not identified any specific plans for future expansion or abandonment of the facilities proposed in this docket (21)," is currently holding an open season for a new Project Beacon to solicit more long term commitments from utilities and gas suppliers along the very same gas pipeline system.

AGT's proposed installation of the G-2 12-inch pipeline loop, under section 7b of the Natural Gas Act, is an act of abandonment rather than looping (as the existing portion pipeline will no longer be in use after its construction). Thus, the proposed installation should be denied unless Algonquin shows by reasonable terms and conditions the present or future public convenience



BERKSHIRE ENVIRONMENTAL ACTION TEAM

20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

and necessity of the project. In this vein, Algonquin finds two fundamentally flawed points of recourse. For one, the fact that the Project is designed and pursued to “satisfy the natural gas demands of the Project Shippers” is of no clear relevance to the public need of the Project. Secondly, the rising cost and volatility of energy that Algonquin cites as a reason for the Project is a [direct consequence](#) of the inherent volatility in the market of natural gas, which the Project will increase the public’s reliance on. By increasing access to natural gas, the Project reduces demand for alternative renewable energy sources abundantly shown by rigorous, ongoing global studies (for example, [IRENA’s 2024 renewable energy generation cost report](#)) to actively reduce wholesale energy prices. This aspect of the project is not in the public’s interest.

Those commenting should urge the Commission to review in its environmental document whether the Project fulfills by reasonable interpretation present or future public convenience or need.

7. AGT will not take sufficient measures in reducing greenhouse gas emissions as a result of constructing their pipeline

For a project whose purpose is to move more natural gas, the absence of any upstream or downstream emission analysis is concerning. Although *Seven County Infrastructure Coalition v. Eagle County* has made this currently not required, we request a quantification of direct construction emissions and resulting emissions from an additional 73,500 dekatherms per day of incremental firm natural gas that Enbridge predicts to transport.

Request the Commission investigate in its environmental document ways to increase gas capture remaining in a pipeline prior to abandonment, rather than releasing twenty percent of it into the atmosphere.

Request that FERC’s environmental document address consistency with Massachusetts and Rhode Island climate statutes including the MA Global Warming Solutions Act, 2050 net-zero mandate, and RI’s Act on Climate.

8. Project segmentation

Impermissible segmentation occurs when a project sponsor or agency artificially divides a single, large project into smaller, distinct components to bypass comprehensive environmental review. It is primarily a violation of the National Environmental Policy Act (NEPA) or similar state-level equivalents. Courts have ruled that segmentation of projects, breaking them up into smaller projects that may fall under cost thresholds, or look smaller for permitting purposes or appearances to impacted communities, is impermissible.



BERKSHIRE ENVIRONMENTAL ACTION TEAM
20 Chapel St. Pittsfield, MA 01201 • thebeatnews.org
(413) 464-9402 • team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

Enbridge has been segmenting similar projects along their Algonquin Gas Transmission (AGT) system for the last few years. First, during the Open Season for “Project Maple”, they filed for three projects under Blanket Authorizaition. Now, they’ve prefiled for this AGT Expansion (R.A.R.E.) project, but before the Scoping process is done on this project, they’re opening another Open Season for Project Beacon. All of these projects are along the same system, but rather than filing one large project, it’s been broken up into multiple small, segmented projects. This project is just one more in that chain of project segments.

How to file a comment

1. **Option 1:** eComment (Quickest – Text Only)

[Click HERE](#) to file an eComment.

For most people, creating an account with FERC is not necessary to file an eComment. Just make sure the comment is under 10,000 characters and does not include any photos or file attachments.

2. **Option 2:** eFiling (Best for Longer Comments or Attachments)

This way requires a FERC Online account made [HERE](#).

Go to www.ferc.gov and use the eFiling system. You can attach a formatted document. Include Docket No. PF26-7 in your filing.

This is FERC’s eFiling system. Most people should file a shorter eComment above unless the comment is over 10,000 characters or has files

See our guide on [how to file comments with FERC](#)

3. **Option 3:** Mail

Send a hard copy to:

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Always include Docket No. PF26-7 in any mailing.