

RICHARD BLUMENTHAL
ATTORNEY GENERAL



55 Elm Street
P.O. Box 120
Hartford, CT 06141-0120

Office of The Attorney General
State of Connecticut

ORIGINAL

April 17, 2006

SENT VIA FEDEX OVERNIGHT

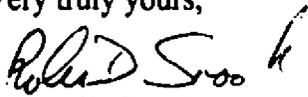
The Honorable Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

FILED
OFFICE OF THE
ATTORNEY GENERAL
2006 APR 18 A 11:58
FEDERAL ENERGY
REGULATORY COMMISSION

**RE: Broadwater Energy Liquefied Natural Gas Project
Project No. CP06-54-000, 55-000, 56-000**

Dear Secretary Salas:

Enclosed for filing is an original and 14 copies of Motion for Leave to Answer and Answer of the Attorney General of Connecticut in the above-referenced docket. Please file stamp and return the 15th copy in the enclosed self-addressed stamped envelope.

Very truly yours,

Robert D. Snook
Assistant Attorney General

ORIGINAL

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

In The Matter Of:)	
)	
Broadwater Energy LLC)	Docket No. CP06-54-000
)	
Broadwater Pipeline LLC)	Docket Nos. CP06-55-000
)	CP06-56-000

**MOTION FOR LEAVE TO ANSWER AND ANSWER
OF THE ATTORNEY GENERAL OF CONNECTICUT IN RESPONSE TO
THE MOTION FOR LEAVE TO REPLY AND REPLY COMMENTS OF
BROADWATER ENERGY LLC AND BROADWATER PIPELINE LLC**

Pursuant to Rules 212 and 213 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Rules of Practice and Procedure, 18 C.F.R. §385.212 and 213, the Attorney General of Connecticut hereby submits this Motion For Leave To Answer and Answer in response to the “Motion For Leave To Reply And Reply Comments Of Broadwater Energy LLC and Broadwater Pipeline LLC” filed in the above referenced dockets on April 3, 2006 (“Reply”). Broadwater Energy LLC and Broadwater Pipeline LLC (collectively “Broadwater”) submitted their April 3rd Reply in response to, among others, the Attorney General’s Comments filed in this docket on March 8, 2006.

In support of its requested relief, the Attorney General states as follows:

Motion for Leave to Answer

While Rule 213(a)(2) of the Commission’s Rules of Practice and Procedure generally prohibits answers to answers,¹ the Commission has permitted such filings where the proposed answer will clarify the record or otherwise provide the Commission

¹ 18 C.F.R. §385.213(a)(2).

with information that aids it in resolving the matters at issue.² As discussed more fully below, the Attorney General submits that the answer set forth below clarifies certain misstatements in Broadwater's April 3rd Reply and will assist the Commission in its decisionmaking in this proceeding. Accordingly, good cause exists for the Commission to accept the Attorney General's proposed answer.

SUMMARY

Broadwater's Reply is based on a number of incorrect assertions of fact and misstatements of law. Further, much of the Reply is neither fact nor law but bald and unsupported assertions of no legal validity. Specifically, in flat contradiction to the considered opinions of respected federal authorities that have concluded that "the maritime domain's open nature and economic and military significance [make] it [] an attractive target" for terrorists, Broadwater has dismissed any concerns about its position as a terrorist target based solely on the factually unsupported assurance of a single paid consultant. See, Department of Justice, Audit Report 06-26, March 26, 2006. Similarly, Broadwater proclaims that the public need for its project is proven, by the simple fact that Broadwater is willing to build it.

Many of the factual claims made in the Reply are not true. For example, Broadwater states that the floating storage and regassification facility ("FSRU") does not interfere with shipping when, in actuality, it is sited directly in a shipping corridor. Broadwater claims that any other project to get natural gas to the greater New York City region would require a new underwater pipeline across Long Island Sound, when the Northeast NE-07 proposal is now pending before the Commission to provide more natural gas to that region without a new underwater pipeline.

² *Natural Gas Pipeline Company of America*, 104 FERC ¶61,322 at 62,209, fn. 9 (2003).

Further, many of the statements of law in the Reply are neither complete nor accurate. For example, Broadwater inaccurately claims that the State of Connecticut has no jurisdiction under the Coastal Zone Management Act ("CZMA") and Broadwater's conclusions regarding the public trust doctrine have no basis in the law. Further, much of the discussion about NEPA, alternatives analysis and cumulative impacts analysis is misstated.

Most importantly, nothing in the Reply changes the fact that this proposal is ill-conceived and unacceptable. It threatens immense damage to the critical environment of Long Island Sound, a precious national resource. The risks of serious accidents or attacks associated with the Broadwater project are real and substantial. The project raises the clear and present danger of an accident or attack causing catastrophic damage to human life, the environment, and commercial and recreational use of the Sound. FERC has a legal and moral obligation to consider all reasonably possible alternatives for new clean energy supplies for the Northeast together, and to permit only the most prudent, safest, least damaging proposals necessary to ensure adequate natural gas supplies. A careful, honest overall evaluation will show that Broadwater is the least safe, most dangerous and damaging proposal, and it should not be approved.

Background

The proposed Broadwater project will be made up of several interrelated elements. The largest will be the floating storage and regassification unit. The FSRU is planned to be about the length of four football fields -- over 1,200 feet long, 200 feet wide and 100 feet high with a draft of 40 feet. The FSRU is designed to hold up to 8 billion cubic feet of natural gas along with the machinery to transform liquid methane

into its gaseous form at up to a billion cubic feet per day. The FSRU will be anchored to the seafloor by mooring system that will cover 13,180 square feet. The FSRU will be the first installation of its kind in the world.

The second element of the project is a planned 22.6 mile long undersea thirty inch pipeline from the FSRU to the Iroquois Gas Transmission System (IGTS) pipeline. Broadwater plans to employ an underwater plow to install the pipeline. However, if bedrock or other seafloor conditions are unfavorable, the company has indicated that it might pursue blasting or other methods. Finally, there will a series of land based support facilities including various administration buildings and land based equipment.

Motion For Leave To Respond.

The Notice of Applications issued by the Commission on February 17, 2006 does not refer to responsive pleadings. However, the Commission has accepted response documents when they have been of benefit to the Commission, particularly when they address matters regarding the completeness of the record and, in fact, Broadwater's Reply was styled as such. Reply, p. 4, *see also*, Dominion Transmission, Inc. 104 FERC ¶ 61,294 at p. 14 (2003). *Inasmuch as this Response seeks to correct matters of law and fact otherwise in the record, this Response will assist the Commission.*

Response Comments

1. Need.

The Reply states that conservation efforts "are not likely to reduce demand" and that those advocating an "opposing view cite to no authoritative objective analysis." (Reply, p. 6.) *To the contrary, not only has a third party professional report been filed*

addressing these specific issues, but the Applicant itself cites to no authority whatsoever, except itself, for the proposition that conservation is valueless to reduce demand.

The Reply then proceeds to cite to industry sources for the conclusion that demand in New England is growing. *Id.* This assertion is no more supportive of the Broadwater project than of any of the other numerous projects under review. Regarding the natural gas market, Broadwater makes conflicting claims. At one point, it asserts that “the domestic pipeline industry is a reasonably efficient national grid, [and thus] questions of purely local need, such as those raised by the adversary parties, miss a portion of the picture and assume that New York and Connecticut are islands, [b]ut New York and Connecticut compete for supplies that may be diverted to other markets in response to competing demand.” (Reply, p. 9.) Yet, on the next page, Broadwater insists that other projects that are further along “will be used to meet the demands of northern and central New England and will be able to displace some demand in southern New England. For New York and Connecticut, however, the projects are remote.” (Reply, p. 10.)

It is difficult to understand how an “efficient national grid” that ensures that the New York – Connecticut region is not an island but in fact competes nationally for supplies is at the same time so inefficient that new supplies brought into northern New England cannot address needs in southern New England. Broadwater’s claim that it will be at the “head of the system” with the ability to reap the benefits of suppliers anywhere “in the Atlantic Basin,” is also not on point. No one is asserting that some additional supplies and sources would not be helpful to the Northeast. The question in this proceeding, however, is whether any future need would be better served by this LNG

facility located in an undeniably vital and threatened natural resource, or other, land-based LNG facilities such as are being proposed or are already under review by the Commission. In essence, Broadwater's assertions go to any of a number of projects, and do nothing to establish that this particular project is needed.

Ultimately, Broadwater states that “[p]erhaps the most compelling argument supporting the need for the Project is the simple fact that Broadwater has proposed the Project. . . . The Broadwater Project sponsors are sufficiently confident of market demand that they will invest millions of dollars in the Project.” (Reply, p. 11.) Thus, the “most compelling” argument the company has proving public need is that it wants to build its project and is willing to spend its money.

If the Commission were ever to take such an argument seriously, it would mark a complete abdication of the agency's duties as regulators. A company's say-so cannot satisfy the obligation, established under federal law, for responsible officials to determine whether, in fact, there is a public need for a specific project, and whether it is environmentally preferable to other proposals. Any number of companies, in any number of areas of the energy business, have been willing to spend money. A business' willingness to invest cannot be equated with a defined public need, especially when, if the company is wrong, its investors may suffer some financial loss, but they can walk away. The communities and the natural environment cannot just walk away and the one undisputed fact of this type of marine pipeline construction is that the damage done cannot be restored by any known means.

Finally, the Reply spends a full page referring to a statement of Coral Energy Resources, L.P. on the importance of having additional supplies in order to dampen price

volatility. (Reply, p. 12.) Coral Energy is a corporate affiliate of Broadwater and any statement therefrom is, to quote the Reply, “an advocacy piece . . . by an adversary party.” (Reply, p.5 fn. 4.)

2. Safety and Security

One critical area of concern that Broadwater cannot escape is the risk it poses to public safety and security. The Reply attempts to minimize the concerns of municipal and state officials, and the public, by referring to their so-called “lack of factual foundation.” (Reply, p. 14.) Nothing could be further from the truth and Broadwater’s comments emphasize their failure to recognize and acknowledge the dangers of this project.

Broadwater cannot deny that natural gas is a highly flammable product and the storage and transportation of natural gas has resulted in accidental fires and explosions, sometimes of massive proportions. The Attorney General’s comments of March 8, 2006 refer to numerous deadly fires associated with natural gas facilities, including a 1944 fire at an East Ohio Gas LNG tank that killed 128 people and a 1973 Texas Eastern Transmission LNG fire that caused the collapse of the top of the LNG tank, crushing 40 workers. Comments of the Attorney General, pp. 2-4. In 1979 in Maryland, when LNG leaked through a pump at an LNG terminal, arcing of a circuit breaker caused an explosion, killing one and seriously injuring another. As recently as 2004, 27 people were killed and 56 injured in a fire at an LNG facility in Algeria. It is obvious that LNG is dangerous. *Id.*

3. Terrorism

The Reply notes that many commentators have noted that the FSRU and the LNG tankers “will be attractive and vulnerable terrorist targets.” (Reply, p. 15.) Broadwater then, once again, insists that there is “no record support for [this] proposition.” Broadwater concludes that, according to Giuliani Partners LLC, its “assessment has determined that the Project is not a likely terrorist target. . . .” (Reply, p. 15.)

Of course, to quote Broadwater, the Giuliani report “is not a learned treatise ... and should not be cited in this manner” and, in fact, “is an advocacy piece funded by an adversary party.” More to the point, it is wrong. Independent, truly objective officials have a very different view of the maritime terrorist threat.

As noted in the Attorney General’s Comments, no less an authority than the terrorist themselves, specifically Abdul Aziz bin Rasheed al-Anzy, described by Saudi authorities as a key ideologue for al-Qaida, states that “In this era, economic jihad is one of the best ways to spite unbelievers” and that pipelines and tankers are fair targets. This project includes pipelines, up to 3 tankers a week, and a massive, floating energy facility, all in proximity to one of terrorism’s prime targets -- New York. In Broadwater’s own words, it believes that it is an important economic facility and vitally needed for New York City and the region.

If Broadwater believes that more citations to the record are needed on this point, the Attorney General would note that the United States Department of Justice (“DOJ”) Audit Report 06-26, released in March, 2006, (“Report”) states:

The nation’s seaports and related maritime activities are widely recognized as being vulnerable to acts of terrorism. The consequences of a maritime-based terrorist attack are potentially devastating to both the economy and to public safety. . . .Further, seaports are often located near

major population centers and hazardous fuel or chemical storage facilities that may provide attractive terrorist targets. According to the National Commission on Terrorist Attacks Upon the United States (9/11 Commission), the risk of maritime terrorism is equal to or greater than the risk of terrorism involving commercial aviation. Although the United States has placed much attention on better securing civilian aviation since 2001, seaports remain largely at risk.

The Report is particularly disturbing when viewed in the context of the Broadwater Project. For example, DOJ notes that the FBI has focused its efforts on addressing attacks by scuba divers and the use of maritime efforts to infiltrate the United States while *“terrorists have indicated a strong desire to use a WMD and vessels can be used to transport a WMD. . . .”* (Report, p. vi) Furthermore, the DOJ notes that a 9/11 Commissioner has said; *“The same is true with respect to maritime security. We only have to look at the Cole. We know that terrorists, and al Qaeda in particular, have identified maritime avenues for threatening U.S. interests.”* (Report, p. 49)

In addition, the FBI’s National Threat Assessment (“NTA”) noted that terrorists *“are constantly innovating, finding new ways to circumvent security measures, and build more threatening bombs.”* The NTA added that *“Based on suspicious activity reports and the vulnerability of ports, it concludes that al Qaeda will resume its maritime strategy.”* It further notes that *“maritime facilities, infrastructure, merchant vessels”* are all listed as *“the most likely maritime targets.”* (Report, pp. 51-53) In fact, the FBI noted 68 *“incidents”* involving possible terrorist surveillance efforts, commonly including ferries and fuel tankers (Report, p. 68).

This threat is hardly hypothetical. Al-Qaida operatives have repeatedly attacked energy infrastructure systems in Saudi Arabia and Iraq. Further, at least one seaborne attack was made on a French tanker and there have been several successful terrorist

and/or pirate attacks on tankers and shipping in the Middle East and Southeast Asia, including the infamous seizure of the *Achille Lauro*. Further, as a recent published news report states:

When Al Qaeda suicide bombers smashed a small boat into the USS Cole in 2000 in the Yemeni port of Aden, 17 sailors died. Pottengal Mukundan, who tracks piracy from his office at the International Maritime Bureau in London, says Somali gunmen regularly commandeer much larger vessels, including cargo ships and bulk carriers. Security officials also worry about the economic consequences of a vessel being rammed into a key port and disrupting international trade.

But most troubling for U.S. officials is the prospect of terrorists hijacking a supertanker transporting extreme flammables like liquefied natural gas (LNG) and blowing it up close to shore. Eben Kaplan, who authored a recent study on LNG for the Web site of the Council on Foreign Relations, says the gas requires very specific conditions to explode—a precise vapor mix when it leaks from a ship. But if the conditions are met near a population center, the explosion could kill many thousands. “It has the potential to be a very serious weapon,” Kaplan says.

Terror on the High Seas, Newsweek, April 11, 2006. Clearly, terrorists desire to attack the United States energy infrastructure and they have a demonstrated capability to launch seaborne attacks or hijacking of surface vessels.

In the face of the opinions of the 9/11 Commission members, the FBI, and the DOJ, that maritime terrorism is a real and present threat and that al Qaida will use every effort to launch maritime terrorist attacks against U.S. interests, it is difficult to explain the Broadwater Reply’s lack of apparent concern. Maritime infrastructure, tankers, and fuel supplies are known targets for terrorists. The FSRU and the LNG tankers would fit the bill nicely.

4. Millstone

The Connecticut Long Island LNG Task Force 2006 Interim Report, a document produced as part of an exhaustive and extensive review process, has identified damage to the Millstone Nuclear Power Station from a hijacked LNG tanker as a potential threat. Broadwater's response is that this "scenario is not scientifically possible" because LNG burns and does not explode and, in any event, the maximum radius of impact of a major fire would be .7 miles. (Reply, p. 16.)

There can most certainly be explosions at LNG facilities. As one recent example, at the Petronas LNG complex at Bintulu, Malaysia, there was an explosion caused by leaking methane associated with a regeneration coil coming in contact with a heat source. (*LNG Journal*, July/August 2005, p. 12.) While it is true that in its liquefied state, LNG is more likely to burn than to explode, this is a distinction without a difference. The FSRU will have both liquid and regassified LNG in the facility. Ultimately, whether a person is killed by a shockwave and debris from an explosion of gaseous methane or consumed in a fireball of liquid methane the size of a large building, the result is the same.

More to the point, the threat to Millstone is from damage from either an explosion or a conflagration at or near the cooling water outflow structures at the edge of the Sound, particularly if a hijacked LNG tanker is being used as a weapon by terrorists.

5. Security Zones

The Reply incorrectly claims that the Attorney General "has erroneously asserted that the Coast Guard's Ports and Waterways Safety Assessment ("PAWSA") report ("Coast Guard Report"), dated July 15, 2005, questioned the enforceability of the

proposed safety and security zones....” (Reply, p. 16.) This is not true. The Attorney General's Comments state that the PAWSA “contains some very disturbing information that calls into question the very possibility of creating an effective security zone around the proposed terminal.” (Comments of the Attorney General, pp. 7-8) This statement is accurate. The PAWSA is replete with data that show that the Sound is a “[m]ultiple [use] waterway” with already “[h]eavy interaction between non-commercial and commercial vessels at The Race” and waterway conditions that are “[g]etting worse.” Coast Guard Report, pp. 18, 26. Total commercial traffic through the Sound is on the order of 700 foreign flag ships and 1200 tugs and barges per year and the volume of traffic in the Sound “is generally going up.” Coast Guard Report, page 16. Furthermore, that “[v]olume of traffic is focused at The Race, New London, New Haven, and Port Jefferson.” *Id.*

Furthermore, the consequences of an LNG tanker or FSRU accident could be severe for the entire region. As the Report notes, “Long Island Sound contributes at least \$5.5 billion to the regional economy each year.” Coast Guard Report, p. 37. The anticipated LNG shipments “[c]ould freeze traffic at certain places temporarily,” Coast Guard Report, p. 16, and an accident, particularly in The Race, could result in a major adverse impact on shipping. “Closure of the waterway through the Sound could have a multifaceted affect [sic] on the regional area, especially for oil transshipments” and “[j]ust-in-time inventory management means industry has about a week before there is an economic impact.” Coast Guard Report, p. 37. In these circumstances, the Coast Guard Report notes that “[s]ecurity zone requirements further limit dimensions” of the available and usable waterway. Coast Guard Report, p. 26.

6. Emergency Response

Broadwater dismisses the concerns of public officials regarding the dearth of adequate emergency/fire fighting capabilities by saying that the company will complete an emergency plan before construction is begun. The Reply states, without specification or elaboration, that “[c]onsiderable resources will be available onboard the FSRU to enable facility personnel to deal with emergency situations.” (Reply, p. 20.) This statement’s lack of factual analysis permeates the Reply. Broadwater provides no actual information as to the emergency capabilities it is talking about. Further, if the FSRU is itself the source of the conflagration, has been seized by terrorists, or has been damaged by an errant LNG tanker and the so-called “considerable resources” damaged or impaired, how can Broadwater claim to be able to address a fire or other catastrophe? Much more information will be needed -- not a promise of a future plan -- before even the basic requirements for addressing emergency preparedness have been satisfied.

7. Untested Technology

As Broadwater’s documents disclose, the planned FSRU will be the first of its kind in the world. This technology has never been tested or even built.

Broadwater addresses this concern by stating that the FSRU “is a product of tested, proven technologies. . . .” (Reply, p. 21.) This statement could have been made about the Challenger and Columbia space shuttles -- the basic technological components had been used in other spacecraft and aircraft before. The assembling of a series of technologies, some of which have been used in other applications before, into a wholly new and utterly untried system does not mean that the new application is safe. The same is this true when a new application uses older technologies on a vastly larger scale than

they have been used before. Further, while Broadwater states that the regassification equipment onboard the FSRU will be the same as that used on land, it is precisely the fact that this activity is now being placed on a moving, dynamic structure rather than on a stable, fixed structure, that accentuates the dangers of ship-to-FSRU LNG transfer.

The Reply makes no comment about the effect of a major storm on off-shore drilling platforms, the existing technology most similar to the anchored FSRU. Hurricane Katrina damaged or destroyed 167 offshore platforms, ripping many of them from their moorings. Katrina, while powerful, was determined by the National Hurricane Center to be only a Category 3 storm, on a rating system which extends to Category 5. Hurricanes have repeatedly struck Long Island Sound, which, obviously, is much narrower than the Gulf of Mexico. If the FSRU is torn loose, there is practically nowhere it could go without endangering commercial shipping or seacoast communities. Therefore, FERC must analyze the consequences of a Class 5 storm on the FSRU and whether it is possible to protect the shoreline communities in the event the anchoring system fails.

8. Cumulative Impacts

As the Reply correctly notes, NEPA requires a cumulative impacts analysis when several actions have a synergistic effect. (Reply, p. 26.) This is established law.

Finally, . . . when several proposals . . . that will have cumulative or synergistic environmental impact upon a region are pending concurrently before an agency, *their environmental impacts must be considered together.*

Churchill County v. Norton, 276 F.3d 1060, 1075 (9th Cir. 2001) (Internal quotation marks omitted)(emphasis added). *See also, Custer County Action Ass'n v. Garvey*, 256 F.3d 1024, 1035 (10th Cir. 2001); *Mississippi River Basin Alliance v. Westphal*, 230 F.3d 170, 175 (5th Cir. 2000); *Colorado Envtl. Coalition v. Dombeck*, 185 F.3d 1162, 1176

(10th Cir. 1999)(“[a]n environmental impact statement must analyze not only the direct impacts of a proposed action, but also the indirect and cumulative impacts of ‘past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.’”)

Broadwater, however, disputes that the impacts of the Islander East pipeline project, or other planned or proposed projects, need be considered in the context of its project. Broadwater’s position is legally untenable.

The affected environment is the ecosystem of Long Island Sound. Degradation of the water quality, for example, affects the entire Sound. Similarly, sediment dispersion will not be limited to one discrete area, but may be carried over great distances. This fact was conclusively demonstrated by the Iroquois pipeline project, whose impacts are still being felt. In fact, the Islander East and Broadwater projects will, according to available maps, be superimposed on each other at one point. There is nothing hypothetical or speculative about this – these projects will both result in major impacts to Long Island Sound and are legally required to be considered together.

Similarly, the Reply is dismissive of the need for a full alternatives analysis and evidently wishes to limit discussion to its “preferred alternative” alone. (Reply, p. 24.)

However, nothing in the Reply changes the law as established more than thirty years ago, specifically “the requirement in NEPA of discussion as to reasonable alternatives does not require ‘crystal ball’ inquiry. Mere administrative difficulty does not interpose such flexibility into the requirements of NEPA as to undercut the duty of compliance ‘to the fullest extent possible.’” *Natural Resources Defense Council, Inc. v. Morton*, 458 F.2d 827, 837 (D.C. Cir. 1972)

9. Public Trust Lands and the Coastal Zone Management Act

Broadwater asserts that the State of Connecticut has no authority to review this project under the Coastal Zone Management Act ("CZMA") and is equally dismissive of the public trust lands issue raised by Suffolk County. (Reply, pp. 32, 36-41.) To the contrary, the proposed security zones surrounding both the FSRU and the LNG tankers will constitute material intrusions on Connecticut waters and public trust lands. Under the State's coastal zone management plan, this intrusion is subject to review by Connecticut authorities pursuant to their authority under the CZMA. Further, the land underlying the Long Island Sound is owned by the respective states, New York and Connecticut, not by the federal government. Thus, from the high tide mark on the Connecticut side of the Sound to the border with New York, the submerged lands under the Sound belong to, and are held in trust by, the State of Connecticut for the benefit of its citizens. *State v. Sargent & Company*, 45 Conn. 358, 372 (1877). Without the consent or approval of the State, the security zones would clearly and improperly effect a transfer of public trust land to the benefit of a private company in violation of the State's sovereignty.

Conclusion

For the reasons detailed above, the Attorney General respectfully requests that the Commission accept this answer to be incorporated to the docket in this proceeding.

Respectfully submitted,



Richard Blumenthal
Attorney General, State of Connecticut

Dated: April 17, 2006

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

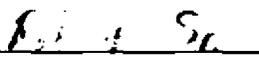
**BROADWATER ENERGY LIQUEFIED
NATURAL GAS PROJECT**

**DOCKET NO. CP06-54-000
CP06-55-000
CP06-56-000**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Hartford, Connecticut this 17th day of April, 2006.



Robert Snook
Assistant Attorney General
State of Connecticut
55 Elm Street
Hartford, CT 06106