

Testimony of Patty Cronheim  
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Energy Master Plan: Energy Infrastructure

Thank you for the opportunity to speak today on the Energy Master Plan. ReThink Energy NJ fully supports Governor Murphy's and the BPU's 2050 100% clean energy goal.

Today I'd like to address the integrity of fossil fuel pipeline infrastructure. Sadly, we are all too aware of the tragedy that occurs when even small distribution pipelines fail. Today, I'd like to discuss the potential safety risks to New Jersey's much larger transmission pipelines from an over-stressing by proposed new gas infrastructure. NJ is being inundated with new pipeline infrastructure that would increase the volume of gas and, in some cases, operating pressures and velocities through our existing system. We are especially concerned because pipelines are most vulnerable to explosion in the first five years and as they age. New Jersey has the perfect storm — new and proposed pipelines like PennEast and older, aging pipelines.

While the Pipeline Hazardous Materials Safety Administration (PHMSA) is responsible for providing a pipeline safety net, there are widening holes in that safety net that we urgently need to address.

Safety impacts are not part of the Federal Regulatory Energy Commission (FERC) interstate pipeline review certification process. PHMSA only becomes active as a regulating agency after the infrastructure is built.

New Jersey, as the most densely populated state in the nation, understands that higher safety standards concerning pipeline safety are essential. New Jersey already requires that all intrastate gas pipelines constructed after March 2, 2009 meet the most stringent PHMSA safety standards by adhering to Class 4 design regardless of the population and building density of the location. These New Jersey standards are much higher than the many miles of Class 1 and Class 2 location interstate pipeline that run through much of New Jersey.

Currently, New Jersey has seven proposed new pipelines and the equivalent of 5 new and proposed compressor stations within a 50 mile radius of central NJ that would stress the safety dynamics of our pipeline system. We support recently introduced Senate Concurrent Resolution No. 118/Assembly Concurrent Resolution No. 164 that urges Congress and the President of the United States to require that all interstate gas pipelines constructed in New Jersey and are built, operated, and maintained to the higher class 4 safety regulations that New Jersey's requires for in-state natural gas pipelines.

The federal government has recognized that there is an industry problem with pipeline safety. Seven years ago, after the devastating San Bruno accident in California, the National Transportation Safety Board (NTSB) recommended, and congress directed, PHMSA to do an overhaul of pipeline safety rules. No part of the new rule making has been completed and it is facing even more delays. Despite this, PHMSA has opened a docket to consider industry recommended loosening of class location requirements for existing pipelines. This would allow interstate operators to leave existing thinner-walled pipe in the ground at unacceptably high

operating pressures where populations have increased since the time of construction, increasing risk to local residents and the surrounding environment. It would also do away with the public's right to know and further limit transparency. Post-accident investigations have brought to light that pipeline operators themselves, let alone PHMSA, often lack records of important characteristics and testing history of in-service pipelines. New Jersey simply does not have full, independent accounting of the health of our inter-state pipelines. This weakening of class location rules, rather than our recommended strengthening, would clearly further erode New Jersey's safety.

NJ needs to require a complete and transparent safety analysis that would look at the potential impacts proposed pipelines would have on existing pipelines. That review would include pipeline wall and weld corrosion analysis, a new operating gas velocity risk analysis, and a pressure risk analysis. After the tragic accident in Massachusetts this month, the Massachusetts' legislature ordered a study of the safety impacts of new gas infrastructure on existing pipelines. New Jersey should pro-actively conduct a similar study and not wait for an accident to prompt an investigation here. We, as a state, need to protect the infrastructure we have until we are able to fully transition away from fossil fuels.

The concerned public has a right to know and feel secure about the health of the pipeline system under their feet.

Solar and wind are not only much cleaner sources of energy, but much safer. We fully support 100% clean renewable energy by 2050 for New Jersey.