



Catskill Citizens for Safe Energy, an all-volunteer, grassroots organization with members located throughout the country, including in the Town of Windsor, New York, respectfully submits the following comments in response to the request for public comment on the Supplement filed on July 22, 2013 concerning the Williams Gas Compressor Station located in West Windsor (PSC Case 10-T-0350) (the "Notice"):

Background

The existing compressor station in the Town of Windsor (the "Station") has a history of community disruption and damage in at least fourth areas.

The first two areas of disruption and damage relate to the noise generated by the Station. In brief, the noise generation was of sufficient concern to the Town of Windsor ("the "Town") that, in 2010, a local regulation placed an upper limit on the allowable noise which could be generated within the Town's limits. The Station has not been able to comply with this regulation. Even the various Sound Sampling Surveys performed and filed by one of the Station's owners concede that the Station has never been able to operate within these limits, including as recently as June 2013. Thus the first disruption is the Station's inability to comply with existing local noise limits.

Second, the Petitioner has consistently pushed back against the local noise limits, requesting various extensions, concessions and exemptions. However, as the Station's owners themselves have conceded, the Station's attempts at remediation within the parameters afforded to it have been unavailing. The Station has not met deadlines for compliance and has had to back off plans to limit or reduce sound-dampening efforts.

Third, on July 23, 2012, a lightning strike caused a "huge fireball" to explode at the Station, which should have been anticipated and protected against. The failure of the Station's owners to anticipate and protect against this type of event suggests that they not be afforded the benefit of any doubt and that the Petition be denied until the citizens of Windsor can be satisfied that this will not recur.

Fourth, construction and operating traffic attendant to the Station has damaged roads within the Town in excess of normal wear and tear, causing the Town to incur expenses which the Station's owners have not yet defrayed.

Specific Responses to Request for Comment

1. A History of Non-Compliance and Resistance Merits Denial.

Despite historical and ongoing non-compliance and resistance, the Station seeks to expand its capacity and install additional noise-generative equipment. This application should be denied since it will only exacerbate an already untenable and non-compliant operation.

Further, the Station seeks an exemption from the noise limitations placed thereon by the Town. Since the Station's owners, despite being unable to do so as yet, anticipate that they can meet the noise regulation imposed by the Town, no exemption should be afforded, regardless of whether capacity is maintained or increased. The noise regulation was duly considered and passed and has not been successfully challenged. The Petitioner has not demonstrated any extraordinary circumstances which would support an exemption and by force of its owner's logic--given their repeated promises to comply--no exemption is necessary, let alone in the interest of the Town's citizens directly affected by the Station.

2. Expansion Of Plant Is Premature And, At The Very Least, Should Await Full Compliance With Existing Regulation.

By simple force of logic, if the Station at present capacity cannot comply with the Town's noise regulation, then an increase in the capacity of the Station with newly installed

equipment, will only produce more noise and forestall or avoid compliance altogether. It would therefore be preferable, if the Petition is not denied outright, to defer any determination until such time as the Station complies with the Town's noise regulation for a time period long enough to establish stability over the course of changing seasons and weather. Additionally, the Town should be entitled to recoup its road damages before any increased construction and activity is permitted at the site of the Station.

3. The Uncertain Future of the Millennium Pipeline Renders the Petition Premature.

With completion of the Millennium Pipeline currently uncertain, it is premature to consider expanding the Station, particularly given the substantial opposition to the Millennium Pipeline and the already-disruptive effects of the Station at present capacity.

Dated: Fremont Center, New York
August 16, 2013

Respectfully submitted,

CATSKILL CITIZENS FOR SAFE ENERGY

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