

Citizens for the Preservation of Middletown Valley
www.cpmv.org
April 6, 2008

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Re: Response to DTI letter dated April 3, 2008
Middletown Gas Compressor Station, Docket # PF07-12-000

Secretary Bose:

As representatives of the "Citizens for the Preservation of Middletown Valley" (CPMV) we are writing to you in response to the recent letter from Dominion Transmission, Inc. (DTI) to the Federal Energy Regulatory Commission (FERC) dated April 3, 2008.

The CPMV is very pleased to hear DTI is concentrating its efforts on an alternative site located outside the Rural Legacy Program area and adjacent to property currently designated for industrial use just west of Jefferson, Maryland. We look forward to learning more of the details regarding this new site.

The CPMV is concerned the letter written by DTI has misrepresented several of the facts regarding the identification of this alternative site. DTI's letter states "this third alternative site was also highly recommended by a member of the Citizens for the Preservation of Middletown Valley (CPMV) who provided comments during the process." The "member" DTI refers to is in fact an *individual stakeholder* residing in Middletown and does not represent the position of the CPMV. Further, any alternative sites presented to DTI and the FERC are those of *individual stakeholders* and are not those of the CPMV. In fact, **the CPMV has deliberately avoided endorsing any alternate sites.**

DTI states in their letter "CPMV acknowledged the benefits of its member's proposal in its March 18, 2008, filing in this proceeding (under bullet no. 4), which attached the member's alternative site study and included this recommended alternative site." Further, "the CPMV reported that they also requested the Commission to consider this alternative site as presented in its meeting with staff of the Commission's Office of External Affairs on March 18, 2008, and in a subsequent filing by a principal of the organization."

These statements again are a misrepresentation of the facts. The CPMV letter of March 18, 2008 stated:

"DTI admitted they have not looked at any alternate sites. (Over a single weekend, a **private citizen** found several potential alternate sites (see "Attachment B", FERC submission). **CPMV does not specifically endorse any one of these alternate sites**; however, the sites identified by this individual have direct access to DTI's gas pipeline. Some are industrially zoned, with less potential for significant environmental risk, and are currently for sale.)"

No where in the letter from the CPMV to the FERC on March 18, 2008 does the CPMV "acknowledge the benefits" of the "member's" proposal. The CPMV would like the record to reflect:

- the recommendations were those of an *individual stakeholder* not those of a CPMV member,
- the CPMV does not endorse any one of these alternate sites recommended by any *individual stakeholder*, and
- the CPMV did not request the Commission to consider **this** alternative site as presented in its meeting...and in a subsequent filing by a principal of the organization.

The efforts of the CPMV have been to:

- ensure the FERC pre-application process is being followed appropriately,
- urge DTI to review all potential alternative sites,
- urge DTI to thoroughly evaluate the concerns expressed by all *individual stakeholders* at the scoping meeting on February 6, 2008 and in the subsequent filings to the FERC as part of the scoping response period, and
- recommend the FERC review the “pre-application” process for possible flaws and consider some suggested changes submitted by the CPMV in their letter dated March 18, 2008.

The CPMV is a grass-roots citizen’s action organization seeking responsible and appropriate land use in Maryland’s agricultural and historic Middletown Valley. We are concerned about protecting our rich local history, our rural landscapes, and the environment here in Frederick County. The CPMV supports DTI performing “due diligence” before selecting a site and has strongly urged DTI to do so as they continue their efforts in solidifying their plans.

Respectfully submitted,

Citizens for the Preservation of Middletown Valley

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