

October 9, 2017

**VIA EMAIL**

Debra Howland, Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord New Hampshire 03301

RE: DG 17-068 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities - Keene  
Division Petition for Declaratory Ruling

Dear Ms. Howland,

I respectfully ask that the Public Utilities Commission deny Liberty Utilities a Declaratory Ruling on their franchise request for Keene, NH.

Circumventing the right of Keene citizens to have a full public hearing on Liberty Utilities' (LU) proposal denies citizens their right to determine their community's collective choices and is indicative of LU's lack of respect for the importance of those rights. Additionally, it illustrates Liberty Utilities' determined avoidance of scrutiny, further raising serious questions and concerns about the product they are so aggressively pushing in Keene.

Allowing LU to install HV/HF infrastructure and bring liquid natural gas (LNG) and compressed natural gas (CNG) into Keene without the community's input and ability to examine the important environmental, economic and public health issues regarding that fuel would be, at best, dismissive. Bypassing a community hearing on its climate impact would also be degrading of the town's character and identity as a leader in environmental conservation and protection.

Another serious concern that should flag warnings is Liberty Utilities' questionable integrity as an "honest broker" with the PUC and citizens of Keene. In its "Revised Petition for Declaratory Ruling", page 2, LU attempts to conceal the actual identity of its hydraulically fractured natural gas, disguising it as just "gas." They attempt to blur its identity with conventional gas, also called "natural gas" in the past. In its own words, LU states that its gas is simply one of the "several forms of 'gas' distributed "over the past 150 years" in Keene. Do they expect the PUC to fall for this charade?

[www.puc.nh.gov/Regulatory/Docketbk/2017/17-068/INITIAL%20FILING%20-%20PETITION/17-068\\_2017-04-26\\_ENGIKEENE\\_REV\\_PETITION\\_DECLARATORY\\_RULING.PDF](http://www.puc.nh.gov/Regulatory/Docketbk/2017/17-068/INITIAL%20FILING%20-%20PETITION/17-068_2017-04-26_ENGIKEENE_REV_PETITION_DECLARATORY_RULING.PDF)

Nevertheless, LU proceeds to argue on page 5 of the Revised Petition that the PUC Staff was incorrect when it exposed the fact that the conversion from propane-air to LNG and CNG involves a "Change in Character". In fact, when LU states on page 6 that, "the nature of the gas delivered will be the same", they are flatly denying reality. This attempted deception insults the

intelligence of the Commissioners and all concerned. LU's HV/HF natural gas is patently and significantly different from propane-air and from any previous form of gas referred to "over the past 150 years", because it carries with it proven radioactive, carcinogenic and toxic pollutants. Clearly, the Staff was not fooled by their word game.

One of the most glaring examples of how LU tries to avoid scrutiny is that they refuse to reveal all the ingredients in the "natural gas" within their pipelines. In fact, the entire HV/HF industry is silent on the subject or offers only incomplete and pat answers. What is in that gas?

Fortunately, toxicologists nation-wide have been examining air samples at "natural gas" infrastructure sites and leaks throughout the country. What is now confirmed is that along with the methane, which provokes rapid heating of the atmosphere, there are a multitude of toxins and carcinogenic pollutants within the gas, resulting from the fluids used in the "proprietary" hydraulic fracturing process, residue from the geological matrix the gas came out of, and as a consequence of the combustion process at compressor stations during its transmission. [http://www.templenh.org/sites/templenh/files/file/file/subra\\_study\\_miniisink.pdf](http://www.templenh.org/sites/templenh/files/file/file/subra_study_miniisink.pdf)

In plain English, we know there are toxic and carcinogenic pollutants in fracked gas! For NH it's predominantly from the Marcellus shale, known for excessive quantities of Radium 222 and 226. The public health hazards from its emissions are being tracked. And the lengthy list of safety accidents is recorded at the Pipeline and Hazardous Material Safety Administration (PHMSA). [http://www.templenh.org/sites/templenh/files/file/file/compressor\\_station\\_hazards\\_and\\_health\\_issues\\_-1.pdf](http://www.templenh.org/sites/templenh/files/file/file/compressor_station_hazards_and_health_issues_-1.pdf)

The concealment of the ingredients in Liberty Utilities' "natural gas", coupled with the data on the toxicity of the chemicals and pollutants it releases through emissions and leaks, gives citizens and their appointed public health officials a right and duty to determine whether or not the fuel should be allowed to enter their town, based on the Precautionary Principle, as noted by Dr. David Brown, toxicologist. With respect for citizens' rights, at the very least, that decision deserves a well-publicized public hearing and debate. What is an acceptable risk? How much toxicity is acceptable and who decides?

I respectfully request that the Commission deny the Declaratory Ruling on the Liberty Utilities franchise in Keene.

Thank you for taking my comments on this docket.

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