

July 28, 2019

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

Dear Ms. Howland,

Thank you for accepting my comments on the petition for a Declaratory Ruling by Liberty Utilities, dated July 24, 2019 of DG 17-068.

While I appreciate the diligent work of the Safety Division of the Public Utilities Commission in analyzing the technical and safety aspects of this project, those are not the only issues at stake here. Nor do I feel that the issues listed in the order have been fully addressed in Liberty's responses and actions. I do not think a Public Awareness Plan that focuses on alerting customers to maintenance activities or trying to solicit new customers along a route, constitute a Public Awareness Plan appropriate for Keene as a community.

A Declaratory Ruling would only seem appropriate if there were no argument with the plans from the community. That is clearly not the case here. I am also concerned about the scope of any such Declaratory Ruling. Would it amount to pre-approving Phases 2 through 5 or be used to argue a precedent if the other phases are challenged?

Liberty's plans to convert the entire city from a propane air to Compressed Natural Gas (CNG) system represents a tremendous financial investment in a system unlikely to help Keene achieve its goal of operating on 100% renewable energy for all uses by 2050. Just to upgrade the 8 miles of old Cast Iron and Bare Steel (CIBS) pipeline in Keene is estimated to cost \$14.4 million! That's an expense of approximately \$11,321 per each of Liberty's 1272 customers in Keene and will be required if Liberty hopes to deliver CNG at the higher pressures it proposes. That cost doesn't include any of the facilities required to support the conversion.

The only way for Liberty to recoup the expense of the conversion is to increase its customer base significantly. Liberty has ambitious plans for Keene. This is from testimony delivered by Director Randy Knepper from NH Pipeline Safety Division when Liberty purchased Keene's existing air/propane system in 2014. <https://www.puc.nh.gov/Regulatory/Docketbk/2014/14-155/TESTIMONY/14-155%202014-09-25%20STAFF%20DTESTIMONY%20OF%20R%20KNEPPER.PDF>

"1. (Reference Leehr Testimony p II of 17 Line I9-21) states: "As stated, the Keene System 23 has approximately 1,250 customers along with a total annual consumption of approximately 130,000 Dth. EnergyNorth has a market forecast of increasing customer connections that

2 would result in annual consumption levels approaching 500,000 Dth within 5 years of the 3 acquisition".

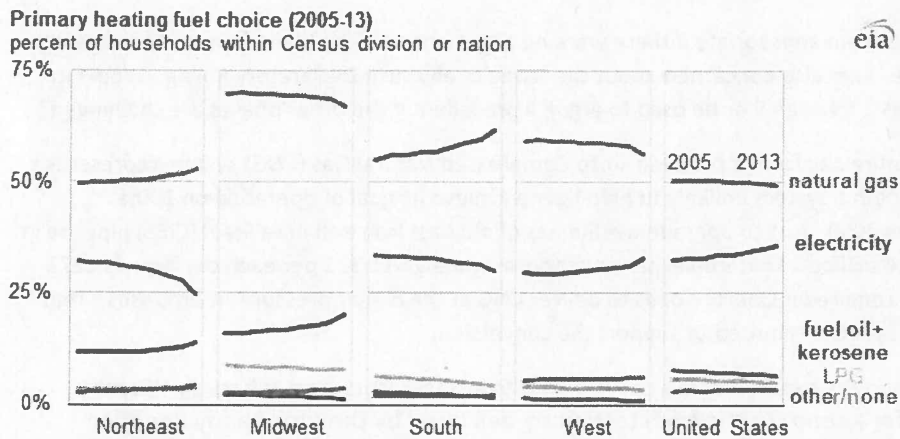
4 The Safety Division found this to be an unrealistic forecast considering an LNG supplied 5 plant needs to be installed, a new supply location selected, larger gas piping extended to 6 reach larger commercial customers, multiple regulator stations would be required, existing 7 customers converted from propane air, lowered delivery rates and lowered costs of gas 8 absorbed by existing EnergyNorth base customers. Given all those expenses, it is doubtful 9 that within 5 years a customer base could be expanded by that much within a single 10 community. There are numerous contingencies that would be encountered that make this 11 formidable. 12"

In fact, in 5 years, the number of Keene customers has only grown from 1250 to 1272 and volumes have only increased from 130,000 Dth to 147,000 Dth.

Tripling the amount of fracked gas service to Keene at a time when Keene is trying to achieve 100% clean energy is contrary to the community's goal. Just like drilling under the Ashuelot River, Liberty is undeterred by the community's reluctance and opposition, so makes plans not to serve the community, but to satisfy their marketing objectives with the less public input, the better.

Former Massachusetts Department of Public Utilities Chair, Ann Berwick, notes. "As the region struggles to abandon its use of fossil fuels, it should be moving from oil heat to new, efficient electric heating technologies, such as air-source heat pumps. As the electric grid gets cleaner, thanks to state laws requiring that electricity increasingly be generated by renewable resources, switching from oil to gas for heating instead of switching from oil to electricity would be a step in the wrong direction." <https://commonwealthmagazine.org/opinion/natural-gas-is-not-a-clean-fuel/>

According to the EIA, the Northeast is the only region of the country that is still increasing it's use of Natural Gas for home heating. <http://www.eia.gov/todayinenergy/detail.php?id=18131>



Liberty could be investigating ground source (geothermal) district hot water heating systems and expand by delivering BTUs instead of DTHs. They could free up existing capacity with energy efficiency and weatherization efforts while they transition to a renewable delivery system. This plan for CNG service to Keene is ill-conceived and should be denied.

Sincerely,

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